

ROPA 48 – Public Submission Response Document

Staff Response of Comments Received from the Public on Draft ROPA 48 – “An Amendment to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan” Received February 16, 2021 to June 23, 2021.

Overview

This document provides responses to written submissions received by Halton Region on Draft Regional Official Plan Amendment (ROPA) No. 48 from February 16, 2021 to June 23, 2021

The document is organized into three columns: ‘Source’, ‘Submission’, and ‘Response’.

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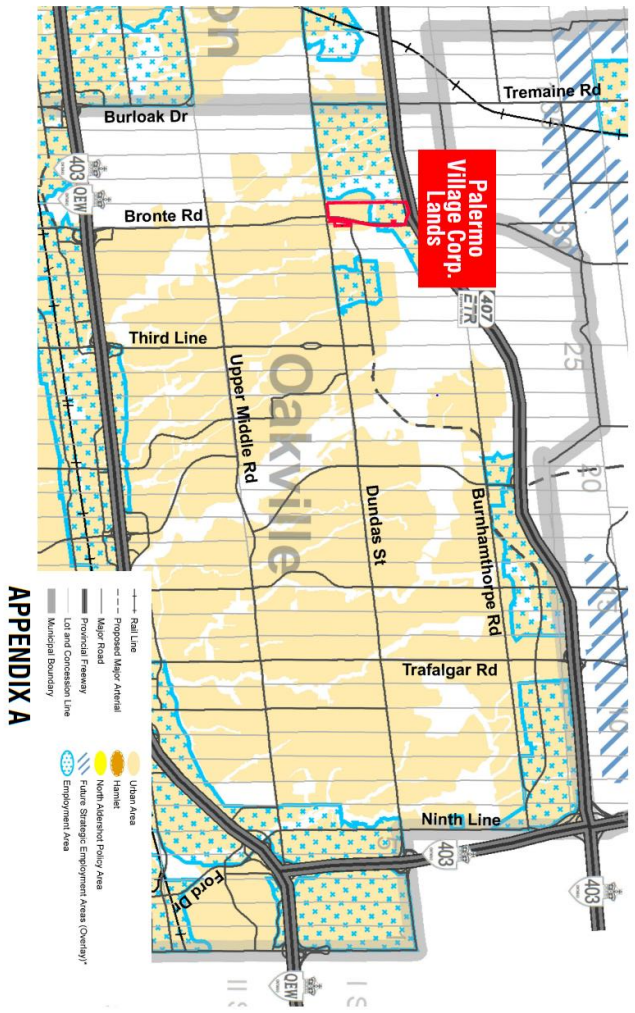
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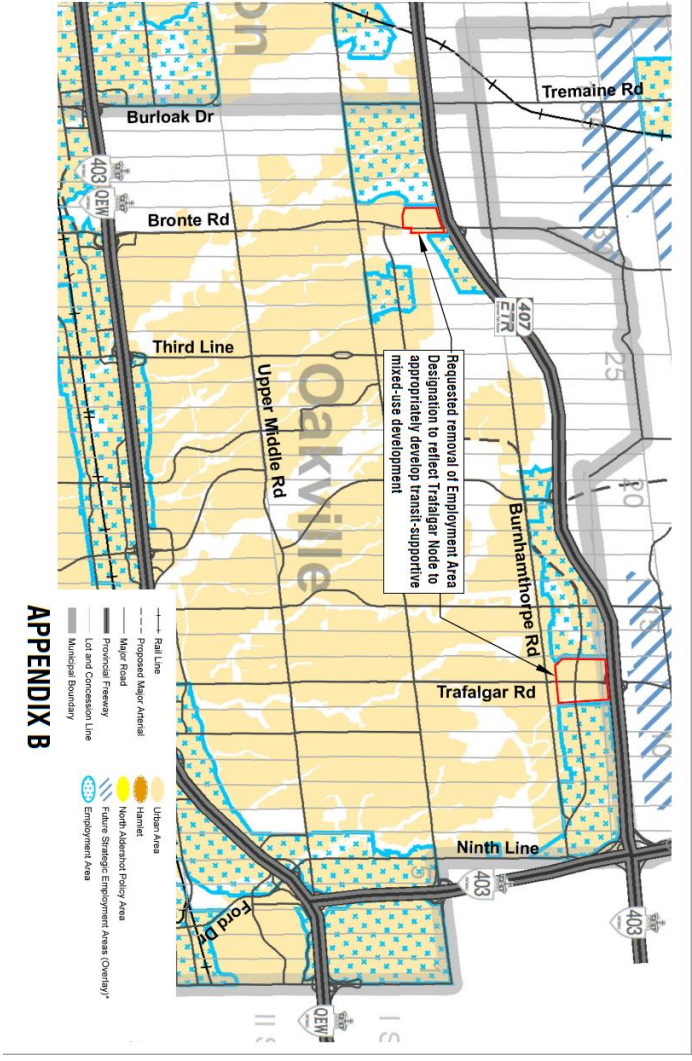
No.	Source	Submission	Response
1	<p>Patrick Harrington on behalf of Argo and Palermo Village Corporation</p> <p>E-mail dated February 16, 2021</p>	<p>[ATTACHED LETTER]</p> <p>February 16, 2021</p> <p>BY EMAIL</p> <p>Our File No. 104079 Attn. Curt Benson Director Planning Services and Chief Planning Official Region of Halton, Planning Department 1151 Bronte Road Oakville, Ontario L6M 3L1</p> <p>Sent via email: ropr@halton.ca</p> <p>Dear Mr. Benson:</p> <p>Re: Submission by Palermo Village Corporation 3069 Dundas Street West, Oakville Draft Regional Official Plan Amendment No. 48</p> <p>As you are aware, our firm acts on behalf of Argo Developments and Newmark Developments (collectively now known as “Palermo Village Corporation”). Palermo Village Corporation owns lands known municipally as 3069 Dundas Street West in the Town of Oakville, which generally comprises the majority of the northwest quadrant of the intersection of Bronte Road and Dundas Street West, extending up to (and beyond) Highway 407 (the “PVC Lands”). The location of the PVC Lands is outlined in Attachment A to this letter.</p> <p>Our firm wrote to you on October 30, 2020, to provide our client’s comments respecting the Region’s Official Plan Review – specifically pertaining to the PVC Lands. We are now in receipt of Draft Regional Official Plan Amendment No. 48 (“ROPA 48”), which is scheduled to be considered by Regional Council on Wednesday, February 17. The purpose of ROPA 48 is to <i>“implement components of the Regional Urban Structure that establishes a hierarchy of strategic growth areas in the Regional Official Plan.”</i> We are writing to provide our client’s comments respecting ROPA 48’s proposed effect on the PVC Lands. For purposes of the public record, we ask that our letter dated October 30 form part of our submission to Regional Council on ROPA 48. A copy of our October</p>	

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		<p>30 letter is attached for ease of reference. We will attempt to refrain from repeating the submissions contained in that letter.</p> <p>Our client's concerns with Draft ROPA 48 primarily arise from the proposed maps. As indicated in Map 1, the PVC Lands are within the Regional Urban Area, though a portion of the site continues to be identified as Regional Natural Heritage System. Our submissions respecting the Region's NHS mapping are included in our October 30 letter. We remind the Region that the NHS currently shown on the PVC Lands is subject to Policy 116.3 of the Region's existing Official Plan, which specifically reserves the delineation of the Regional NHS on land within the North Oakville West Secondary Plan Area to the determination of Newmark Development's ongoing appeal of OPA 289. We are hopeful of resolving this issue directly with the Town through its Palermo Village Growth Area Review process. For now, Draft ROPA 48 will need to continue to reserve the delineation of the Regional NHS on the PVC Lands.</p> <p>Maps 1C and 1H to Draft ROPA 48 indicate a proposed <i>Employment Area</i> overlay on the northern portion of the PVC Lands (see Attachment A to this letter). This <i>Employment Area</i> overlay is continuous between the lands to the immediate west of the PVC Lands along the south side of Highway 407. For all of the reasons outlined in our October 30 letter, Palermo Village Corporation submits that this overlay does not constitute good planning and ought to be removed. These reasons include:</p> <ol style="list-style-type: none"> 1. The PVC Lands constitute the northwest quadrant of a Primary Regional Node. 2. The PVC Lands are bounded by two Major Arterial Roads that are also designated as Higher Order Transit Corridors, being Bronte Road and Dundas Street West. 3. A bus transit station is proposed to be located near the south portion of the PVC Lands. 4. A 407 Transitway station is proposed to be located near the north portion of the PVC Lands. 5. The PVC Lands lie outside of any Provincially Significant Employment Zones. 6. The PVC Lands are immediately adjacent to the Built Boundary, are easily serviceable and are not encumbered by any significant landforms or features that would limit their development potential. <p>The foregoing confirms that the PVC Lands are ideally situated for higher-density, mixed-use development. To restrict the north portion of the PVC Lands through the use of an <i>Employment Area</i> overlay would significantly reduce the</p>	<p>In regards to the Regional Natural Heritage System and the PVC lands, the Region acknowledges that it is subject to Policy 116.3 of the Region's existing Official Plan.</p> <p>Regional staff have not recommended that the employment conversion be advanced as part of ROPA 48 due to the scoped nature of ROPA 48 to advance local plans and priorities. However, the request will continue to be considered as part of the Integrated Growth Management Strategy process and the development of a Preferred Growth Concept.</p>

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		<p>potential to create an effective <i>complete community</i> that is walking distance to multiple modes of Provincial, Regional and Local transit.</p> <p>‘For comparison, we ask that Regional Council refer to the areas surrounding the intersection of Trafalgar Road and Burnhamthorpe Road (see again, Maps 1C and 1H). This area contains a similar Primary Regional Node at the intersection of two Major Arterial Roads that are also Higher Order Transit Corridors. Tracing Trafalgar Road north from Burnhamthorpe Road to Highway 407, the draft mapping shows a “break” in the proposed <i>Employment Area</i> overlay. This “break” will allow both sides of Trafalgar Road to appropriately develop for transit-supportive mixed-used development within a <i>complete community</i>.</p> <p>Palermo Village Corporation submits that Bronte Road north of Dundas Street West should receive similar treatment by having the proposed <i>Employment Area</i> overlay “break” across Bronte Road near Highway 407, thereby excluding the north portion of the PVC Lands.</p> <p>Our client’s requested revision is shown on Attachment B to this letter.</p> <p>Our client also notes that Draft ROPA 48 proposes a new table (Table 2b – See Item 13 to Draft ROPA 48) that proposes to prescribe targets for the “<i>proportion of residents & jobs</i>” for various strategic growth areas within the Region. Included in this table is a proposed <i>60% residents to 40% jobs</i> requirement for Palermo Village in Oakville. With respect, these types of prescriptive proportions in a Regional-level Official Plan are not conducive to good planning, particularly when the proportions serve as a limitation on local decision-making. These proportions lead to planning-by-numbers approaches to community design and create unnecessary complications, particularly in areas that will develop over time. Accordingly, our client encourages the Region to either not adopt Table 2b or to include policy language confirming that the proportions shown in the table (including the 60/40 split for Palermo Village) represent a goal or objective of the Region that will not function as a directive or limitation on the ability of local municipalities (like Oakville) to plan for and approve their complete communities. Please ensure our office is notified of any further opportunities to provide input to the current Regional Official Plan Review, including Draft ROPA 48. Our request at this time is that all decisions on Draft ROPA 48 be deferred to allow our client the opportunity to</p> <p>(a) complete its consultation process with the Town of Oakville concerning the Palermo Growth Area Review and</p>	<p>Given the importance of accommodating employment growth in SGAs to the Region’s growth strategy, a target proportion of residents and jobs in Table 2b is maintained in ROPA 48. However, Table 2b is revised to:</p> <ul style="list-style-type: none"> clarify the general nature of the target (through the addition of the word ‘General’ and through the addition of the tilde (~) symbol which is commonly read as ‘approximately’); update the targets for specific SGAs based on local feedback (Milton UGC, Palermo Village) and/or to achieve a greater level of consistency across the SGAs and to reflect the more general nature of the targets (Aldershot, Acton, etc.); add a footnote to reinforce the general, long-term, and aspirational nature of the target and the latitude for refinements to it through a local process, consistent with Section 55.3, which has also been revised to clarify the implementation of the general target in Table 2b through local planning processes.

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		<p>(b) discuss directly with Regional Staff the issues raised in this letter and in our October 30 letter. To date, no direct discussions between Regional Staff and consultants on behalf of Palermo Village Corporation have taken place.</p> <p>Yours truly,</p> <p>AIRD & BERLIS LLP</p> <p><i>Original signed by P.J. Harrington</i></p> <p>Patrick J. Harrington PJH/np</p> <p>Includes Attachments cc: Clerk, Region of Halton K. Singh,</p> <p>Argo Developments M. Shapira, Newmark Developments Ltd. T. Korsiak, Korsiak Urban Planning</p>	<p>A meeting was held with the Region and Palermo Village Corp on March 31. 2021</p>

No.	Source	Submission	Response
		<div><p>APPENDIX A</p></div>	

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		 <p>APPENDIX B</p> <p>Requested removal of Employment Area Designation to reflect Trafalgar Node to appropriately develop transit-supportive mixed-use development</p> <p>Legend:</p> <ul style="list-style-type: none"> Rail Line Proposed Major Arterial Major Road Provincial Freeway Lot and Concession Line Municipal Boundary Urban Area Hamlet North Adopted Policy Area Future Strategic Employment Areas (Overlay) Employment Area 	

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2	<p>Karl Gonnissen on behalf of Penta Properties Inc. and Argo</p> <p>E-mail dated February 16, 2021</p>	<p>[ATTACHED LETTER]</p> <p>VIA EMAIL February 16, 2021 Regional Municipality of Halton Planning Services Department Attn: Mr. Curt Benson, RPP, MCIP, Director and Chief Planning Official 1151 Bronte Road Oakville, ON L6M 3L1 Dear Mr. Benson,</p> <p>Re: Regional Official Plan Review (ROPR) Discussion Papers Comments on Behalf of Penta Properties Inc. and Paletta International Corporation File; P09006, Eagle Heights</p> <p>We are planners and engineers for Penta Properties Inc. and Paletta International Corporation (collectively "Penta"). Penta has extensive land holdings in the Region of Halton, including 106.67 ha (263.6 ac) in the City of Burlington in what is known as the North Aldershot Planning Area (NAPA).</p> <p>This submission relates to the three matters LPS05-21, LPS18-21 and LPS17-21 on the Council agenda for its meeting on Wednesday February 17, 2021. You may recall that Metropolitan Consulting (MCI) made a submission to the Region of Halton regarding Eagle Heights dated October 27, 2020. That submission was included in a submission to the Region of Halton dated October 30, 2020 made by counsel for Penta Properties Inc., Scott Snider.</p> <p>Of the three items on your agenda, I want to particularly comment on Appendix J, <i>North Aldershot Policy Area, Urban Area Expansion Assessment, February 2021, Regional Official Plan Review</i>. I would have liked to comment on the other reports and matters on your agenda but there was not enough time to read the hundreds and hundreds of pages between receiving notice and the date of the meeting to consider these matters. We in fact did not get any notice as requested in Mr. Snider's October 30, 2020 submission.</p> <p>We have always been surprised at how little mention or recognition there has been in the current Official Plan review of the history and status of the Eagle Heights property. That continues today in the three reports on the agenda for Wednesday. In the Meridian Report found at Appendix J there is no discussion or recognition of the history of Eagle Heights. In particular, there is no recognition that:</p> <ul style="list-style-type: none"> • the property is draft approved for residential development; • the property is designated and zoned for residential development • just last year, 	<p>Comments noted and will be considered as part of the development of the Preferred Growth Concept.</p> <p>The referenced matter is subject to a separate Ontario Land Tribunal litigation and outside the scope of Regional Official Plan Amendment 48.</p>

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		<p>the portion of the property in the Niagara Escarpment Commission Planning Area was approved for "infrastructure and municipal servicing" on lands designated as Escarpment Protection Area and Escarpment Natural within the North Aldershot Policy area, on Map3 of the Niagara Escarpment Plan." (See NEP Amendment UA 24 at Tab 1) • the 2016 Servicing Study prepared by MCI at the request of the Region demonstrates that the wastewater mains, front end financed by Penta, are sufficient to accommodate the development of the balance of the NAPA in the Central sector not included in Eagle Heights</p> <p>The analysis of the Region's historical approach to growth management in section 3.1 is misleading. The report claims that "up to 550 new dwellings could potentially be developed in the three pockets in the central Sector". This statement does not recognize that in addition to those 550 units, an elementary school was included in the Official Plan approval, the draft approval and the approved zoning. Subsequently, the school board decided that it did not require the block on Waterdown Road for an elementary school and that block is now intended for 123 residential units.</p> <p>In the last paragraph on page 7 there is a discussion of servicing. MCI believes that it is important to differentiate between Eagle Heights and other areas in the NAPA. Eagle Heights has been substantially studied in all respects including servicing by both Penta and the Region. The Penta studies were carried out by Cosburn, Patterson, Mather and MCI. The Region has examined this area on at least two occasions as part of its Master Servicing Plans and its Development Charge Background Studies. In fact, Phase A of the wastewater servicing project has been built. Discussions were underway with respect to a front ending scheme a year ago for the development of the rest of Eagle Heights (see Tab 2).</p> <p>The policy requirements cited at the bottom of page 8 were in the process of being satisfied but seemed to come to an end about a year ago.</p> <p>Meridian Planning has ignored the fact that NEPA Amendment UA 24 has been approved by the Province and allows municipal servicing and infrastructure in the part of Eagle Heights that is in the NEPA. This amendment was approved as part of a coordinated review at the same time as the reviews of the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Growth Plan for the Greater Golden Horseshoe. To interpret the Growth Plan as provincial policy that fundamentally undermines existing approvals for Eagle Heights is inconsistent with that amendment.</p>	<p>The section referenced is specifically outlining the recommendations resulting from the NAIR Land Use Concept which identified a theoretical total of 550 units in the Central Sector for lands in the 'Single Detached Residential, Estate Residential and Cluster Residential' designation in addition to approximately 45 infill units in the 'Individual Houses' designation.</p>

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		<p>At the top of page 14 and elsewhere there is some discussion of the Natural Heritage System. The most accurate and up to date mapping was done in 2014, 2015, and 2016 by Penta and its consultants with representatives of the Region, the City, CH, the NEC and the MNRF. This work was based on detailed, on-the-ground field work. To date, all attempts by MCI to engage with the Region regarding this mapping have failed.</p> <p>In the last paragraph of section 3.3 there is discussion of “revision of the NHS maps for the NAPA”. No information is given on how this was done. Did it utilize the work of Penta, its consultants and the various agencies done in 2014, 2015 and 2016? In section 3.5 “Water and Wastewater Servicing in the NAPA” is discussed. GM Blue Plan notes that there may be some challenges. Servicing solutions were included in the 2011 Sustainable Halton Master Plan and the 2017 Development Charges Background Study. MCI attended the public information sessions for these initiatives and made representations. At no time were these alleged challenges identified.</p> <p>Based on MCI's background and study, we do not agree that there are significant servicing challenges. In fact, some of the infrastructure downstream of the NAPA was designed and sized to accommodate development of NAPA.</p> <p>On page 17, GM Blue Plan states that “extending servicing can be costly, inefficient, and technically challenging”. This is simply inconsistent with the many servicing reports that have been completed since these lands were approved for development.</p> <p>In section 3.5 of the Halton Region Integrated Growth Management Study, North Aldershot Policy Area Urban Expansion Assessment by Meridian Planning dated February 2021 updates to the extent of the RNHS in the NAPA is discussed. It is unclear where the updated information came from. MCI's attempts to get this information have been fruitless. Furthermore, all of this has been done without the involvement of the owner of the land. It is not clear what role, if any, the staking out of the natural features carried out in 2014, 2015 and 2016 by Penta and the agencies played.</p> <p>On page 22, Meridian examines the possibility of extending the urban area to include NAPA. Extending the urban area is unnecessary to address development in Eagle Heights. Substantial urban development that requires full municipal services was approved in 1994. Relying on those approvals, Penta has spent millions of dollars refining and advancing development for the lands. In 2009, an agreement was signed by Penta and the City that reinforces that</p>	<p>For the update to the Regional Natural Heritage System (RNHS), the Region used the best available data including data from the Province and Conservation Authorities to update layers that are under their jurisdiction. The update to the RNHS also included refinements to the RNHS that were the result of a Planning Act approval as of June 2018. Details on the Region's process for updating the RNHS can be found in the Region's <u>Mapping Audit Technical Memo Review of the Regional Official Plan Natural Heritage System Policies + Mapping</u> and all of the data sets that were used are identified in the Region's <u>Quality Assurance/Quality Control Process Memo on the draft 2019 Regional Natural Heritage System (RNHS)</u>.</p>

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		<p>these lands are to be developed on full services. The notion of development was again reinforced in 2020 when the Province approved municipal servicing and infrastructure through an Order in Council. That order in Council was as a result of a “coordinated review at the same time as the reviews of the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Growth Plan for the Greater Golden Horseshoe”. Clearly it was the Provinces intent to allow development or there would be no need for “municipal servicing or infrastructure”.</p> <p>Summary</p> <p>We are concerned that the Region has so far not wished to engage Penta regarding the North Aldershot Planning Area. We hope that discussions can be held in the near future regarding the issues raised in this submission.</p> <p>Yours truly,</p> <p>Karl Gonnsen, P. Eng., RPP, President</p>	<p>Regional Staff have had two meetings with Metropolitan Consulting regarding the North Aldershot Planning Area. These meetings were held on March 29, 2021 and June 8, 2021.</p>
3	<p>Kevin Singh on behalf of Argo and Palermo Village Corporation</p> <p>E-mail dated February 17, 2021</p>	<p>[ATTACHED LETTER]</p> <p>Attn. Curt Benson Director Planning Services and Chief Planning Official Region of Halton, Planning Department 1151 Bronte Road Oakville, Ontario L6M 3L1</p> <p>Sent via email: ropr@halton.ca Dear Mr. Benson:</p> <p>Re: Submission by Palermo Village Corporation 3069 Dundas Street West, Oakville Draft Regional Official Plan Amendment No. 48</p> <p>As you are aware, our firm acts on behalf of Argo Developments and Newmark Developments (collectively now known as “Palermo Village Corporation”). Palermo Village Corporation owns lands known municipally as 3069 Dundas Street West in the Town of Oakville, which generally comprises the majority of the northwest quadrant of the intersection of Bronte Road and Dundas Street West, extending up to (and beyond) Highway 407 (the “PVC Lands”). The location of the PVC Lands is outlined in Attachment A to this letter.</p>	<p>Please refer to the response provided for Submission #1 above.</p>

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		<p>Our firm wrote to you on October 30, 2020, to provide our client's comments respecting the Region's Official Plan Review – specifically pertaining to the PVC Lands. We are now in receipt of Draft Regional Official Plan Amendment No. 48 ("ROPA 48"), which is scheduled to be considered by Regional Council on Wednesday, February 17. The purpose of ROPA 48 is to <i>"implement components of the Regional Urban Structure that establishes a hierarchy of strategic growth areas in the Regional Official Plan."</i> We are writing to provide our client's comments respecting ROPA 48's proposed effect on the PVC Lands. For purposes of the public record, we ask that our letter dated October 30 form part of our submission to Regional Council on ROPA 48. A copy of our October 30 letter is attached for ease of reference. We will attempt to refrain from repeating the submissions contained in that letter.</p> <p>Our client's concerns with Draft ROPA 48 primarily arise from the proposed maps. As indicated in Map 1, the PVC Lands are within the Regional Urban Area, though a portion of the site continues to be identified as Regional Natural Heritage System. Our submissions respecting the Region's NHS mapping are included in our October 30 letter. We remind the Region that the NHS currently shown on the PVC Lands is subject to Policy 116.3 of the Region's existing Official Plan, which specifically reserves the delineation of the Regional NHS on land within the North Oakville West Secondary Plan Area to the determination of Newmark Development's ongoing appeal of OPA 289. We are hopeful of resolving this issue directly with the Town through its Palermo Village Growth Area Review process. For now, Draft ROPA 48 will need to continue to reserve the delineation of the Regional NHS on the PVC Lands.</p> <p>Maps 1C and 1H to Draft ROPA 48 indicate a proposed <i>Employment Area</i> overlay on the northern portion of the PVC Lands (see Attachment A to this letter). This <i>Employment Area</i> overlay is continuous between the lands to the immediate west of the PVC Lands along the south side of Highway 407. For all of the reasons outlined in our October 30 letter, Palermo Village Corporation submits that this overlay does not constitute good planning and ought to be removed. These reasons include:</p> <ol style="list-style-type: none"> 1. The PVC Lands constitute the northwest quadrant of a Primary Regional Node. 2. The PVC Lands are bounded by two Major Arterial Roads that are also designated as Higher Order Transit Corridors, being Bronte Road and Dundas Street West. 	

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		<p>develop over time. Accordingly, our client encourages the Region to either not adopt Table 2b or to include policy language confirming that the proportions shown in the table (including the 60/40 split for Palermo Village) represent a goal or objective of the Region that will not function as a directive or limitation on the ability of local municipalities (like Oakville) to plan for and approve their complete communities.</p> <p>Please ensure our office is notified of any further opportunities to provide input to the current Regional Official Plan Review, including Draft ROPA 48. Our request at this time is that all decisions on Draft ROPA 48 be deferred to allow our client the opportunity to (a) complete its consultation process with the Town of Oakville concerning the Palermo Growth Area Review and (b) discuss directly with Regional Staff the issues raised in this letter and in our October 30 letter. To date, no direct discussions between Regional Staff and consultants on behalf of Palermo Village Corporation have taken place.</p> <p>Yours truly,</p> <p>AIRD & BERLIS LLP</p> <p>Original signed by P.J. Harrington Patrick J. Harrington PJH/np</p> <p>Includes Attachments</p> <p>cc: Clerk, Region of Halton K. Singh, Argo Developments M. Shapira, Newmark Developments Ltd. T. Korsiak, Korsiak Urban Planning</p>	
4	<p>Robert Lehman on behalf of Sofina Foods</p> <p>E-mail dated March 4, 2021</p>	<p>[ATTACHED LETTER]</p> <p>March 4, 2021 Curt Benson Director, Planning Services and Chief Planning Official Region of Halton</p> <p>SENT ONLY BY EMAIL Re: Sofina Foods and Ortech Report</p>	

No.	Source	Submission	Response
		<p>Dear Mr. Benson:</p> <p>I am writing as requested by Sofina Foods in response to a report entitled Branthaven Development Corp. Land use Compatibility Study – Phase II 720 Oval Court, Burlington, Ontario (the “Report”). This report was provided to Sofina by the Region of Halton.</p> <p>In summary my conclusions with respect to the Ortech Report are as follows:</p> <ol style="list-style-type: none"> 1. The assumptions and conclusions in the Report which rely upon Sofina being a Class II industry are incorrect. The potential area of influence as derived from the D6 Guidelines should be 1,000m rather than the 300m assumed. 2. The Report does not address the Provincial Policy Statement policies which require that, if a sensitive land use is proposed for a location where avoiding employment uses cannot be achieved, the following must be demonstrated: <ul style="list-style-type: none"> • there is a need for the use; • that alternative locations have been evaluated and no reasonable location found; and, • that the adverse effects to the industrial use and to the proposed sensitive use are mitigated and minimized. 3. The Report suggests that if there are adverse effects on new sensitive uses, it will be the responsibility of Sofina to mitigate impacts. The PPS does not impose a requirement on Sofina to minimize impacts on any proposed development. The PPS places the onus to minimize impacts on the change agent, in this case Branthaven Development Corp. 4. Any compatibility report should reflect that this onus exists and, if impacts of odour or noise are anticipated, suggest means by which they can be mitigated and minimized in the development process. 5. The Report does not address the issue of compatibility of development adequately to assist in a decision on a planning application. <p>According to the covering letter from Ruth Victor & Associates:</p> <p><i>“Branthaven is one of the larger landowners within the proposed Appleby MTSA and agree that there is a concern regarding land use compatibility within portions of the proposed MTSA area with the Sofina activities on their lands. Branthaven has completed a land use compatibility assessment in accordance with the MECP and Region of Halton requirements for the Oval Court lands which will be most helpful to this discussion. We have attached a copy of this Ortech Report for your use and in any discussion to address Sofina’s concerns. The results of study do show that there are portions of the MTSA that are constrained by the</i></p>	<p>Comments noted. Adjustments have been made to ROPA 48 to revise the policies that address land use compatibility to achieve better alignment and consistency with the Provincial Policy Statement, 2020.</p>

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		<p><i>activities of Sofina; however, the Oval Court lands are not constrained in terms of residential or other sensitive land uses by the activities on the Sofina lands."</i></p> <p>According to the Report:</p> <p><i>The specific objective of the study is to undertake land use compatibility of surrounding land uses and their air quality impact on the proposed development site. The study was conducted based on the Ontario Ministry of the Environment, Conservation and Parks (MECP) Guideline D-1 on Land Use Compatibility, D-6 on Compatibility between Industrial Facilities and Sensitive Land Uses and Halton Region's land use compatibility guidelines.</i></p> <p>Sofina is in the process of conducting a technical review of the Report. However, I have been asked to respond from a planning perspective as soon as possible. Insofar as the Report applies to the Sofina facility there are several foundational errors in the assumptions used for the analysis which, in my opinion, lead to incomplete and incorrect technical and planning conclusions.</p> <p>Sofina is a Class III Facility</p> <p>The Report assumes that the Sofina facility is a Class II facility. The Report describes the Sofina facility as follows:</p> <p><i>A pork processing facility with expected particulate, ammonia and hydrogen sulfide emissions is located at a distance of 320 meters from the proposed site boundaries. This Class II facility, located at 821 Appleby Line, Burlington, was acquired by Sofina Foods.</i></p> <p>Sofina is a Class III facility that currently operates on a 16-hour day with the permission available to operate 24/7. At the present time pigs are delivered to the property on Sunday night so that processing can commence on Monday morning. In addition, at the present time there are ten Saturdays each year when production occurs. The facility produces emissions that include both odour and noise.</p> <p>Sofina as a major primary processing facility is a key component of Ontario's agri-business complex. Eleven percent of all hog processing in Canada is completed at this plant. There are 150 family farms within a three-hour radius of the Property that transport livestock to this facility. As such the facility generates 188 truck movements per day, not including employee or service vehicles.</p>	<p>Comments noted. ROPA 48 includes policies that address and provide direction related to land use compatibility in Strategic Growth Areas and in relation to Major Transit Station Areas that include Employment Areas in Sections 79.3(12), 81.2(4)f, and 83.2(7). As noted above, adjustments have been made to these policies to achieve better alignment and consistency with the Provincial Policy Statement, 2020.</p>

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		<p>There are refrigeration units on the roofs of the buildings on the property which run continuously, creating a constant noise. Trailers sit along the south fence, adjacent to the rail line with their cooling units running. These units cannot be turned off as the product is perishable and must be maintained at a constant temperature.</p> <p>The odours are distinctive and the noise is also potentially impactful. Over the years significant capital has been invested to exhaust barn odours through the use of a large chimney stack at a height of approximately 30m. While entirely screened at street level, a significant portion of the operation occurs out of doors and would be visible from a modest height in the surrounding area. All emissions from the facility on the Property are regulated by the <i>Environmental Protection Act</i> through the Environmental Compliance Approval process. Sofina meets all environmental requirements through Certificate of Approval No. 4494-685MWW, which approval is based on the current location of sensitive use receptors in the area, the nearest being some 360 metres to the south and in ground-oriented dwellings.</p> <p>The assumptions and conclusions in the Report which rely upon the Class of industry are thus incorrect. The potential area of influence as derived from the D6 Guidelines should be 1,000m rather than the 300m assumed.</p> <p>The Report does not address Provincial Policy Statement and Growth Plan Revisions - the Change Agent</p> <p>It is important to note that both the Region of Halton Official Plan and the associated Land Use Compatibility Guidelines, which are referred to in the Report, have not yet implemented the relevant changes to the Provincial Policy Statement (the "PPS") and the Growth Plan. Both of these Provincial policies have been amended over the past two years to strengthen the protections for existing industrial operations that may be threatened by the development of nearby sensitive uses.</p> <p>Changes made to the PPS reflect a more pragmatic approach to the issue of compatibility, and a set of new requirements now establishes tests for the impact of new sensitive uses on existing employment uses. These changes have two key impacts.</p> <p>Firstly, the new policies view impacts in both directions – on both sensitive uses and on industries. As a result, the policies require proof that the location of proposed new sensitive uses will not compromise the operational and economic viability of the industry. Secondly the new policies place the onus for mitigation</p>	

