



May 5, 2023

Hannah Evans
Assistant Deputy Minister
Municipal Services Division
Ministry of Municipal Affairs and Housing
777 Bay St.
Toronto, ON M5G 2G2

BY EMAIL ONLY: Hannah.Evans@Ontario.ca

Dear Hannah Evans,

Thank you for the opportunity to provide comments on Bill 97, the proposed *Helping Homebuyers, Protecting Tenants Act*. Although the Town of Halton Hills will be providing general comments through ERO Posting 019-6821, we would like to take the opportunity to share with you our main concerns with the revised definition for Areas of Employment and the negative impacts anticipated for the Town.

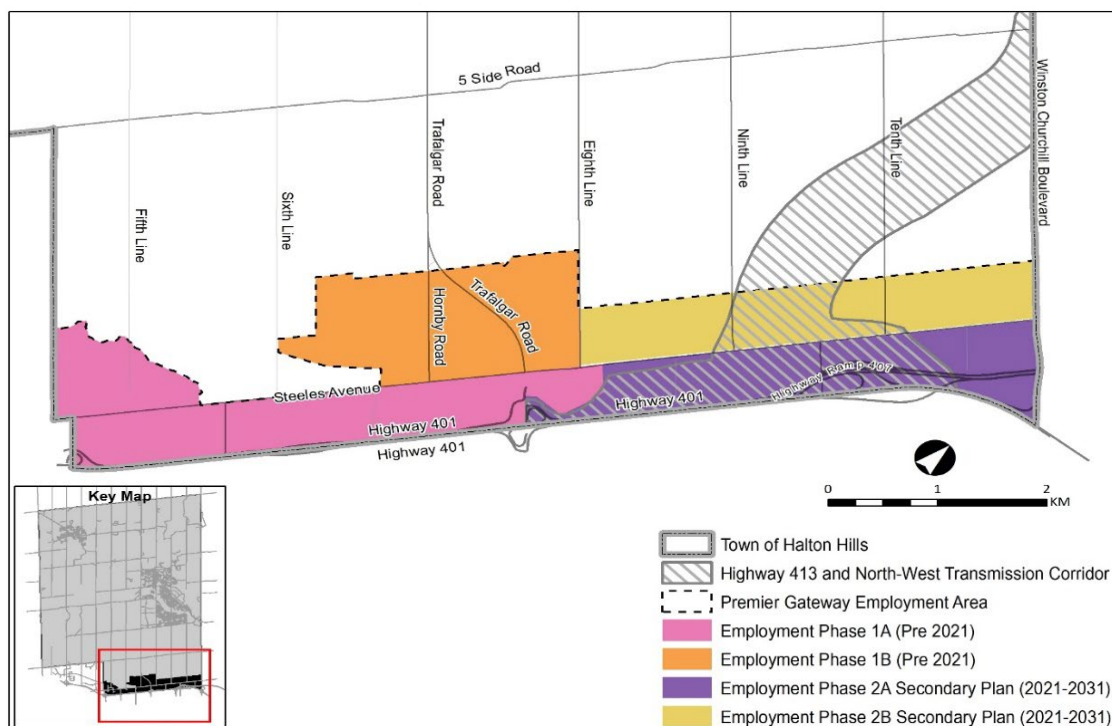
Bill 97 proposes to remove institutional and commercial uses from the definition of Areas of Employment which will prohibit uses such as commercial and office uses not associated with primary industrial uses in Employment Areas. Prohibiting institutional and commercial uses in strategically located Areas of Employment, is not in keeping with the proposed PPS goal of supporting a modern economy and promoting economic development and competitiveness. In addition, it will require that Employment Areas in the Town, such as the Premier Gateway Employment Area, which are already designated and, in some cases, zoned to allow supportive commercial and institutional uses be stripped of those existing land use permissions. As such, the Town does not support the revised definition of Areas of Employment.

The Premier Gateway Employment Area is identified as the Town's Prestige Employment Area where large scale employment growth is to be directed. The Premier Gateway is strategically located near Hwy 401, Hwy 407, and the proposed Hwy 413. The Area is divided into four phases; Secondary Plans have been completed for three phases (Phase 1A, Phase 2A, Phase 1B) while a secondary plan is near completion for the last phase of employment lands (Phase 2B). Existing and proposed land use permissions allow for institutional and commercial uses including business and

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professional offices in free-standing buildings or as part of an industrial mall, hotels, banquet halls, full-service restaurants, convenience stores, commercial fitness centres and limited retail and service commercial uses. These uses are permitted in areas designated, and in the case of Phase 1A and 2A zoned, as “Gateway Area” or “Business Commercial Area” and are located along strategic roads or at key intersections, such as at Trafalgar Road and Steeles Avenue, and Winston Churchill Boulevard and Steeles Avenue.

Figure 1: Premier Gateway Employment Area



As part of these Secondary Plan processes, the Town has completed supportive commercial needs assessments to address the market demand for Supportive Commercial Uses in each Employment Area. The range of Supportive Commercial Uses often include business supportive retail and professional office space which contribute to creating comprehensive and complete Employment Areas and influence the vitality and connectivity of the local economy. Demand for these uses is influenced by various sources, including need generated from businesses and employees within the area, as well as traffic generated from existing uses in the vicinity of the Employment Area.

