



# OSKAR GROUP

March 18<sup>th</sup>, 2024

Ministry of Municipal Affairs and Housing  
Provincial Land Use Plans Branch  
13th Floor, 777 Bay St  
Toronto, ON M7A 2J3  
Canada

Submitted electronically – ERO Number 019-8273

**Re: Get It Done Act 2024 – Amending the Official Plan Adjustments Act, 2023**

The Oskar Group (1625488 Ontario Inc. and 1652157 Ontario Inc. c/o) represents landowners in the Greater Toronto Area with lands in Halton, York, and Durham Regions. In response to the *Official Plan Adjustments Act* (the “Act”), we submitted a letter in December 2023 to the Ministry expressing our concern that the Act would wind back provincial changes to Official Plans and Official Plan Amendments, that would contravene existing provincial legislation. Specifically, the *Official Plan Adjustments Act (2023)* would approve the municipally adopted Region of Halton Official Plan (retroactively to the date of the provincial approval, on November 4<sup>th</sup>, 2022). This would reverse the Minister’s Modification 22 which identified that the subject lands (known as Part of Lots 14 and 15, Concession 1, Trafalgar NS, Town of Milton) are “deferred” pending a final decision from the Ministry of Natural Resources and Forestry for the Niagara Escarpment Plan Area Amendment Application - Urban Amendment 63, as shown in Appendix 2.

While we are supportive of the idea that the *Amending Official Plan Adjustments Act (2024)* would reinstate some of the Minister’s Modifications, the Oskar Group remains concerned that the Minister’s Modification 22 will be carried forward as part of the approved amendments. As stated in our submission to the Region of Halton in January 2022, any decision on the subject lands with the ongoing Regional Official Plan update should be deferred until the Ministry has had an opportunity to make a formal decision, in light of the open application with the MNRF and NEC.

The subject lands are designated ‘Escarpment Protection’ within the Niagara Escarpment Plan, and therefore, any changes or modifications applying to the NEP must be approved by the appropriate commenting agency, such as the NEC and MNRF prior to the upper tier approval authority approving any changes. Additionally, the Regional Official Plan must conform with Provincial Plans. All development within the Niagara Escarpment Plan Area is subject to the provisions of the *Niagara Escarpment Planning and Development Act*, the Niagara Escarpment Plan and its applicable policies, the Local Official Plan, and Local zoning bylaws. Therefore, until an ultimate decision has been made by the provincial agencies, no changes or designations should be contemplated on the subject lands. We are continuing to work with the MNRF on the application and will circulate the materials to the Town, the Region, and the Niagara Escarpment Commission for input once the Ministry has provided clarity.

Furthermore, it should be noted that the Oskar Group has also engaged Crozier Engineering to research existing servicing around the property. They obtained as-built drawings from the Region which demonstrates that water mains existed around the property on both Tremaine Rd and Steeles Ave. Additionally, the sanitary connection is less than 1km away from the south side of the property. Crozier has stated that connecting existing services to the site will be simple. As such, Oskar group has submitted allocation requests for more than 900 homes for the region to consider for their master servicing study. Moreover, more opportunities have been discussed with Crozier to improve site drainage patterns and possible servicing connections to benefit neighboring properties.

### **Changes to Urban Boundaries**

In addition, the *Planning Statute Law Amendment Act, 2023* would wind back changes to urban boundaries. The Minister's Modifications contained within the Amendments to the *Official Plan Adjustments Act* do not reverse the changes to the urban boundaries. While we recognize that the proposed amendments are to reinstate municipally requested modifications, Mayor Gordan Krantz of the Town of Milton commented that all the boundary expansions added in Milton by the provincial government should be maintained. Going against the mayor's wishes would conflict with the province's move towards decentralizing housing authorities to municipalities, as specifically alluded to in the *Strong Mayors, Building Homes Act, 2022*.

In accordance with Mayor Krantz's comments, it is our opinion that the boundary should be expanded further by including the subject lands, owned by Oskar Group, to match the growth for the Region of Halton and an efficient land development pattern. This was promoted within the *Provincial Policy Statement, 2020* and *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020*.

Additionally, it should be noted that the Region of Halton missed its affordable housing target in 2022, for the first time in four years. Therefore 30% of all new development will need to meet the affordability threshold. Stopping all increased supply of housing will keep homes unaffordable. The proposed request to identify the subject lands as deferred in the Regional Official Plan supports this initiative and Oskar Group can help reach those goals.

### **More Homes, Built Faster, 2022**

The development proposal envisioned on the subject lands would also assist the province's efforts to build 1.5 million homes, as stated in the *More Homes, Built Faster Act, 2022*. The proposed development will be a mixed-use and multi-purpose community that will include a variety of housing types to help keep homes affordable while making effective use of the land. Through innovative designs, the proposed development aims to create an appropriately dense community that incorporates versions of single-family, medium-density, and higher-density dwellings.

In addition to housing, the agri-food sector will also be strengthened, which was highlighted for improvement in the *Grow Ontario* strategy by creating a local agri-food system to support the community as well as Milton's population. Within the agricultural landscape of the development, there will be farm-diversified infrastructure such as a multi-purpose barn, a community kitchen, farm product retail stores, a farm-to-table eatery, and a farmer's market. In combination with the farm, there will be smaller-scale community gardens to engage people and educate them about food production and sustainability. The

goal is to reintroduce the heritage of producing fresh food into a contemporary housing development while addressing the need for more homes in Ontario.

Finally, education will play a large role in the community with a youth training centre and a farming mentorship program facilitated through partnerships with non-profit and not-for-profit organizations.

**Recommendation:**

Based on the above, we ask that the Ministry **reinstate the Minister's Modification 22** as part of the "Act" and that the subject lands continue to be shown as "deferred" pending a final decision from the Ministry of Natural Resources and Forestry.