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		<p>on the agent of change. If a new industry proposes to locate it must minimize potential adverse effects. If a new sensitive use proposes to locate it must meet several tests including protecting the long-term viability of the industry by minimizing and mitigating impacts. The Report does not address these policies of the PPS.</p> <p>The policies are quoted below:</p> <p><i>“1.2.6 Land Use Compatibility</i></p> <p><i>1.2.6.1 Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.</i></p> <p><i>1.2.6.2 Where avoidance is not possible in accordance with policy</i></p> <p><i>1.2.6.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:</i></p> <p><i>a) There is an identified need for the proposed use;</i> <i>b) Alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;</i> <i>c) Adverse effects to the proposed sensitive land use are minimized and mitigated; and</i> <i>d) Potential impacts to industrial, manufacturing or other uses are minimized and mitigated.”</i></p> <p>The new policies also provide direction for situations where avoidance of adverse effects is not possible. In these cases, the PPS requires a new sensitive land use to demonstrate that there is a need for the use, that alternative locations have been evaluated and no reasonable location found, and that the adverse effects to the industrial use and to the proposed sensitive use are mitigated and minimized.</p> <p>The Report suggests that if there are adverse effects on new sensitive uses, it will be the responsibility of Sofina to mitigate impacts. The Ortech report states</p>	

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		<p><i>“the adverse air impacts from pork processing facility are not expected on the proposed development”</i> because Sofina lies more than 300m to the west and that because of the distance beyond the 300m Sofina would be required to respond to and mitigate complaints. The scope of the compatibility test should include minimizing the risk of complaint as existing MECP protocol generally treats a valid complaint as an adverse effect and thus invokes s.14 of the Environmental Protection Act.</p> <p>Any compatibility report should properly consider these policies and review the tests in the PPS for the impact of a new sensitive use on an employment area generally and individual industries specifically.</p> <p>The PPS and Growth Plan do not impose a requirement on Sofina to minimize impacts on any proposed development. The PPS and Growth Plan require a developer, the change agent, to minimize the impacts on Sofina. Any compatibility report should reflect that the onus exists and, if impacts of odour or noise are anticipated, suggest means by which they can be mitigated in the development process.</p> <p>Reliance on D-6 Guidelines</p> <p>Traditionally, to help manage compatibility issues related to employment uses, planners have considered the Province's D-Series Guidelines. Over the years the guidelines have been applied and interpreted in different ways. The Guidelines set separation distance and influence area standards by industry class, which, as a general standard, does not recognize the unique circumstances and emissions of all industries in the context of their employment neighborhood. This one-size-fits-all approach does not work well to achieve compatibility in existing urban areas.</p> <p>The Guidelines also are not entirely consistent with the PPS policies dealing with impacts on employment areas and uses - either in terms of the means of protecting existing industrial operations, or the responsibility for mitigation lying with the agent of change.</p> <p>Given that concern, as the Report incorrectly categorizes Sofina as a Class II facility it dismisses any potential for impacts beyond 300m. It should be noted that the D-Guidelines state that the actual influence area should be determined to achieve the following:</p> <p><i>“Purpose of Separation Distance (3.2)</i></p>	

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		<p><i>The separation distance should be sufficient to permit the functioning of the two incompatible land uses without an 'adverse effect' occurring The distance shall be based on a facility's potential influence area or actual influence area if it is known."</i> The Guidelines do properly describe the appropriate consequence of not resolving impacts.</p> <p><i>Irreconcilable Incompatibilities (3.4)</i></p> <p><i>When impacts from discharges and other compatibility problems cannot be reasonably mitigated or prevented to the level of a trivial impact (defined in Procedure D-1-3, "Land use Compatibility: Definitions") new development, whether it be a facility or a sensitive land use, shall not be permitted.</i></p> <p>I would be pleased to discuss this issue with you at your convenience.</p> <p>Robert Lehman, F.C.I.P.</p>	
5	<p>Joel Farber on behalf of Fogler Rubinoff Lawyers</p> <p>E-mail dated March 4, 2021</p>	<p>Dear Ms. Cunningham:</p> <p>Re: Halton Regional Official Plan Review - Employment Conversion Request RioCan Oakville Place – 240 Leighland Avenue, Oakville</p> <p>Thank you for your email of March 1, 2021 and for providing the materials for the February 17, 2021 Regional Council meeting including the IGMS Discussion Paper.</p> <p>On behalf of our client, we are pleased to support the recommended approach to include removal of the regional employment area overlay designation from Oakville Place as part of the Initial Scoped ROPA.</p> <p>While we support staff's recommendation and approach, we will continue to monitor the matter so as to ensure the timely implementation of the recommendation. A timely resolution will avoid any need to consider an alternative course of action such as a privately initiated ROPA to remove the employment area overlay from Oakville Place.</p> <p>Our client is continuing to engage with the Town of Oakville on the redevelopment and intensification prospects for the shopping centre. With an expeditious resolution of the Regional OP issues, our client and the Town can be secure in making the important</p>	<p>Comment Noted. The conversion of the lands at 240 Leighland Avenue continues to be included in ROPA 48.</p>

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		<p>investment of resources for the future planning of this important asset for our client, the Town and the Region.</p> <p>Thank you again for reaching out and for all the hard work that staff and the consultant team have put into the ROPR effort thus far.</p> <p>Yours truly,</p> <p>FOGLER, RUBINOFF LLP</p> <p>"Joel D. Farber" Joel D. Farber* *Services provided through a professional corporation JDF/sz cc. RioCan (Stuart Craig)</p>	
6	<p>Eldon C Theodore on behalf of Oakville Green Developments Inc.</p> <p>E-mail dated April 10, 2021</p>	<p>See attached comments on the Regional Official Plan Review on behalf of Oakville Green Developments Inc. Thank-you ELDON C THEODORE</p> <hr/> <p>[ATTACHED LETTER]</p> <p>April 10, 2021 regionalclerk@halton.ca ropr@halton.ca</p> <p>RE: OAKVILLE GREEN DEVELOPMENTS INC. LPS05-21 - REGIONAL OFFICIAL PLAN REVIEW OUR FILE 1572A</p> <p>I am writing on behalf of my client, Oakville Green Developments Inc. ("OGDI"), Owners of the 15.32 ha property located at the northeast corner of Dundas Street West and Third Line, the eastern extent of the Hospital District. My clients' lands are the subject of an active Draft Plan of Subdivision application for Phase 1 of an overall master plan for a mixed use innovation district within the Hospital District.</p> <p>We understand that the draft Regional Official Plan Amendment No. 48 ("ROPA") has been released for consultation. We have had the opportunity to review the draft ROPA and would like to extend our support for the Region's initiative to update the Regional urban structure and strengthening of the urban</p>	

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		<p>growth centres, including the recognition of the Hospital District as a mixed use area.</p> <p>We would like to share the following comments to assist with the improvement of the ROPA in advance of the Statutory Public Meeting:</p> <p>1. We are supportive of the Target Proportion of Residents and Jobs as 40% and 60% respectively for the "Hospital District, Oakville" in Table 2B.</p> <p>2. Draft revisions to Policy 79/2(13) state with emphasis added:</p> <p><i>b) ... iii) Local Municipalities to identify the minimum amount of gross floor area that should be planned for employment uses, including major office uses, within the Strategic Growth Area in order to meet the minimum job target and the target proportion of residents and jobs. Furthermore; and,</i></p> <p><i>iv) ... identifying a minimum proportion of threshold of the total gross floor area within the area to be developed for employment uses.</i></p> <p><i>iii) encourage the development of employment uses as part of mixed use developments and in advance of or concurrent with residential and other non-employment uses, and where appropriate, require that the gross floor area provided for employment uses within such mixed use developments represents a majority or significant proportion of the total gross floor area; and,</i></p> <p><i>iv) Identify other development criteria or policy approaches that support achieving the minimum employment target and target proportion of residents and jobs within the Strategic Growth Area. e) monitoring on a regular basis and in conjunction with the Region, the amount of residential and employment development within Strategic Growth Areas to assess progress toward achieving the targets identified in Table 2b, and if there are significant deficits or deviations from these targets, developing a strategy to redress them as part of a review of the Local Official Plan or applicable Area-Specific Plan."</i></p> <p>We appreciate the Region's objective of prioritizing employment jobs over residents as part of this policy framework, particularly as it relates to the Hospital District. However, we want to ensure that the Region appreciates that there is a disconnect between a people and jobs target, and a minimum proportion threshold of gross floor area associated with people and jobs.</p> <p>It is a fair assumption that space devoted to living space is on average larger than space devoted to employment, and specifically the type of employment that would be encouraged in a higher density mixed use growth area such as the Hospital District. Given this understanding, the gross floor area required to achieve 60% jobs may equal or be smaller than the gross floor area required to achieve 40% residents. As a result, the 60%/40% split of jobs to residents</p>	<p>Given the importance of accommodating employment growth in SGAs to the Region's growth strategy, a target proportion of residents and jobs in Table 2b is maintained in ROPA 48. However, Table 2b is revised to:</p> <ul style="list-style-type: none"> clarify the general nature of the target (through the addition of the word 'General' and through the addition of the tilde (~) symbol which is commonly read as 'approximately'); update the targets for specific SGAs based on local feedback (Milton UGC, Palermo Village) and/or to achieve a greater level of consistency across the SGAs and to reflect the more general nature of the targets (Aldershot, Acton, etc.); add a footnote to reinforce the general, long-term, and aspirational nature of the target and the latitude for refinements to it through a local process, consistent with Section 55.3, which has also been revised to clarify the implementation of the general target in Table 2b through local planning processes. <p>In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches in Section 79.3(13) c) in Draft ROPA 48.</p>

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		<p>cannot be applied equally to a minimum gross floor area of residents and jobs as the target balance may never be achieved.</p> <p>Furthermore, the gross floor area devoted to jobs will differ depending on the type of employment, and that employment can change as tenants come and go. The Region needs to ensure that the implementation of this policy framework at a local level does not become overly prescriptive; placing an additional level of scrutiny that would limit the ability to attract and occupy tenants within available floor area. The development of an average jobs rate and a minimum jobs target connected to gross floor area would provide greater certainty and give greater guidance to local municipalities in their implementation. These average and target rates can be determined at the local level as part of individual zoning application in consultation with the development industry, and should be re-evaluated with each new application to ensure flexibility with a changing market. By allowing the target rate to be refined at the zoning by-law level, it ensures each block that proceeds responds to the current market at that time, removing the prescriptive requirement of monitoring in "e)" that has the potential to discourage re-tenanting.</p> <p>As such, we recommend that e) be replaced with the following new language:</p> <p><i>e) Local official plan policies for Strategic Growth Areas provide policies that require implementing zoning by-law amendments to define a rate to achieve the residential and employment targets identified in Table 2b."</i></p> <p>Oakville Green intends to proceed with Phase 2 representing the balance of the innovation district on their property. Based on the policy framework to date, my clients' vision aligns with the draft framework of ROPA 48 and will help to achieve the Regional and City building efforts of this growth area.</p> <p>Thank you for the opportunity to share these initial comments and concerns. We reserve the right to modify or provide additional comments following the statutory public meeting and the release of any revised draft, and will make ourselves available to discuss should you have any specific questions.</p> <p>Yours truly,</p> <p>MHBC Eldon C. Theodore, BES, MUDS, MLAI, MCIP, RPP Partner Planner Urban Designer</p> <p><i>cc. Joseph Dableh, OGD I Tony Dableh, OGD I</i></p>	

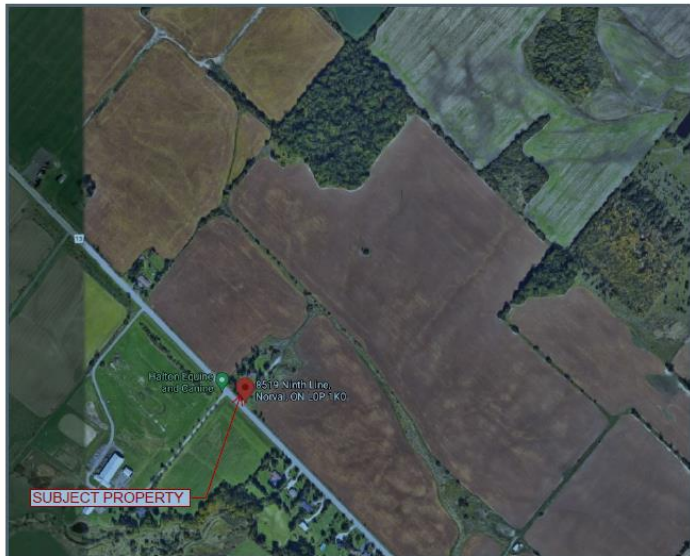
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7	<p>Jonathon Rodger on behalf of CP REIT Ontario Properties Limited</p> <p>E-mail dated April 12, 2021</p>	<p>[ATTACHED LETTER]</p> <p>VIA EMAIL</p> <p>April 9, 2021 Office of the Regional Clerk Regional Municipality of Halton 1151 Bronte Road Oakville, ON L6M 3L1 Attention: Graham Milne, Regional Clerk</p> <p>Re: Halton Region Official Plan Review Staff Report LPS17-21 dated February 17, 2021 and Draft ROPA 48 Preliminary Comments on Behalf of CP REIT Ontario Properties Limited Our File: CHO/HLT/19-01</p> <p>We are the planning consultants for CP REIT Ontario Properties Limited ("CP REIT") for the Region of Halton Official Plan Review and the associated Municipal Comprehensive Review (MCR), including Draft ROPA 48. CP REIT are the owner or have interest in lands within Halton Region, including:</p> <p>2025 Guelph Line, Burlington; 1025 & 1059 Plains Road East, Burlington; 2515 Appleby Line, Burlington; 820 Main Street East, Milton; 173-183 Lakeshore Road West, Oakville; Lands in the northwest quadrant of Dundas Street West & Sixth Line, Oakville; 493 Dundas Street West, Oakville; 171 Guelph Street, Georgetown; 2460 Winston Churchill Blvd., Oakville; 1122 Dorval Rd, Oakville; 315 Guelph Street, Georgetown; 8100 Parkhill Dr., Milton; 3333 James Snow Parkway, Milton; and 2994 Peddie Road, Milton.</p> <p>It is our understanding from Halton Region Staff Report LPS17-21 dated February 17, 2021 that as part of the Region's Official Plan Review and MCR, Draft ROPA 48 dated February 2021 was released for public comment. According to Staff Report LPS17-21, Draft ROPA 48 is an amendment to the current Official Plan and includes: revisions to Population and Employment Distribution and targets; revisions to the Urban Area policies for conformance with the Growth Plan (2019); and mapping updates to delineate the boundaries</p>	

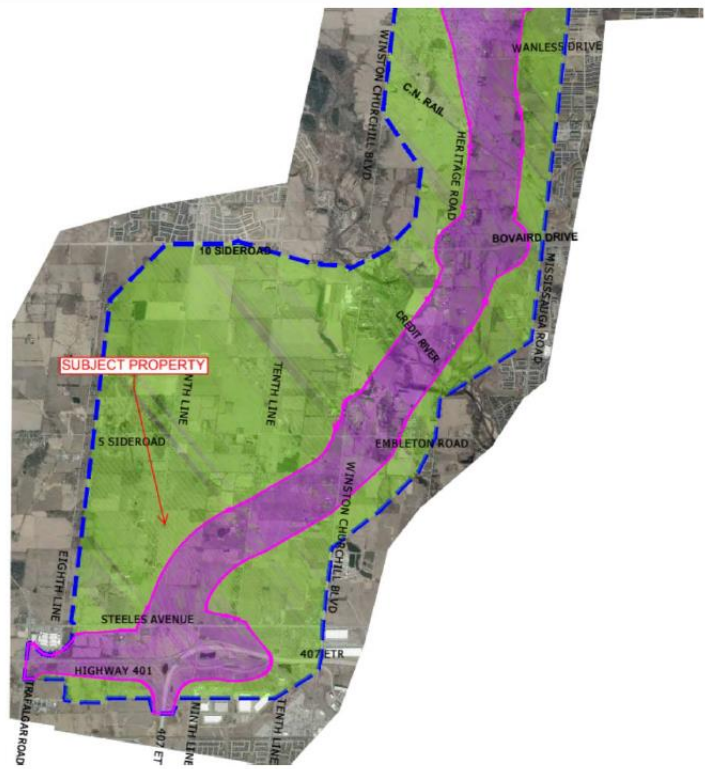
No.	Source	Submission	Response
		<p>of the MTSAs. Based upon our review Draft ROPA 48, on behalf of CP REIT we have preliminary comments as outlined below and will continue to review Draft ROPA 48 in more detail, and may provide further comments as required.</p> <p>At this time, our preliminary comments for Draft ROPA 48 are as follows: Based upon our review of the Draft ROPA 48, according to Map 1h Regional Urban Structure, the CP REIT lands are identified as follows:</p> <ul style="list-style-type: none"> • 2025 Guelph Line, Burlington: within the Urban Area and inside the Built Boundary; • 1025 & 1059 Plains Road East, Burlington: within the Urban Area, inside the Built Boundary and south of Commuter Rail Corridor; • 2515 Appleby Line, Burlington: within the Urban Area, inside the Built Boundary and both Dundas and Appleby are Higher Order Transit Corridors; • 820 Main Street East, Milton: within the Urban Area, inside the Built Boundary, along a Commuter Rail Corridor and within the Urban Growth Centre/MTSA; • 173-183 Lakeshore Road West, Oakville: within the Urban Area and inside the Built Boundary; • Dundas Street West & Sixth Line, Oakville: within the Urban Area, outside the Built Boundary and along a Higher Order Transit Corridor (Dundas Street West); • 493 Dundas Street West, Oakville: within the Urban Area, outside of the Built Boundary and along a Higher Order Transit Corridor (Dundas Street West); • 171 Guelph Street, Georgetown: within the Urban Area, inside the Built Boundary, outside of the MTSA and inside a Secondary Regional Node; and • 1122 Dorval Rd, Oakville: within the Urban Area and inside the Built Boundary; • 315 Guelph Street, Georgetown: within the Urban Area and inside the Built Boundary; • 8100 Parkhill Drive, Milton: within the Urban Area, inside the Built Boundary and shown as Employment Area; • 3333 James Snow Parkway, Milton: within the Urban Area, inside the Built Boundary and shown as Employment Area; and • 2994 Peddie Road, Milton: within the Urban Area, inside the Built Boundary and shown as Employment Area. 	

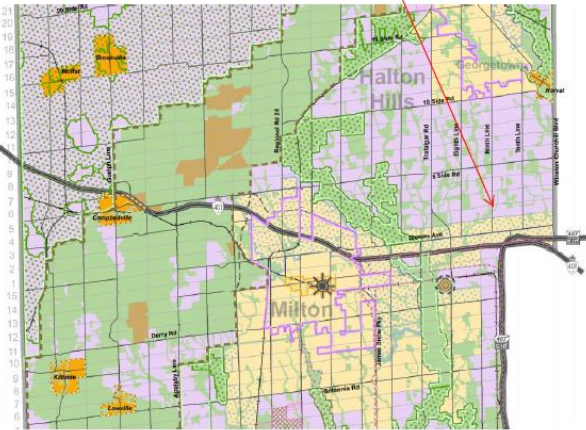
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		<p>For Higher Order Transit Corridors (including 493 Dundas Street West, Oakville), in our submission it is not clear from Map 1h and the draft policies whether they are intended as Regional Corridors (new definition that means “a Strategic Growth Area identified along major roads, arterials or higher order transit corridors that are planned to accommodate a significant amount of growth in alignment with the delivery of frequent transit and to support future transit projects”). We note that according to the Integrated Growth Management Strategy Growth Concepts Discussion Paper dated February 2021, “Regional Corridors are an important component of the Regional Urban Structure not addressed through the initial scoped ROPA, but which will be addressed through the overall Integrated Growth Management Strategy” (p. 22).</p> <p>We suggest that clarity be provided as to the Regional Corridors on the Map 1h legend; and For new Policy 79.3(13) that “requires local municipalities to plan for employment uses within Strategic Growth Areas by: ... [iii] identify the minimum amount of gross floor area that should be <i>planned</i> [emphasis added] for employment uses, including major office uses, within the Strategic Growth Area in order to meet the minimum jobs target and the target proportion of residents and jobs; [iv] identify specific lands within the Strategic Growth Area to be <i>planned</i> [emphasis added] for employment-focused mixed use development, and, identifying a minimum proportion or threshold of the total gross floor area within this area to be developed for employment uses, where appropriate; [v] <i>encourage</i> [emphasis added] the development of employment uses as part of mixed use developments and in advance of or concurrent with residential and other non-employment uses, and where appropriate, <i>require</i> [emphasis added] that the gross floor area provided for employment uses within such mixed use developments represents a majority or significant proportion of the total gross floor area”.</p> <p>In general, notwithstanding the “should be planned” and “encouraged” language, we are concerned as to a requirement that where appropriate, the gross floor area provided for employment uses within mixed use developments is to represent a majority or significant proportion of the total gross floor area. Such a requirement where there may not be a sufficient market for employment uses, and in particular office uses, may result in a barrier to redevelopment. In our submission, encouragement language is appropriate as opposed to a requirement.</p> <p>We would welcome the opportunity to meet with Staff to discuss our comments further. In addition, please kindly ensure that the undersigned is notified of any</p>	<p>Regional Corridors will be considered in a subsequent regional official plan amendment.</p> <p>In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches in Section 79.3(13) c) of Draft ROPA 48.</p> <p>As noted above, the specific requirements in Section 79.3(13)c) of Draft ROPA 48 have been removed in favour of more general direction to the Local Municipalities to develop policy approaches that ensure an appropriate amount of employment is planned for and achieved over the long-term in Strategic Growth Areas.</p>

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		<p>further meetings with respect to this matter as well as notice of the adoption of the Official Plan Amendment.</p> <p>Should you have any questions, or require further information, please do not hesitate to call.</p> <p>Sincerely,</p> <p>ZELINKA PRIAMO LTD. Jonathan Rodger, MScPI, MCIP, RPP Senior Associate cc. CP REIT (Via Email) Draft ROPA 48 Project Team (Via Email at ropr@halton.ca)</p>	
8	<p>David Igelman on behalf of Design Plan Services Inc.</p> <p>E-mail dated May 7, 2021</p>	<p>[ATTACHED LETTER]</p> <p>Scott MacLeod Senior Planner Halton Region 1151 Bronte Road Oakville, On L6M 3L1 Canada</p> <p>By e-mail: Scott.MacLeod@halton.ca</p> <p>Friday May 7th, 2021</p> <p>DPS File: 1933 RE: Halton Region Regional Official Plan Review 8519 Ninth Line, Halton Hills Comments on Draft Regional Official Plan Amendment 48</p> <p>We are writing this letter on behalf of the owners of the above noted property in the Town of Halton Hills. This letter constitutes our formal submission to the Region on the Draft Region Official Plan Amendment No. 48 ("ROPR 48"), released through the Region's website and specifically located at https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Halton-s-Regional-Of-ficial-Plan-Review-(ROPR)/Regional-Official-Plan-Amendment-48 as found on May 3rd, 2021.</p>	

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		<p>The subject property is located north of Steeles Avenue and south of 5 Side road with frontage along the east side of Ninth Line (see attachment "1"). The legal description of the subject property is the West Half Lot 3 Concession 10. There is currently one single detached dwelling as well as accessory structures located on the subject property.</p> <p>In regards to the GTA West Corridor Study, a large portion of the subject property has been identified as "Green" as per the 2020 Focused Area Analysis Map (see attachment "2"). "Green" identifies that the "MTO has reduced interest in properties located in the green areas and notes that applications can proceed through municipal development processes.</p> <p>In regards to the Halton Region Official Plan, the subject property is currently designated as "Agricultural Area" (see attachment "3"). Map 1c of the proposed Draft OPA No.48 identifies an area in close proximity to the subject property as "Future Strategic Employment Areas" (see attachment "4").</p> <p>Considering the MTO has reduced interest in the subject property in regards to the GTA West Corridor preferred route, the subject property's proximity to the identified "Future Strategic Employment Areas" and the subject property's proximity to the future GTA West Corridor, there is merit in including the subject property within the area identified as "Future Strategic Employment Areas" and we would request that the Draft OPA be revised to indicate the same.</p> <p>In addition, we would note that the Province of Ontario has recently released "A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020)". This plan reinforces that all municipalities in the Growth Plan area should be looking at encouraging intensification throughout the municipality and to achieve complete communities that can provide a variety of choices for living, working and playing throughout an entire lifetime.</p> <p>We agree that this is an important consideration in any Official Plan, and would encourage the Region to consider the subject property for future strategic employment development beyond the horizon of the Official Plan. This will make the application of the Official Plan more efficient for the Region in the future.</p> <p>We would be happy to discuss these comments further with the Region at your convenience. Should you have any questions or concerns please do not hesitate to contact the undersigned.</p> <p>Sincerely,</p>	<p>Additions to the Halton Region's Future Strategic Employment Area were not considered as part of Regional Official Plan Amendment 48, but may be considered as part of the broader Integrated Growth Management Strategy.</p>

No.	Source	Submission	Response
		<div><div><div><div><div><div>DESIGN PLAN SERVICES INC. T.J. Cieciora, MSc MCIP RPP PRESIDENT</div></div></div><div></div></div></div><div><div>Attachment 1</div><div>Location Map</div><div><div><div><div><div>DESIGN PLAN SERVICES INC. Town Planning Consultants</div><div>180 The East Mall Suite 200 Scarborough, ON M1B 4Z2 Telephone: 416.225.5445 www.dpsinc.com</div></div></div><div><div><div>D</div><div>P</div><div>S</div></div></div></div></div></div></div>	

No.	Source	Submission	Response
		 <p data-bbox="520 1141 625 1166">Attachment 2</p> <p data-bbox="667 1141 1003 1190">GTA West Corridor, 2020 Focused Area Analysis Map</p> <p data-bbox="1035 1125 1213 1182"> DESIGN PLAN SERVICES INC. Town Planning Consultants 1810 The Loop West, Suite 200 Toronto, ON M6P 1A7 Telephone: 416-226-5445 www.designplanservices.ca </p>	

No.	Source	Submission	Response
		<div data-bbox="520 277 1224 1187">  <p>APPROX. LOCATION OF SUBJECT PROPERTY</p> <p>20 viewed conjunction Official Plan</p> <p>Attachment 3 Halton Region Official Plan, Regional Structure Map 1</p> <p>DESIGN PLAN SERVICES INC. Town Planning Consultants 100 The East Mall, Suite 200 Scarsdale, ON M1S 4S3 Telephone: 416-226-5445 www.designplanserv.com</p> </div>	

No.	Source	Submission	Response
		<p>APPROX. LOCATION OF SUBJECT PROPERTY</p> <p>This map should be viewed and interpreted in conjunction with the text of the Official Plan.</p> <p>The geographic extent and boundary of the Urban Area, and the geographic extent and classification of the Corridors, as shown on this map are subject to revision through the current municipal comprehensive review.</p> <p>* Note: The Future Strategic Employment Areas are not land use designations but represent a constraint to development. Refer to Sections 130.6 and 130.7 of this Plan.</p> <p>Attachment 4 Halton Region Official Plan Amendment No. 48, Proposed FSEA's Map 1C DESIGN PLAN SERVICES INC. Town Planning Consultants</p>	
9	Mike Collins-Williams on behalf of West End Home Builders Association	<p>[ATTACHED LETTER]</p> <p>Curt Benson, Director of Planning Services and Chief Planning Official, and; Bob Gray, Commissioner, Legislative and Planning Services and Corporate Counsel The Regional Municipality of Halton</p>	

No.	Source	Submission	Response
	E-mail dated May 11, 2021	<p>1151 Bronte Road Oakville, Ontario, L6M 3L1</p> <p>West End Home Builder's Association Submission Draft Regional Official Plan Amendment 48 - An Amendment to Define a Regional Urban Structure</p> <p>The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Halton Region. The WE HBA represents approximately 300 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. The residential construction industry employed over 22,700 people, paying \$1.4 billion in wages, and contributed over \$2.6 billion in investment value within Halton Region in 2019.</p> <p>The WE HBA appreciates the opportunity to provide feedback on Draft Regional Official Plan Amendment 48 (ROPA 48) - An Amendment to Define a Regional Urban Structure. WE HBA and our members appreciate being informed of the progress of ROPA 48. As a key partner to Halton Region in the delivery of new housing supply and the building of complete communities, WE HBA wishes to ensure we can effectively work together toward the goal of a full range of housing choices at prices and rents people can afford in Halton Region.</p> <p>General Comments</p> <p>The WE HBA is strongly supportive of the provincial planning framework established by A Place to Grow: Growth Plan for the Greater Golden Horseshoe. Furthermore, we are supportive of the provincial timelines established with the date by which upper and single-tier municipalities must have their official plans in conformity with the updated policies in A Place to Grow as July 1, 2022. The WE HBA notes that the province has stated that this can be achieved through phasing a series of official plan amendments, adopting a new official plan, or through a single official plan amendment. While the WE HBA has significant concerns regarding the proposed draft ROPA 48, given its stated purpose appears to be a focus on advancing certain strategic local municipal planning priorities above well-established provincial planning policy, the WE HBA believes that these concerns can be resolved in a collaborative fashion and that conformity can be achieved by the July 1, 2022 deadline.</p>	Comments noted.