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The Premier Gateway Employment Area has been planned to support local job growth and attract innovative investment and a talented workforce. Restricting institutional uses will prevent skilled trades and apprenticeship programs and other technology institutions from locating close to key advanced manufacturing, agri-business, clean technology, and food and beverage processing sectors. In addition, supportive commercial uses provide services and convenience retail uses that primarily serve businesses and employees within the Employment Area and the travelling public. Allowing these supportive uses will minimize vehicle use and contribute to the long-term success of the Employment Area.

The Province recently approved ROPA 49 which expanded the urban boundary in Halton Hills to accommodate approximately 873 ha of employment lands (see Appendix A). It is essential that those lands allocated to accommodate employment to the year 2051 develop to support large industrial and manufacturing uses but also other employment uses that generate high levels of employment, including institutional, office and commercial uses to support a strong economic base for the Town and its residents.

It is crucial for the Town of Halton Hills that supportive institutional and commercial uses continue to be permitted within Areas of Employment; providing this flexibility is imperative for developing vibrant, stable, and innovative Areas of Employment better positioned to respond to the changing needs of the job market. To this end, the Town strongly recommends that the Province should revise the proposed definition of Areas of Employment to provide for such uses as set out in this letter.

We thank you for considering our request and look forward to continuing working together to strengthen Employment Areas in Halton Hills.

Sincerely,

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cc: Heather Watt, Manager, Community Planning & Development MSO-Central (West)
Chris Mills, Chief Administrative Officer, Town of Halton Hills
John Linhardt, Commissioner of Planning & Development, Town of Halton Hills
Damian Szybalski, Commissioner of Business, Environment and Culture, Town of Halton Hills

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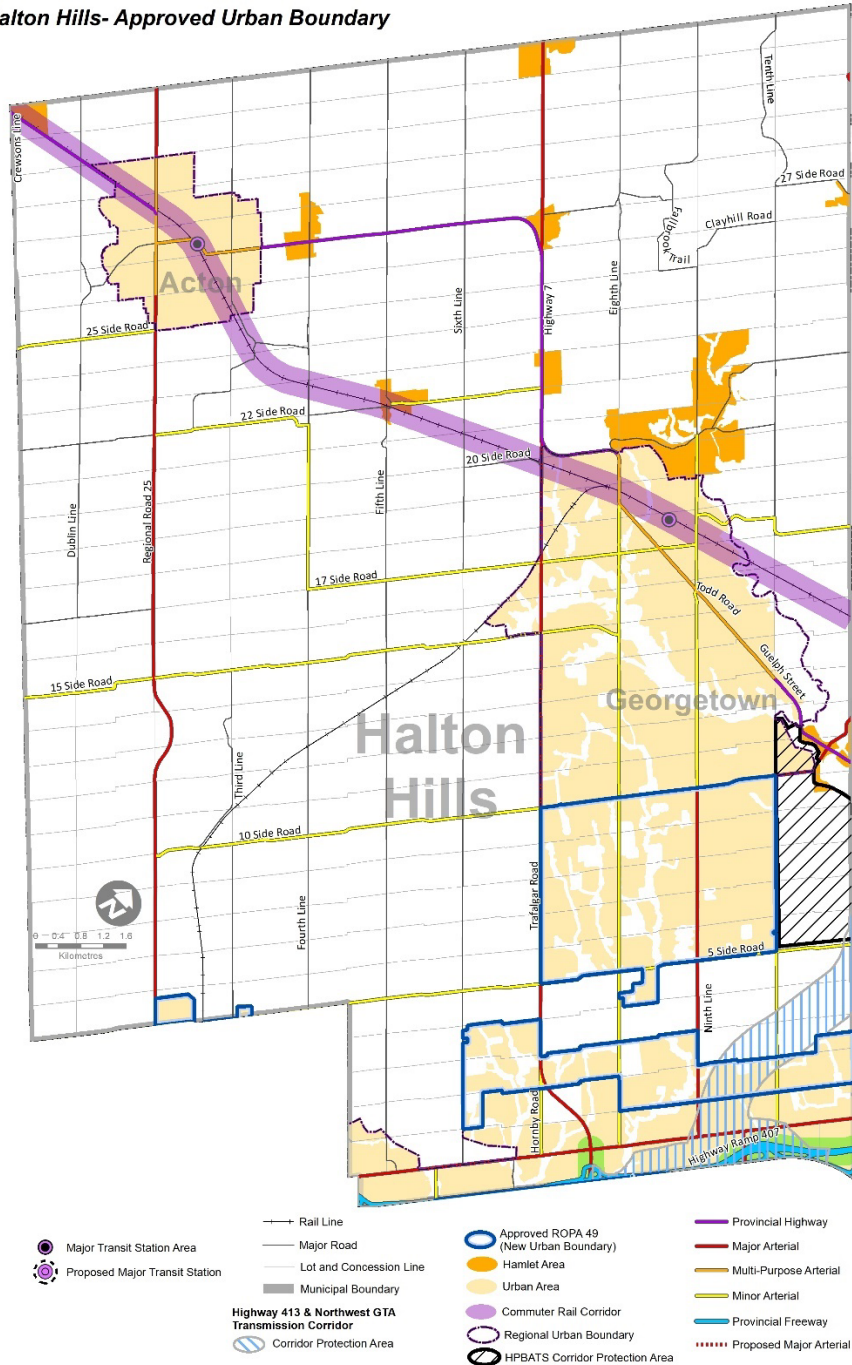
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Appendix A: ROPA 49 Approved Urban Boundary

Halton Hills- Approved Urban Boundary



Note: Map 3 as currently shown, will be updated by amendments to this Plan, upon completion of the Transportation Master Plan, and/or when the next transe corridors to the year 2031.

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November 4, 2022

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