

September 28, 2022

GSAI File: 1436-001

(Via Email – minister.mah@ontario.ca)

Hon. Steven Clark

Ministry of Municipal Affairs and Housing

777 Bay Street, 17th Floor

Toronto, ON M5G 2E5

**RE: Halton Regional Official Plan Review Amendment No. 49
Ranbir and Jasbir Dhaliwal
9111 Third Line, Town of Halton Hills**

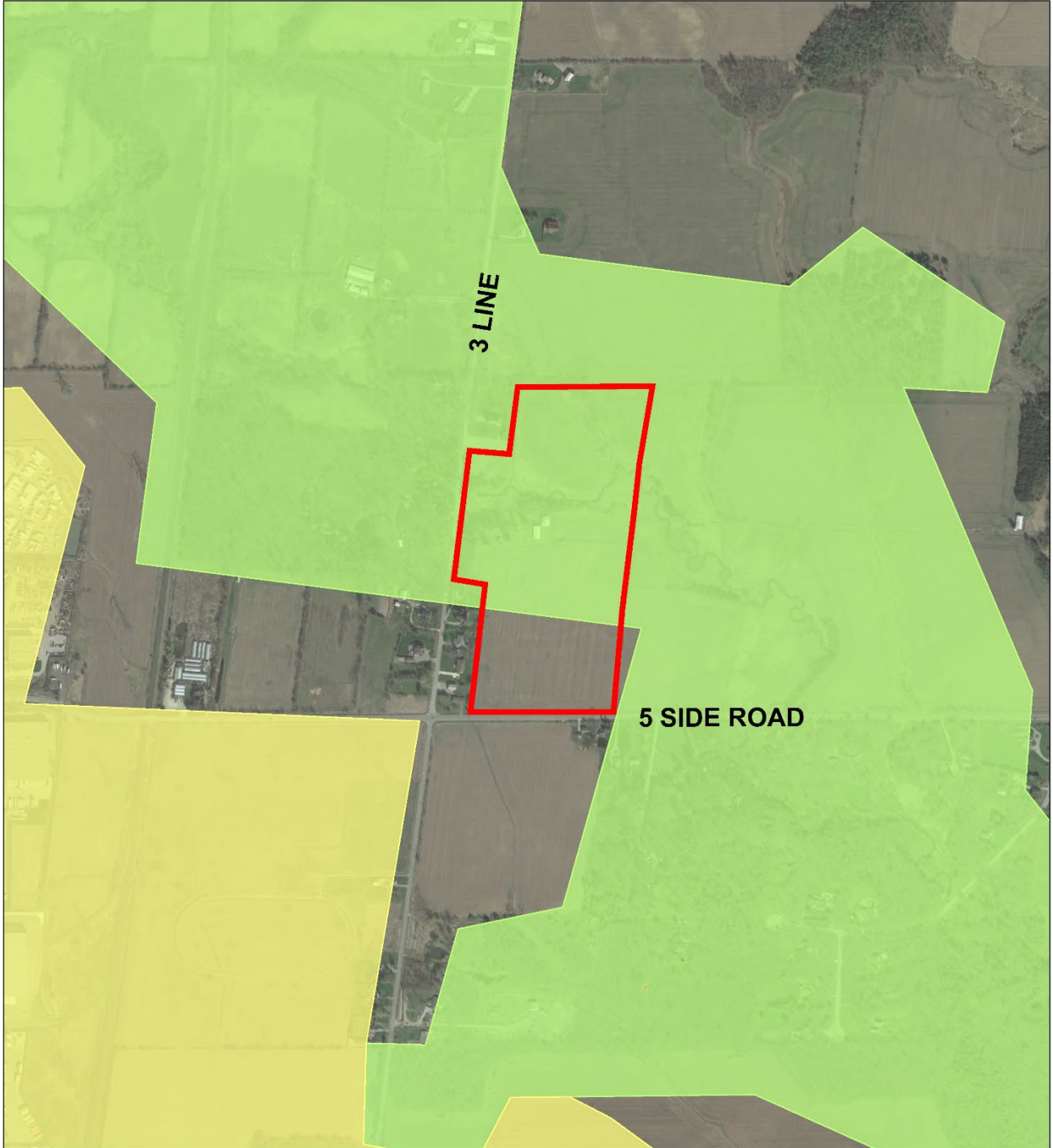
Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to Ranbir and Jasbir Dhaliwal (the 'Owner') of the lands municipally known as 9111 Third Line, in the Town of Halton Hills (the 'Subject Lands'). We note that the Subject Lands are situated within the Future Strategic Employment Area adjacent to the Employment Area that were previously brought into the Region of Halton 2031 Urban Area as part of the Sustainable Halton Regional Official Plan Review process (ROPA 38) as shown in the Aerial Context Plan on the next page.