No.	Source	Submission	Response
		<p>WE HBA notes that while local priorities are an important component of the planning process, Halton Region is responsible for reviewing and protecting matters of provincial interest and is required by the provincial planning framework to achieve conformity with the 2020 Growth Plan. This includes the 2051 Schedule #3 forecasts utilizing the provincially required Land Needs Assessment process. The WE HBA appreciates that Halton Region is interested in retaining its ability to comprehensively evaluate the full range of growth concepts as associated with the Integrated Growth Management Strategy. However, the WE HBA is concerned that certain local municipal priorities and growth scenarios being explored are not in alignment with the Growth Plan or the Provincial Policy Statement. WE HBA has concerns that the confirmation of the urban structure, as proposed through ROPA 48 presents a significant risk to the Provincial government in that Halton Region is proposing a growth scenario that will not be in conformity with the Growth Plan. ROPA 48 also presents risks to Halton Region's ability to promote housing development and the delivery of a range of housing options in different communities in accordance with the Housing Supply Action Plan. Should ROPA 48 be approved in its current form, the WE HBA is concerned that growth in some of the lower-tier municipalities could reasonably be expected to stagnate. The WE HBA looks forward to engaging with the Region of Halton and lower-tier municipal partners in a collaborative manner to work together to build new communities with a full range of housing choice and supply.</p> <p>Urban Structure</p> <p>WE HBA's members have participated in the Urban Structure consultation process and at the local level and have raised significant concerns regarding the City of Burlington's Official Plan Amendment 119 (proposed urban structure to 2031) which was approved by the City of Burlington but is currently under appeal by several stakeholders including the WE HBA. Local Official Plan Amendment (LOPA) 119 proposes a new urban structure for the City of Burlington in advance of any determinations being made in respect of ROPA 48. WE HBA has questions about how Halton Region can finalize the urban structure without sufficient planning justification and given the uncertainty that currently surrounds the existing status of Burlington's Official Plan and LOPA 119.</p> <p>Secondary to the above issue, WE HBA notes that Halton Region, through ROPA 48 is identifying the urban structure and confirming boundaries without having allocated the Schedule #3 minimum growth targets throughout the lower-tier municipalities. WE HBA believes that the advancement of ROPA 48 in the absence</p>	

No.	Source	Submission	Response
		<p>of allocated growth is premature, and that the Region should advance ROPA 48 concurrently with the allocation of assigned growth targets to inform a full picture of growth within the Region across all four municipalities. The quantum of future growth must be understood first to ensure that the proposed urban structure can accommodate it. WE HBA has had similar discussions with the City of Burlington regarding its new Official Plan, which was subsequently appealed by numerous stakeholders. WE HBA notes that we continue to support the July 1, 2022 Growth Plan conformity deadline and that we believe that the allocation of growth targets can be done concurrently with this process without delaying the process.</p> <p>Strategic Growth Areas and Urban Growth Centres</p> <p>As growth targets have yet to be allocated to municipalities, WE HBA is concerned that through ROPA 48, the Region has not assigned growth targets to its various intensification areas, which are being proposed to be redefined as Strategic Growth Areas. The WE HBA is supportive of Halton Region directing additional growth to areas surrounding GO Stations and the Major Transit Station Areas (MTSAs). These MTSAs should be a focus for significant growth and the associated required infrastructure to service future population and employment. However, WE HBA is concerned that the proposed removal of the Downtown Burlington Urban Growth Centre designation undermines and fails to reflect long-standing provincial policy. This will undercut the economic stability of the existing community of downtown Burlington. The Region of Halton is proposing to relocate the existing Downtown Urban Growth Centre to an entirely different area of the city, north of the existing Downtown to overlap with the already existing MTSA designated lands surrounding the Burlington GO Station.</p> <p>This existing UGC boundary promotes connections from the rest of Burlington to the downtown and is important to further advance the existing, established and growing community. In contrast, WE HBA recognizes that the GO Station MTSA serves commuters travelling to Downtown Toronto, and does not represent a local destination to restaurants, retail, the hospital, city hall and the waterfront in the same way downtown Burlington does. Existing development investments made in downtown Burlington focused on concentrating new development in an area well served by local transit with existing infrastructure and public service facilities provided by the City of Burlington to support forecasted growth. This infrastructure does not exist in the GO Station MTSA. Existing and planned development in the downtown also supports a more diverse range and mix of housing options. WE HBA recommends that the Region of Halton and the City of Burlington maintain the existing Downtown UGC designation and focus efforts</p>	

No.	Source	Submission	Response
		<p>on the promotion and enhancement of dependable and frequent transit connections with the Burlington GO facilities that serve a different population.</p> <p>WE HBA maintains the removal and relocation of the Downtown UGC to the Burlington GO Station lands is inappropriate. This is also reflected in many of the appeals of Burlington's Local Official Plan Amendment 119 (LOPA 119). As a result, this proposed adjustment should not be reflected in the confirmed Urban Structure of the Regional Official Plan through ROPA 48. Furthermore, the WE HBA contends that the Minister of Municipal Affairs and Housing exercised their authority to establish the size and location of the Urban Growth Centres across the GGH in 2008. Neither the Region of Halton nor the City of Burlington have the authority to relocate an existing Urban Growth Centre. Thus, it is inappropriate for the Burlington Official Plan Amendment 119 and the Region of Halton's ROPA 48 to propose this change. Specifically, Policy 5.2.2 of the Growth Plan states:</p> <p>"To implement this Plan, the Minister will, in collaboration with other Ministers of the Crown where appropriate, identify, establish, or update the following:</p> <ul style="list-style-type: none"> a) the delineated built boundary; b) the size and location of the urban growth centres; c) a standard methodology for land needs assessment; and d) provincially significant employment zones." <p>The section noted above indicates the process the Minister took in 2008 to establish the Downtown Burlington Urban Growth Centre.</p> <p>The WE HBA further notes that under policy 5.2.5 of the Growth Plan, upper-tier municipalities are required to delineate through their official plans the built boundary and the size and location of the Urban Growth Centres "as established by the Minister under 5.2.2". The definition of an Urban Growth Centre in the 2020 Growth Plan states: "Existing and emerging downtown areas shown on Schedule 4 and as further identified by the Minister on April 2, 2008". The WE HBA notes that the proposed removal of the Downtown Burlington UGC to be relocated to overlap the MTSA location at Burlington GO in ROPA 48 is not the "existing or emerging downtown area shown in Schedule 4 of the Growth Plan and as further identified by the Minister on April 2, 2008". The proposed urban structure and the proposed removal of the UGC from Downtown Burlington explicitly contravenes provincial policy. In addition, the City of Burlington has expressed no intention of creating a new downtown at the Burlington GO Station area.</p> 	<p>The Downtown Burlington Urban Growth Centre is not being removed, however, the Region, in consultation with the City, has adjusted the boundary in ROPA 48 to focus new growth around the Burlington GO station, an area served by provincial infrastructure investment in conformity with the Growth Plan, 2019 as amended. Section 2.2.3.1 of the Growth Plan identifies that the Urban Growth Centres are planned to accommodate population and growth which support investments in regional transit.</p> <p>Further, Section 5.2.2.1 provides the Minister of Municipal Affairs and Housing the ability to update the size and location of Urban Growth Centres. This is confirmed by the June 15, 2021 announcement by the Minister that the City and the Region have the ability to adjust the boundary of the UGC to focus growth new provincial transit infrastructure investment at the Burlington GO station.</p>

No.	Source	Submission	Response
		<p>WE HBA notes designations of Urban Growth Centres are solely a provincial responsibility, and only the Minister has the authority to update size and locations of UGCs, including the Downtown Burlington UGC. The Province of Ontario established the existing structure of the Urban Growth Centre in 2008 and has recently reconfirmed their support for the designation in both the previous government's 2017 Growth Plan and the currently in force 2020 update of the Growth Plan. In fact, of the 25 UGCs identified in the Growth Plan, at no time has any urban growth centre been removed or relocated. Should the Ministry approve such a significant change to the Growth Plan, it would set a dangerous precedent. WE HBA is not opposed to the inclusion of the Burlington GO lands in an expansion of the Urban Growth Centre, but this cannot be done through the removal of Downtown Burlington. The WE HBA is prepared to support an expanded Urban Growth Centre encompassing both Downtown Burlington and the Burlington GO Station.</p> <p>Complete Communities and Enhancing our Downtowns</p> <p>WE HBA notes that through ROPA 48, the intent is to promote complete communities. WE HBA maintains that through directing growth away from Downtown Burlington—an emerging complete community created through significant investment since the 2008 designation in collaborative city building efforts by our members and the City of Burlington—does a disservice to the City. Through stagnating development in Burlington's downtown via ROPA 48's confirmation of the urban structure, Halton Region is foregoing the existing investments made by both government and our members to further the creation of an economically prosperous complete community. Over the last 15 years, WE HBA's members have been strong contributors to building a thriving community in downtown Burlington that now functions as a successful force for economic growth in Burlington. As a result of investments made by our members, downtown Burlington is a place where residents can live, work, and play in an area that is supportive of walkable amenities and local public transit use. The success of Downtown Burlington is a story that we should all be proud of. The WE HBA believes that redirecting growth away from downtown Burlington and towards the GO station loses sight of the progress that has been made in revitalizing downtown Burlington and it may ultimately lead to economic decline.</p> <p>Further to this, WE HBA notes that the land by the Burlington GO Station serves a different purpose in the City than downtown Burlington does. The downtown serves both the residents living there as well as the entire community of Burlington and is the primary destination for visitors to Burlington. The downtown is a growing retail, restaurant, and entertainment centre in a walkable</p>	

No.	Source	Submission	Response
		<p>community. The hospital, City Hall, art galleries, spectacular waterfront park, hotel and convention facilities truly make downtown Burlington a live/work/play community. This contrasts sharply with the land by the Burlington GO Station, which is currently a sea of parking lots with limited amenities and will serve as a community for commuters in the area, who likely work outside of Burlington. The WE HBA recognizes the strong potential for growth surrounding the GO Station, but it is an entirely different set of on the ground circumstances than for what exists downtown. The WE HBA recognizes both populations are important components of the Burlington community, and supports a greater focus on planning towards creating a complete community for residents surrounding the GO Station. However, the WE HBA believes that growth downtown serves as an opportunity for residents in Burlington to live close to work, amenities, local shops, and restaurants. It also presents an opportunity for residents looking to downsize their homes to live near amenities and age within their own community. These are both important areas to the future of Burlington, but they serve different markets and different purposes.</p> <p>Lastly, the proposed relocation of the Downtown Urban Growth Centre to the Burlington GO Station MTSA proposes no benefit to the existing Burlington GO MTSA, nor is it necessary to facilitate growth and development around the Burlington GO. The minimum growth and combined density targets for MTSA's may be lower than an Urban Growth Centre. However, it is a minimum that the City of Burlington could exceed through its future area specific planning exercises that it is proposing to undertake. There is nothing to prevent this provided the City of Burlington appropriately plans for growth.</p> <p>Long-Term Population Growth</p> <p>The WE HBA reiterates that the Schedule #3 Growth Plan forecasts an additional 4.6 million people living in the Greater Golden Horseshoe by 2051, including 485,000 new residents for Halton Region. This growth brings both challenges and opportunities for our growing region. The WE HBA notes that between 2005 and 2019, there is a strong correlation between population growth and home price increases in Southern Ontario.</p> <p>Although WE HBA acknowledges that a range of other factors also have an impact on pricing, it is critical to acknowledge the elephant in the room and make realistic and achievable plans to respond to population growth and to provide stability to renters and aspiring homeowners.</p> <p>Between 2016 and 2019, Ontario's population growth was double historic averages, thanks to an influx of international students and visa workers. The fact</p>	Comments noted

No.	Source	Submission	Response
		<p>is that housing, particularly in the GTA (including Halton Region), has not kept up with population growth is contributing to significant pricing increases. It is both squeezing out the middle class and causing more Ontarians to scatter across the province as they “drive until they qualify” for a mortgage for the types of housing that suit their family needs. To highlight the scale of the affordability challenges Halton Region faces please refer to the chart below:</p> <p>The pandemic has created some degree of uncertainty, but it is important to recognize that the provincial planning policy framework is underpinned by strong demographic analysis. The market-based approach of the Land Needs Assessment is in place to ensure that long-term planning for housing supply is aligned with housing demand, to avoid market distortions that arise if supply is not planned in a balanced manner. Market distortions can cause skyrocketing housing prices, or leapfrog development to communities beyond the Greenbelt, exacerbating environmental impacts. To put it simply, we have not been building enough new housing supply across the GTHA in the past five years, and with the growth that is forecasted, Halton Region must implement a planning framework to facilitate the delivery of housing supply, both through intensification and through urban boundary expansions in a more efficient manner than has been done in the past.</p> <p>Specific Policy Considerations</p> <p>WE HBA has several concerns about the proposed policy changes that are being advanced through ROPA 48, specifically in terms of the hierarchies of Strategic Growth Areas. This is especially concerning as it relates to Downtown Burlington Urban Growth Centre being designated as a Secondary Growth Area and the corresponding relocation of the Urban Growth Centre to the Burlington GO MTSA. The WE HBA notes that servicing capacity and infrastructure does not currently exist to fulfill housing and employment needs there. To accommodate the level of intensification that is required under the Growth Plan, it appears to WE HBA that investments for service/infrastructure expansions may be required. This inevitably will take time and financial resources, thus the ability for some areas of the City to absorb growth will be limited in the years immediately following the adoption of ROPA 48.</p> <p>Provincial policy requires Urban Growth Centres to achieve minimum development densities of 200 persons and jobs per hectare by 2031 or earlier. Given servicing constraints and market realities, it is unclear how this would be possible at Burlington GO, which is proposed as the new location of the Burlington UGC. Municipalities are required to show how minimum density</p>	<p>Comments noted</p>

No.	Source	Submission	Response
		<p>targets can and will be met. WE HBA is concerned by a lack of detailed planning work for the MTSAs in Burlington thus far. While we support intensification of the three MTSAs in Burlington along the GO corridor, further planning and servicing will be required.</p> <p>Leveraging of Provincial investments for regional transit/infrastructure and public service facilities should allow the MTSAs to accommodate a significant share of future growth. By the same token, WE HBA recognizes that Section 82 of ROPA 48 establishes the policies for Strategic Growth Areas. Downtown Burlington is proposed to be classified as “Downtown Urban Centre, Burlington” within the Secondary Regional Node category. In contrast, WE HBA notes that an emerging node at Upper Middle Road and Appleby Line is proposed in a higher tier of growth classification as a Primary Regional Node. While we support intensification at this emerging node, the higher tier of growth classification does not make sense from a planning perspective, given the existing community infrastructure downtown Burlington already has. Furthermore, Downtown Oakville, while also an appropriate location to facilitate intensification, is also given the same classification as Downtown Burlington despite completely different contexts.</p> <p>WE HBA is also unclear with respect to the affordable housing component and potential requirements under Section 81 of ROPA 48. Section 81.2 - subsection (i) proposes the establishment of affordable housing targets and for the adoption of inclusionary zoning policies. Such policies would authorize a minimum number of affordable housing units and/or a minimum gross floor area of affordable housing along with policies that are intended to ensure their long-term maintenance as affordable units. WE HBA notes that there is no such thing as free affordable housing, and that those units would come at a significant cost. Provincial regulations require that municipalities complete an analysis of demographics, income, housing supply, housing need, demand, and current average market prices and rents. An analysis of the potential impacts on the housing market will need to be completed. While WE HBA is open to dialogue, collaboration and consultation on inclusionary zoning, we note that unless a partnership model between government and industry is adopted whereby significant cost offsets are provided, market distortions through cross subsidization will lead to cost implications for the balance of market units.</p> <p>In addition to the above policies, WE HBA is concerned that ROPA 48 does not mention local municipalities are required to make decisions based on conformity to provincial policy including the Provincial Policy Statement and the Growth Plan. Section 255.2 requires municipalities to define their own local urban structures to further community building objectives to complement the Halton</p>	

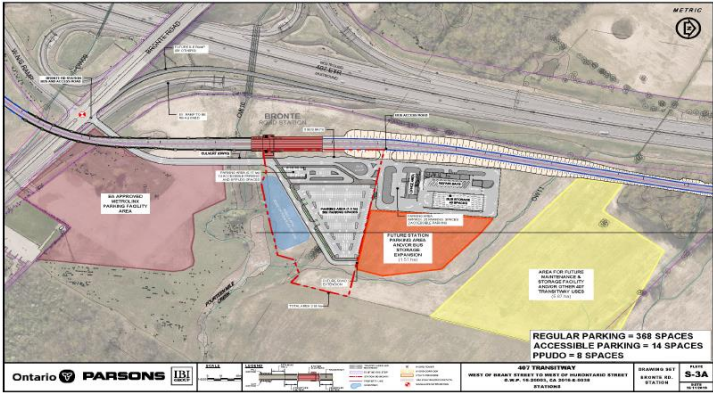
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		<p>Region's Official Plan but does not refer to these structures needing to conform with provincial policy. WE HBA recommends that additional language with respect to provincial policy be included.</p> <p>WE HBA also has concern regarding the definitions put forward as part of ROPA 48. The definition of Urban Growth Centres proposed is not in conformity with the definitions section of the Growth Plan for the Greater Golden Horseshoe. The WE HBA notes that through the Municipal Comprehensive Review process the provincial definition is required to apply to all 25 Urban Growth Centres throughout the Greater Golden Horseshoe and that individual municipalities should not determine their own definitions. WE HBA respectfully recommends that this policy should be brought into conformity with the Growth Plan. WE HBA further recommends that Halton Region review all proposed definitions to confirm their conformity with provincial policy.</p> <p>Public and Stakeholder Consultation</p> <p>To-date the Region of Halton has conducted several public participation exercises. Many comments have been provided by the public and interested stakeholders. WE HBA would appreciate the opportunity to review input received through the public consultation process. This information should be made publicly available for all interests to review and consider prior to any significant proposed urban structure changes being considered.</p> <p>Conclusion</p> <p>Thank you for providing the WE HBA the opportunity to provide our comments on this component of the IGMS and ROPA 48. The WE HBA respects that this is a long and multi-layered process involving the provincial government, upper and lower-tier municipalities, directly impacted stakeholders, existing and future residents and that planning staff and elected officials must balance a wide range of interests. The WE HBA strongly believes that provincial policy and conformity with provincial policy must underpin regional and local planning policy. The WE HBA is strongly supportive of the Region of Halton continuing to work with stakeholders and to advance ROPA 48 through the process to achieve conformity with the Growth Plan by July 1, 2022. Further, WE HBA looks forward to working collaboratively with Regional Planning staff and requests Regional Planning staff meet directly (virtually) with WE HBA planning staff to have further discussions regarding both our recommendations to improve and amend ROPA 48 as well as the long-term significance of this planning initiative. The confirmation of the Regional Urban Structure will have long-term planning</p>	<p>No change has been made to policy 255.2. No modification is proposed for the definition of urban growth centres as defined in ROPA 48.</p>

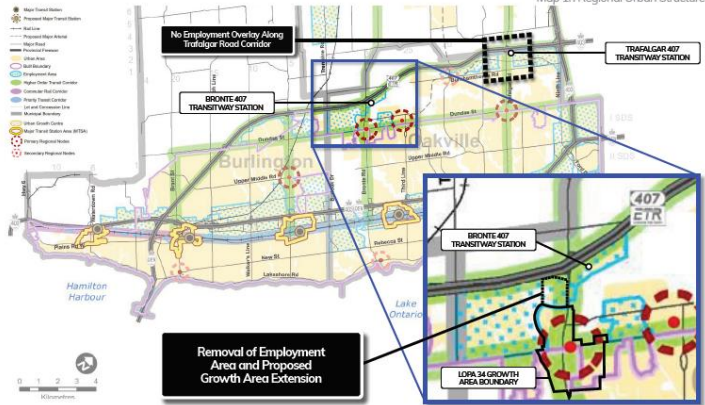
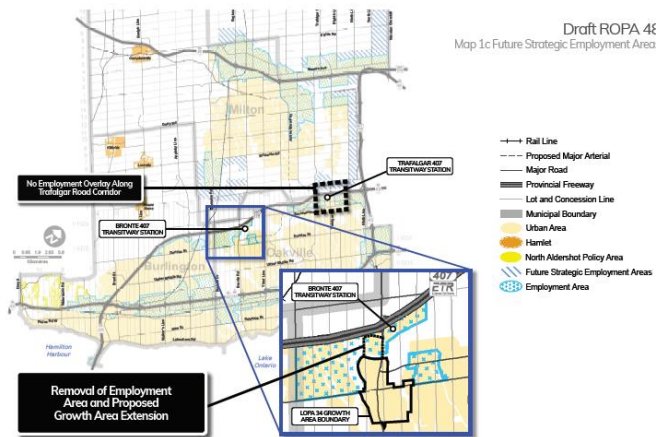
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		<p>implications for the vitality of our communities. We are looking forward to further engagement with Regional staff.</p> <p>Sincerely,</p> <p>Mike Collins-Williams, MCIP, RPP Chief Executive Officer West End Home Builders' Association</p>	
10	<p>Alison Bucking on behalf of Palermo Village Corporation</p> <p>E-mail dated May 26, 2021</p>	<p>[ATTACHED LETTER]</p> <p>May 2021 Mr. Curt Benson, MCIP, RPP Director, Planning Services and Chief Planning Official Region of Halton 1151 Bronte Road Oakville, ON L6M 3L1</p> <p>Dear Mr. Benson:</p> <p>Re: Palermo Village Corporation 3069 Dundas Street West, Oakville Draft Regional Official Plan Amendment (ROPA) 48</p> <p>Thank you for taking the time to meet on March 31st to discuss Palermo Village Corporation's (PVC) proposal to expand the Palermo Village Growth Area north to Highway 407 to support and strategically plan for the recently approved 407 Transitway and Bronte 407 Transitway Station. The purpose of this letter is to provide our rationale for the requested expansion to the Palermo Village Growth Area up to the 407 Transitway and, specifically, to request that the expanded Growth Area be identified as such in ROPA 48. This letter is intended to supplement comments provided by Aird & Berlis dated February 16, 2021, a copy of which is attached for your convenience.</p> <p>The PVC lands (formerly referred to as Newmark Developments) are the subject of ongoing appeals to the Regional and Town Official Plans. Given the appeals, the lands remain undesignated in both Plans. Town Council recently adopted LOPA 34, which had the effect of including a portion of the PVC property within the Palermo Village Growth Area. We are generally supportive of the Town's initiative to expand the Growth Area; however, we believe that the Growth Area needs to be extended further north to support and fully optimize the use of the</p>	<p>Please refer to the response provided for Submission #1 above.</p>

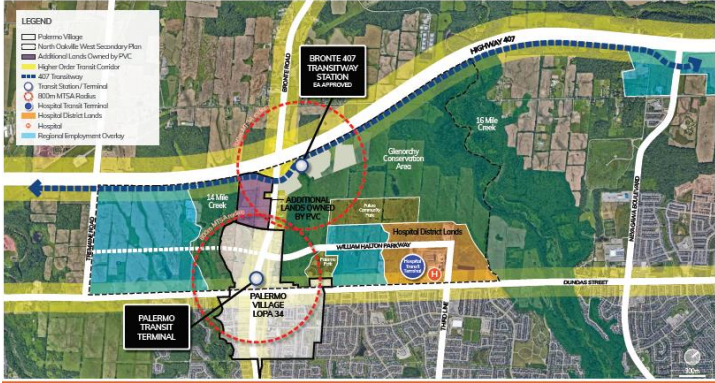
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		<p>407 Transitway and the Bronte 407 Transitway Station. The Environmental Assessment for both was approved by the Province in October of 2020. The approved bus rapid Transitway alignment and Transitway station design is shown on Figure 1: <i>407 Transitway EA</i>. Given this recent approval, it is appropriate for Regional and Local planning policy to incorporate policies to optimize its use. This is a very significant Provincial transit facility and the ongoing planning for this area needs to “catch up”.</p> <p>On Map 1H: Regional Urban Structure from draft ROPA 48, the PVC lands that lie within the limits of LOPA 34 are proposed to be within a “<i>Primary Regional Node</i>”. The lands outside of the limits of LOPA 34 are proposed to be designated “<i>Employment Area</i>” (see Figure 2). In our opinion, the ongoing Regional Official Plan Review needs to recognize the significance of the recently approved Transitway Station and include the area outside of LOPA 34 within the “<i>Primary Regional Node</i>”. The PVC lands are not within a Provincially Significant Employment Zone, and as shown on Map 1C: Future Strategic Employment Areas from draft ROPA 48 (Figure 3), the PVC lands are not within a <i>Future Strategic Employment Area</i>. Accordingly, we request that the proposed “<i>Employment Area</i>” designation be removed from the PVC lands on all Maps in draft ROPA 48.</p> <p>Our request to remove the proposed “<i>Employment Area</i>” designation and include the lands within an expanded Growth Area is supported by prevailing Provincial policy. Specifically, the guiding principles of the <i>Growth Plan</i> (2020) prioritize intensification and higher densities around existing and planned transit stations to support transit viability, and to make efficient use of land and infrastructure. The 407 Transitway meets the <i>Growth Plan</i>’s definition of a “<i>Higher Order Transit</i>” corridor as the buses will be travelling on a dedicated right-of-way. We note that the Regional Plan already identifies the area along the 407 as a “<i>Higher Order Transit Corridor</i>”, and that this designation is being carried forward in draft ROPA 48. We also note that Bronte Road is designated as a “<i>Higher Order Transit Corridor</i>” in the existing Regional Plan from Speers Road in Oakville all the way north to Main Street in Milton and is being maintained as such in draft ROPA 48. The long-term plan is to have dedicated bus lanes on Bronte Road. The Bronte 407 Transitway Station, being at the intersection of 2 designated “<i>Higher Order Transit Corridors</i>”, will fulfill a key role in providing connections between local (Oakville & Milton) and Provincial GO transit services.</p> <p>The area around the Bronte 407 Transitway Station meets the <i>Growth Plan</i>’s definition of a “<i>Major Transit Station Area</i>” since it is a “<i>planned higher order</i></p>	

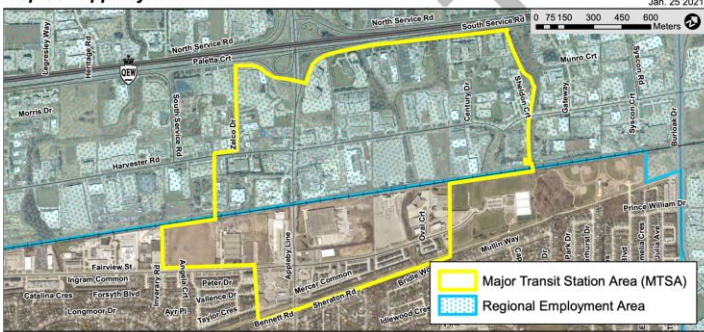
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		<p><i>transit station...within a settlement area.</i>" As you are aware, a <i>Major Transit Station Area</i> is further defined as "the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk." The attached Figure 4: <i>Planning Context</i>, shows that most of the PVC lands outside of the currently proposed "<i>Primary Regional Node</i>" are within an 800 metre radius of the planned Bronte 407 Transitway Station and should be considered as being within a "<i>Major Transit Station Area</i>". Figure 4 also shows that the PVC lands are the only potentially developable lands with 800 metres of the station since the remaining lands are occupied by Glenorchy Conservation Area and the 407 corridor. We emphasize that the PVC lands will be exceptionally well serviced by transit due to its proximity to both the Bronte 407 Transitway Station and Palermo Transit Terminal. This further supports the need to take advantage of the PVC lands and plan appropriately to create a compact urban form with a diverse mix of land uses, housing types, employment, and amenities.</p> <p>Section 2.2.4.8 of the <i>Growth Plan</i> requires that "all major transit station areas will be planned and designed to be transit-supportive". The <i>Growth Plan</i> defines "Transit-supportive" as "Relating to development that makes transit viable and improves the quality of the experience of using transit. It often refers to compact, mixed-use development (our emphasis) that has a high level of employment and residential densities." Section 2.2.4.9 of the <i>Growth Plan</i> also requires that "Within all (our emphasis) major transit station areas, development will be supported, where appropriate, by... planning for a diverse mix of uses (our emphasis), including additional residential units and affordable housing, to support existing and planned transit service levels", and "prohibiting land uses and built form that would adversely affect the achievement of transit supportive densities." The <i>Growth Plan</i> clearly directs municipalities to plan and design areas around planned and existing <i>major transit stations</i> to be transit supportive. Where appropriate, they are to include a diverse mix of uses. In our opinion, planning for a diverse mix of uses is appropriate given that this area is not within a Provincially designated Significant Employment Zone and is isolated from other approved employment areas by the extensive Natural Heritage Systems associated with 14 Mile Creek and Glenorchy Conservation Area. Figure 4 shows how these lands have no connection to the employment areas and represent a logical extension of the proposed Palermo Village Growth Area.</p> <p>As per ROPA 48, "<i>Primary Regional Nodes</i>" are "intended to accommodate growth and contain a concentration of public service facilities or transit supportive high density mixed uses (our emphasis) or perform a regional transit network function at an appropriate scale for their context". Given that the Region is only identifying <i>major transit stations</i> along <i>priority transit corridors</i>,</p>	

No.	Source	Submission	Response
		<p><i>“Primary Regional Nodes”</i> function as a different type of growth area, similar to a <i>major transit station area</i>, which play a key role in supporting the transit network in the Region. As the PVC lands are located within an 800 metre radius of the Bronte 407 Transitway and along two Higher Order Transit Corridors, they should be protected for transit supportive development and identified as a <i>“Primary Regional Node”</i>.</p> <p>At our meeting you posed the question as to how we could provide jobs within this area if it were included within an expanded Growth Area/<i>Primary Regional Node</i>. As a reminder, this area is not designated <i>“Employment”</i> due to the appeal of ROPA 38. Therefore, the request to include these lands within an expanded Palermo Village Growth Area does not represent a land use conversion. PVC is committed to pursuing the development of a diverse mix of uses on its lands (inclusive of office/employment uses) in a manner consistent with the direction provided by the <i>Growth Plan</i> to support planned transit service levels along Bronte Road and at the Bronte 407 Transitway Station. PVC’s vision for their lands is to create a complete community with a mix of Residential and employment uses to fully optimize the use of the 407 Transitway and create opportunities for people to live, work and play in the same neighbourhood. This is consistent with one of the findings in Strategycorp’s presentation of April 21st to Regional Council on the “Changing Nature of the Economy and Employment”. It was noted that the areas around major transit stations represent an opportunity to develop a “vibrant mixed-use environment with higher land use intensity... that should not be passed by”.</p> <p>We would also like to highlight that draft ROPA 48 proposes a new table identifying the proportion of people and jobs in <i>“Strategic Growth Areas”</i>. These people and job targets are overly prescriptive and are not conducive to good planning as it limits local decision making. Our position is consistent with the comments provided by Local municipalities and noted previously in the comments provided by Aird & Berlis, dated February 16, 2021. The chart should be removed from ROPA to allow <i>“Strategic Growth Areas”</i> to be comprehensively planned for a mix of people and jobs at the local level.</p> <p>The land use designations and related policies in LOPA 34 provide for a mix of uses, including those associated with the provision of jobs. To date, LOPA 34 has been focused on providing mixed-uses in the vicinity of the Palermo Transit Terminal and in the base of buildings along major roads. We are supportive of working with the Town and Region to consider how best to apply similar designations and policies providing a mix of uses, including those providing jobs,</p>	

No.	Source	Submission	Response
		<p>in the area nearest the Bronte 407 Transitway Station and along Bronte Road to support and make use of the significant planned transit facilities.</p> <p>In conclusion, the policies of the <i>Growth Plan</i> need to be implemented through the Region's Official Plan Review by removing the proposed "<i>Employment Area</i>" designation from the PVC lands in all maps in draft ROPA 48 and identifying the remaining portion of the PVC lands as being within the "<i>Primary Regional Node</i>" for the Palermo Village Growth Area on draft Map 1H: Regional Urban Structure.</p> <p>Thank you for your consideration. As always, we are available to discuss our comments at your convenience.</p> <p>Yours truly,</p> <p>KORSIAK URBAN PLANNING</p> <p>Terry Korsiak, MA, RPP Copy: Neil Garbe, Gabe Charles – Town of Oakville Kevin Singh, Adrian Marsili, Argo/PVC Patrick Harrington, Aird & Berlis LLP</p> 	

No.	Source	Submission	Response
		<p>Draft ROPA 48 Map 1h Regional Urban Structure</p>  <p>Draft ROPA 48 Map 1c Future Strategic Employment Areas</p> 	

No.	Source	Submission	Response
		<p>Planning Context</p> 	
11	<p>Robert Lehman on behalf of Sofina Foods</p> <p>E-mail dated May 28, 2021</p>	<p>[ATTACHED LETTER]</p> <p>May 25, 2021 Kerry Towle Vice President, Industry and Government Relations Sofina Foods Inc.</p> <p>SENT ONLY BY EMAIL</p> <p>Dear Ms. Towle:</p> <p>Re: ROPA 48 Input</p> <p>I am pleased to provide my planning opinion on the Region of Halton draft Regional Official Plan Amendment #48 ("ROPA 48"). My comments are directed to the framework created by ROPA 48 that is intended to lead to the redevelopment of lands in proximity to the Appleby GO Train Station. Because the Sofina Foods meat processing facility ("Sofina") at 821 Appleby Line is located in proximity to the Appleby GO Train Station, Sofina will be directly impacted by the policy changes in ROPA 48.</p> <p>As you are aware, two development applications (OPA/ZBA) were recently filed with the City of Burlington in proximity to Sofina:</p> <p>(i) two mixed-use towers within 100m of Sofina; and,</p>	

No.	Source	Submission	Response
		<p>(ii) Seven towers located 320m to the east of Sofina.</p> <p>Both of these projects potentially pose a risk to Sofina's operational viability.</p> <p>The City of Burlington has recently indicated its intention to restart the Appleby MTSA Precinct Plan process which was halted two years ago. The policies of ROPA 48 will direct the nature, location and amount of change in the Appleby MTSA. As written the ROPA 48 policies do not provide sufficient protection for Sofina's operation. ROPA 48 should establish a clear direction to protect the employment uses and lands in the area. My comments include modifications to the draft policies to achieve that objective.</p> <p>With respect to the Appleby GO Major Transit Station Area ("MTSA"), the draft policies of ROPA 48 contain an unreconcilable policy dichotomy due to the location of a Regional Employment Area within the boundaries of the Appleby MTSA destined for intensification. In addition, the draft policies do not conform with "A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020" (the "Growth Plan") nor are they consistent with the "Provincial Policy Statement, 2020" (the "PPS") in terms of the protections offered to employment areas and industrial uses.</p>  <p>ROPA 48 promotes intensification in the defined MTSA's as Strategic Growth Areas. However, the Appleby MTSA includes a large and important Regional Employment Area north of the GO rail line. This confluence, if not directly addressed in ROPA 48, will result in an ongoing series of adversarial planning processes challenging the operational viability of industries such as Sofina, and the 1,000 jobs it provides.</p>	

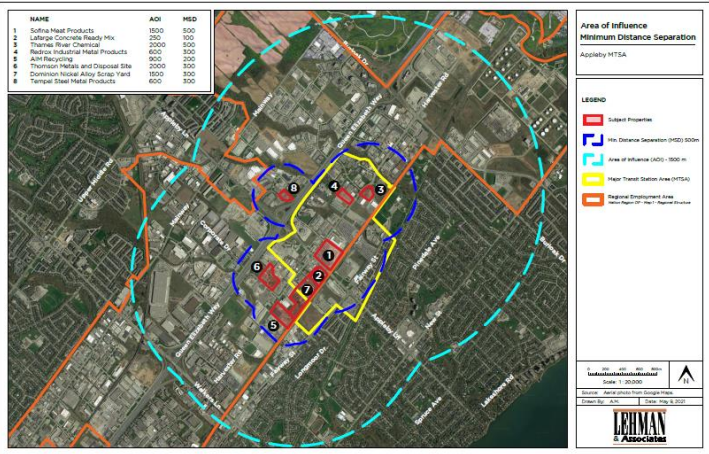
No.	Source	Submission	Response
		<p>The PPS and Growth Plan have similar policies that establish mandatory criteria to be met when sensitive land uses are proposed in proximity to industrial and manufacturing uses.</p> <p>Not all of these policies are reflected in ROPA 48. These policies are intended to reflect the priority of protecting for and providing employment and constitute a key economic element of Provincial policy.</p> <p>The Provincial compatibility policies address the priority of jobs over the intensification of sensitive land uses, which priority is designed to ensure the long-term viability of employment uses. This priority is not implemented by ROPA 48. As such ROPA 48 is not consistent with the PPS and does not conform to the Growth Plan policies addressing land use compatibility. I would recommend the following modifications to address these issues.</p> <p>Remedy #1 - Modification to prioritize jobs and the economy.</p> <p>The policies of ROPA 48 are contradictory as both the Strategic Growth Area/Major Transit Station Area and Regional Employment Area policies apply to the same lands. One set of policies promotes the development of dense mixed-use complete communities, the other the protection of existing employment uses and Employment Areas from the encroachment of sensitive land uses.</p> <p>Section 83.2.7 of ROPA 48 recognizes and attempts to reconcile this conflict, however, Section 83.2.7 only somewhat protects existing employment uses. In ROPA 48, an Employment Area designation in an MTSA whether by oversight or by intention, is envisioned to transition to support changed “employment opportunities” that are transit supportive, with higher job density targets that are more compatible with mixed use. In other words, ROPA 48 does not balance Provincial objectives, it promotes the MTSA policies over that of the Employment Area policies and in doing so undermines the purpose and importance of a Regional Employment Area.</p> <p>For clarity, and to address the potentially directly contradictory objectives of residential intensification and employment protection, ROPA 48 should establish the priority of policies with an overarching statement that will directly support the local, regional and provincial economy, and avoid lengthy and costly planning processes that by default would determine the priority of policies on a case by case basis. Where a conflict exists between</p>	<p>Staff have made changes to Section 83.2 (7). A reference to protect existing employment uses has been added to 83.2. (7) a).</p> <p>With regards to 83.2(7) c), major institutional development and major retail uses are prohibited in Employment Areas within the existing Official Plan. Major office development would be subject to other compatibility policies and 83.2(7) c).</p> <p>In terms of d), the overall employment area framework is to be addressed as part of the broader Regional Official Plan Review.</p> <p>In terms of e); the proposed policy is consistent with the recommendation.</p>

