



**Submitted online**

Municipal Services Office - Central Ontario  
777 Bay Street, 16th Floor  
Toronto, ON M7A 2J3

**Attention: Jennifer Le**

Dear Ms. Le:

Re: ERO Number 019-5684  
Ministry Reference Number 21-OP-215006  
Regional Municipality of Halton's Regional Official Plan Amendment 49 ("ROPA 49")  
Comments Submitted on behalf of Mattamy Homes Canada

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Mattamy has contributed to building complete communities throughout Halton Region for over five decades and builds a wide range of low to high rise housing. We continue to build and own lands in all four municipalities in Halton Region and, therefore; take a holistic view at creating a balanced approach to growth in the Region.

In June 2022 the Region of Halton approved ROPA 49, a no urban boundary expansion plan to accommodate growth from 2031-2051. This plan is contrary to the wishes of those local municipalities in Halton that were willing and able to accommodate some growth through urban boundary expansion (i.e., Milton and Halton Hills) and based on aspirational planning rather than market demand, which will result in a significant housing shortage in Halton Region. We see five significant concerns with the approved ROPA 49:

- 1) It does not address local municipal visions.

Local Councils in Halton Hills and Milton both approved recommendations in 2021 (Attachments 1 & 2: PD-2021-0045 & DS-055-21) for expansion of their community and employment lands to help achieve their local growth objectives. ROPA 49 provides no urban expansion, therefore ignoring the local visions and priorities. ROPA 49 was approved by Regional Councillors from Oakville and Burlington but opposed by the majority of the local Regional Councillors in Milton and Halton Hills. Demonstrating the divide between the local municipalities, as well as the impact that regional voting structures can have on local planning. It is critical in land use planning that a one-size-fits-all approach is not applied to municipalities at very different stages of maturity and that local context and interests be a primary consideration.

- 2) It does not address housing needs from 2041-2051.

ROPA 49 only provides for growth to 2041 with a framework to determine in the future if a boundary expansion is required to accommodate growth to 2051. The planning process has many steps after urban boundary expansion that take time. Delaying this decision puts at risk having 'shovel ready' land supply in Halton Region for 2041-2051 and does not meet the requirements of the 2020 Growth Plan.

- 3) It is based on aspirational planning that would require a significant shift to apartment units.

Halton Region's Land Needs Assessment is based on a future unit mix consisting of approximately 50% apartments. This varies significantly from the market projection prepared for the Growth Plan where apartments were projected to account for only 22% in Halton. There are several unintended consequences that may result from this approach including a shortfall in housing, increased pressure on housing affordability especially for family-type units (I.e., ground related housing types), and a risk of pushing potential residents and employers outside of Halton Region to accommodate their needs and desired housing form. Furthermore, it relies on significant intensification which is unpredictable in its supply, impacting the availability and timing of development, which in many cases may never come to fruition.

- 4) It does not address the need for complete communities, including providing land for required public uses like hospitals, parks, and schools.

Local Councilors in both Halton Hills and Milton have advocated for urban expansions to be able to provide much needed public services to their communities. Without allowing for an expansion these uses cannot be appropriately planned within a larger community context. ROPA 49 has not addressed how these uses will be achieved.

- 5) It does not provide employment lands to attract new businesses and continued economic growth.

Halton Hills and Milton saw new employment lands as necessary for the continued growth of their communities, which is not addressed in ROPA 49. Currently the GTA is experiencing extremely low industrial vacancy rates - around 1% - whereas the vacancy rate for a balanced industrial market is around 4-5%. There is an opportunity for Halton Region to provide much needed employment land to continue the economic growth in Southern Ontario.

**Recommendation:**

- The Minister amend ROPA 49 to align with Halton Hills Council direction for a moderate community area expansion of around 330 hectares south of 10<sup>th</sup> Side Road and 450-500 hectares of new employment lands. We believe this moderate boundary expansion aligns with local municipal goals for building the community and provides the necessary balance to continue to provide a range of housing forms to attract people and businesses to Halton Region.
- Although Mattamy's interests are tied solely to Halton Hills we believe that consideration should be given to all the concerns raised by the various local municipalities within Halton Region.

Mattamy is committed to building sustainable communities and believes climate change can be addressed while providing a range of housing types, employment land for economic growth and community uses needed to support additional population and jobs.

Thank you for your consideration of our comments on ROPA49. If you have any questions or require additional information, we would be happy to assist.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Karen Ford', with a stylized flourish at the end.

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