On behalf of the Owner and further to our previous correspondence dated January 14, 2022 and April 12, 2022, included as **Appendix I** to this Letter, we are pleased to provide this Letter to you in relation to the Environmental Registry of Ontario (ERO Number 019-5684 and Ministry Reference Number 21-OP-215006) dealing with the Region of Halton ROPA 49.

GSAI has been participating in the Region's Municipal Comprehensive Review ('MCR') process. We understand that this process will culminate in comprehensive Regional Official Plan Amendments ('ROPAs') that will modify policy permissions for lands across Halton, including the Subject Lands. We have reviewed the Halton Regional Official Plan Amendment No. 49 ('ROPA 49'), as adopted by Regional Council. Based on the adopted ROPA 49, the Regional Urban Boundary remains unchanged and intact until 2041.




Prior to adoption of ROPA 49, the Subject Lands were identified as being immediately adjacent to the lands to be included within an expanded 2051 Urban Area as new Employment Area lands via a site-specific Settlement Area Boundary Expansion in both the Town of Milton Council approved Urban Expansion Option and Regional Staff recommended Preferred Growth Concept (see Region of Halton, Preferred Growth Concept Report, dated February 2022).

P:\1436-001\4. Drawings\2022 09 September\Aerial Context Plan September 14 22.dwg



AERIAL CONTEXT PLAN

9111 THIRD LINE
 PART OF LOT 6, CONCESSION 4,
 TOWN OF HALTON HILLS,
 REGIONAL MUNICIPALITY OF HALTON

-  Subject Lands
-  Urban Boundary Area
-  Greenbelt Natural Heritage System



Scale NTS
 September 14, 2022

The Subject Lands are also located in proximity to an area previously under consideration for inclusion in the Town of Milton Urban Area as part of the Town of Milton North Porta Secondary Plan Amendment (Town File LOPA-03/21). As further described in Town of Milton Staff Report DS-064-21, dated August 23, 2021, the proposed North Porta lands were found to be appropriate location for inclusion in the Secondary Plan and would be consistent with the Regional Official Plan priorities. Based on this, the Subject Lands are an appropriate location for inclusion in an expanded Urban Area as this will enable a natural and logical extension of growth, will support Provincial growth targets, will facilitate development to be situated in proximity to and with easy, reliable access to major transportation corridors, will represent a minor rounding out of the development area, will enable the long-term preservation and health of key Natural Heritage System features and functions and will facilitate cost-efficient development forms and servicing.

In our opinion, Regional Council's decision to maintain a firm urban boundary to the year 2041 and not plan to the year 2051 does not conform to the policy requirements outlined in A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 (the 'Growth Plan') and is inconsistent with the Province of Ontario's Land Needs Assessment Methodology. Our opinion herein is consistent with the technical opinion from various land economy experts in the development industry such as MGP, C4SE, Altus and IBI Group who have made written submissions to the Region on this matter. Additionally, the Growth Plan establishes forecasts for the number of new employees a municipality is expected to plan for to the planning horizon of 2051. As outlined in the Town of Halton Hills Staff Reports on the Regional Official Plan Review initiative, it was the desire of Halton Hills to expand the Urban Area to provide for additional lands to accommodate projected growth.

We are writing to request that you exercise your discretion under the *Planning Act* to modify Halton Regional Official Plan Amendment 49 to ensure that appropriate growth projected for the Region of Halton and the Town of Halton Hills can be accommodated through expansion of the Urban Area to include the Subject Lands. As outlined above, the Subject Lands are an appropriate and desirable location for inclusion in an expanded Urban Area. We therefore ask you to modify ROPA 49 to include the requested lands in an expanded Urban Area in the Town of Halton Hills.

Thank you for the opportunity to provide these comments. We ask that we be provided with Notice of any decision that you make on this Official Plan Amendment.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Colin Chung, MCIP, RPP
Managing Partner

APPENDIX I / *Previous Comment Letters*



January 19, 2022

GSAI File: 1436 – 001

Halton Region
1151 Bronte Road
Oakville, ON L6M 3L1

Attn: Curt Benson
Director of Planning Services

RE: Halton Regional Official Plan Review
Draft Preferred Growth Scenario
9111 Third Line, Town of Halton Hills

Dear Mr. Benson,

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to Ranbir and Jasbir Dhaliwal (the 'Owner') of the lands municipally known as 9111 Third Line in the Town of Halton Hills (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are pleased to provide this Comment Letter in relation to the ongoing Halton Regional Official Plan Review ('ROPR') initiative.