No.	Source	Submission	Response
		<p>the planned function of a Strategic Growth Area and a Regional Employment Area, the preservation and growth of employment uses and Employment Areas should be paramount.</p> <p>Burlington cannot create additional employment lands within the City. However, there are many locations where intensification can occur at nodes and corridors. Protection of the limited resource of Regional Employment lands should recognize the scarcity of the lands with this function.</p> <p>In addition, Section 83.2 (7) is not consistent with the PPS requirement in 1.3.2.1 that requires planning authorities to plan for, protect and preserve employment areas for current and future uses, not just existing uses. The following change to 83.2 (7) would be appropriate, provide PPS consistency and provide certainty to major employers:</p> <p><i>"Where Employment Areas are located within a Major Transit Station Area as delineated on Map 1H, recognize the dual role and function of these Major Transit Station Areas as mixed use Strategic Growth Areas as well as the location of important existing employment uses. It is the intent that the planned employment function should take priority should conflicts arise. Local municipalities shall plan for these areas by:</i></p> <p><i>a) recognizing the importance of the employment function, the protection of existing employment uses and the potential for employment growth and intensification within the Employment Area and within adjacent mixed use areas;</i></p> <p><i>b) providing an appropriate interface between the Employment Area and adjacent mixed use areas to maintain land use compatibility; and [2.2.5.7c) APTG]</i></p> <p><i>c) only permitting major institutional development, major retail uses or major office uses within the Employment Area, in accordance with provincial guidelines, where such uses avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on existing employment uses that are particularly vulnerable to encroachment; [2.2.5.8 APTG]</i></p> <p><i>d) prohibiting sensitive land uses within the Employment Area, with the exception of major institutional development in accordance with (c) above; and [2.2.5.7a) APTG]</i></p>	

No.	Source	Submission	Response
		<p><i>e) in proximity to Employment Areas, only permitting the development of sensitive land uses if land use compatibility can be addressed in a manner that protects existing employment uses in accordance with Section 79.3(12) of this Plan.”</i></p> <p>Remedy #2 – Including the PPS mandatory criteria to be met when sensitive land uses are proposed adjacent to industrial and manufacturing uses.</p> <p>Changes made to the PPS and Growth Plan over the past two years have strengthened the protections for existing industrial operations that may be threatened by the development of nearby sensitive uses. These new policies view compatibility from two perspectives – on both sensitive uses and on industries. The policies recognize that a new sensitive use locating in proximity to an industry may create requirements for mitigation under the Environmental Protection Act that are costly and potentially limit the operation of the industry. As a result, the new policies set out four tests to ensure that the location of proposed new sensitive uses will not compromise the operational and economic viability of industry.</p> <p>Secondly, the new policies place the onus for mitigation on the agent of change. If a new industry proposes to locate, it must minimize potential adverse effects. If a new sensitive use proposes to locate it must meet these tests which include protecting the long-term viability of the industry by minimizing and mitigating impacts. These two key policy approaches are detailed in Section 1.2.6. Land Use Compatibility, of the PPS.</p> <p>Section 1.2.6.1 sets out the public policy objective and the following section establishes criteria that are mandatory. Planning authorities “shall protect the long term viability” of existing industrial uses that are vulnerable to encroachment. The planning and development of sensitive land uses is only permitted if the following four tests are met.</p> <p>The tests are:</p> <p><i>a) there is an identified need for the proposed use</i> <i>b) alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;</i> <i>c) adverse effects to the proposed sensitive land use are minimized and mitigated; and</i></p>	<p>Section 79.3(12) has been modified to make its terminology consistent with the PPS, 2020. In addition, a new Section 79.3(12) b) has been added to implement Section 1.2.6.2 of the PPS, 2020.</p>

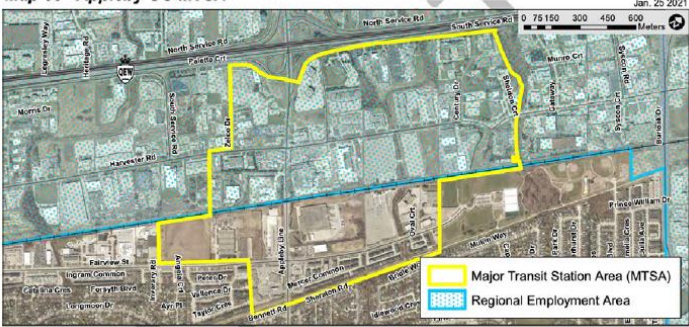
No.	Source	Submission	Response
		<p><i>d) potential impacts to industrial, manufacturing or other uses are minimized and mitigated."</i></p> <p>These tests are not found in ROPA 48. In order to properly implement the PPS and the Growth Plan a policy should set out the criteria detailed in Section 1.2.6.2 of the PPS. ROPA 48 proposes to add the following new policy as Section 79.3(12):</p> <p><i>79.3 It is a policy of the Region to:</i> <i>"(12) Ensure the long-term operational and economic viability of major employment uses, and achieve land use compatibility between major employment uses and sensitive land uses within or adjacent to Strategic Growth Areas, by requiring that such uses are planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, and risk to public health and safety is minimized, in accordance with Section 143(12) of this Plan."</i></p> <p>This would appropriately be modified to read as follows</p> <p><i>79.3 It is a policy of the Region to:</i></p> <p><i>(12) Ensure the long-term operational and economic viability of major employment uses, and achieve land use compatibility between major employment uses and sensitive land uses within or adjacent to Strategic Growth Areas by requiring that such uses are planned and developed to avoid, or if avoidance is not possible, to minimize and mitigate any potential adverse effects from odour, noise and other contaminants, and minimize risk to public health and safety is minimized. in accordance with Section 143(12) of this Plan</i></p> <p><i>Where avoidance is not possible, the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment shall be protected by ensuring that the planning and development of sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:</i></p> <p><i>a) there is an identified need for the proposed use</i> <i>b) alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;</i> <i>c) adverse effects to the proposed sensitive land use are minimized and mitigated; and</i> <i>d) potential impacts to industrial, manufacturing or other uses are</i></p>	

No.	Source	Submission	Response
		<p><i>minimized and mitigated.”</i></p> <p>References in ROPA 48 to Section 143(12) of the existing ROP should be modified by a direct reference to the modified Section 79.3(12) for consistency as follows:</p> <p><i>“81.2 It is the policy of the Region to:</i></p> <p><i>(4) Require the Local Municipalities to prepare detailed official plan policies or an Area-Specific Plan for a Major Transit Station Area, in accordance with Sections 48 and 77(5) of this Plan that also:</i></p> <p><i>f) achieves land use compatibility, by ensuring that the <u>planning and development of sensitive land uses, <u>major retail uses</u> or major office uses, avoids, or where avoidance is not possible, minimizes and mitigates <u>adverse effects and adverse potential adverse</u> impacts on industrial, manufacturing or other uses that are vulnerable to encroachment, in <u>accordance with Sections 79.3(12) and 83.2(7) of this Plan.</u>”</u></i></p> <p>Remedy #3 –Removing Reference to Out-of-Date Compatibility Policies and Guidelines</p> <p>ROPA 48 includes cross-references to the existing land use compatibility policies and study requirements in Section 143(12) of the Regional Official Plan. These policies are out of date, inconsistent with the PPS and do not conform to the Growth Plan insofar as they may apply to the interface between employment uses and sensitive uses.</p> <p>Section 143(12) refers to Land Use Compatibility Guidelines prepared in 2014. These policies and the Guidelines do not recognize the change in perspective on compatibility issues as set out in the changes to the PPS and Growth Plan since that date. The ROPA should make it clear that the Guidelines will incorporate both the letter and spirit of the changes. Removing the reference to Section 143 (12) and substituting the specific four tests from the PPS are described in Remedy #3 should provide the necessary policies to be consistent with the PPS.</p> <p>A draft new Land Use Compatibility Guideline has been posted on the Environmental Registry by the MOECP. This is intended to replace the D-Series guidelines that have been in use for close to 30 years and to assist planning authorities in implementing the new PPS policies.</p>	<p>Reference to Section 143(12) of the Official Plan has been removed from Regional Official Plan Amendment 48.</p>

No.	Source	Submission	Response
		<p>The Guideline states that it is intended to:</p> <ul style="list-style-type: none"> • <i>protect employment areas (including industrial employment areas) designated for future major facilities from incompatible uses and encroachment by sensitive land uses</i> • <i>protect existing or planned major facilities from potential impacts from new sensitive land uses</i> • <i>prevent adverse effects to existing or planned sensitive land uses from new and/or expanding major facilities</i> <p><i>“The Guideline will also be applied when municipalities are incorporating land use compatibility policies and principles into various land use planning tools under the Planning Act and other legislation. “</i></p> <p>The Guideline implements the new policies in the 2020 PPS dealing with land use compatibility. The map below details the Minimum Distance Separation (the “MDS”) for each of eight of the industries in the Appleby area and the combined MDS.</p>  <p>The combined separation distances would preclude the development of any sensitive uses within the MTSA boundary. It is clear that the Guideline will require a different approach to the establishment of an MTSA in the Appleby area.</p>	

No.	Source	Submission	Response
		<p>In summary it is my opinion that ROPA 48 should be modified as described in this letter and that the references to land use compatibility guidelines should both use and be informed by the new draft Land Use Compatibility Guidelines produced by the Ministry of Environment, Culture and Parks.</p> <p>Robert Lehman, F.C.I.P.</p>	
12	<p>Nick Dell on behalf of several properties including 4340 Henderson, 6116 Tremaine Road, 8995 Boston Church</p> <p>E-mail dated June 8, 2021</p>	<p>Good Morning Owen & Policy Planning,</p> <p>I am representing a number of properties contemplated by Halton Region's ROPA 48, specifically:</p> <ul style="list-style-type: none"> • 4340 Henderson • 4487 Henderson • 6116 Tremaine Rd. • 8995 Boston Church • 8329 Esquesing Line • Dublin Lane & Campbellville Rd. (2nd property north of this intersection, east side of Dublin) <p>Re: Servicing Allocation</p> <p>Are my clients required to request / identify themselves for future capacity of services?</p> <p>Is there a deadline to make an application to do so with the Region on Halton?</p> <p>Apologies if I am sounding naive, but I wish to make sure we can properly participate with any long-range infrastructure planning issues related to ROPA 48 and its employment conversions.</p> <p>Best regards,</p> <p>--</p> <p>Nicholas Dell BA. H</p>	<p>As per the Growth Plan, lands can be brought into the Urban Area as part of a municipal comprehensive review (MCR), which is currently underway. A Preferred Growth Concept will be recommended to Regional Council, supported by technical analysis, including for water, wastewater, and transportation infrastructure. Following the ROPR, Regional infrastructure master plans will be updated to support planning for this growth.</p> <p>ROPA 48 is an initial amendment being advanced as part of the MCR and ROPR process to define a Regional Urban Structure in the existing Urban Area. The identified properties (with the exception of 6116 Tremaine Road which is also identified in Submission #17), are outside the scope of ROPA 48 and considered through the broader Integrated Growth Management Strategy</p>

No.	Source	Submission	Response
13	<p>Robert Lehman on behalf of Sofina Foods</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>May 25, 2021 Kerry Towle Vice President, Industry and Government Relations Sofina Foods Inc.</p> <p>SENT ONLY BY EMAIL</p> <p>Dear Ms. Towle:</p> <p>Re: ROPA 48 Input</p> <p>I am pleased to provide my planning opinion on the Region of Halton draft Regional Official Plan Amendment #48 ("ROPA 48"). My comments are directed to the framework created by ROPA 48 that is intended to lead to the redevelopment of lands in proximity to the Appleby GO Train Station. Because the Sofina Foods meat processing facility ("Sofina") at 821 Appleby Line is located in proximity to the Appleby GO Train Station, Sofina will be directly impacted by the policy changes in ROPA 48.</p> <p>As you are aware, two development applications (OPA/ZBA) were recently filed with the City of Burlington in proximity to Sofina:</p> <ul style="list-style-type: none"> (i) two mixed-use towers within 100m of Sofina; and, (ii) seven towers located 320m to the east of Sofina. <p>Both of these projects potentially pose a risk to Sofina's operational viability.</p> <p>The City of Burlington has recently indicated its intention to restart the Appleby MTSA Precinct Plan process which was halted two years ago. The policies of ROPA 48 will direct the nature, location and amount of change in the Appleby MTSA. As written the ROPA 48 policies do not provide sufficient protection for Sofina's operation. ROPA 48 should establish a clear direction to protect the employment uses and lands in the area. My comments include modifications to the draft policies to achieve that objective.</p> <p>With respect to the Appleby GO Major Transit Station Area ("MTSA"), the draft policies of ROPA 48 contain an unreconcilable policy dichotomy due to the location of a Regional Employment Area within the boundaries of the Appleby MTSA destined for intensification.</p> <p>In addition, the draft policies do not conform with "A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020" (the "Growth Plan") nor are they consistent with the "Provincial Policy Statement, 2020" (the "PPS") in terms of the protections offered to</p>	<p>Please refer to the response provided for Submission #11 above.</p>

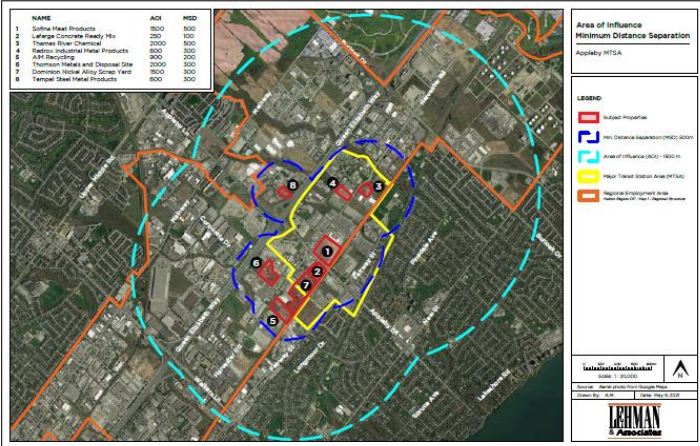
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		<p>employment areas and industrial uses.</p>  <p>ROPA 48 promotes intensification in the defined MTSA's as Strategic Growth Areas. However, the Appleby MTSA includes a large and important Regional Employment Area north of the GO rail line. This confluence, if not directly addressed in ROPA 48, will result in an ongoing series of adversarial planning processes challenging the operational viability of industries such as Sofina, and the 1,000 jobs it provides.</p> <p>The PPS and Growth Plan have similar policies that establish mandatory criteria to be met when sensitive land uses are proposed in proximity to industrial and manufacturing uses.</p> <p>Not all of these policies are reflected in ROPA 48. These policies are intended to reflect the priority of protecting for and providing employment and constitute a key economic element of Provincial policy.</p> <p>The Provincial compatibility policies address the priority of jobs over the intensification of sensitive land uses, which priority is designed to ensure the long-term viability of employment uses. This priority is not implemented by ROPA 48. As such ROPA 48 is not consistent with the PPS and does not conform to the Growth Plan policies addressing land use compatibility. I would recommend the following modifications to address these issues.</p> <p>Remedy #1 - Modification to prioritize jobs and the economy.</p> <p>The policies of ROPA 48 are contradictory as both the Strategic Growth Area/Major Transit Station Area and Regional Employment Area policies apply to the same lands. One set of policies promotes the development of dense mixed-use complete communities, the other the protection of existing</p>	

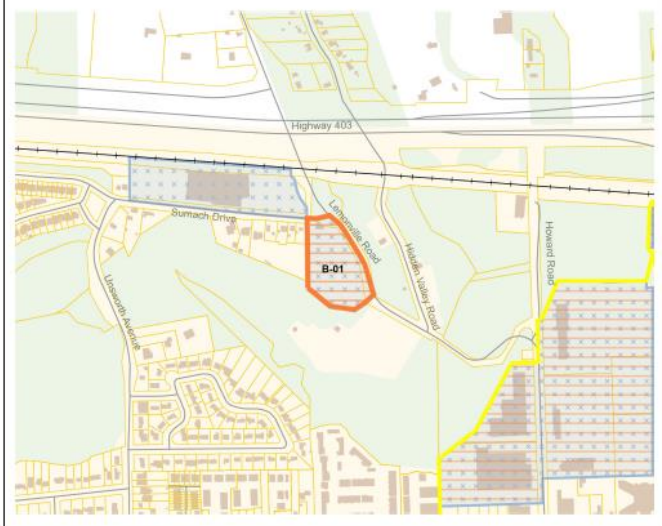
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		<p>employment uses and Employment Areas from the encroachment of sensitive land uses. Section 83.2.7 of ROPA 48 recognizes and attempts to reconcile this conflict, however, Section 83.2.7 only somewhat protects existing employment uses. In ROPA 48, an Employment Area designation in an MTSA whether by oversight or by intention, is envisioned to transition to support changed “employment opportunities” that are transit supportive, with higher job density targets that are more compatible with mixed use. In other words, ROPA 48 does not balance Provincial objectives, it promotes the MTSA policies over that of the Employment Area policies and in doing so undermines the purpose and importance of a Regional Employment Area.</p> <p>For clarity, and to address the potentially directly contradictory objectives of residential intensification and employment protection, ROPA 48 should establish the priority of policies with an overarching statement that will directly support the local, regional and provincial economy, and avoid lengthy and costly planning processes that by default would determine the priority of policies on a case by case basis. Where a conflict exists between the planned function of a Strategic Growth Area and a Regional Employment Area, the preservation and growth of employment uses and Employment Areas should be paramount. Burlington cannot create additional employment lands within the City. However, there are many locations where intensification can occur at nodes and corridors. Protection of the limited resource of Regional Employment lands should recognize the scarcity of the lands with this function.</p> <p>In addition, Section 83.2 (7) is not consistent with the PPS requirement in 1.3.2.1 that requires planning authorities to plan for, protect and preserve employment areas for current and future uses, not just existing uses. The following change to 83.2 (7) would be appropriate, provide PPS consistency and provide certainty to major employers: <i>“Where Employment Areas are located within a Major Transit Station Area as delineated on Map 1H, recognize the dual role and function of these Major Transit Station Areas as mixed use Strategic Growth Areas as well as the location of important existing employment uses. It is the intent that the planned employment function should take priority should conflicts arise. Local municipalities shall plan for these areas by:</i></p> <ul style="list-style-type: none"> <i>a) recognizing the importance of the employment function, the protection of existing employment uses and the potential for employment growth and intensification within the Employment Area and within adjacent mixed use areas;</i> <i>b) providing an appropriate interface between the Employment Area and adjacent mixed use areas to maintain land use compatibility; and [2.2.5.7c) APTG]</i> 	

No.	Source	Submission	Response
		<p><i>c) only permitting major institutional development, major retail uses or major office uses within the Employment Area, in accordance with provincial guidelines, where such uses avoid, or where avoidance is not possible, minimize and mitigate adverse impacts on existing employment uses that are particularly vulnerable to encroachment; [2.2.5.8 APTG]</i></p> <p><i>d) prohibiting sensitive land uses within the Employment Area, with the exception of major institutional development in accordance with (c) above; and [2.2.5.7a) APTG]</i></p> <p><i>e) in proximity to Employment Areas, only permitting the development of sensitive land uses if land use compatibility can be addressed in a manner that protects existing employment uses in accordance with Section 79.3(12) of this Plan.”</i></p> <p>Remedy #2 – Including the PPS mandatory criteria to be met when sensitive land uses are proposed adjacent to industrial and manufacturing uses.</p> <p>Changes made to the PPS and Growth Plan over the past two years have strengthened the protections for existing industrial operations that may be threatened by the development of nearby sensitive uses. These new policies view compatibility from two perspectives – on both sensitive uses and on industries. The policies recognize that a new sensitive use locating in proximity to an industry may create requirements for mitigation under the Environmental Protection Act that are costly and potentially limit the operation of the industry. As a result, the new policies set out four tests to ensure that the location of proposed new sensitive uses will not compromise the operational and economic viability of industry.</p> <p>Secondly, the new policies place the onus for mitigation on the agent of change. If a new industry proposes to locate, it must minimize potential adverse effects. If a new sensitive use proposes to locate it must meet these tests which include protecting the long-term viability of the industry by minimizing and mitigating impacts. These two key policy approaches are detailed in Section 1.2.6. Land Use Compatibility, of the PPS. Section 1.2.6.1 sets out the public policy objective and the following section establishes criteria that are mandatory. Planning authorities “shall protect the long term viability” of existing industrial uses that are vulnerable to encroachment. The planning and development of sensitive land uses is only permitted if the following four tests are met.</p> <p>The tests are:</p>	

No.	Source	Submission	Response
		<p> <i>a) there is an identified need for the proposed use</i> <i>b) alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;</i> <i>c) adverse effects to the proposed sensitive land use are minimized and mitigated; and</i> <i>d) potential impacts to industrial, manufacturing or other uses are minimized and mitigated.”</i> </p> <p>These tests are not found in ROPA 48. In order to properly implement the PPS and the Growth Plan a policy should set out the criteria detailed in Section 1.2.6.2 of the PPS. ROPA 48 proposes to add the following new policy as Section 79.3(12):</p> <p>79.3 It is a policy of the Region to:</p> <p><i>“(12) Ensure the long-term operational and economic viability of major employment uses, and achieve land use compatibility between major employment uses and sensitive land uses within or adjacent to Strategic Growth Areas, by requiring that such uses are planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, and risk to public health and safety is minimized, in accordance with Section 143(12) of this Plan.”</i></p> <p>This would appropriately be modified to read as follows</p> <p>79.3 It is a policy of the Region to:</p> <p><i>(12) Ensure the long-term operational and economic viability of major employment uses, and achieve land use compatibility between major employment uses and sensitive land uses within or adjacent to Strategic Growth Areas by requiring that such uses are planned and developed to avoid, or if avoidance is not possible, to minimize and mitigate any potential adverse effects from odour, noise and other contaminants, and minimize risk to public health and safety is minimized. in accordance with Section 143(12) of this Plan</i></p> <p><i>Where avoidance is not possible, the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment shall be protected by ensuring that the planning and development of sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures:</i></p> <p> <i>a) there is an identified need for the proposed use</i> <i>b) alternative locations for the proposed use have been evaluated and there are no reasonable alternative locations;</i> <i>c) adverse effects to the proposed sensitive land use are minimized and mitigated; and</i> <i>d) potential impacts to industrial, manufacturing or other uses are minimized and mitigated.”</i> </p>	

No.	Source	Submission	Response
		<p>References in ROPA 48 to Section 143(12) of the existing ROP should be modified by a direct reference to the modified Section 79.3(12) for consistency as follows: "81.2 It is the policy of the Region to:</p> <p>(4) Require the Local Municipalities to prepare detailed official plan policies or an Area-Specific Plan for a Major Transit Station Area, in accordance with Sections 48 and 77(5) of this Plan that also:</p> <p>f) achieves land use compatibility, by ensuring that the <i>planning and development of sensitive land uses, major retail uses or major office uses, avoids, or where avoidance is not possible, minimizes and mitigates adverse effects and adverse potential adverse impacts on industrial, manufacturing or other uses that are vulnerable to encroachment, in accordance with Sections 79.3(12) and 83.2(7) of this Plan.</i>"</p> <p>Remedy #3 –Removing Reference to Out-of-Date Compatibility Policies and Guidelines</p> <p>ROPA 48 includes cross-references to the existing land use compatibility policies and study requirements in Section 143(12) of the Regional Official Plan. These policies are out of date, inconsistent with the PPS and do not conform to the Growth Plan insofar as they may apply to the interface between employment uses and sensitive uses.</p> <p>Section 143(12) refers to Land Use Compatibility Guidelines prepared in 2014. These policies and the Guidelines do not recognize the change in perspective on compatibility issues as set out in the changes to the PPS and Growth Plan since that date. The ROPA should make it clear that the Guidelines will incorporate both the letter and spirit of the changes. Removing the reference to Section 143 (12) and substituting the specific four tests from the PPS are described in Remedy #3 should provide the necessary policies to be consistent with the PPS. A draft new Land Use Compatibility Guideline has been posted on the Environmental</p> <p>Registry by the MOECP. This is intended to replace the D-Series guidelines that have been in use for close to 30 years and to assist planning authorities in implementing the new PPS policies.</p> <p>The Guideline states that it is intended to:</p> <ul style="list-style-type: none"> • protect employment areas (including industrial employment areas) designated for future major facilities from incompatible uses and encroachment by sensitive land uses 	

No.	Source	Submission	Response																											
		<p>• protect existing or planned major facilities from potential impacts from new sensitive land uses</p> <p>• prevent adverse effects to existing or planned sensitive land uses from new and/or expanding major facilities</p> <p>“The Guideline will also be applied when municipalities are incorporating land use compatibility policies and principles into various land use planning tools under the Planning Act and other legislation. “</p> <p>The Guideline implements the new policies in the 2020 PPS dealing with land use compatibility. The map below details the Minimum Distance Separation (the “MDS”) for each of eight of the industries in the Appleby area and the combined MDS.</p> <div><table><thead><tr><th>NAME</th><th>ADI</th><th>MDS</th></tr></thead><tbody><tr><td>1. Softex Heat Products</td><td>1500</td><td>500</td></tr><tr><td>2. Lafarge Concrete Ready Mix</td><td>250</td><td>100</td></tr><tr><td>3. Thomas Gray Chemical</td><td>2500</td><td>500</td></tr><tr><td>4. Balfour Industrial Water Products</td><td>500</td><td>500</td></tr><tr><td>5. ABE Recycling</td><td>500</td><td>200</td></tr><tr><td>6. Thomson Metals and Chemical Site</td><td>2500</td><td>500</td></tr><tr><td>7. Dominion Waste Recycling Yard</td><td>1500</td><td>500</td></tr><tr><td>8. Tempco Steel Metal Products</td><td>500</td><td>500</td></tr></tbody></table></div> <p>The combined separation distances would preclude the development of any sensitive uses within the MTSA boundary. It is clear that the Guideline will require a different approach to the establishment of an MTSA in the Appleby area.</p> <p>In summary it is my opinion that ROPA 48 should be modified as described in this letter and that the references to land use compatibility guidelines should both use and be informed by the new draft Land Use Compatibility Guidelines produced by the Ministry of Environment, Culture and Parks.</p>	NAME	ADI	MDS	1. Softex Heat Products	1500	500	2. Lafarge Concrete Ready Mix	250	100	3. Thomas Gray Chemical	2500	500	4. Balfour Industrial Water Products	500	500	5. ABE Recycling	500	200	6. Thomson Metals and Chemical Site	2500	500	7. Dominion Waste Recycling Yard	1500	500	8. Tempco Steel Metal Products	500	500	
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14	<p>Brendan Graham on behalf of 238 Sumach Drive, Burlington</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>[Representative of 238 Sumach Drive submitted the Region’s analysis of their Employment Area conversion request to Regional Council at the Statutory Public Meeting and provided a verbal delegation]</p> <p>Halton Region IGMS – Employment Conversion Initial Assessment: City of Burlington</p> <div><p><u>Request B-01 – 238 Sumach Drive</u></p></div> <div><p><u>Summary</u></p><p>The subject lands are located south of Highway 403 and west of Lemonville Road along Sumach Drive and are currently vacant. The removal of the lands from the Regional Employment Area is requested in order to enable a residential redevelopment of the lands.</p><p><u>Proponent</u></p><p>NovaCare Communities Corporation / City of Burlington (see: Item A in Appendix D to PB-04-18)</p><table><tr><th>Location</th><th>Size</th><th>Local OP Designations</th></tr><tr><td>238 Sumach Drive</td><td>1.5 hectares</td><td>General Employment</td></tr><tr><th>Existing Uses</th><th>PSEZ</th><th>Adjacent Uses</th></tr><tr><td>Vacant</td><td>No</td><td>Employment uses (north), open space (south and east), residential uses (west).</td></tr></table></div>	Location	Size	Local OP Designations	238 Sumach Drive	1.5 hectares	General Employment	Existing Uses	PSEZ	Adjacent Uses	Vacant	No	Employment uses (north), open space (south and east), residential uses (west).	<p>Comment Noted. The conversion of the lands at 238 Sumach Drive continues to be included in ROPA 48.</p>
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15	<p>T.J. Cieciora, Design Plan Services, on behalf of 2669006 Ontario Inc. (Better Life Retirement Residence Inc.)</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Planning Services Legislative & Planning Services Halton Region 1151 Bronte Road Oakville, Ontario L6M3L1 Friday June 11th, 2021 via email:ropr@halton.ca DPS File: 1942</p> <p>RE: 4103 Palladium Way, City of Burlington Part of Lot 10, Concession 1, North of Dundas Street Geographic Township of Nelson, City of Burlington Regional Municipality of Halton Statutory Public Meeting - Regional Official Plan Amendment (ROPA) 48 – An Amendment to Define a Regional Urban Structure 2669006 Ontario Inc. (Better Life Retirement Residence Inc.)</p> <p>On behalf of our client, 2669006 Ontario Inc. (Better Life Retirement Residence Inc.), who is the property owner of 4103 Palladium Way, City of Burlington (“subject land”), we are pleased to submit these comments. We have reviewed the staff report dated June 16, 2021 (Report No. LPS49-21) and in particular how it relates to our client’s property which is located in the City of Burlington. An Employment Land Conversion request for the subject land was submitted to the Planning Services Department of Halton Region on August 31, 2020 to add “retirement home” as a permitted use on the subject property in addition to the</p>	<p>Comments noted. As stated in Report No. LPS60-21, on the basis of further analysis and given the site’s context and the relatively small-scale of the subject lands, as well as the community benefit and timeline constraints in relation to Provincial funding, it has been recommended that this conversion be advanced as part of ROPA 48.</p>																					

No.	Source	Submission	Response
		<p>already permitted uses including a Long Term Care Facility in order to create a campus of care development. After reviewing the staff report, we have concerns with the proposed ROPA48 which excludes the submitted Employment Land Conversion request for the subject property.</p> <p>A Zoning By-law Amendment application was approved by the City of Burlington to permit a Long Term Care Facility with ancillary uses on the subject property, and we would like to relocate the existing residents from Maple Villa into this brand new Facility prior to the license expiry in 2025 in conjunction with a retirement home on the subject property, which is why the timeline of the requested employment land conversion of the subject property to permit the retirement home use is critical.</p> <p>ROPA 48</p> <p>According to staff report LPS49-21 dated June 16, 2021, only limited employment land conversions in City of Burlington are proposed to be included in the ROPA48. However, the Employment Land Conversion request of the subject property has not been included in this staff report LPS49-21 or in the City of Burlington Comments (PL-20-21) dated May 4, 2021 (Page 66 of attachment 2 to the LPS49-21 staff report). It is our opinion that the requested employment land conversion of the subject property in the City of Burlington should be included in ROPA48. An Employment Land Conversion request was submitted to the Planning Services of Halton Region on August 31, 2020 as part of the Regional Official Plan Review (ROPR). Substantial discussion with Regional Planning Staff took place prior to this request being submitted. The initial assessment of the request by the Regional of Halton concluded that further analysis is required to determine whether the request meets the 'Employment Area Viability' and 'General Considerations' principles as described on pages 14-15 of Appendix C2 of the Growth Concepts Discussion Paper dated February 2021 prepared as part of the Integrated Growth Management Strategy (IGMS) portion of the ROPR. Subsequent discussions occurred with Region of Halton staff and supporting documents were provided as requested specifically in regards to the Employment Area Viability principal. Regional Planning Staff appears to be generally in support of the proposed Employment Land Conversion and advised Better Life Retirement Residence Inc., on April 16, 2021, that no further information was required to address their assessment regarding viability and compatibility as the supplemental letter from EXP Inc. on the D-6 Guideline Study was sufficient. A response to the General Consideration principle is described below under the City of Burlington Council Recommendation.</p>	

No.	Source	Submission	Response
		<p>City of Burlington Council Recommendation</p> <p>The City of Burlington Community Planning, Regulation & Mobility Committee has recently reviewed a new staff report prepared by the City's Community Planning Department regarding 'Submission on the Region of Halton's Growth Concepts Discussion Paper'. This staff report is dated June 8, 2021 and the report number is PL-21-21. At the Committee Meeting on June 8, 2021, the Committee passed the following resolution: Direct the Director of Community Planning to provide City Council's position on 4103 Palladium Way in Staff Report PL-21-21 (pgs. 20-21) to reflect the following: <i>"The employment conversion request for 4103 Palladium Way is currently under further consideration for employment conversion through the Region's Growth Concepts Discussion Paper. However, given the unique nature of this site, which is subject to a site-specific policy in the new Official Plan, the introduction of a retirement home on this site resulting in an employment conversion may be supported if it can be demonstrated that the further development will have no new impacts on the function of the abutting employment area as an integral component of the permitted long term care home."</i></p> <p>900 THE EAST MALL, SUITE 300, TORONTO, ONTARIO M9B 6K2 416.626.5445 WWW.DESIGNPLAN.CA</p> <p>This resolution indicates that a retirement home use may be appropriate to add to the current land use permissions on the condition that it can be demonstrated that the proposed retirement home, as an integral component of the permitted long term care facility will not have any new impacts on the function of the abutting employment area.</p> <p>Next Steps</p> <p>We are of the understanding that the supplemental letter by EXP Inc. that was provided to the Region of Halton met the Region's criteria. Further the applicant will be subject to Official Plan Amendment and Zoning By-law Amendment applications with the City of Burlington that will include the requirement for the updated D-6 Guideline Study with the addition of the retirement home use. As such, it is our opinion that, it would be appropriate for the Region of Halton to support the employment conversion request for this property in the initial scoped ROPA 48, based on the analysis completed to date and forthcoming through the pending planning applications as well as the resolution passed by the City of Burlington which collectively address the outstanding principles from the Growth Concepts Discussion Paper. We would appreciate the opportunity to continue</p>	

No.	Source	Submission	Response
		<p>the conversation with Regional Staff on the employment land conversion for the subject property at this stage, so that we can deliver much needed seniors housing in a campus style development, in a timely manner to the Region of Halton and as obligated to the Ministry of Health and Long Term Care. Should you have any questions or concerns please do not hesitate to contact the undersigned.</p> <p>Sincerely,</p> <p>DESIGN PLAN SERVICES INC. T.J. Cieciura, MSc MCIP RPP PRESIDENT Encl. TJC/sq Cc. Kimberley Harrison-McMillan, Director of Planning & Development, Better Life Development Angelo Bentivegna, Ward 6 Councillor</p>	
16	<p>David Bronskill, Goodmans LLP, on behalf of Reserve Properties Ltd.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>June 9, 2021 Our File No.: 173167 Via Email Regional Municipality of Halton 1151 Bronte Road Oakville, ON L6M 3L1 Attention: Graham Milne, Regional Clerk Dear Sirs/Mesdames: Re: Preliminary Comments on Draft Regional Official Plan Amendment No. 48 We are the solicitors for Reserve Properties Ltd., the owner of the property known municipally in the City of Burlington (the "City") as 401-413 Brant Street, 444-450 John Street, and 2002-2012 James Street (the "Site"). We are writing to provide our client's preliminary concerns regarding the Draft Regional Official Plan Amendment No. 48 ("ROPA 48").</p> <p>The Site is currently located within the City's Downtown Urban Growth Centre (UGC) and is near the John Street Bus Terminal, which is currently designated as a Major Transit Station Area (MTSA).</p> <p>Our client has been extensively involved in the planning process for the City's Downtown UGC and the John Street Bus Terminal MTSA. As you are aware, this involvement includes providing extensive written comments to the City and Region respectively concerning the following:</p> <ul style="list-style-type: none"> •the City's adoption of Official Plan Amendment No. 119 ("OPA 119"), and •the Region's issuance of the Notice of Decision to adopt the New Burlington Official Plan (the "New OP"). 	

No.	Source	Submission	Response
		<p>On January 22, 2018, our client submitted applications for an official plan amendment and zoning by-law amendment to permit a 23-storey mixed-use building with rooftop amenity space at the Site. The City ultimately adopted Official Plan Amendment 113 to permit a smaller tower. The City's decision is now final, but unable to proceed as a result of ongoing appeals of OPA 119 to the LPAT. Our client is a Party to the appeal of OPA 119 and the New OP. In both matters, the treatment of the John Street Bus Terminal and the Site's location within the Downtown UGC are active issues on which the Tribunal has yet to issue a final ruling.</p> <p>Our client's concerns with ROPA 48 relate specifically to its treatment of planning policies in the City and more particularly with the Downtown. These concerns include the following:</p> <p>•Map 1H, Map 6B, Items 13, 35, and 67:</p> <p>ROPA 48 proposes to relocate the majority of the UGC Boundary to align with the Burlington GO MTSA. At the same time, the Downtown UGC is being designated as a Secondary Regional Node. For comparison purposes, ROPA 48 proposed to designate the Appleby Line/Upper Middle Road area as a higher order Primary Regional Node. These changes are to be reflected in the New OP. We request that the original Downtown UGC be restored as a primary area of growth and intensification. As it is currently envisioned, the Downtown UGC/Burlington GO MTSA will significantly reduce the overall amount of intensification area in the City and the Region and would not support the province's vision to provide access to the diversity of housing, jobs, cultural amenities and services. For this reason alone, it is our opinion that ROPA 48 is not consistent with the <i>Provincial Policy Statement, 2020</i> (PPS) and does not conform to the Growth Plan for the Greater Golden Horseshoe, 2019 (the "Growth Plan").</p> <p>•Map 1H, Items 13, 35, 60, and 67: In addition to the above, ROPA 48 proposes to remove the Downtown Burlington MTSA designation from the OP and require the New OP to conform to this requirement. As noted in Urban Strategies' comments on the Discussion Paper, this approach will discourage transit-supportive development in the City and is not in keeping with the direction of the Growth Plan to support and facilitate linkages between investments in transit and growth. The fact that the City and Region have not directed investments to the John Street Bus Terminal to provide reliable and convenient transit service cannot serve as a reason to stop planning the Downtown as a focal area for investment and community growth.</p>	<p>Comments noted.</p> <p>On April 27, 2020, the Region of Halton and the City of Burlington received a letter from the Ministry of Municipal Affairs and Housing and the Ministry of Transportation. The letter confirmed that there is no provincial requirement for Mobility Hubs to be identified in municipal official plans, including Downtown Burlington. Both Ministries agreed that the downtown John Street Bus terminal does not constitute a Mobility Hub as it is not located at the intersection of multiple frequent rapid transit network routes.</p> <p>The Burlington GO Station and the Lakeshore West GO Line are being upgraded to support electrified Regional Express Rail that will allow for 15-minute service all day between Toronto and Burlington. By adjusting Burlington's Urban Growth Centre boundaries to include Burlington GO Station, growth in jobs and people will be focused where it can be best</p>

No.	Source	Submission	Response
		<p>•Items 32, 34 and 61: Item 32 proposes a new Section 79.2 to establish a hierarchy of Strategic Growth Areas under the Regional Official Plan. This hierarchy should be deleted. The Growth Plan defines both UGCs and MTSAs as Strategic Growth Areas and does not require UGCs to overlap with MTSAs. Furthermore, it is our opinion that a prescriptive hierarchy that is to be rigidly applied to all proposed development is inappropriate and not in keeping with the flexible policy-driven planning regime established by the Province.</p> <p>Our client is also extremely concerned that the Region has not included any form of transition for development applications currently under review. This approach is common in other major planning initiatives and would promote fairness and good planning. Failing to do so would lead to the unfair application of new policy requirements in a manner that is clearly contrary to the policy-led system required by the <i>Planning Act</i>.</p> <p>We would also appreciate this letter being treated as our client's request for notice of any revisions, updates, events, or decisions on ROPA 48.</p> <p>Yours truly, Goodmans LLP David Bronskill DB/</p>	<p>supported by existing and planned higher order transit infrastructure operating at a regional scale. The downtown will continue to be serviced by transit as it is important to maintain connections between the Burlington GO, the existing downtown and to the rest of the City.</p>
17	<p>Nicholas Dell, Harper Dell & Associates, on behalf of TREDM HOLDING INC.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Attention: Regional Chair and Members of Regional Council Legislative Services Subject: Statutory Public Meeting - ROPA 48 Amendment to Define a Regional Urban Structure Report No. LPS49-2 I [Milton Education Village]</p> <p>Dear Regional Chair, Members of Regional Council;</p> <p>Harper Dell & Associates is the planning consultant for TREDM HOLDING INC., registered owner of the property municipally known as 6116 Tremaine Rd., Milton.</p> <p>This letter seeks to be deposited into the public record for the June 16th 2021 Special Council Agenda at 8:30 a.m. agenda, via zoom conference. This letter also serves as a formal notice of support of the recommendations surrounding the Milton Education Village conversions contained in staff report LPS49- 21.</p> <p>Section C.12 - Milton Education Village Secondary Plan information report was received by Town Council in September of 2020. LPS49-21 seeks to posit to Regional Council that DRAFT ROPA 48 has been modified following Council's direction to include the employment conversion of the Agerton Secondary Plan and the southerly Milton Education Village prior to circulating to the Minister of</p>	<p>Regional staff have assessed the subject lands against the Region's Employment Area conversion assessment criteria and recommend that the subject lands be removed from the Regional Employment Area through Regional Official Plan Amendment 48.</p>

No.	Source	Submission	Response
		<p>Municipal Affairs and Housing to satisfy the legislative requirement under Section 17(17.1) of the <i>Planning Act</i>.</p> <p>TREDM HOLDING INC. continues to support Staff's inclusion of these lands and supporting rationale. My offices wishes to stay informed to facilitate my client's participation in the public feedback as part of the future recommendation report for ROP A 48.</p> <p>Yours truly,</p> <p>Nicholas H. Dell BAH. Harper Dell & Associates Inc. Planning, Traffic, Tax and Land Development Consultants</p>	
18	<p>Dana Anderson, MHBC, on behalf of Aldershot Greenhouses Ltd.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Chair Carr and Members of Regional Council:</p> <p>RE: REGIONAL OFFICIAL PLAN AMENDMENT NO. 48 ("ROPA 48") STATUTORY PUBLIC MEETING MAJOR TRANSIT STATION AREA BOUNDARY ADJUSTMENT 1097, 1107 AND 1135 GALLAGHER ROAD, BURLINGTON OUR FILE: 20379A</p> <p>MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") are currently retained by Aldershot Greenhouses Ltd. ("Aldershot Greenhouses") with respect to their lands located at 1097, 1107 and 1135 Gallagher Road in the City of Burlington (the 'Subject Lands'). Over the past year, Aldershot Greenhouses has made multiple requests to the Region to have its lands included within the Aldershot Major Transit Station Area ("MTSA") boundary including a detailed request and justification attached as Appendix A to this letter. To date Aldershot Greenhouses has not received any formal response to their written comments or their request for the Subject Lands to be included within the Aldershot GO MTSA.</p> <p>Background</p> <p>In June 2020, Halton Region released an Integrated Growth Management Strategy Regional Urban Structure Discussion Paper, which was prepared as part of the Regional Official Plan Review Process (ROPR). The Discussion Paper addressed planning for growth in the Region, Settlement Areas, Community Areas and Employment Areas. The Paper provided an overview of the Region's Major Transit Station Areas (MTSAs) both existing and proposed. The Discussion Paper additionally set out a methodology for delineating the MTSA boundaries. The Discussion Paper stated that "the MTSA delineation exercise identifying the proposed boundaries has taken into account the local</p>	

No.	Source	Submission	Response
		<p>plans and studies completed to date where appropriate.” Based on the methodology provided in Appendix B, there was no assessment, planning rationale or information to clarify why the Subject Lands were removed and not included in the proposed MTSA boundary whereas they were included by the City in its Official Plan Review study process specific to Aldershot GO MTSA.</p> <p>Discussion question 4 from the Discussion Paper asked <i>“From the draft boundaries identified in Appendix B and the Major Transit Station Area (MTSA) boundary delineation methodology outlined, do you have any comments on the proposed boundaries? Is there anything else that should be considered when delineating the Major Transit Station Areas?”</i> On October 30, 2020, comments were provided in response to the Discussion Paper by Aldershot Greenhouses and a formal detailed justification and request was submitted to the Region of Halton to give consideration to include the Subject Lands within the revised Aldershot GO MTSA boundary. As noted, a copy of this request is attached as Appendix A.</p> <p>In February of 2021, a draft of Regional Official Plan Amendment No. 48 (“ROPA 48”) was proposed as a first phase of the Region’s MCR work and was noted to reflect local plans and priorities. It included the MTSA boundaries but did not reflect the approved local Official Plan’s delineation of the Aldershot MTSA.</p> <p>The proposed draft Aldershot GO Station MTSA boundary as provided in ROPA 48 continues to be significantly different than the MTSA boundary currently identified in the Council-adopted and Regionally approved City of Burlington Official Plan (currently under appeal). The Region’s proposed Draft Aldershot GO MTSA boundary is significantly reduced in size from the boundary identified in the new Official Plan which was reviewed and studied through the City’s Official Plan Review process which included the Aldershot GO Mobility Hub Study as one of the many studies to inform the City’s new Official Plan. It was through the work completed by the City that the boundary was identified and supported in accordance with the Growth Plan. The boundary was based on the inclusion of strategic lands within 800 metres of the GO Station. In the case of the Subject Lands, they are located within 400 metres of the GO Station.</p> <p>As noted, the Subject Lands are located within the 800 metre radius of the Aldershot Go Major Transit Station Area, with the closest portion of the Subject Lands approximately 400 metres from the Aldershot Go Station. These lands represent a block of lands directly east and connected to the GO Station. The Subject Lands represent a unique opportunity, due to their size and redevelopment potential, to allow for strategic intensification within walking</p>	

No.	Source	Submission	Response
		<p>distance of the GO Station that can implement appropriate buffering and setbacks to the surrounding mature neighbourhoods. The inclusion of the lands conforms to the Growth Plan policy that requires the inclusion of a diverse mix of land uses (Section 2.2.1(a)).</p> <p>Allowing for the inclusion of Grove Park within the MTSA boundary would also implement an immediate connection from the Subject Lands to the Aldershot GO parcel to the immediate west of Grove Park, as originally envisioned in the Draft Precinct Plan for the Aldershot GO Mobility Hub Preferred Concept which planned for an active transportation connection along the southern limits of the rail corridor. The inclusion of existing parks within MTSA areas should be an important planning principle to achieve complete community elements within the MTSA's. It is unclear why the Regional delineation would exclude such areas. In our opinion, this is contrary to the Growth Plan which states in Section 2.2.1(4): "Applying the policies of this Plan will support the achievement of <i>complete communities</i> that...(d) expand convenient access to: iii) an appropriate supply of safe, publicly accessible open spaces, parks, trails and other recreational facilities."</p> <p>On April 12, 2021, a meeting was held with Regional Planning staff to discuss Aldershot Greenhouse's October 2020 submission, comments and request. It was raised at the meeting that there had been no formal response to the request and it was unclear how the comments provided had been considered in the preparation of ROPA 48. A question was also asked as to where and when the comments on the Discussion Paper and ROPA 48 would be made public as part of the public planning process. We believe it is important for Regional Council to have all available information before them to inform the decision making on critical growth issues. While the Phase 2 Initial Consultation Summary provided a high level overview of themed comment areas and on-line survey results, it did not identify key issues and concerns and illustrate how they had or were being addressed in the current recommended draft of ROPA 48. In fact, landowners and stakeholders who provided specific comments were not identified and their comments were not addressed as part of a public response document. Discussions with Regional staff regarding boundaries and impacts to specific properties took place after ROPA 48 was issued.</p> <p>At the meeting on April 12, 2021, Regional staff advised that they removed the Subject Lands from the MTSA boundary as a result of removing Grove Park, and the lands to the south that included an existing place of worship and the additional Aldershot Park. The rationale provided was that these areas were part of an existing established neighbourhood and should not be part of the MTSA.</p>	<p>Regional staff do not recommend that subject lands, located at 1097, 1107 and 1135 Gallagher Road in the City of Burlington, be included within the Aldershot Major Transit Station Area boundary.</p> <p>Appendix B of the Regional Urban Structure Discussion Paper established a methodology for the delineation of Major Transit Station Areas which identified excluding established areas including parks on the periphery. The delineation methodology has been supported by the City of Burlington. The area-specific planning process can consider appropriate transitions for adjacent areas to the MTSA boundary.</p>

No.	Source	Submission	Response
		<p>This response, again in our opinion, is completely contrary to integrated planning principles as established by the Growth Plan for building complete communities. In fact, it sets a dangerous precedent to completely disconnect existing built up areas from strategic growth areas. It is also unclear why the Region did not remove the Subject Lands when they were included and approved by both the City and the Region within the City's new Official Plan in accordance with the Growth Plan.</p> <p>The Subject Lands should be included together with Grove Park in the Aldershot GO MTSA boundary for several reasons:</p> <ul style="list-style-type: none"> • The lands are within 400 metre of the station; • The lands are underutilized and represent an ideal location given their size and location to provide for much needed housing supply and redevelopment that can be appropriately designated and transitioned; • The lands were included, supported and justified in the Preferred Draft Precinct Plan endorsed by the City of Burlington through the Aldershot Go Station Mobility Hub Study; • The lands were included, supported and justified in the City's new Official Plan which envisions an active transportation connection along the southern limits of the rail corridor; • The lands were included, supported and justified in the City's new Official Plan as part of the MTSA to accommodate growth to 2031. The growth targets are now required to be met to 2051 as provided in the Growth Plan (2020) and the removal of lands within walking distance of the MTSA reduces the ability to address the growth requirements; • There is no support or justification provided based on the methodology for MTSA boundary delineation as to why the Subject Lands should not be included; and • The inclusion of the Subject Lands is in conformity with the Growth Plan and advances the planning policies as noted. <p>For the reasons outlined above, we would recommend the Aldershot GO Station Area boundary be amended to include Grove Park and the Subject Lands to maintain elements of a complete community for the MTSA and the broader community and to ensure sufficient land is provided to meet the Region's growth targets and reflect the local plans.</p> <p>Sincerely,</p> <p>MHBC Dana Anderson, MA, FCIP, RPP</p>	

No.	Source	Submission	Response
		<p>Partner <i>Attach.</i> CC: Curt Benson, Region of Halton Karyn Poad, Region of Halton Allison Enns, City of Burlington</p>	
19	<p>Dana Anderson, MHBC, on behalf of Dorham Holdings</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Chair Carr and Members of Regional Council: Via email: regionalclerk@halton.ca Via email: ropr@halton.ca</p> <p>RE: REGIONAL OFFICIAL PLAN AMENDMENT NO. 48: STATUTORY PUBLIC MEETING WRITTEN SUBMISSION - DORHAM HOLDINGS NORTHWEST QUADRANT OF NEYAGAWA BOULEVARD AND BURNHAMTHORPE ROAD WEST, OAKVILLE OUR FILE: 21255A</p> <p>MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") are retained by Dorham Holdings, who are the owners of the land located in the northwest quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands"). In light of the Town of Oakville's strategic local objectives as set out in their recent report on Regional Official Plan Amendment No. 48 ("ROPA 48") presented on May 10, 2021, the Subject Lands should be supported as part of the conversion of employment lands within ROPA 48 as outlined in the Town's staff report. The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix scale and intensity for the Secondary Growth Node inclusive of employment uses.</p> <p>Please find attached our submission to staff on matters related to ROPA 48. We trust these matters will be considered and addressed and the appropriate revisions made to ROPA 48.</p> <p>Sincerely, MHBC</p> <p>[ATTACHED LETTER]</p> <p>June 3, 2021</p> <p>Dan Tovey, RPP, MCIP Manager of Policy Planning Region of Halton 1075 North Service Road West Oakville, Ontario L6M 2G2</p>	<p>Regional staff have not recommended that the employment conversion be advanced as part of ROPA 48 due to the scope and purpose of the amendment. However, the request will continue to be considered as part of the Integrated Growth Management Strategy process and the development of a Preferred Growth Concept.</p>


No.	Source	Submission	Response
		<p>Dear Mr. Tovey</p> <p>RE: REGION OF HALTON EMPLOYMENT CONVERSION NORTHWEST QUADRANT OF NEYAGAWA BOULEVARD AND BURNHAMTHORPE ROAD WEST, OAKVILLE - EMPLOYMENT CONVERSION REQUEST OUR FILE: 21255A</p> <p>MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") are retained by Dorham Holdings, the owners of the land located in the northwest quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands"). The Subject Lands are approximately 11.3 hectares in size. A location map is provided in Figure 1.</p> <p>On August 24, 2020, we submitted a request to the Region for the Subject Lands in response to the Region's Integrated Growth Management Strategy ("IGMS") Urban Structure Discussion Paper dated June 2020, which was prepared as part of Regional Official Plan Review Process ("ROPR"). A copy of our initial submission is attached as Appendix 1. On February 17, 2021, the Growth Concepts Discussion Paper prepared as part of the IGMS portion of the ROPR was received and released for public consultation by Regional Council. The Discussion Paper built upon the previous IGMS Discussion Papers and presented information on how the Region could accommodate population and employment growth to 2051 and included consideration of employment conversions with an initial assessment of the requests received through the ROPR process. Appendix C2 to the Discussion Paper contained information on the initial assessment of the conversion requests received.</p> <p>The request submitted for the Subject Lands was identified as Request 0-22 in Appendix C2. The initial assessment concluded that further analysis was required to determine a recommendation regarding the Subject Lands. An extract of the Region 's assessment is attached as Appendix 2.</p> <p>The initial conversion request provided a full description of the site context, the applicable policy context and a full assessment of the employment conversion based on the Region's conversion criteria found in Section 77.4 of the Regional Official Plan and the additional criteria provided in the Urban</p>	

No.	Source	Submission	Response
		<p>Structure Discussion Paper. We maintain that our assessment of the criteria fully supports and justifies the conversion of the Subject Lands.</p> <p>Further Analysis and Meeting with Regional Staff</p> <p>On April 26, 2021 we met with Regional staff to discuss the conversion and the further analysis to support the conversion. During the meeting we responded to the Region's comments with additional information as noted below. Several examples were provided of where the Region has specially supported strategic employment conversions for lands where current operating employment uses exist (i.e. Aldershot and Burlington GO Station MTSAs) and the Region has justified significant land conversion by noting that the "removal of lands from the Regional Employment Area is requested in order to permit the development of an Area Specific Plan for strategic growth that includes a mix of uses". These lands also share the same peripheral locational context as the Subject Lands. The Town of Oakville's Neyagawa Urban Core is an approved Strategic Growth Node where a similar area study is to be undertaken. Conversion of the lands within it should be accommodated on the same planning basis and rationale.</p> <p>Assessment 0-22 Criteria Regional Comment Response Employment</p> <ul style="list-style-type: none"> •The Subject Lands currently function as part of the supply of lands that could accommodate certain types of employment uses in Halton. They are of a significant size, are vacant, are strategically located in relation to goods movement facilities, and are part of a contiguous Regional Employment Area identified south of Highway 407. •As a result, and given their location in relation to the Local Urban Structure, further analysis is required to determine whether the conversion would have the potential to adversely impact the overall supply of employment lands or the ability to achieve employment targets by 2051. •The Subject Lands are located at a Land Supply strategic location within the Town of Oakville. The Subject Lands have great potential to support increased densities and jobs through a mixed use designation within the planned Neyagawa Urban Core as approved through OPA 15. The lands are not part of an existing development 	

No.	Source	Submission	Response
		<p>employment area and as part of the existing planned area are at the terminus of the area and part of a key node to be redeveloped.</p> <ul style="list-style-type: none"> The conversion will not adversely impact the overall supply of Regional employment lands or the ability to achieve employment targets by 2051 as the provision of a mix of uses at a much higher density will provide for more employment opportunities on the lands. <p>Demonstrated Need</p> <ul style="list-style-type: none"> A need for the conversion may be established based on the strategic location of the lands in the context of the Regional Urban Structure and/or Local Urban Structure given the location of the Subject Lands in relation to the Neyagawa Urban Core and the identification of a portion of The Town has clearly stated the importance and need for the conversion to meet future growth needs as approved through OPA 15. As part of a strategic mixed use node, the lands will meet key strategic growth management objectives as directed by the Town's approved the lands as a node for further study in the Town's urban structure. Further analysis is required to confirm the need for the conversion on the basis of its strategic location and strategic opportunity, including how the conversion contributes to the key strategic growth management objectives, as well as in relation to the considerations related to the overall supply of employment lands as discussed above urban structure and will not negatively impact the overall supply of employment lands. <p>Employment Area Viability</p> <ul style="list-style-type: none"> The Subject Lands are not located at the periphery of the Regional Employment Area as it is currently delineated. The removal of the lands would not result in a logical boundary for the Regional Employment Area and would change a contiguous employment area into an isolated employment area to the west of the Subject Lands. The removal of the lands would create an isolated Regional Employment Area, which could in turn impact the overall viability of the employment area over the long-term. Further analysis is required to 	

No.	Source	Submission	Response
		<p>determine the impacts to the viability of the Regional Employment Area, considered in relation to the land supply and need principles discussed above.</p> <ul style="list-style-type: none"> The Subject Lands are located at the periphery of the Regional Employment Area. The conversion of the lands will not impact the remaining employment area to the east. The overall viability of the Regional Employment Area is not impacted by the conversion. <p>General Considerations</p> <ul style="list-style-type: none"> No cross-jurisdictional issues were identified in the review of the request. Given the nature of the conversion and the location of the Subject Lands, further analysis is required to ensure the conversion can be supported by existing or planned infrastructure and public service facilities. Further information on the Town's position can be provided through subsequent consultation. The Subject Lands area located where services and infrastructure to accommodate the conversion will be provided. The Town has provided clear support for the full conversion of the Subject Lands based on its report entitled Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021). <p>Town of Oakville Report - Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021)</p> <p>At the May 10, 2021 Oakville Planning and Development Committee, Town of Oakville staff presented a report as input into the Region's ROPA 48 process that addressed a number of matters including the importance of the Neyagawa Urban Core. In the report the Town noted the following:</p> <p>"Neyagawa Urban Core</p> <p>These lands are identified in the town's urban structure as a Node for Further Study as a mixed use area. Through the town's ongoing official plan review, a study will be undertaken of the Neyagawa Urban Core Area (NUC) to delineate a boundary and to determine an appropriate mix, scale and intensity for this SGA. Town staff anticipate that this study will be initiated in 04 2021. This study would also examine the potential role, support and</p>	

No.	Source	Submission	Response
		<p>connectivity of the NUC with a future 407 Transitway station at Neyagawa Boulevard and Highway 407. Although the town will study all four quadrants of the NUC at the intersection of Neyagawa Boulevard and Burnhamthorpe Road West the northeast and northwest quadrants are currently designated in the region's Employment Area overlay.</p> <p>Town Staff Opinion: Town staff is of the opinion that the region's Employment Area overlay should be removed from the NUC north of Burnhamthorpe Road West in order for the town's study to proceed. More specifically:</p> <ul style="list-style-type: none"> • For the northeast quadrant the lands extending eastward to line up approximately with the northerly extension of Carding Mill Trail; and • For the northwest quadrant the lands west of Neyagawa Boulevard should be removed, as well as the lands west of Fourth Line over to the limit of the Region's Natural Heritage System." <p>Restated Request for Conversion</p> <p>In light of the Town's clear objectives as set out in their recent report, the Subject Lands should be supported as part of the conversion of employment lands within ROPA 48 as outlined in the Town's staff report. The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix, scale and intensity for the Secondary Growth Node inclusive of employment uses.</p> <p>We trust the above information provides the further analysis and support required by the Region to support the advancement of the full conversion of the Subject Lands as part of the ROPA 48 process. We thank the Region for providing the opportunity to comment further and would be pleased to provide any additional information or clarification of our request.</p> <p>Sincerely, MHBC</p> <p>Dana Anderson, MA, FCIP, RPP Partner</p>	

No.	Source	Submission	Response
		<p>Cc: Mary Mitar, Dorham Holdings Curt Benson, Region of Halton Diane Childs, Town of Oakville Kirk Biggar, Town of Oakville</p> 	
20	<p>Dana Anderson, MHBC, on behalf of Emshih Developments Inc.</p> <p>E-mail dated June 16, 2021</p>	<p>Dear Chair Carr and Members of Regional Council:</p> <p>RE: REGION OFFICIAL PLAN AMENDMENT NO. 48: STATUTORY PUBLIC MEETING WRITTEN SUBMISSION: Emshih Developments Inc. – 380 Brant St. and 433-439 Brant St.</p> <p>OUR FILE: 1583</p> <p>MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") are retained by Emshih Developments</p>	

No.	Source	Submission	Response
	(Statutory Public Meeting)	<p>Inc. ("Emshih") in relation to various properties located throughout the City of Burlington. Over the last several years there have been multiple studies and reviews that have impacted Emshih's Downtown properties. Emshih have made several submissions to both the City of Burlington and the Region of Halton in response to these studies and most recently to the Interim Control By-law Study, the Re-examination of the Downtown through the City of Burlington's Official Plan Review process and the resulting new Official Plan and policies for the Downtown approved but now under appeal.</p> <p>Within the City's new Official Plan approved by the Region and now under appeal, Downtown Burlington is the City's Urban Growth Centre as established through the Growth Plan. The new Official Plan is to provide for growth for the next 10 years, to 2031. The proposed Regional Official Plan Amendment No 48 ("ROPA 48") is seeking to "adjust" the boundary of the current Downtown by removing 94% of the land area from the Urban Growth Centre, presumably starting in 2031 although this is not clear. The existing MTSA for Burlington GO which is also a primary growth area is to become the new Downtown Urban Growth Centre for Burlington in addition to its existing role as a Major Transit Station Area.</p> <p>Following the release of the Supplemental Discussion Paper, in December, 2020, Emshih made a formal submission to the Region of Halton, requesting that the Region maintain the Downtown UGC boundaries along with its extension to the Burlington GO MTSA. A copy of the detailed submission and planning analysis is attached as Appendix A. Since that time, neither the City nor the Region have engaged in any discussions with Emshih regarding their comments or the impacts of an altered urban structure on the Downtown properties which have also been substantially impacted by COVID-19 and the development freeze that remains in place by the City. There has also been no assessment or analysis of how these comments have or have not been addressed through ROPA 48.</p> <p>This information has not been presented to Council since December 2020 and there was no report prepared by Staff (by their own acknowledgement) to review and assess the comments on the Supplemental Discussion Paper before ROPA 48 was drafted other than the high level consultation summary document. No further analysis of the submissions or comments has been made public to our knowledge. This is extremely disappointing as we believe ROPA 48 as it applies to the Downtown is a fundamental change in planning policy that appears to be moving forward without proper planning analysis and consideration.</p>	<p>Comments received on the Regional Urban Structure Discussion Paper and Supplementary Discussion Paper on the Burlington Urban Growth Centre and MTSA are summarized as Attachment #2 to LPS60-21 - Adoption of Regional Official Plan Amendment 48 - "An Amendment to Define a Regional Urban Structure".</p> <p>The Downtown Burlington Urban Growth Centre and MTSA Supplemental Discussion paper was released by the Region in October 2020 for the purposes of consultation. Section 3.2 of the Discussion paper</p>

No.	Source	Submission	Response
		<p>The submission made in December 2020 is clear on the significant issues raised through ROPA 48 in relation to the boundary “adjustment” which in fact is a substantial removal of 94% of the existing Urban Growth Centre. In the letter a number of matters are raised, to which there has still been no response provided:</p> <p>i) What planning rationale, analysis or justification at the Regional or Provincial level has occurred since November 30, 2020 to justify the changes proposed? Prior to that, planning staff provided no planning rationale, analysis or justification that questioned the role of the downtown as a UGC or its capacity as a UGC and in fact fully support the current Downtown boundary as the UGC in full conformity with the Growth Plan;</p> <p>ii) How is the removal of 94% of an UGC considered a boundary “adjustment” by the Province;</p> <p>iii) What engagement with landowners and business owners has taken place in relation to the removal of their businesses and investments from the Downtown and future opportunities for employment development? The change in designation from an Urban Growth Centre and Primary Growth Centre to Other Strategic Growth Node is not even recognized in the Region’s urban structure chart. On what basis under the Growth Plan is the removal of the Downtown Area founded? There appears to be an assumption that if the Downtown Bus Terminal is removed there is no basis for the Downtown to remain as an Urban Growth Centre which is fundamentally incorrect.</p> <p>The removal and relocation of the Downtown UGC will have a detrimental effect on the continued growth and prosperity of Downtown Burlington and on the ability of the Region to accommodate growth to 2051. Given the level of investment and detailed planning for the Downtown to date, the shift of intensification outside of the current Downtown UGC will negatively impact:</p> <ul style="list-style-type: none"> • The supply of new, attainable and affordable housing Downtown; • The viability of businesses and employment in the Downtown; • The ability to secure continued investment in future housing, employment and transit Downtown. <p>We recommend that ROPA 48 be amended as set out in our detailed submission to retain the Downtown boundary with the Burlington GO MTSA. We also recommend that existing Downtown land owners and business owners be afforded a meeting with the Province, Regional and City planning staff and Council to discuss the implications and issue of the recommended changes in</p>	<p>presents the proposed Burlington UGC boundary adjustment options. These options are supported by an assessment of the options against the relevant Growth Plan guiding principles and Urban Growth Centre policies.</p> <p>Section 5.2.2.1 of the Growth Plan provides the Minister of Municipal Affairs and Housing the ability to update the size and location of Urban Growth Centres. This is confirmed by the June 15, 2021 announcement by the Minister that the City and the Region have the ability to adjust the boundary of the UGC to focus growth new provincial transit infrastructure investment at the Burlington GO station.</p> <p>The Downtown Bus terminal is not being removed. The downtown will continue to be serviced by transit as it is important to maintain connections between the Burlington GO, the existing downtown and to the rest of the City. ROPA 48 does not identify the Downtown John Street bus terminal as a Major Transit Station Area. Section 3.1 of the Supplemental Discussion paper presents the rationale for the removal of the designation of the Downtown John Street bus terminal as an MTSA. This is also supported by the April 27, 2020 letter from the Ministry of Municipal Affairs and Housing that indicated the Region has the ability to remove the identification of the MTSA designation centred on the John Street bus terminal from the Regional Official Plan.</p> <p>Following the release of the Supplemental Discussion paper, the Region commenced public consultation which included two Public Information Centres, meetings with Regional and City advisory committees, and stakeholder meetings with the development community, interested residents, landowners and business owners. Newspaper and email notifications were issued to support the engagement activities including the virtual Public Information Centres and virtual statutory public meeting.</p>