GSAI has been participating in the Region's ongoing ROPR initiative. We understand that when complete, it will culminate in a comprehensive Regional Official Plan Amendment ('ROPA') that will modify policy permissions for lands across Halton, including the Subject Lands.

The Subject Lands are located on the east side of Third Line and north of 5 Sideroad. The Site consists of agricultural lands in the southern quadrant and lands subject to the Provincial Greenbelt Plan in the northern quadrant. The Site is also situated in proximity to the planned Town of Milton's 401 Industrial / Business Park Secondary Plan area, as modified by the inclusion of the North Porta lands (Town File LOPA-03/21) and immediately adjacent to lands municipally addressed as 8995 Boston Church Road, in the Town of Milton which are proposed for inclusion in the Town of Milton Urban Area for employment-related purposes based on the Draft Preferred Growth Concept Plan, dated November 2021 (see *Growth Concept Figure* enclosed). For clarity, we support the proposed inclusion of the lands addressed as 8995 Boston Church Road within the Town of Milton Urban Area as this will enable a logical continuation of employment-related development within the planned 401 Industrial / Business Park Secondary Plan area.

Given the above-noted locational attributes, we request that you consider the Subject Lands for

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inclusion within the Town of Halton Hills Urban Area to facilitate future employment-related development. In our opinion, inclusion of the Subject Lands supports good planning principles as the Site would facilitate a natural and logical extension of employment-related development, would support the achievement of Provincial growth targets, would support the preservation of key natural heritage features and systems and would facilitate cost-efficient servicing given development occurring in the nearby 401 Industrial / Business Park area. The Subject Lands would also enable a rounding out of lands that will not adversely impact the Land Needs Assessment efforts completed to date.

Thank you for the opportunity to provide these comments. Our Client wishes to be included in the engagement for the Halton Regional Official Plan Review initiative and wishes to be informed of updates and future meetings.

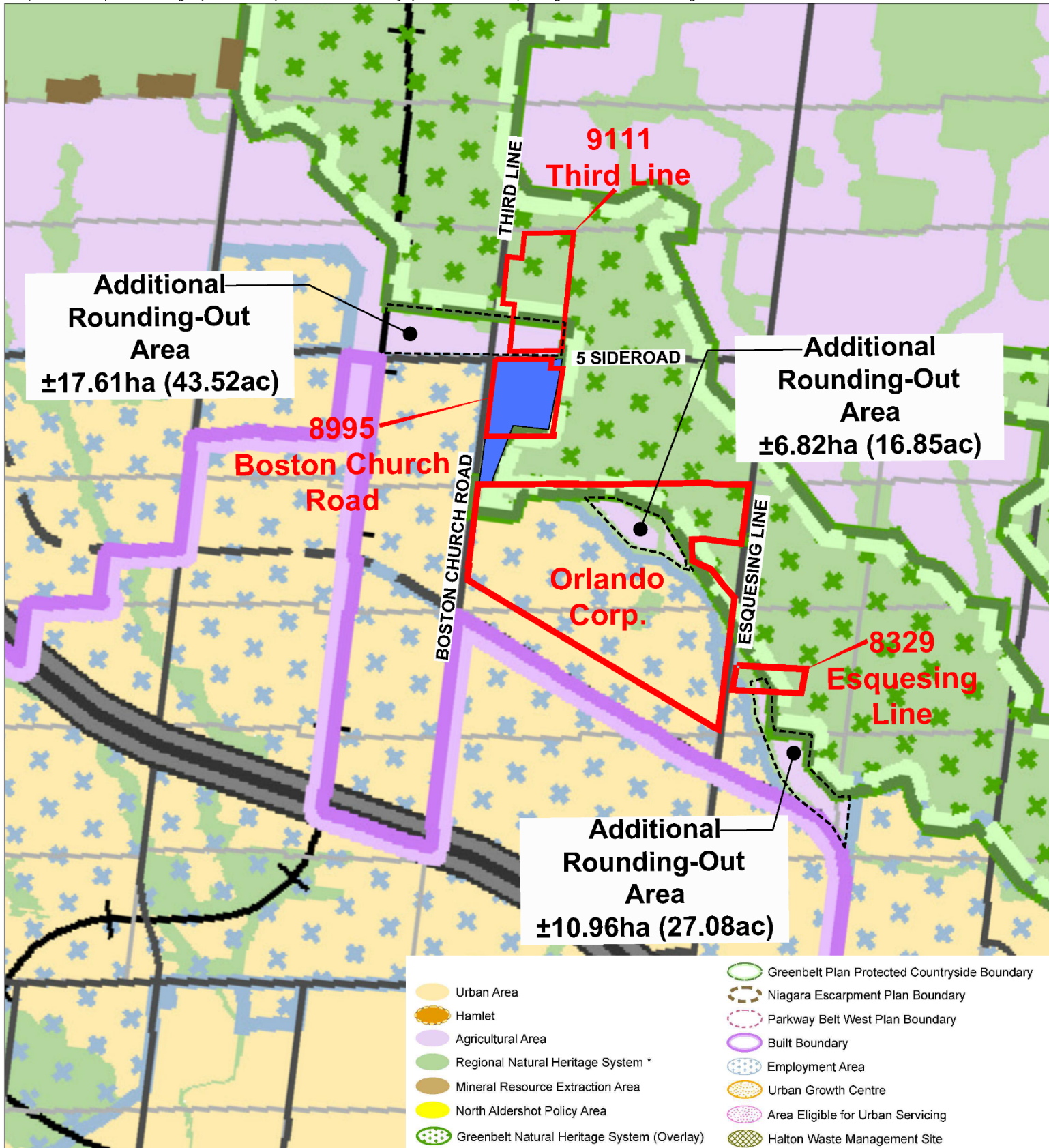
We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Colin Chung, MCIP, RPP
Partner