No.	Source	Submission	Response
		<p>policy well before any decision is made that in our opinion will have un reversible long term impacts on the Downtown.</p> <p>Yours Truly,</p> <p>MHBC</p> <p>Dana Anderson, FCIP, RPP <i>Attach.</i> Emshih Developments Inc. Submission to Halton Region, December 2020 cc: Curt Benson, Region of Halton Heather MacDonald, City of Burlington Dr. Michael Shih, Emshih Developments Inc.</p>	<p>Growth and development will still continue in the downtown. The City of Burlington's Official Plan will guide development by the policy framework and vision established through the City's scoped re-examination of the downtown and Official Plan policies. These policies support growth in the Downtown to 2031 that will respect the existing character.</p> <p>ROPA 48 identifies the existing Downtown Urban Centre as a Secondary Regional Node that are historic downtown areas and are intended to be the focus of growth through mixed use intensification as a scale appropriate for their context.</p>
21	<p>Dana Anderson, MHBC, on behalf of Penta Properties Inc.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Chair Carr and Members of Regional Council: RE: REGIONAL OFFICIAL PLAN AMENDMENT NO. 48 – STATUTORY PUBLIC MEETING Written Submission – Penta Properties Inc. OUR FILE: 1886A</p> <p>MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") are retained on behalf of Penta Properties Inc. ("Penta") in relation to various properties located throughout the City of Burlington. Over the past year, Penta has made a number of submissions in relation to the Region's Municipal Comprehensive Review and the Integrated Growth Management Study ("IGMS") process as it affects its properties.</p> <p>In February 2021, the Region formally released a draft of Regional Official Plan Amendment No. 48 ("ROPA 48") which is as a first phase amendment to the Regional Official Plan to address the Region's urban structure to 2051. ROPA 38 is focused on identifying the Region's growth targets and growth areas, delineating the Major Transit Station Area boundaries, and advancing several local strategic planning objectives including key employment land conversions.</p> <p>As noted, over the past few years, Penta has submitted multiple requests with detailed supporting information to the City of Burlington and to the Region of Halton, to consider both employment land conversions and revisions to the proposed MTSA boundaries in the City of Burlington. Most recently, Penta submitted a response to the Region's Integrated Growth Management Strategy Urban Structure Discussion Paper, a copy of which is attached as Appendix A. The submission provided a detailed justification for employment conversion</p>	<p>The initial assessment of the conversion requests related to these subject lands was provided in Appendix C2 to the Growth Concepts Discussion Paper. The comments in this submission will continue to be considered by Regional staff as part of the Integrated Growth Management Strategy, the consultation on the Growth Concepts Discussion Paper, and the development of a Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>requests for a number of properties. In many cases, the requests were seeking to expand existing use permissions to include commercial, community and employment supportive uses otherwise restricted under the Region's current Employment Overlay policies.</p> <p>The following is a summary of the information provided to the Region to date and a request for further consideration by Council to amend ROPA 48.</p> <p>Employment Land Conversion Requests</p> <p>In June, 2020, the Region released an Integrated Growth Management Strategy Urban Structure Discussion Paper. The Discussion Paper set out additional criteria for employment conversion requests and established a deadline for additional submissions to be made for consideration by the Region through its Regional Official Plan Review ("ROPR") process related to existing or new conversion requests. In August, 2020, a detailed request (attached as Appendix A) was submitted to Halton Region to consider employment land conversions for the following four Penta properties:</p> <ul style="list-style-type: none"> • 1200 King Road; • 3309 Harrison Court; • 4450 & 4480 Paletta Court; and, • 5164, 5366, 5470, 5900 Upper Middle Road & 5201 Mainway. <p>As noted in many cases, the employment land conversion requests were to remove the Employment Overlay as a restriction to development and in some cases redevelopment of the sites with employment generating uses. Providing for a wider range of uses on many of the properties will actually better meet the Region's minimum job targets and better respond to current market needs given the physical location and context of the properties.</p> <p>It was requested that these lands should not be restricted to industrial only uses but should be permitted to provide for uses that allow for a wider range of opportunities to meet market demands that have significantly changed since the planning framework for employment in the Region was established. As noted in the submission, the conversions would assist in creating complete communities by increasing the range of permitted uses located close to existing and planned neighbourhoods.</p> <p>On April 13, 2021, MHBC staff had an opportunity to meet with Regional staff to review the Region's response to the employment requests as provided in Appendix C1 of the Integrated Growth Management Strategy Growth Concepts Discussion Paper. The focus of that meeting was to discuss 1200 King Road,</p>	

No.	Source	Submission	Response
		<p>4450 & 4480 Paletta Court and 3309 Harrison Court. During the meeting Regional staff reiterated their reliance on the assessment of the conversion criteria which in many cases was extremely subjective and without any detailed analysis at the time or quantitative/factual consideration. Some of the concerns noted from the meeting included the following:</p> <ul style="list-style-type: none"> • There has been limited study of the provision of commercial uses as part of the IGMS work related to how commercial land use needs will be provided only through mixed use development forms; • Much of the additional work referenced has not yet been completed is not yet public. • Changes to policies related to the permitted uses within the Employment Areas based on the changing nature of employment in the Region and changing retail markets will be presented later for review and discussion and not in advance of considerations for employment land conversions. <p>It is strongly recommended that employment land conversions be considered together with proposed changes to employment policies. Should those policies remain restrictive, retention of the overlay will sterilize many sites. One specific employment conversion request made by Penta relates to its vacant site located adjacent to the existing Lowes store, east of Appleby Line in the City of Burlington. When meeting with Regional staff, a number of concerns were raised related to the Region's assessment of the criteria and recommendation not to convert the Harrison Court lands. Following the meeting, MHBC submitted additional information to further justify the importance of converting the lands, a copy of which is attached as Appendix B. In summary, the lands located at 3309 Harrison Court in Burlington, represent a similar context to other sites recommended for approval for conversion and the lands meet all of the conversion criteria. The adjacent lands on which the Lowes is currently located is within the same Plan of Subdivision as the 3309 Harrison Court site and should be developed as part of the commercial node to serve the current and growing community area. It is strongly recommended that both Harrison Court sites be included for conversion and be included with ROPA 48 for the planning reasons set out in the letter that address both Provincial and Regional policies.</p> <p>MTSA Boundary Delineations</p> <p>Over the past few years, multiple requests have been submitted to the City of Burlington to include the following Penta properties within proposed MTSA boundaries for Appleby GO and Aldershot GO Stations as they are both within 800 metres of the stations:</p>	

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • 1200 King Road (Aldershot GO) • 4450 Paletta Court (Appleby GO) <p>The 1200 King Road lands represent an extension of lands directly eastward from the existing Metrolinx Aldershot GO Station. It is a prime location for intensification given that it is within the '15-minute neighbourhood' of the station and would achieve the Growth Plan objectives of creating a complete community. Similarly, 4480 & 4450 Paletta Court is also within the 15-minute neighbourhood and provides opportunities for population and job growth near a public transit facility.</p> <p>The exclusion of 4450 Paletta Court results in one half of the parcel being located outside of the MTSA. One of the key criteria of the Region for the delineation of MTSA's in its methodology is to include whole parcels. As noted by the Regional criteria "blocks should remain intact to facilitate the cohesive and comprehensive development of the MTSA". This was clearly not applied to 4480 and 4450 Paletta Court. A map illustrating the "splitting" of the boundary is attached as Appendix C. While the City of Burlington had opportunities to include these lands within proposed MTSA boundaries, the City did not include the lands in the recently approved new Official Plan (under appeal). The inclusion of the lands would provide both the Region and the City with opportunities for intensification. of these two Strategic Growth Areas.</p> <p>In accelerating ROPA 48 ahead of the Preferred Growth Concept, it is not clear how the proposed MTSA boundaries will achieve the minimum density targets of 150 people and jobs per hectare to meet ROPA 38's targets for 2031, not to mention 2051 targets. We trust the staff report will provide the detailed growth projections and distribution of growth based on the proposed land areas for the MTSA's.</p> <p>Public Engagement: Halton Region's Response</p> <p>While we acknowledge Halton Region has met the minimum <i>Planning Act</i> requirements for public engagement, through Open Houses and various virtual workshops, the Region has not documented publicly how all submissions have been addressed through proposed policy amendments. The Region produced one "communication plan" that provided a conceptually themed report. That report was general to Phase 2 of the Region Official Plan Review. Halton Region Report no. LPS05-21: "Regional Official Plan Review - Phase 2 Initial Consultation Summary" provided Attachment 1, "Regional Official Plan Review:</p>	<p>The Region's methodology, as identified in the Regional Urban Structure discussion paper, establishes a 500-800m radius representing a 10-minute walk to identify lands that would enable transit supportive densities. The property at 4450 Paletta Court is outside of the 800m radius of the station as identified by the Region's methodology and therefore no changes were made in response to this request.</p>

No.	Source	Submission	Response
		<p>Phase 2 Initial Consultation Summary." The summation was based on the prescribed on-line survey results and common responses. The summary did not identify how the Region addressed comments and what changes were considered, or not, to the proposed policies. The draft of ROPA 48 was in fact completed without consideration of the comments requested by December 21, 2021. Affected landowners and stakeholders were actively engaged in discussions with Regional staff regarding comments and responses in advance of the draft amendment. This has been a different approach to public engagement than ROPA 38 where comments were noted and made part of the public record.</p> <p>ROPA 48, if adopted with the proposed boundaries for MTSA's, and without the additional requested employment conversions will split the potential redevelopment of two key properties within the MTSA's and will represent a lost opportunity for economic development and job creation within the Region. The public engagement to date on employment and future needs has lacked informed input from key stakeholders in the business and investment community of the Region. We trust these submissions and comments will be further considered to ensure those interests are at a minimum acknowledged.</p> <p>Sincerely,</p> <p>MHBC Dana Anderson, FCIP, RPP</p> <p><i>Attach.</i> Appendix A Submission Response: Region's Integrated Growth Management Strategy Urban Structure Discussion Paper Appendix B Meeting Minutes: Region & Penta, Employment Conversion Appendix C Map: MTSA Delineated Boundary: Paletta Court cc: David Pitblado, Penta Properties</p>	<p>The Region has held extensive public consultation on the Regional Urban Structure Discussion paper and Supplemental Discussion paper since July 2020. This has included a number of Public Information Centres, meetings with Regional and City advisory committees and stakeholder meetings with the development community, interested residents, landowners and business owners. Newspaper and email notifications were issued to support the engagement activities including the virtual Public Information Centre and the virtual Statutory Public Meeting.</p>
22	<p>Dana Anderson, MHBC, on behalf of Westerkirk Capital Inc.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>[ATTACHED LETTER]</p> <p>Dear Mr. Tovey RE: REGION OF HALTON EMPLOYMENT CONVERSION</p> <p>NORTHEAST QUADRANT OF NEYAGAWA BOULEVARD AND BURNHAMTHORPE ROAD WEST, OAKVILLE - EMPLOYMENT CONVERSION REQUEST OUR FILE: 20262A</p>	





No.	Source	Submission	Response
		<p>MacNaughton Hermesen Britton Clarkson Planning Limited ("MHBC") are retained by Westerkirk Capital Inc., the owners of the land located northeast quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands"). The Subject Lands are approximately 18.8 hectares in size. A location map is provided in Figure 1.</p> <p>On August 24, 2020, we submitted a request to the Region in response to the Region's Integrated Growth Management Strategy ("IGMS") Urban Structure Discussion Paper dated June 2020, which was prepared as part of Regional Official Plan Review Process ("ROPR"). A copy of our initial submission is attached as Appendix 1. On February 17, 2021, the Growth Concepts Discussion Paper prepared as part of the IGMS portion of the ROPR was received and released for public consultation by Regional Council. The Discussion Paper built upon the previous IGMS Discussion Papers and presented information on how the Region could accommodate population and employment growth to 2051 and included consideration of employment conversions with an initial assessment of the requests received through the ROPR process. Appendix C2 to the Discussion Paper contained information on the initial assessment of the conversion requests received.</p> <p>The request submitted for the Subject Lands was identified as Request 0-02 in Appendix C2. The initial assessment concluded that the conversion should be supported and recommended that it be implemented through the Preferred Growth Concept. An extract of the Region's assessment is attached as Appendix 2.</p> <p>The initial conversion request provided a full description of the site context. In our initial request we noted that the total land area for the Subject Lands was 18.80 ha, approximately 5.7 ha being located within the Neyagawa Urban Core and the balance (13.1 ha) designated Employment District and Transitway. We had requested at that time that only 3.3 ha of the Employment District lands be converted to be consolidated for development with the lands designated as Neyagawa Urban Core to the west. Our request included a detailed assessment of the Region's Conversion Criteria from Section 77.4(4) of the Regional Official Plan.</p> <p>Regional Official Plan Amendment 48 ("ROPA 48") We understand the Region will be proceeding with a first phase of the IGMS work through ROPA 48 to advance strategic local planning priorities and needs related to urban structure. As such the Region released a draft of ROPA 48 on March 11, 2021.</p>	<p>Regional staff have not recommended that the employment conversion be advanced as part of ROPA 48 due to the scope and purpose of the amendment. The original request was identified as supported by Regional staff on the basis of the initial assessment. The updated request, which expands the area requested for conversion and which warrants consideration with the conversion requests related to the broader Neyagawa Urban Core areas to the west, will continue to be considered as part of the Integrated Growth Management Strategy process and the development of a Preferred Growth Concept.</p>


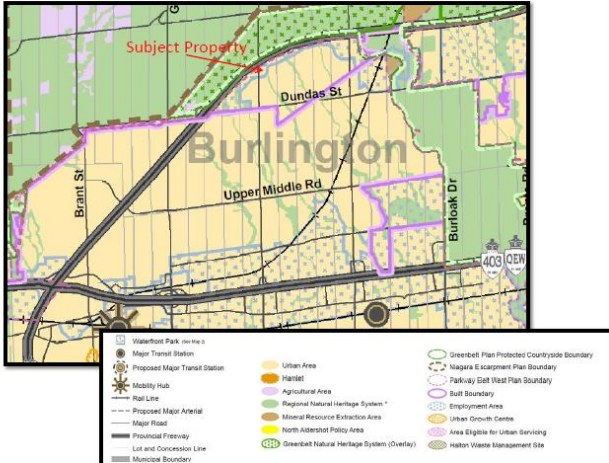
No.	Source	Submission	Response
		<p>On March 22, 2021 we forwarded an email to the Region noting that the Subject Lands were part of the Town's study of the Neyagawa Urban Core Node which came out of the Town's Official Plan Amendment 15 ("OPA 15") approved by the Region. We noted that the Town should be able to secure the conversion of lands within that Node prior to their study and questioned why they could not be included in ROPA 48 which would then allow the Town to advance its important planning for growth for the area. The Region responded that the intent of ROPA 48 was to address a limited set of conversions that advance strategic planning objectives and support the Regional/Local Urban Structures. The Region recognized that the Subject Lands were in the vicinity of a proposed Secondary Regional Node and the Town's Neyagawa Urban Core Area and stated that feedback on the appropriateness of advancing the conversion of the Subject Lands as part of ROPA 48 would be appreciated and considered as part of the public consultation process on ROPA 48.</p> <p>Town of Oakville Report- Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (may 10, 2021)</p> <p>At the May 10, 2021 Oakville Planning and Development Committee, Town of Oakville staff presented a report as input into the Region's ROPA 48 process that addressed a number of matters including the importance of the Neyagawa Urban Core. In the report the Town noted the following:</p> <p><i>"Neyagawa Urban Core These lands are identified in the town's urban structure as a Node for Further Study as a mixed use area. Through the town's ongoing official plan review, a study will be undertaken of the Neyagawa Urban Core Area (NUC) to delineate a boundary and to determine an appropriate mix, scale and intensity for this SGA. Town staff anticipate that this study will be initiated in 04 2021. This study would also examine the potential role, support and connectivity of the NUC with a future 407 Transitway station at Neyagawa Boulevard and Highway 407. Although the town will study all four quadrants of the NUC at the intersection of Neyagawa Boulevard and Burnhamthorpe Road West, the northeast and northwest quadrants are currently designated in the region's Employment Area overlay. Town Staff Opinion: Town staff is of the opinion that the region's Employment Area overlay should be removed from the NUC north of Burnhamthorpe Road West in order for the town's study to proceed. More specifically:</i></p> <p><i>For the northeast quadrant, the lands extending eastward to line up approximately with the northerly extension of Carding Mill Trail, and</i></p>	

No.	Source	Submission	Response
		<p><i>For the northwest quadrant, the lands west of Neyagawa Boulevard should be removed, as well as the lands west of Fourth Line over to the limit of the Region's Natural Heritage System."</i></p> <p>Updated Request In light of the Town's clear objectives, we fully support the inclusion of the Subject Lands as part of the conversion of employment lands within ROPA 48 and in their entirety as out lined in the staff report. The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix, scale and intensity for the Secondary Growth Node inclusive of employment uses. The following additional considerations justify the advancement of the Subject Lands for conversion in their entirety (18.8ha):</p> <ul style="list-style-type: none"> • The full conversion will facilitate the comprehensive development of the site as part of the Neyagawa Urban Core and the North Oakville East Secondary Plan. The lands are part of a Node that serves an important function to support the transitway with mixed use, compact urban development; • The conversion of the full site will also ensure more integrated and compatible land uses while still providing for employment opportunities through the mixed use Node; • The conversion of the full site will not compromise the Region's or the Town's ability to meet the employment forecasts as the mixed use node policies can ensure a mix and density of jobs and residents is retained and in fact provide for a higher yield of jobs in the short term; • The conversion of the full site can ensure the remaining employment area to the east is not negatively impacted through additional design and land use policies to address transition and ensure compatibility; and; • The conversion of the full site will also allow for more compatible land uses to be integrated and comprehensively developed with the balance of the node to the west and south. <p>We trust the above information will be used by the Region to support the advancement of the full conversion of the Subject Lands as part of the ROPA 48 process. We thank the Region for providing the opportunity to comment further and would be pleased to provide any additional information or clarification of our request. Sincerely,</p>	

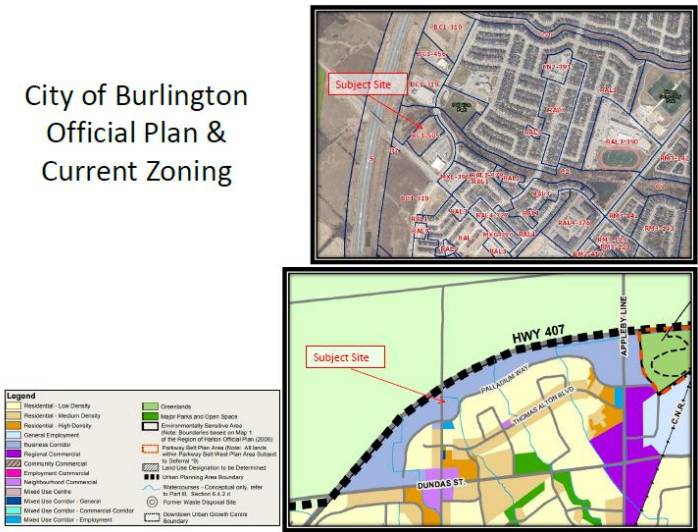
No.	Source	Submission	Response
		<p>MHBC Dana Anderson, MA, FCIP, RPP Partner</p> <p>Cc: Curt Benson, Region of Halton Diane Childs, Town of Oakville Kirk Biggar, Town of Oakville</p>	
23	<p>Megan Suddergaard, resident, Halton Hills</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>June 14, 2022 Halton Regional Council c/o Regional Clerk Graham Milne E: regionalclerk@halton.ca Re: ROPA 48: An Amendment to Define a Regional Urban Structure"</p> <p>Dear Council, I am writing you to express my concerns and objection to the proposed ROPA 48, specifically regarding the Georgetown MTSA (Major Transportation Station Area).</p> <p>The proposed Georgetown (and Acton) MTSA is very different in its current land use versus all other proposed MTSA's throughout the Region. The land uses in the Georgetown MTSA are primarily existing stable low and medium density family neighbourhoods. This is a striking contrast the other identified MTSA's which are primarily employment, commercial and existing high density residential. Other than minor adjustments to <i>minimum</i> density targets, the Georgetown MTSA's will be subject to the same policies with no protection for existing residents. I urge Regional and Town Planning staff and Council to reconsider the proposal based on the following:</p> <ul style="list-style-type: none"> - That the Georgetown MTSA is an existing stable low/medium density neighbourhood that requires special policies that address and protect its current residents. The current MTSA policies are "once-size-fits-all", that fail to respect the residential land uses already in place; - That Regional staff have been unsuccessful in describing actual implementation details regarding how this will work, i.e. how will new parks, schools and other community facilities be built to support increased population densities, how residents will provide input, and in articulating how existing and new municipal policies interact with ROPA 48 policies. 	<p>ROPA 48 implements a Regional Urban Structure and establishes a hierarchy of strategic growth areas based on their locational context in the Region. Stations that are not on the Growth Plan Priority Transit Corridor but could accommodate a level of intensification appropriate for their context and level of transit service include the Aldershot GO, Georgetown GO and Acton GO.</p> <p>Given the level of current and planned service to the Georgetown GO station and existing context, a minimum density target of 100 residents and jobs per hectare was identified for the MTSA. While the planning horizon for the Growth Plan is 2051, this target may be planned for beyond the horizon of the plan. The balance of the Integrated Growth Management Strategy will confirm the allocation of population and employment to the local municipalities to 2051. ROPA 48 includes a policy allowing for the revision of the minimum density target through the subsequent ROPA implementing the Integrated Growth Management Strategy, based on further consultation with residents and Local Municipalities.</p> <p>The detailed local planning work will follow the Region's Official Plan review and will also consider appropriate implementation of new public service facilities including schools, green space and parks to support the community.</p>


No.	Source	Submission	Response
		<p>We request that Council reconsider the designation of the Georgetown MTSA and do the following:</p> <ul style="list-style-type: none"> - That Regional Planning staff work with both the Regional and Local council to ensure that any planning or density changes be consistent with the 2019 Council approved Georgetown GO Station Area Secondary Plan. - That Regional and Town councilors reach out specifically to residents of the Georgetown GO Station Secondary Plan Area to discuss the changes the Region is targeting for our neighbourhood; - That Regional and Local planning staff look for other areas within the Town of Georgetown to evenly distribute population increases. <p>I am aligned with Town Staff and Council's guiding direction in the approved GO Station Secondary Plan. This Plan allows for redevelopment and intensification on a Georgetown scale. I urge our local Regional Representatives to carefully reconsider the MTSA proposal to support your existing local constituents.</p> <p>Sincerely,</p> <p>Megan Suddergaard CC: Mayor Rick Bonnette, Regional Councilors Jane Fogal, Clark Somerville, Town Councilors Wendy Farrow-Reed, Moya Johnson</p>	<p>A new objective is added to Section 81(7) and a policy to Section 81.2(4) k) that maximizes the number of potential transit users within walking distance of a station while considering contextually appropriate intensification opportunities within stable residential neighbours as determined through the preparation of Area Specific Plans.</p>

No.	Source	Submission	Response
24	<p>TJ Cieciora and Kim Harrison, Design Plan Services</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p style="text-align: center;">4103 Palladium Way, Burlington Better Life Residences Proposed Retirement Home</p> <p style="text-align: center;">Regional Official Plan Amendment Public Meeting Presentation</p> <p style="text-align: right;">June 16th 2021</p> <div style="text-align: center;">    </div> <p style="text-align: center;">Site Plan In Context</p>  <p style="text-align: center;">BETTER LIFE MAPLE VILLA PALLADIUM WAY, BURLINGTON, ONTARIO</p> <p style="text-align: right;">EspositoArchitects 4103 PALLADIUM WAY SITE PLAN CONTEXT</p>	<p>Please refer to the response provided for Submission #16 above.</p>

No.	Source	Submission	Response
		<p style="text-align: center;">Proposed Site Plan</p>  <p style="text-align: center;">Halton Official Plan Regional Structure</p> 	

No.	Source	Submission	Response										
		<div>Employment Area Conversion Criteria</div> <table><tr><th colspan="2">Assessment – Request B-18</th></tr><tr><td>A Employment Land Supply</td><td><div>✓</div><ul style="list-style-type: none">Given the small size of the subject lands and their potential to continue to accommodate employment following a conversion in the form of a long-term care facility permitted in the City's zoning by-law, the conversion is not expected to have an adverse impact on the overall supply of employment lands or the ability to achieve employment targets by 2051.</td></tr><tr><td>B Demonstrated Need</td><td><div>✓</div><ul style="list-style-type: none">The need for the conversion is demonstrated based on site-specific conditions that are unique to the site, namely its small scale, its proximity to existing institutional uses directly south, and the proposed development of the lands to accommodate additional institutional uses in the form of a long-term care facility, which is also a sensitive use and permitted by the City's zoning by-law. The conversion would recognize the existing and evolving condition that sees a cluster of institutional uses at the northeast corner of Walkers Line and Palladium Way that are compatible with and provide an appropriate transition between the Regional Employment Area along the Highway 407 corridor and the residential community to the south.</td></tr></table> <div>Employment Area Conversion Criteria Continued</div> <table><tr><td>C Employment Area Viability</td><td><div>*</div><ul style="list-style-type: none">The subject lands are not located at the periphery of the Regional Employment Area as it is currently delineated, and the removal of the lands would have the effect of creating an irregular boundary for the Regional Employment Area in this area. However, a logical boundary could be delineated by recognizing the existing and evolving institutional uses on the subject lands as well as the lands to the south known as 4085 Palladium Way and occupied by a courthouse. Removing these lands could occur while maintaining the northerly connection between the remaining Regional Employment Areas south of the Highway 407 corridor on the west and east sides of Walkers Line.The introduction of sensitive land uses brings with it concerns related to compatibility and the ongoing viability of the adjacent Regional Employment Areas. Land use compatibility and the continued function and viability of the Regional Employment Area were considered in the City's evaluation of a recent rezoning application that resulted in a long-term care facility, in addition to other uses, being permitted on the subject lands. As summarized in City Report PL-20-20, the long-term care facility "would only limit the future use of Class II or Class III industrial sites, however, such uses would be limited by existing factors and not further limited by the proposed development".Further analysis is required to determine: if residential uses would introduce additional compatibility or viability concerns in comparison to the existing permission for institutional uses; if there are any viability impacts due to the associated removal of 4085 Palladium Way; and, if there are implications for the Regional policy framework for institutional uses and other sensitive land uses within Employment Areas.</td></tr><tr><td>D General Considerations</td><td><div>*</div><ul style="list-style-type: none">No cross-jurisdictional issues were identified in the review of the request.Given the small-scale and location of the subject lands, existing or planned infrastructure and public service facilities are expected to support the conversion request.The conversion request has not been considered by the City and further information on the City's position can be provided through additional consultation.</td></tr></table>	Assessment – Request B-18		A Employment Land Supply	<div>✓</div> <ul style="list-style-type: none">Given the small size of the subject lands and their potential to continue to accommodate employment following a conversion in the form of a long-term care facility permitted in the City's zoning by-law, the conversion is not expected to have an adverse impact on the overall supply of employment lands or the ability to achieve employment targets by 2051.	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A Employment Land Supply	<div>✓</div> <ul style="list-style-type: none">Given the small size of the subject lands and their potential to continue to accommodate employment following a conversion in the form of a long-term care facility permitted in the City's zoning by-law, the conversion is not expected to have an adverse impact on the overall supply of employment lands or the ability to achieve employment targets by 2051.												
B Demonstrated Need	<div>✓</div> <ul style="list-style-type: none">The need for the conversion is demonstrated based on site-specific conditions that are unique to the site, namely its small scale, its proximity to existing institutional uses directly south, and the proposed development of the lands to accommodate additional institutional uses in the form of a long-term care facility, which is also a sensitive use and permitted by the City's zoning by-law. The conversion would recognize the existing and evolving condition that sees a cluster of institutional uses at the northeast corner of Walkers Line and Palladium Way that are compatible with and provide an appropriate transition between the Regional Employment Area along the Highway 407 corridor and the residential community to the south.												
C Employment Area Viability	<div>*</div> <ul style="list-style-type: none">The subject lands are not located at the periphery of the Regional Employment Area as it is currently delineated, and the removal of the lands would have the effect of creating an irregular boundary for the Regional Employment Area in this area. However, a logical boundary could be delineated by recognizing the existing and evolving institutional uses on the subject lands as well as the lands to the south known as 4085 Palladium Way and occupied by a courthouse. Removing these lands could occur while maintaining the northerly connection between the remaining Regional Employment Areas south of the Highway 407 corridor on the west and east sides of Walkers Line.The introduction of sensitive land uses brings with it concerns related to compatibility and the ongoing viability of the adjacent Regional Employment Areas. Land use compatibility and the continued function and viability of the Regional Employment Area were considered in the City's evaluation of a recent rezoning application that resulted in a long-term care facility, in addition to other uses, being permitted on the subject lands. As summarized in City Report PL-20-20, the long-term care facility "would only limit the future use of Class II or Class III industrial sites, however, such uses would be limited by existing factors and not further limited by the proposed development".Further analysis is required to determine: if residential uses would introduce additional compatibility or viability concerns in comparison to the existing permission for institutional uses; if there are any viability impacts due to the associated removal of 4085 Palladium Way; and, if there are implications for the Regional policy framework for institutional uses and other sensitive land uses within Employment Areas.												
D General Considerations	<div>*</div> <ul style="list-style-type: none">No cross-jurisdictional issues were identified in the review of the request.Given the small-scale and location of the subject lands, existing or planned infrastructure and public service facilities are expected to support the conversion request.The conversion request has not been considered by the City and further information on the City's position can be provided through additional consultation.												

No.	Source	Submission	Response
		<p data-bbox="554 350 779 456">City of Burlington Official Plan & Current Zoning</p>  <p data-bbox="667 824 1083 906">City of Burlington Council Recommendation</p> <p data-bbox="554 927 1173 1000">Direct the Director of Community Planning to provide City Council's position on 4103 Palladium Way in Staff Report PL-21-21 (pgs. 20-21) to reflect the following:</p> <p data-bbox="554 1032 1178 1243"><i>"The employment conversion request for 4103 Palladium Way is currently under further consideration for employment conversion through the Region's Growth Concepts Discussion Paper. However given the unique nature of this site, which is subject to a site-specific policy in the new Official Plan, the introduction of a retirement home on this site resulting in an employment conversion may be supported if it can be demonstrated that the further development will have no new impacts on the function of the abutting employment area as an integral component of the permitted long term care home."</i></p>	

No.	Source	Submission	Response
		<p style="text-align: center;">Aerial View from Palladium Way Looking West</p> <p style="text-align: center; color: red; font-size: small;">Please note: Plans are preliminary and will be subject to change</p>  <p style="text-align: center; font-size: small;">Ontario Adding 195 New Long-Term Care Spaces in Burlington Project involves the construction of a new 288-bed home</p> <p>BURLINGTON (November 25, 2020) — The Ontario government is moving forward with a new long-term care home project at Maple Villa Long Term Care Centre in Burlington to help reduce wait times and improve the quality of care and quality of life for our seniors. This initiative is part of the 2020 Budget, Ontario's Action Plan: Protect, Support, Recover, a comprehensive action plan in response to the serious health and economic impacts of COVID-19.</p> <p>Details were provided today by Jane McKenna, MPP for Burlington and Parliamentary Assistant to the Minister of Labour, Training and Skills Development.</p> <p>Maple Villa Long Term Care Centre has been approved for the development of 195 new spaces and the upgrade of 93 existing spaces. This project will involve the construction of a new 288-bed home in Burlington and will be part of a campus of care.</p> <p>"Protecting our loved ones and ensuring they receive the care they deserve is at the centre of everything we do," said Minister Merrilee Pufferford, Minister of Long-Term Care. "With this announcement, our government is taking another step towards creating a 21st century long-term care sector that provides the highest quality of care for our most vulnerable people, where and when they need it."</p> <p>"Too many seniors in our community are on waiting lists for long-term care. Our government's announcement of 195 new beds and 93 upgraded beds for Maple Villa Long Term Care Centre is good news for Burlington seniors," said Catherine North-Burton, MPP for Etobicoke, Parliamentary Assistant to the Minister of Long-Term Care. "More beds at Maple Villa means our seniors will have faster access to compassionate, high-quality care."</p> <p>Across the province, the Ontario government is moving forward with 29 new long-term care projects, which will lead to an additional 3,000 new and upgraded long-term care spaces. Among the 29 new long-term care projects, 19 will include campuses of care where multiple services are provided for residents on the same site.</p> <p>QUICK FACTS</p> <ul style="list-style-type: none"> • The 29 new projects consist of 2,983 long-term care spaces, including 1,968 new and 1,015 upgraded spaces. • Ontario is investing \$1.75 billion to create 30,000 beds over ten years. Today's announcement brings the total number of new and upgraded long-term care spaces in the pipeline to 22,360. • As of June 2020, more than 38,500 people are on the waitlist to access a long-term care bed. • Ontario is committing to an average of four hours of direct care per day for our loved ones living in long-term care homes. Ontario is the first province in Canada to take this important step. • Ontario's Action Plan sets out a total of \$45 billion in support over three years to make available the necessary health resources to continue protecting people, deliver critical programs and take measures to support individuals, families and job creators impacted by the virus, and lay the groundwork for a robust long-term economic recovery for the province. <p>ADDITIONAL RESOURCES</p> <ul style="list-style-type: none"> • Ontario Providing New and Upgraded Long-Term Care Spaces • 2020 Ontario Budget/Ontario's Action Plan: Protect, Support, Recover • Visit Ontario's website to learn more about how the province continues to protect Ontarians from COVID-19 • Emergency information and updates <p style="text-align: center; font-size: x-small;">-30-</p>	

No.	Source	Submission	Response																
		<div>Job Creation</div> <table><thead><tr><th>Development Type</th><th># of Jobs</th></tr></thead><tbody><tr><td>Retirement Housing</td><td>36 (Full Time)</td></tr><tr><td></td><td>26 (Part Time)</td></tr><tr><td></td><td></td></tr><tr><td>Long Term Care Facility</td><td>165 (Full Time)</td></tr><tr><td></td><td>157 (Part Time)</td></tr><tr><td></td><td></td></tr><tr><td>Total Jobs Created</td><td>384</td></tr></tbody></table> <div><div><div>D</div><div>P</div><div>S</div></div><div>CONTACT INFORMATION: TJ CIECIURA DESIGN PLAN SERVICES INC 900 THE EAST MALL, SUITE 300 TORONTO, ONTARIO, M9B 6K2 416.626.5445 TJC@DESIGNPLAN.CA</div></div>	Development Type	# of Jobs	Retirement Housing	36 (Full Time)		26 (Part Time)			Long Term Care Facility	165 (Full Time)		157 (Part Time)			Total Jobs Created	384	
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25	<div>John Corbett, Corbett Land Strategies, on behalf of Penta Properties Inc.</div> <div>E-mail dated June 16, 2021</div>	<div>RE: PROPOSED AMENDMENT TO THE REGIONAL OFFICIAL PLAN “ROPA 48: AN AMENDMENT TO DEFINE A REGIONAL URBAN STRUCTURE” – STATUTORY PUBLIC MEETING, JUNE 16, 2021 PENTA PROPERTIES INC. – EAGLE HEIGHTS NORTH ALDERSHOT POLICY AREA</div> <div>Corbett Land Strategies (“CLS”) has been retained by Penta Properties Inc. (“Penta”) with respect to their land holdings consisting of 106.67 hectares (263.5 acres) in North Aldershot. These lands are located west of Waterdown Road,</div>																	

No.	Source	Submission	Response
	(Statutory Public Meeting)	<p>east of the Grindstone Creek Valley, north and south of Flatt Road. The lands are situated in the area referred to as the Central Sector within the North Aldershot Policy Area.</p> <p>KEY CONCLUSION FOR THE PURPOSES OF ROPA 48</p> <p>1. Eagle Heights is part of a <i>settlement area</i> within the meaning of the Growth Plan (2020). The lands are part of an urban area (approved for urban uses on full municipal services) and "...have been designated in an official plan for development" in accordance with the policies of the Growth Plan.</p> <p>2. Since Eagle Height's status as a settlement area was approved in both the City and Region's official plans long before July 1, 2017, the <i>Natural Heritage System for the Growth Plan</i> does not apply to the lands.</p> <p>BACKGROUND AND CONTEXT:</p> <p>CLS has had no previous involvement with respect to the approvals process with respect to these lands. I was asked by Penta to review all the previous reports, submissions and policies related to Eagle Heights from a fresh perspective and to address Regional staff concerns.</p> <p>I have reviewed in detail, the history of this project, which is unique in Halton. The lands were acquired by Penta after the province had identified what we know as the "Central Sector" of the North Aldershot Policy Area as lands to be considered for development purposes. The rest of the area was ultimately placed in the Greenbelt and development was not considered appropriate for the remaining lands. Eagle Heights is located within the Central Sector and was designated for development.</p> <p>SCOPE OF EXISTING APPROVALS:</p> <p>This submission is supplementary to a formal response to the Discussion Paper entitled "<i>North Aldershot Planning Area, Regional Official Plan Review</i>" as prepared by Metropolitan Consulting (October 27, 2020).</p> <p>We understand that the Region now intends to implement the Municipal Comprehensive Review process in a staged manner (under section 26 of the <i>Planning Act</i>), leading with proposed ROPA 48 which will define a Regional Urban Structure. In particular, ROPA 48 prescribes a hierarchy of Strategic Growth Areas including:</p>	<p>The focus of Regional Official Plan Amendment 48 is to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan for the lands within existing urban boundary. As North Aldershot is located outside the urban boundary it is not within the scope of this amendment.</p> <p>The referenced matter is subject to a separate Ontario Land Tribunal matter and outside the scope of Regional Official Plan Amendment 48.</p> <p>These comments will be considered as part of the broader Regional Official Plan Review.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> • Reflecting the current urban boundary within the Regional Urban Structure Plan; • The identification of “Regionally Significant Growth Areas” including “Primary” and “Secondary” nodes; • The establishment of “Urban Growth Centres”; and, • The identification of “Major Transit Station Areas” (MTSA’s). <p>The Eagle Heights lands are located within the area known in the City of Burlington and Region of Halton official plans as the “<i>North Aldershot Policy Area</i>” (“NAPA”). A review of the in force official plans demonstrate that the lands have been “designated for development”. The applicable policies and schedules in the City’s Official Plan are extremely detailed and permit development that must be fully serviced with urban services. Consistent with this status, the Regional Official Plan designates the lands as an “Area Eligible for Urban Services”. The lands are fully zoned for urban development that requires full urban services. The lands are subject to two, approved draft plans of subdivision that require urban services. In fact, the requirement for urban services is a Regional condition to those draft plans. The Region would not have agreed to draft approve the lands on full urban services had servicing the lands not been intended.</p> <p>All of these approvals have been in place for 25 years (since 1996). The current approvals status was the product of a settlement of appeals before the Ontario Municipal Board. This settlement was endorsed by both the City and the Region. The decision of the Board approving that settlement comments on the remarkable detail in the official plan that I have referenced:</p> <p><i>“24 The Board feels obliged to remark that the applications for Official Plan Amendment were particularly unusual in the degree of detail with which the policy proposals were enhanced. The development areas within the application were precisely defined, the number of lots/units assigned to each were established, site restrictions including trees and woodlots were identified, building envelope constraints were demarcated and areas subject to site plan control confirmed.”</i></p> <p>Based on previous planning approvals and long-standing land use designations and zoning applicable to the subject lands in the North Aldershot Policy Area, in my opinion the Region should continue to recognize the long-standing planning, development approvals and servicing status afforded to Eagle Heights as a settlement area through the Municipal Comprehensive Review. Otherwise, the Region will be undertaking a down designation of the lands. A down designation of this scale is unprecedented and unwarranted. The Growth Plan speaks to the</p>	

No.	Source	Submission	Response
		<p>issue of housing affordability in the Greater Golden Horseshoe and ties it to the lack of housing supply. The down designation of Eagle Heights would be inconsistent with the intent of the Growth Plan and other current provincial policy aimed at increasing housing supply to combat these affordability challenges. The down designation of Eagle Heights would also be inconsistent with the recommendation of ROPA 48 to identify a “Major Transit Station Area” surrounding the Aldershot GO station, immediately south of the subject lands.</p> <p><i>Factors Supporting the Continuance of Development Approvals Under the Aldershot Special Policy Area Provisions and Current Approvals in the Municipal Comprehensive Review Process.</i></p> <p>Current development permissions for the Eagle Heights lands are not in question. There are a number of facts that substantiate the continuance of development and servicing rights as currently established in the City and Regional Official Plans, in particular:</p> <ul style="list-style-type: none"> • Advancement of the development approvals process for Eagle Heights plans of subdivision and related applications, and, • Advancement of capital works to support urban development in Eagle Heights. <p><i>Advancement of Development Approvals:</i></p> <p>In 2002 Penta applied for modifications to the official plan, zoning and plan of subdivision approvals for Eagle Heights. Consistent with provincial intensification policies, Penta applied to increase the number of units within the areas already identified for development. Part of the increase was due to the decision of the Halton Board of Education to release the block reserved for a school. The proposed increase was appealed on the basis of a non-decision. That appeal was settled, in part, in 2009 when Penta and the City of Burlington entered into a settlement agreement (the “2009 Settlement Agreement”) to resolve matters related to these and other planning issues.</p> <p>Under the 2009 Settlement Agreement, <i>the City recognized Eagle Heights as an approved residential development</i> for up to 924 residential units as a required component of the City’s housing supply and agreed to assist in resolving concerns of other planning agencies. After the settlement, the next step was for Penta to comply with the 2009 Settlement Agreement by conducting a new comprehensive planning and environmental review. That was done. Fieldwork was carried out between 2014 and 2018.</p> <p>By 2018, ten reports were completed and submitted to the City of Burlington. The reports addressed agency comments received, and the results of the field work. Concurrent with the preparation of these reports and studies, an</p>	

No.	Source	Submission	Response
		<p>application was made to the Ministry of Natural Resources and Forestry to allow servicing and municipal infrastructure in that part of Eagle Heights which is located in the Escarpment Protection Area of the Niagara Escarpment Plan, north of the hydro right-of-way. This application was approved by the Province through an Order-in-Council on February 13, 2020.</p> <p>Penta properties has also filed an application for NEC approval for a development permit to allow work on Horning Road which includes servicing and the construction of an in-ground reservoir and the construction of homes in accordance with approved and revised draft plans of subdivision.</p> <p>The engineering submission for a first phase of development for an area south of Flatt Road was completed and delivered in 2019.</p> <p>The planning and development approvals history related to the Eagle Heights community demonstrates a consistent and long-standing commitment by the municipal and provincial levels of government to develop this portion of the North Aldershot Area for urban residential uses.</p> <p>It is clear that development rights for Eagle Heights are derived from previous approvals, and the fact that post 2006 official plans for Burlington and Halton reflected these development permissions which were deemed to be in conformity with the Growth Plan.</p> <p><i>Advancement of Capital Works to Facilitate Urban Development in Eagle Heights:</i></p> <p>Penta has worked with the Region and the City to advance the necessary engineering infrastructure to support urban residential development as follows:</p> <ol style="list-style-type: none"> 1. The projects required for the development of Eagle Heights are included in the City of Burlington and the Region of Halton's Capital Budget and Forecast. 2. The servicing of this area has been incorporated in successive Development Charges By-laws and Water and Wastewater Master Plans; 3. Phase "A" of the sanitary sewer servicing work was front-end financed by Penta Properties Inc. and was completed in conjunction with the Waterdown Road/403 interchange in 2010; 4. The City has acquired from Penta, through expropriation, the land required for the widening and the urbanization of Waterdown Road. The expropriation was approved in 2019 and the report from the Hearing Officer accepted evidence from the City that a line for the wastewater main is included in their plans. Specifically, Phase " B" of the sanitary work will be part of the reconstruction and 	

No.	Source	Submission	Response
		<p>widening of Waterdown Road to be undertaken by the City with the cost thereof being front ended Penta Properties;</p> <p>5. Under the 2009 Settlement Agreement, Penta front-ended municipal services in Waterdown Road to Craven Avenue. The installed municipal services are designed to have the capacity for Eagle Heights as applied for. The phase "A" pipes are in the ground.</p> <p>6. Penta has confirmed servicing allocation from the Region. Penta and the Region are in the process of negotiating a front-end financing agreement for the services required for Eagle Heights;</p> <p>7. Penta has secured the necessary approvals to build roads across the two hydro corridors to facilitate the road network associated with the plans of subdivision.</p> <p>8. The Aldershot GO station is identified as a MTSA in the Regional Structure Plan. MTSA's require a significant population and employment base to support its development. The Eagle Heights lands are located generally within 1650 metres of the station along Waterdown Road which will enhance the population base of the MTSA, with a diverse range of fully serviced housing types;</p> <p>9. In addition, the City of Hamilton has introduced inter-regional transit service along Waterdown Road from Hamilton providing an urban level of service through the North Aldershot Area.</p> <p>GROWTH PLAN COMPLIANCE:</p> <p>Based on the facts noted herein, the past planning decisions for this area bear all the hallmarks of establishing a <i>Settlement Area</i> as defined by the Growth Plan. In my opinion, the intent of the Growth Plan is to support the development of such areas. It is not the intent of the Plan to down designate development lands.</p> <p>The intent of the Growth Plan to respect existing planning approvals is evident throughout the Plan including areas that (unlike Eagle Heights) do not meet the definition of a settlement area. It defies any reasonable interpretation of the Growth Plan to propose that it is the intent of the Plan to down designate Eagle Heights. This down designation would include imposing the Growth Plan's natural heritage system on lands that have been designated for development on full, urban services with in force zoning and approved plans of subdivision for 25 years. This is why the Growth Plan excludes such areas from the application of this system.</p>	

No.	Source	Submission	Response
		<p>There is no question that the North Aldershot area contains significant environmental features that merit protection and in fact were protected through the lengthy planning approvals that led to the detailed official plan, zoning and plans of subdivision now in force. The current proposed modifications to the developable portions of the lands have been subject to further detailed ecological study and review.</p> <p>The proposed development of the Eagle Heights lands have been assessed over several years of study, and it has been determined that it will have a limited predicted effect on the natural environment. The natural features on the Eagle Heights lands occur mainly within the Grindstone Creek Subwatershed. Through the years of study, the area of land proposed for development has decreased from 48.3 percent to 37.31 percent. The area to be preserved as open space increases from 55 per cent to 63 per cent. The most recent submission has reduced the number of storm water ponds from 5 to 1 by utilizing Low Impact Development (LID) methods as an environmentally sensitive solution.</p> <p>I have been informed that for the ongoing planning process, Penta is committed to a holistic approach that will support and enhance the emerging Cootes to Escarpment Eco Park. Penta intends on making a comprehensive submission in this regard in the near future.</p> <p>WASTEWATER AND WATER SERVICING IMPLICATIONS:</p> <p>Through the recent release of technical discussion papers for the MCR process, the Region of Halton has labelled the Eagle Heights area as “inefficient and technically challenging to service”. This is in reference to the Integrated Growth Management Study as prepared by GM BluePlan. I have received detailed input on this issue from Penta’s consulting engineers. As far as the efficiency is concerned, the GM BluePlan Study under-estimates the developable area for the Eagle Height lands at 15.13 hectares. There are several references throughout the study which indicates that, due to the relatively small developable area compared to the financial requirements to service these lands, it becomes inefficient when compared to other areas in the Region. However, no actual financial comparisons have been provided. The Growth Plan’s Natural Heritage System does not apply to Eagle Heights. The full extent of the developable areas will be finally determined through the current planning process.</p> <p>Further, the increased population that will be derived from the revised 2018 plan of subdivision will enhance the feasibility of the servicing strategy for this area. It</p>	

No.	Source	Submission	Response
		<p>has been made clear through this submission that the subject lands were historically approved for development, and servicing was never deemed challenging. Penta has submitted at least four (4) Functional Servicing Reports since 2007 which has outlined the servicing approach for the Eagle Heights development as well as some of the neighbouring lands (Cama Woodlands, Aldershot Landscaping, Morgante). The technical challenges identified in the GM BluePlan report included both topography (i.e., 75m elevation difference between the top and bottom of site) as well as some environmental features (i.e., creek crossings). Basic engineering practices can easily overcome these obstacles.</p> <p>Finally, the four (4) Region requirements for extension of urban services to new areas are as follows:</p> <ol style="list-style-type: none"> 1. Feasibility Study; 2. Landowner Meets Financial Obligations; 3. Sufficient Servicing Capacity; and 4. Regional Council Approval. <p>Three of the four criteria have been satisfied through either our submissions and/or commitments. The 2018 FSR best outlined the servicing requirements for the Eagle Heights lands as well as some of the neighbouring lands. Correspondence between the landowner and the Region have captured the financial obligations of the various Development Charge eligible projects necessary for the development of the subject lands. These requirements have been acknowledged by Penta. through proposed front-end financing arrangements. Servicing capacity has been deemed granted through the Region's allocation program. During the most recent program, it was determined that the Eagle Heights lands have been accounted for in the existing treatment system's capacity and are not subject to the allocation program requirements. Based on these facts, the subject lands will be serviced efficiently under City and Regional commitments.</p> <p>CONCLUSION:</p> <p>In my opinion, the implementation of the Municipal Comprehensive Review should preserve the long-standing status of these lands as a unique settlement area that complies with the Growth Plan and that is eligible for urban services and should continue to final approval of the Eagle Heights plans of subdivision.</p> <p>Thank you for this opportunity to comment on proposed ROPA 48. Respectfully submitted:</p>	

No.	Source	Submission	Response
		<p>John B. Corbett</p> <p><i>John B. Corbett, MCIP, R.P.P.</i></p>	
26	<p>Agnieszka Pagowska, resident</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Honourable Members,</p> <p>I would like to address the architects of the proposed amendments to consider the serious and damaging consequences of losing yet more precious farmland and green space to urban development. In light of the ongoing pandemic and the results we have seen in our imported goods, food supply and the critical role poor air quality has made, we must ask ourselves if sacrificing vital resources for the sake of material wealth is what the people of this province need. The immediate monetary gains of a few must not trump the real needs of the greater population. At a time when food prices are skyrocketing globally we are facing the prospect of permanently sacrificing chunks of productive farmland and the natural areas that keep it so, to single family homes, giant warehouses and distribution centres for disposable consumables. Southern Ontario's climate is unique in Canada and can sustain so many of us.</p> <p>Please consider that currently you are the custodians if this land and are responsible for what will be passed on to future generations.</p> <p>Respectfully yours,</p> <p>Agnieszka Pagowska</p>	<p>The focus of ROPA 48 is to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan for the existing urban boundary.</p> <p>The feedback from this submission will be considered as part of the Integrated Growth Management strategy component of the Regional Official Plan Review.</p>
27	<p>Draga Barbir, Barbir and Associates, on behalf of 2220243 Ontario Inc.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Re: First Submission Letter for 8283 Esquesing Line, Milton Draft Amendment No. 48 to the Regional Plan - ROPA 48</p> <p>I am the land use planning consultant retained by 2220243 Ontario Inc., the owner of a parcel of land legally described as Part Lot 3, Concession 5, Town of Milton (the "Subject Lands"), known municipally as 8283 Esquesing Line. I have been retained to advise on Draft Amendment No. 48 to the Regional Plan (ROPA 48) to change the proposed mapping by including the entire parcel except its northwest corner into the "Future Strategic Employment Area".</p> <p>As a result of a brief review of the relevant materials including the Minutes of Settlement (attached and explained), we conclude again that the Subject Lands' urban area boundary should include the creek, the NHS Areas, and Agricultural Areas on all relevant maps which are part of ROPA 48.</p> <p>Property description:</p>	<p>The focus of ROPA 48 is to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan for the existing urban boundary. As the subject lands are located partially outside the urban boundary it is not within the scope of this amendment.</p> <p>The feedback from this submission will be considered as part of the Integrated Growth Management strategy component of the ROPR.</p>

No.	Source	Submission	Response
		<p>The Subject Lands are located on the east side of Esquesing Line, north of James Snow Parkway. The lands are in very close proximity to the 401 Industrial Business Park. The lands have a frontage of approximately 500 feet along Esquesing Line and a depth of approximately 1100 feet, and are 12 acres in area.</p> <p>Current Land Use Designations:</p> <ol style="list-style-type: none"> 1. In the Regional Official Plan on Map 5 (Regional Phasing), the subject property is shown as “Urban Area with Regional Phasing between 2021 and 2031”. 2. In the Town of Milton Official Plan, the Subject Lands are designated as “Agricultural Area” and “Greenland Area” (Schedule A – Land Use Plan). 3. In the Town of Milton Phasing Plan, the subject property is in Phase 4 Lands – “Urban Expansion Area” – 2021 onwards. <p>Current Zoning:</p> <p>In the Town of Milton Zoning By-Law 144-2003, approximately ninety percent of the subject property is zoned “A1 – Agricultural”, and the remaining portion of less than ten percent, located at the far back of the property, is zoned “GA – Greenlands” (Maps 11 and 12 attached).</p> <p>Issue Number 1</p> <p>In the Minutes of Settlement dated March 31, 2015, between the Regional Municipality of Halton and 2220243 Ontario Inc. (hereinafter referred to as “222”), in regard to the appeal of ROPA 38 identified by the Ontario Municipal Board as appeal No. PL111358, point number 3 states that: “The Parties agree that Halton Region has commenced the next statutory five-year review of the Plan in 2014 (the “Next Five-Year Review”). Part of the Next Five-Year Review will consider the allocation of additional Urban Area lands within Halton Region to respond to the additional numbers provided to Halton Region under Amendment 2 to the Growth Plan (June 2013). Halton Region agrees to consider the Subject Lands as part of the Next Five-Year Review without prejudice to 222’s withdrawal of the Appeal as a result of these Minutes.”</p> <p>Issue Number 2</p> <p>In the Town of Milton Zoning By-Law 144-2003, approximately ninety percent of the subject property is zoned “A1 – Agricultural”, and the remaining portion of</p>	

No.	Source	Submission	Response
		<p>less than ten percent, located at the far back of the property, is zoned “GA – Greenlands”.</p> <p>The front part of the Subject Lands is within “Phase 4 Lands” (year 2021–onwards) in the Town of Milton Phasing Plan: Urban Expansion Area.</p> <p>The proposed ROPA 48 Maps 1, 1c, 1h, and 3 show only the front portion of the lands as Urban or Employment Area and extend the Greenbelt Natural Heritage System deeper into the lands almost to the urban- or employment-area boundary.</p> <p>Inconsistency of the mapping is evident and should be further explored. For example, the proposed Map 3 shows almost no urban area for the Subject Lands. The proposed Map 1 shows a smaller urban area than agreed/designated in other plans and shows a wide Greenbelt NHS coming almost to the urban line.</p> <p>Further, Map 1C – Future Strategic Employment Areas – should show the part of the Subject Lands which is not within the urban area or the Greenbelt NHS area, as “Future Strategic Employment Area”. This would be in keeping with point number 3 of the Minutes of Settlement:</p> <p>Part of the Next Five-Year Review will consider the allocation of additional Urban Area lands within Halton Region to respond to the additional numbers provided to Halton Region under Amendment 2 to the Growth Plan (June 2013). Halton Region agrees to consider the Subject Lands as part of the Next Five-Year Review without prejudice to 222’s withdrawal of the Appeal as a result of these Minutes.</p> <p>Regards,</p> <p>Draga Barbir, B.Sc. B.Arch. MCIP RPP</p>	
28	<p>Brad Wilson, Burlington resident</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Mr. Milne:</p> <p>Re: Proposed Regional Official Plan Amendment 48</p> <p>Please accept this correspondence as support for Regional OPA No.48 as it relates to the proposed elimination of an employment designation from my property. Given the strategic location of my site adjacent to the Burlington GO Station, I believe that my property is more suited to a mixed use form of development consistent with Provincial, Regional and local planning directives which seek to encourage mixed-use intensification around GO Station areas. Attached is my correspondence to you of December 14, 2020 regarding the</p>	<p>Comment Noted.</p> <p>The conversion of the lands identified in this submission that are located within the Downtown Burlington UGC / Burlington GO MTSA continue to be recommended in ROPA 48. Following the approval of ROPA 48 and the removal of these lands from the</p>

No.	Source	Submission	Response
		<p>appeal of City of Burlington Official Plan Amendment that further outlines the rationale for my position.</p> <p>Thank you very much for your consideration of this submission.</p> <p>Sincerely,</p> <p>Brad Wilson</p> <p>cc. John MacNamara</p> <hr/> <p>[ATTACHED LETTER]</p> <p>Please accept this letter, together with a completed LPAT form, as a formal appeal of the approval of the City of Burlington Official Plan as it affects my property.</p> <p>I support the direction that the City of Burlington Official Plan is taking in terms of inclusion of my property within the MTSA Special Policy Area and the direction to consider future development options for my site along with other properties immediately adjacent to the GO Station. I support the designation of my site as a Primary Growth Area as opposed to Employment as illustrated in Schedule B-1 of the proposed Official Plan Amendment.</p> <p>However, I am opposed to retaining an employment designation on my property and would request the following changes:</p> <ol style="list-style-type: none"> 1. On Schedule B- Urban Structure, change the designation from "Employment" to Residential Neighbourhood Areas. 2. On Schedule B-2, Growth Framework and Long Term Frequent Transit Corridors, remove the Primary, Secondary, and Employment Growth Area designation from my property. 3. On schedule C – Land use – Urban Area, redesignate my property from "General Employment" to a "Mixed Use" designation that would also allow for high-rise residential buildings. <p>I have enclosed a copy of an air photo which identifies the location of my 1.97-hectare property east of Brant Street between Queensway Drive and the CNR</p>	<p>Regional Employment Area, the lands will be subject to an Area-Specific Planning process led by the Local Municipality which will identify appropriate land use designations.</p>

No.	Source	Submission	Response
		<p>tracks. The site is currently used for employment uses and accommodates 6 jobs. The site is zoned GE2, which permits a range of industrial uses.</p> <p>Given the proximity of my site to the GO Station, I believe that there is a redevelopment potential of this property in the same manner as has been experienced on other lands around the GO Station. I have in the past made submissions to the City in this regard along with my neighbour to the east who previously owned property at 2082 and 2090 Queensway Drive. A copy of those submissions is included with this appeal letter.</p> <p>As part of this process, I submitted a request to the City of Burlington for lands to be redesignated from Employment to Mixed Use as part of an exercise undertaken by the City to consider employment conversions. As a result of those submissions, the City of Burlington agreed this was a site that should be converted from employment uses to a mixed use form of development, I understand all of this material was forwarded to the Region and is being considered in the ongoing Regional Official Plan review process.</p> <p>Since making these submissions, I have been advised that recently Metrolinx has purchased the property of my neighbour at 2082 and 2090 Queensway Drive. While I am not aware of the intent of Metrolinx for these lands, I am expecting it will be to accommodate future expansions of activities related to the GO Station. This places my property in a position where it directly abuts a Major Transit Station.</p> <p>As a result, it would appear that retaining an employment designation that accommodates 6 employees is not consistent with Provincial Regional or local planning policies which call for intensification and the establishment of mixed uses around GO Stations, which I understand are referred to as Mobility Hubs.</p> <p>I am aware of other major developments in a similar position adjacent to the GO Station which have been constructed, and am also aware of plans of others to redevelop sites immediately adjacent to the GO Station.</p> <p>As a result, I believe my request is reasonable and consistent with planning policy objectives. The retention of an Employment designation does not comply with current plan policies or the development pattern which is emerging in this area.</p> <p>I look forward to hearing from you. Let me know if you require anything further.</p>	

No.	Source	Submission	Response
		<p>Sincerely,</p> <p>Brad Wilson</p> <p>ccc. John McNamara</p>	
29	<p>D. Green, Oakville resident</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>ROPR Consultation Team Gary Carr, Halton Regional Chair Town of Oakville Council Good morning,</p> <p>In addition to my previous comments on the need to remove all policy references to the term “greyfield” within the Regional Official Plan, as being policies that are not aligned with Provincial Policy as given in the Provincial Policy Statements, because they effectively give permission for developers to circumvent local plan and zoning regulations contrary to local community needs, I would also like to comment on the Table 2b numbers described as proportional targets for Residents vs. Jobs.</p> <p>Once again, I don't see anything in the PPS that reference a need to identify a split in this manner and I would like to point out what may not be evident to those in the planning and government professions, but that is evident to anyone who has ever been in the job market. Namely, employers in the job market do not advertise much less make their employment hires on the basis of where an applicant lives. An applicant may not be at liberty to choose employment close to their home. With increasing transfer of employment hiring to the internet, employers are effectively overwhelmed with applicants. In order to screen applicants out, job listings become ever more specialized. In a job market heavily reliant on contract labour even for high paying white collar jobs, an employee may not be on a position or have the desire to make a short term move to be close to their employment. To regulate by policy the proportion of jobs vs. residents will not ensure ‘live-work’ lifestyles. The result of having widely distributed employment zones throughout the GTA may simply cause more congestion and commute time rather than lessening these problems.</p> <p>Thank you for the opportunity to further comment and I would ask again that the Region please remove the “greyfield” policies for the reasons previously stated below.</p> <hr/> <p>[ATTACHED LETTER]</p>	<p>Comments noted.</p>

No.	Source	Submission	Response
		<p>ROPR Consultation Team Gary Carr, Halton Regional Chair Town of Oakville Council</p> <p>Good morning, Following are my comments on the policy framework within the ROP around the term “greyfield”. This term is not supported within Provincial Policy and should be removed from the Regional Plan. My explanation follows as it relates to a current application at the Town Of Oakville for the property known as South Oakville Mall, formerly Hopedale Mall, owned by SmartCentres at 1515 Rebecca Street, Oakville. My concern is that it can be used to circumvent zoning for properties merely on the pretext that they are vacant.</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely,</p> <p>D. Green Oakville cc. Hopedale Residents Association Coronation Park Residents Association Stephen Crawford, MPP, Oakville</p> <p>Inappropriate use of the term “Greyfield” within the Halton Regional Official Plan Current Policy Framework Policy 72 (8) lists as an objective of the Urban Area the following: <i>(8) To promote the adaptive re-use of brownfield and greyfield sites.</i> Similar language is used in Policy 85 (13) citing “greyfield” redevelopment as an objective under Housing and the term “greyfield” is further referenced under Policy 86 (13.1)</p> <p>The Regional OP has the following definition <i>241.1 GREYFIELD SITES means developed properties that are not contaminated. They are usually, but not exclusively, commercial properties that may be under-utilized, derelict or vacant.</i></p> <p>The above policy framework is being used to justify development contrary to the local Oakville Official Plan (Livable Oakville) at the former Hopedale Mall, renamed South Oakville Centre by its current owners SmartCentres. From the PPS 2020, there is a definition for Brownfield; there is no definition for Greyfield nor is the term referenced anywhere in the PPS:</p>	<p>The Growth Plan, 2020 provides a definition for Greyfields as follows: “Previously developed properties that are not contaminated. They are usually, but not exclusively, former commercial properties that may be underutilized, derelict, or vacant.”</p> <p>Section 2.1 of the Growth Plan, “<i>Better use of land and infrastructure can be made by directing growth to settlement areas and prioritizing intensification, with a focus on Strategic Growth Areas, including...Greyfields</i>”. The Growth Plan definition for “Strategic Growth Areas” includes “Greyfields”.</p> <p>The references to ‘Greyfields’ in the Regional Official Plan are appropriate and in conformity to the Growth Plan.</p>

No.	Source	Submission	Response
		<p><i>Brownfield sites: means undeveloped or previously developed properties that may be contaminated. They are usually, but not exclusively, former industrial or commercial properties that may be underutilized, derelict or vacant.</i></p> <p>SOUTH OAKVILLE CENTRE, FORMERLY KNOWN AS HOPEDALE MALL</p> <p>In 2020 SmartCentres applied to the Town for redevelopment and described the mall as a “Greyfield” seventeen times in the Planning Justification Report</p> <p>Background</p> <ul style="list-style-type: none"> • Hopedale is not designated for redevelopment or intensification in Livable Oakville. • In 2015 Q1 SmartCentres reported to its investors after the termination of its lease with Target that the retail environment looked favourable and it was planning to release the store. <p><i>Calloway has only two Target locations in its portfolio. The Kitchener store lease has been disclaimed, but the Oakville store lease is subject to the ongoing auction process. Both have the parent company's covenant in place.</i></p> <p><i>In addition, both stores are located in strong markets where Management believes that releasing will be possible over time, and at higher than current rents.</i></p> <p>Source: CALLOWAY REIT SUPPLEMENTAL INFORMATION PACKAGE FOR THE THREE MONTHS ENDED MARCH 31, 2015</p> <ul style="list-style-type: none"> • Three months later in 2015 Q2 SmartCentres reported to its investors that Management had decided to redevelop the mall: <p><i>SmartREIT has only two Target locations in its portfolio. The Kitchener and Oakville store leases have both been disclaimed. Both have the parent company's covenant in place. In addition, these two stores are located in strong markets and management has taken this opportunity to focus on redeveloping both sites, as this is the best way to maximize long term returns.</i></p> <p>Source: SMARTREIT SUPPLEMENTAL INFORMATION PACKAGE FOR THE THREE AND SIX MONTHS ENDED JUNE 30, 2015</p> <ul style="list-style-type: none"> • Since that date every quarterly report has referenced this area as being under consideration or planning for redevelopment • Multiple businesses have left including a Home Hardware, 	