cc. John Linhardt, Town of Halton Hills
Bronwyn Parker, Town of Halton Hills



ADDITIONAL MINOR ROUNDING-OUT OF FUTURE EMPLOYMENT AREAS FOR THE REGION'S PREFERRED GROWTH PLAN

Town of Milton/Halton Hills, Region of Halton

LEGEND

- Subject Properties
 - New Employment Area
- Additional Rounding-Out Areas within Subject Properties
- | | |
|-----------------------------|-------------------|
| 9111 Third Line: | ±3.84ha (9.49ac) |
| Orlando Corp.: | ±6.82ha (16.85ac) |
| 8329 Esquesing Line: | ±0.48ha (1.19ac) |
- *All areas are approximate only**

FOR DISCUSSION PURPOSES ONLY



SCALE: N.T.S.
JANUARY 4, 2022





April 12, 2022

GSAI File: 1436-001

Region of Halton
1151 Bronte Road
Oakville, ON L6M 3L1

Attn: Curt Benson
Director of Planning Services

RE: Halton Regional Official Plan Review
Draft Regional Official Plan Amendment 49 ('ROPA 49')
Ranbir and Jasbir Dhaliwal
9111 Third Line, Town of Halton Hills

Dear Mr. Benson,

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to Ranbir and Jasbir Dhaliwal (the 'Owner') of the lands municipally known as 9111 Third Line, in the Town of Halton Hills (the 'Subject Lands'). We note that the Subject Lands are located in proximity to lands that were previously brought into the Region of Halton Urban Area as part of the Sustainable Halton Regional Official Plan Review process ('ROPA 38').

On behalf of the Owner and further to our previous correspondence dated January 14, 2022, we are pleased to provide this Comment Letter in relation to the ongoing Halton Municipal Comprehensive Review (MCR) process.

GSAI has been participating in the Region's ongoing MCR process. We understand that this process will culminate in a comprehensive Regional Official Plan Amendment ('ROPA') that will modify policy permissions for lands across Halton, including the Subject Lands. We have reviewed the draft ROPA 49 released on March 24, 2022. Based on the draft ROPA 49, we understand that the growth management strategy builds upon the modified Preferred Growth Concept adopted by Regional Council in March 2022 in that the Regional Urban Boundary is to remain unchanged and intact until 2041.

In our opinion, Regional Council's decision to maintain a firm urban boundary to the year 2041 and not plan to the year 2051 does not conform to the MCR policy requirements outlined in A Place to

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Grow: Growth Plan for the Greater Golden Horseshoe, 2020 ('the Growth Plan') and is inconsistent with the Province of Ontario's Land Needs Assessment Methodology. Our opinion herein is consistent with the technical opinion from the various land economy experts in the development industry such as MGP, C4SE, Altus and IBI Group who have made written submissions to the Region on this matter throughout the Region's MCR process.

We support a growth management strategy across Halton Region that conforms with the policies of the Growth Plan and is consistent with the Provincial Land Needs Assessment Methodology. We believe that it is good planning to allocate future growth through intensification in the existing urban area supported by sufficient community services, infrastructure and amenities and new growth that achieves compact, walkable and sustainable communities in the new urban expansion areas. We do not believe that ROPA 49 achieves this balance of growth.

Thank you for the opportunity to provide these comments. Our Client wishes to be informed of updates and future meetings. Please feel free to contact the undersigned if there are any questions.

Yours very truly,
GLEN SCHNARR & ASSOCIATES INC.

Colin Chung, MCIP, RPP
Partner

cc. Regional Clerk
John Linhardt, Town of Halton Hills
Bronwyn Parker, Town of Halton Hills