No.	Source	Submission	Response
		<p>flower shop, family restaurant and book store the latter of which was evicted for non-payment of a monthly rent fee of \$2000, for a very modest sized store.</p> <ul style="list-style-type: none"> · Similar sized community malls north of the QEW such as the one at the corner of Upper Middle and Third Line are not suffering from poor business. · Hopedale Mall is the only community mall in SouthWest Oakville and it is difficult to believe that this location cannot be profitable · Prior to ownership by Calloway REIT/SmartCentres, Hopedale Mall was viable and described by visitors as having a village like atmosphere · There is no reason to assume that Hopedale Mall is a contaminated site · Allowing developers to skirt policies around location of growth centres will promote this behavior at other similar shopping malls and commercial properties within the Region. <p>The inclusion of policies around the term “Greyfield” is not supported by Provincial Policy and all such references should be removed from the Regional Official Plan. Otherwise owners may attempt to circumvent local official plan designations for properties merely on the pretext that they are vacant.</p>	
30	<p>Michael Melling, Davies Howe LLP, on behalf of Crystal Homes</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Chair Carr and Members of Council:</p> <p>Re: Regional Official Plan Amendment No. 48 (“ROPA 48”) Comments of Crystal Homes</p> <p>We are counsel to Crystal Homes, which owns lands (the “Properties”) located in the southerly portion of the city block bounded by James, Elizabeth, Maria and John Streets in the City of Burlington (the “City”). Specifically, the Properties are located in “Downtown Burlington”.</p> <p>We, together with our client’s land use planner, have reviewed the available draft of ROPA 48, Regional Staff Report Nos. LPS56-20, LPS84-20, LPS89-20, LPS17-21 and LPS49- 21, as well as the <i>Downtown Burlington Urban Growth Centre and MTSA Supplemental Discussion Paper</i>.</p> <p>The purpose of this letter is to advise the Region of serious concerns our client has with ROPA 48, and to propose a solution addressing those concerns.</p> <p>The Proposed Downgrading of Downtown Burlington ROPA 48 proposes the removal of the Urban Growth Centre (“UGC”) from Downtown Burlington, which would instead become a Secondary Regional</p>	

No.	Source	Submission	Response
		<p>Node. This is a lower-order Strategic Growth Area. The focus of the UGC would become the Burlington GO Station (the “GO Station”).</p> <p>Along with the change to the UGC, ROPA 48 would move the “Downtown Burlington Major Transit Station Area” (“MTSA”) from the area surrounding the John Street Bus Terminal to the area surrounding the GO Station.</p> <p>This is Bad Planning</p> <p>Downtown Burlington is the cultural, entertainment and commercial hub of the City, a destination for residents and visitors, and the most walkable part of the urban area. It is, in every sense, an existing “complete community”.</p> <p>The UGC and MTSA designations are vital for the ongoing success of Downtown Burlington. The growth expected in an UGC and MTSA is critical to taking full advantage of existing services, facilities and infrastructure, as well as to positioning the core of the City for future success.</p> <p>Our client, and others, have been laying the groundwork to make this vision for Downtown Burlington a reality. Several new buildings have been constructed recently, with more in the planning stage. These city-building initiatives reinforce the appropriateness of the existing UGC and MTSA designations. Residents from these and future buildings will support the growth of local businesses and promote transit use.</p> <p>By contrast, removing the UGC and MTSA designations will threaten the long-term viability of existing businesses, and discourage economic development. It will send a message to investors that they should stay away from:</p> <p>(1) Downtown Burlington in particular; and</p> <p>(2) Burlington as a whole, since there is no commitment there to predictable, long-term strategic growth planning.</p> <p>The Solution is Obvious: There is No Need to Choose</p> <p>Our client does not understand why an “either/or” choice has been assumed for the Downtown Burlington UGC/MTSA and the GO Station UGC/MTSA. Both can, and should, be designated to accommodate the highest achievable levels of growth. There is nothing in Provincial policy which prevents, or even discourages, this from happening.</p>	<p>Growth and development will continue in the downtown guided by the City of Burlington’s Official Plan policy framework and vision established through the scoped re-examination of the downtown and Official Plan policies. Community infrastructure facilities will continue to exist and support the community.</p>

No.	Source	Submission	Response
		<p>Our client is grateful for the opportunity to make this submission. Should you have any questions, please do not hesitate to contact me or our Associate Alex Lusty, who can be reached at (EMAIL REMOVED)</p> <p>Yours sincerely,</p> <p>DAVIES HOWE LLP</p>	
31	<p>Michael May, Delta Urban, on behalf of North Oakville Community Builders Inc. (NOCBI)</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Regional Municipality of Halton c/o Regional Clerk Graham Milne 1151 Bronte Road Oakville ON L6M 3L1 RE: ROPA 48</p> <p>I am writing to you on behalf of North Oakville Community Builders Inc. (NOCBI) who has been extensively engaged throughout the Regional Official Plan Review (ROPR) process by Halton Region. In addition to our submissions to the Region, throughout the ROPR process to date, we have identified several questions which merit consideration prior to proceeding to the adoption of ROPA 48.</p> <p>We would appreciate the opportunity to meet with Regional Staff to review and receive responses to the questions within this letter, prior to ROPA 48 proceeding to adoption.</p> <p>The following general points regarding ROPA 48, are as follows:</p> <ul style="list-style-type: none"> • We question the role of the Region in planning for more localized nodes, such as Neyagawa in their Urban Structure. It is our opinion that this level of planning is more appropriate for the local municipalities. • The Oakville Uptown Core is identified as a Primary Regional Node, with specific population and employment ratios. On the Region's Urban Structure Map, it is shown schematically as occupying all four corners of the Dundas/Trafalgar intersection. In the North Oakville East Secondary Plan, the lands on the north side of Dundas are part of the Trafalgar Core and are distinct from the Uptown Core. Clarification is requested as to what the Region defines as the Uptown Core, so that the landowners on the north side of Dundas are not ultimately faced with two set of policies. In the Region's mapping, the Uptown Core is shown both within the built boundary and in the DGA, which may be confusing in terms of how development within the Uptown Core is considered with regards to intensification. 	<p>Comments noted.</p>

No.	Source	Submission	Response
		<p>• ROPA 48 provides population and employment target ratios for all Primary Regional Nodes, including the Hospital District, Palermo Village, and the Uptown Core. It is understood that the population and employment planned for these areas has been developed in conjunction with the local municipality. It is important that the additional growth be accommodated within the existing DGA, the Hospital District and Palermo prior to any consideration of changes to be made to approved plans along the Trafalgar Corridor.</p> <p>Furthermore, specific questions from the NOCBI consulting team's review, include the below questions related to the associated IGMS and impact the adoption of ROPA 48:</p> <p>Population and Growth Management</p> <p>1. The Growth Plan considers the Schedule 3 Population forecasts as minimums which can be increased through the MCR process. What analysis has the Region done to determine that the Schedule 3 Forecasts are appropriate for the Region and should not be increased?</p> <p>2. The IGMS Growth Concepts Discussion Paper released in February 2021, cautions that:</p> <p><i>Although the Evaluation Framework shows that Concept 3 would best achieve many of the measures under the various themes, the rate of intensification planned for under Concept 3 is 80% of all housing units being built within the Built-Up Area or existing DGA on an annual basis to 2051. An immediate and significant shift in the pattern of housing in Halton—one where family households would increasingly live-in apartment buildings—is required in order to achieve the housing mix under this Growth Concept. Council will need to carefully consider whether the scale of this shift is feasible given current market preferences and the Region's objectives to retain the identity of local communities.</i></p> <p>This statement is true of all the concepts evaluated. Concept 3 is simply the most extreme in terms of deviation from the market. What analysis has the Region undertaken to ensure that the scale of the shift from the market under the concepts being considered is feasible? People have a choice where they live, and that choice is reflected in market demand. Should Halton prepare an additional scenario that assesses land needs based on the market-based housing scenario and conformity with the Growth Plan to assist in understanding</p>	<p>Given the nature of these comments, the feedback from this submission is more appropriately addressed through the Integrated Growth Management strategy component of the ROPR.</p>

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		<p>the scale of the order of magnitude change required to achieve these growth options?</p> <p>Financial Impact to the Region and Local Municipalities?</p> <p>3. The IGMS Growth Concept Reports has undertaken a financial impact analysis which shows that all the concepts will result in annual property taxes increases of approximately 3% (excluding inflation) continuing to 2051. Assuming inflation, this would result in annual increases of approximately 5% annually. In our opinion, this is not sustainable as it is more than double the current annual increase.</p> <p>Is Council willing to support a growth plan that results in 5% annual tax increases to achieve an untested and very speculative growth scenario?</p> <p>4. Given the substantial deviation from the market that these scenarios would require, there is a very significant financial risk to the Region if the growth does not materialize as planned. For example, the required taxes and development charge amounts to will be delayed or may never materialize.</p> <p>This is on top of the reduced non-residential taxes that Strategy Corp. is projecting will occur in the future: <i>Lower office and retail occupancy will mean less property tax revenue for the Region's municipalities from these avenues with no immediate offset as work from home employees do not pay a higher residential rate than traditional office-based employees (p. 16).</i></p> <p>Is Council prepared to accept these very real financial risks?</p> <p>Housing Affordability</p> <p>5. Strategy Corp. notes that:</p> <p><i>Demographic trends are still positive in Halton as it continues to attract families and workers of all types for a diverse property tax base. However, as previously stated, should home prices continue their trajectory, many families will be priced out. (p. 17)</i></p> <p>Affordability is generally achieved when supply is in balance with demand. It is a certainty that the concepts that deviate significantly from the market will result in upward pressure on housing prices across the Region, by firstly restricting the supply of ground related units and secondly by shifting homebuyers into</p>	

No.	Source	Submission	Response
		<p>apartments which are much more expensive to construct on a per square foot basis. What analysis has the Region conducted to ensure that the growth concepts will not result in further housing price escalations and reduced affordability?</p> <p>Densification</p> <p>6. The term densification and its definition are not part of the Growth Plan policies. Could the Region indicate where it derived the concept of densification from and provide examples of other jurisdictions where this concept has been applied and how successful it has been?</p> <p>7. Densification should not be applied to existing planned communities within the current DGA and approved secondary plans should not be impacted. Confirmation should be obtained from the Region that this principle will be applied in the growth concepts.</p> <p>Status of the Trafalgar Corridor</p> <p>8. The IGMS Concepts Discussion Paper refers to the Trafalgar Corridor in Oakville and Milton as a Strategic Growth Area subject to densification. What analysis has been completed to determine how many additional apartment units could be accommodated within an approved secondary plan? Has there been an assessment of what the impact would be the emerging communities and the additional requirements for municipal, community and social services in this area?</p> <p>Impact of Covid 19.</p> <p>9. While we appreciate that the Region through the work completed by Strategy Corp. is attempting to gain an understanding of the significant changes due to Covid19, several recent Studies by Statistics Canada suggests that a large number of employees will continue to work from home following Covid19. Strategy Corp. appears to agree with this conclusion (p.30).</p> <p>The likely outcome will be a need for larger housing units to accommodate home offices and multiple residents working from home concurrently. This will cause a shift in demand from apartment units in general to ground related units. Given that the four concepts, are already deviating substantially from this demand scenario, how will the these changing housing preferences be accommodated</p>	

No.	Source	Submission	Response
		<p>when the growth concepts are heading in the other direction by restricting most of the new housing to apartments? We will be providing separate comments on the IGMS growth options prior to the due date at the end of July 2021 and any future reports under separate cover. We look forward to hearing back from the Region regarding these concerns to assist in our more fulsome comments.</p> <p>On behalf of the North Oakville Community Builders Inc., thank-you for your consideration.</p> <p>Mr. Michael May, P. Eng., General Manager Delta Urban Inc.</p>	
32	<p>Joel Farber, Fogler Rubinoff, on behalf of RK (Burlington Mall) Inc.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>June 14, 2021 Reply To: Joel D. Farber Direct Dial: 416.365.3707 E-mail: jfarber@foglers.com Our File No. 148005</p> <p>VIA EMAIL TO REGIONALCLERK@HALTON.CA</p> <p>Office of the Regional Clerk Region of Halton 1151 Bronte Rd Oakville On L6M 3L1 Dear Sir:</p> <p>Re: REGIONAL OFFICIAL PLAN REVIEW – SPECIAL MEETING OF COUNCIL June 16, 2021 BURLINGTON CENTRE – REQUEST FOR INCLUSION IN BURLINGTON GO MTSA/UGC</p> <p>We are the solicitors for RK (Burlington Mall) Inc., owner of the Burlington Centre located at 777 Guelph Line. On behalf of our client we write to reaffirm our client's position and request that the Region consider and approve inclusion of the Burlington Centre within the Burlington GO MTSA/UGC.</p> <p>The most recent draft ROPA 48 and the public presentation materials do not reflect our request but we have seen no appropriate response or consideration. In accordance with the Growth Management Discussion Paper, lands within an approximate 800m radius of the GO Station should be considered for inclusion in the MTSA/UGC. Our client's lands fall just on the limit of such radius depending on where the measurement is taken from. However, the Growth Plan</p>	<p>The Region's methodology, as identified in the Regional Urban Structure discussion paper,</p>

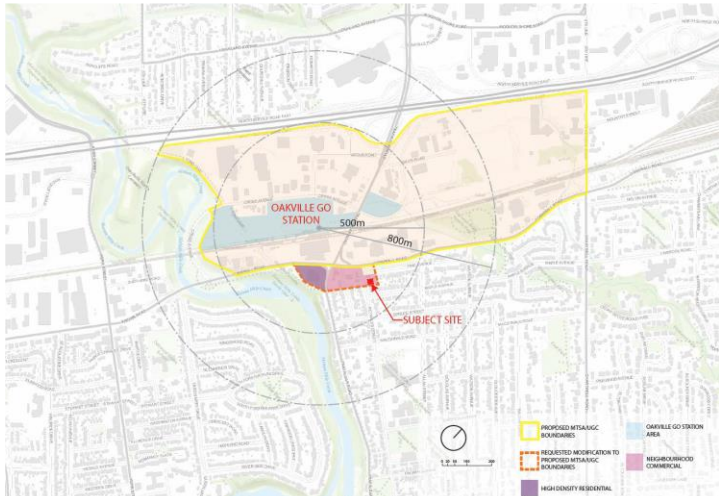
No.	Source	Submission	Response
		<p>permits refinements beyond the suggested radius to capture sufficient areas that can accommodate transit supportive density and to provide connectivity to the major transit infrastructure.</p> <p>In fact, there are areas within the staff proposed MTSA/UGC that are equidistant in proximity to the GO Station as the Burlington Centre, and many such areas have no or considerably diminished capacity for redevelopment and intensification at transit supportive densities. The Burlington Centre has already been recognized within the local planning context as having substantial opportunities for intensification and redevelopment. These opportunities can easily be accommodated at transit supportive densities.</p> <p>RioCan has a proven track record in the planning and redevelopment of large commercial facilities in the GTA. The Burlington Centre has the capacity to be a strategic asset to the City of Burlington to bring a true mixed use development to the Fairview commercial corridor that is focused on transit and the creation of a complete community.</p> <p>In addition to this submission which is made in the context of the Regional Official Plan Review, our client has appealed the Regional approval decision of the new City of Burlington Official Plan consistent with this submission. A copy of that appeal is attached to this correspondence. Our client has initiated discussions with local planning staff and commenced consultations to unlock the potential of the Burlington Centre as a key strategic asset for the development of new and needed transit oriented development within a vibrant commercial district. ROPA 48 and the new City of Burlington OP is the appropriate implementation tool to redesignate the Burlington Centre in a manner consistent with its considerable potential.</p> <p>We look forward to engaging further with the Region and the City to implement an appropriate Regional land use designation for the Burlington Centre and would be pleased to address any further questions, concerns or requests for additional information.</p> <p>Yours truly,</p> <p>FOGLER, RUBINOFF LLP <i>"Joel D. Farber"</i> Joel D. Farber* *Services provided through a professional corporation JDF/SZ</p>	<p>establishes a 500-800m radius representing a 10-minute walk to identify lands that would enable transit supportive densities. The property at 777 Guelph Line is outside of the 800m radius of the station as identified by the Region's methodology and therefore no changes were made in response to this request.</p>

No.	Source	Submission	Response
		cc: Riocan (Stuart Craig and Catherine Truong) Region of Halton Planning (Curt Benson) City of Burlington (Rebecca Lau)	
33	David Bronskill, Goodmans LLP, on behalf of 435 Reynolds Street Inc. E-mail dated June 16, 2021 (Statutory Public Meeting)	<p>June 14, 2021 Our File No.: 211564</p> <p>Via Email</p> <p>Regional Municipality of Halton 1151 Bronte Road Oakville, ON L6M 3L1</p> <p>Attention: Graham Milne, Regional Clerk Dear Sirs/Mesdames:</p> <p>Re: Preliminary Comments on Draft Regional Official Plan Amendment No. 48 On Behalf of 435 Reynolds Street Inc.</p> <p>We are counsel to 435 Reynolds Street Inc. in respect of the lands known municipally as 435 Reynolds Street in the Town of Oakville (the "Property"). We write on behalf of our client to provide preliminary comments regarding Draft Regional Official Plan Amendment No. 48 ("ROPA 48"), in particular the proposed boundaries of the Midtown Oakville GO Urban Growth Centre and Major Transit Station Area (the "Proposed Midtown Oakville UGC/MTSA").</p> <p>As outlined further below, in our submission, the boundaries of the Proposed Midtown Oakville UGC/MTSA do not reflect the context of the area and do not properly implement provincial policy direction regarding UGCs and MTSA's. To assist in rectifying these deficiencies, the proposed boundary should, at minimum, be revised to incorporate the small area of land currently designated Neighbourhood Commercial located immediately south of the proposed boundary, including the Property. Such a revision would provide for a more rational boundary that allows for a mix of uses to support transit ridership in accordance with provincial policy.</p> <p>Provincial Policy Direction Regarding UGCs and MTSA's</p> <p>The Region's consideration of the Proposed Midtown UGC/MTSA takes place in the context of well-established provincial policy direction for the establishment and delineation of such areas.</p>	


No.	Source	Submission	Response
		<p>Under the Growth Plan for the Greater Golden Horseshoe (the “Growth Plan”), UGCs and MTSAs are areas in which growth is to be focused to support the achievement of complete communities that provide for compact built form and a diverse mix of land uses, and expand convenient access public transit, among other things. In order to achieve these objectives, the Growth Plan makes clear that MTSAs must be delineated in a manner that maximizes their size and corresponding transit ridership. More specifically, the Growth Plan defines MTSAs as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk. With these dimensions as a starting point, the Growth Plan then directs municipalities to delineate the boundaries of MTSAs “in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station.”</p> <p>The Proposed Midtown Oakville UGC/MTSA</p> <p>While the proposed policies in ROPA 48 echo the objectives for UGCs and MTSAs as set out in the Growth Plan, the delineation of the Proposed Midtown Oakville UGC/MTSA does not implement the associated policies. ROPA 48 does not provide a rational boundary for the Proposed Midtown Oakville UGC/MTSA which reflects the 500-800m radius specified in the Growth Plan or which maximizes the size of the MTSA as required.</p> <p>The Proposed Midtown Oakville UGC/MTSA is focused on the Oakville GO Station (the “Station”), located along the rail corridor at the intersection of Trafalgar Road. As currently proposed, the boundaries of the Proposed Midtown Oakville UGC/MTSA are distributed around the Station in a dramatically uneven fashion. Specifically, the boundaries extend:</p> <ul style="list-style-type: none"> • northward from the Station approximately 450 metres to the QEW; • westward from the Station approximately 500m to Cross Avenue; and • eastward from the Station approximately 1.2km to Chartwell Road (a distance far in excess of the 800m radius provided for in the Growth Plan). <p>In stark contrast, the proposed boundaries extend southward from the Station as little as 115m – a distance that is less than a quarter of the minimum 500m radius stipulated in the Growth Plan.</p> <p>The unduly circumscribed southward boundary of the Proposed Midtown Oakville UGC/MTSA not only represents an approach that fails to maximize the size of the MTSA as required, it also results in the inappropriate exclusion of</p>	<p>Through the Regional Urban Structure Discussion paper, the Region established a delineation methodology to apply to the delineation of the Major Transit Station Areas. In the methodology, once a 500-800 metre radius was established, undevelopable lands and established areas were excluded. The MTSA boundary was refined to exclude where possible low-density mature residential neighbourhoods, which were not anticipated to accommodate growth and intensification. The delineated boundary of the stations was established in consultation with the local municipalities and supported by local urban structures and official plan policies.</p>

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		<p>lands that are well-suited to supporting provincial policy objectives for MTSAs. The proposed boundary would exclude lands immediately south of Cornwall Road that are already designated High Density Residential and Neighbourhood Commercial in the Town's Official Plan, as shown on the map attached to this letter as Schedule A. For example, the Property is located on the east side of Reynolds Street, just south of Cornwall Road. The Property is just 330m from the Station and is well-suited to supporting the optimization of such transit infrastructure through additional transit ridership that would promote a complete, walkable community as envisioned in provincial policy.</p> <p>In addition, the Growth Plan requires municipalities to support development in MTSAs by planning for a diverse mix of uses, including residential uses. The objectives for MTSAs outlined in ROPA 48 similarly provide that MTSAs are intended to support a range and mix of uses, including residential uses, to leverage infrastructure investments and achieve transit supportive densities. ROPA 48 also provides that such residential intensification must protect existing significant employment uses within MTSAs by ensuring land use compatibility.</p> <p>In this regard, we note that based on the proposed boundaries, the Proposed Midtown Oakville UGC/MTSA would be composed of lands that are currently zoned almost exclusively for either commercial or employment uses under By-law 2014-014. At the Official Plan level, we recognize that the existing land use designations under the Town's Official Plan permit residential uses on a portion of the lands within the proposed MTSA. However, under the Town's existing Official Plan and even under amendments currently proposed, large areas of the MTSA remain designated for employment uses. The presence of such employment uses create potential land use compatibility conflicts that can create challenges for residential intensification, as acknowledged in ROPA 48 itself.</p> <p>In contrast, the Property and the other lands within the Neighbourhood Commercial designation just south of the proposed boundary do not face these compatibility constraints and are therefore well-positioned to provide the residential uses which both provincial policy and ROPA 48 recognize as critical to MTSAs. In this regard, our client is in the process of preparing planning applications to permit the redevelopment of the Property with a mid-rise residential building that would support use of the Station and ridership on the public transit system more generally in a manner that supports the provincial and Regional objectives for the Proposed Midtown Oakville UGC/MTSA.</p>	<p>While the subject lands are located outside the UGC/MTSA boundary, the objective of the delineated boundary in the Regional Official Plan is to establish the area in which a minimum density target would apply to. Through the local municipalities detailed planning work, the local official plans can consider adjacent areas to the UGC/MTSA boundary and identify appropriate land uses that would capture the number of potential users within walking distance of the station.</p> <p>Comments noted.</p>

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		<p>In these circumstances, there is no justification for circumscribing the southward boundary of the Proposed Midtown Oakville UGC/MTSA in the extreme manner proposed and excluding the Property located just 330m from the Station, especially when lands located over 1.2km from the Station are included within the proposed boundary. In our submission, the boundaries of the Proposed Midtown Oakville UGC/MTSA do not conform with the Growth Plan and a revision to ROPA 48 is required to meet the statutory tests for approval.</p> <p>Requested Revision</p> <p>The map attached to this letter as Schedule A outlines the revision to the boundaries of the Proposed Midtown Oakville UGC/MTSA requested. We ask that the Region revise ROPA 48 accordingly in order to rationalize the boundary of the Proposed Midtown Oakville UGC/MTSA in a manner that properly implements provincial policy direction.</p> <p>We would also appreciate this letter being treated as our client's request for notice of any revisions, updates, events, or decisions relating to ROPA 48.</p> <p>Yours truly,</p> <p>Goodmans LLP David Bronskill DJB/MXL</p>	

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34	<p>Hugh Handy, GSP Group, on behalf of Julian Attree</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Clerk Milne,</p> <p>We understand the Regional Municipality of Halton is holding a Public Open House and a Statutory Public Meeting in connection with Draft Regional Official Plan Amendment No. 48 (ROPA 48). ROPA 48 is proposed as a component of Halton Region's Municipal Comprehensive Review pursuant to the Growth Plan, 2019, Section 17 and Section 26 of the Planning Act, as amended.</p> <p>On behalf of Julian Attree (the "Owner"), GSP Group is pleased to provide the following comments in relation to the property municipally referred to as 8889 Tenth Line in Halton Hills (the "Site") for the Region's review and consideration in the proposed amendment to the Official Plan.</p> <p>The Site is currently designated "Agricultural Area (Prime Agricultural Area)" and "Regional Natural Heritage System" according to Map 1 (Regional Structure) in the Region Official Plan. The Site is also identified as a "Future Strategic Employment Area (Overlay)" as per Map 1C of the Region Official Plan. According to the Region's draft Amendment No 48 dated February 2021, the existing Agricultural Area and Regional Natural Heritage Systems designations are proposed to be maintained. This is in addition to the Future Strategic Employment Area (Overlay) designation on the Site.</p> <p>As part of the proposed Official Plan Amendment and Municipal Comprehensive Review, we request that the Region consider amending the boundaries of the</p>	<p>The focus of ROPA 48 is to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan for the existing urban boundary. As the subject lands are located outside the urban boundary it is not within the scope of this amendment.</p> <p>The feedback from this submission will be considered as part of the Integrated Growth Management strategy component of the ROPR.</p>

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		<p>Regional Natural Heritage System designation on the Site. As outlined in the attached memo prepared by Natural Resource Solutions Inc. (NRSI) dated June 14, 2021, the current and proposed natural heritage mapping on the Site was primarily generated using aerial photography and background information from the Conservation Authority without any ground truthing. Based on a recent site assessment conducted by NRSI, and in conjunction with aerial photographs and discussions with the Owner, it is concluded that the natural features shown on Halton Region's mapping (Areas 1, 2, and 3 on the attached map) do not exist. As such, we respectfully request that these natural features and their associated buffers be removed from the Region's mapping.</p> <p>If you wish to discuss these comments further, please do not hesitate to contact either myself or Valerie Schmidt directly.</p> <p>Also, please take this letter as our formal request to be notified of any future correspondence or meetings regarding the Regional Official Plan Amendment.</p> <p>Sincerely,</p> <p>GSP Group Inc. Hugh Handy, MCIP, RPP Valerie Schmidt, MCIP, RPP Senior Associate Senior Planner Cc: Heather Ireland, Regional Planner Dave Stephenson, NRSI Julian Attree Zach Attree</p>	
35	<p>Mike Crough, IBI Group, on behalf of ALOG - Aldershot Land Owners Group</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Dear Mr. Benson:</p> <p>COMMENTS ON REGIONAL OFFICIAL PLAN AMENDMENT 48 ALOG ALDERSHOT GO MTSA AREA, CITY OF BURLINGTON</p> <p>Thank you for the opportunity to provide comments through public consultation on the ongoing ROPA 48 exercise. We have been following and reviewing the Regions work to date and look forward to future releases and opportunities for continued engagement. We are submitting these comments on the draft ROPA 48, which are based on our review of the draft policy document dated February 2021 and is a matter for the upcoming Statutory Public Meeting scheduled on June 16, 2021.</p> <p>As you may know, we are a group of Land Owners in the Aldershot area who have formed a Land Owners Group (ALOG- Aldershot Land Owners Group) to</p>	<p>Comment Noted. The conversion of the lands identified in this submission that are located within the Aldershot GO MTSA continue to be included in ROPA 48.</p>

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		<p>advance a shared vision for the planning and development of lands near the Aldershot GO Station</p> <p>ALOG consists of the following Owners and lands (“subject lands”):</p> <ol style="list-style-type: none"> 1. 1070 Waterdown Rd & 1077 Howard Rd – Howard Road Holdings Ltd. 2. 1035 Howard Rd – St. Marys Cement Inc. 3. 1021 Emery Ave – Emshih Aldershot Inc. 4. 1020 Emery Ave – Gervais Development Corporation <p>The location and extent of the collective landholdings of the ALGO are illustrated on Figure 1 below. Together, these lands are approximately 20 ha.</p> <p>Through the ROPR process ALOG has been monitoring and providing correspondence at each phase of the consultation period. In each of our submissions we have maintained that the focus for the Region is the timely and phased approach of the overall Regional Municipal Comprehensive Review. We are pleased and support the phased approach that the Region has undertaken to allow local municipalities to advance or restart their own local official plan amendments in particular allow the City of Burlington the authority to complete and implement its own mixed-use ASP for this area.</p> <p>Map 6d - Aldershot GO MTSA</p>  <p>Figure 1 – Collective Landholdings for the ALOG as it relates to the Aldershot GO proposed MTSA</p> <p>ALOG Landholdings</p> <p>We have reviewed the draft ROPA 48 document and support the proposed revisions to the urban area policies, the proposed redefined MTSA boundaries and the proposed employment land conversion policies, However, growing</p>	

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		<p>concern over the changing employment patterns and economic trends in the Region and how it relates to population, employment distribution targets lead to concerns regarding the ability for the Region to be able to achieve the Provincial mandated targets by 2051 without further direction or understanding on the how the targets are established.</p> <p>On this topic we offer the following questions/concerns:</p> <ul style="list-style-type: none"> ▪ We require further clarification on how the target proportion of residents and jobs of 75% residents and 25% jobs was established for the Aldershot MTSA specifically and targets for other MTSAs more broadly, and request that the planning basis and background to setting these targets be clearly outlined by staff before any decisions are made. ▪ How will flexibility for transitioning employment trends be built into the calculation for would be considered as employment in the calculation for jobs per hectare targets? (i.e. Work from home employment and/or no place of work). ▪ Will further discussion regarding the appropriateness to have density targets determined through a comprehensive Secondary Plan process undertaken at the local level? ▪ Concern and clarification required regarding Section 79.3(13) v) that “requires” that mixed use developments provide a majority or significant proportion of the total GFA to employment uses. The proposed wording of this policy can lead to an interpretation that results with unachievable employment requirements that could be unsuccessful or burdensome given current market and economic trends. ▪ Clarification on how the required employment target is calculated in developments that achieve a higher residential density than the minimum targets. <p>We would like to reiterate our general support of ROPA 48 and its intent of establishing the appropriate hierarchy of growth areas in the Region. We would very much appreciate an opportunity to discuss the concerns clarifications we have listed above. We would be happy to work with your staff to arrange for a virtual conference call to suit your schedule over the coming weeks.</p> <p>Sincerely,</p> <p>Mike Crough RPP MCIP Associate Director- Practice Lead</p> <p>Cc:</p>	<p>Given the importance of accommodating employment growth in SGAs to the Region’s growth strategy, a target proportion of residents and jobs in Table 2b is maintained in ROPA 48. However, Table 2b is revised to:</p> <ul style="list-style-type: none"> • clarify the general nature of the target (through the addition of the word ‘General’ and through the addition of the tilde (~) symbol which is commonly read as ‘approximately’); • update the targets for specific SGAs based on local feedback (Milton UGC, Palermo Village) and/or to achieve a greater level of consistency across the SGAs and to reflect the more general nature of the targets (Aldershot, Acton, etc.); • add a footnote to reinforce the general, long-term, and aspirational nature of the target and the latitude for refinements to it through a local process, consistent with Section 55.3, which has also been revised to clarify the implementation of the general target in Table 2b through local planning processes. <p>In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches in Section 79.3(13) c) in Draft ROPA 48.</p>

No.	Source	Submission	Response
		<p>Ms. Amy Shepherd- IBI Group Mr. Colin Evans – St. Marys Cement Inc. Dr. Michael Shih – Emshih Aldershot Inc. Mr. Gerard Gervais – Gervais Development Corporation</p>	
36	<p>Keith Mackinnon, KLM Planning Partners Inc., on behalf of Limeside (Burlington) Inc. c/o DG Group</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>June 15, 2021 Chair Carr and Regional Council Planning Services Department 1151 Bronte Road Oakville, Ontario L6M 3L1</p> <p>Attention: Chair Carr and Regional Council Re: Halton Region Official Plan Review Limeside (Burlington) Inc. c/o DG Group Part of Lots 2 & 3, Concession 2 (Former Township of Flamborough)</p> <p>Dear Chair Carr and Regional Council: KLM Planning Partners Inc. represents Limeside (Burlington) Inc. c/o DG Group which owns lands on both sides of King Road in the North Aldershot area of the City of Burlington.</p> <p>Further to our earlier submission at the public meeting held on Wednesday November 18, 2020 along with our written submission made on December 18, 2020, we wish to continue to impress upon that our clients lands which continue to be shown as “Natural Heritage System for the Growth Plan” and “Natural Heritage System”, while currently designated as “Infill Residential” in the current North Aldershot Secondary Plan within the City of Burlington Official Plan, should continue to remain designated as such.</p> <p>Our client continues to object to the re-designation of these lands to “Natural Heritage System for the Growth Plan” and “Natural Heritage System”. In our respectful submission, the “Infill Residential” designation should continue to apply along with the development permissions that are currently afforded to this property via the existing land use designation.</p> <p>We would be happy to meet with staff to discuss our concerns and furthermore, we continue to request notification of any decision related to this matter.</p> <p>Yours truly,</p> <p>KLM PLANNING PARTNERS INC. Keith MacKinnon, BA, MCIP, RPP</p>	<p>The focus of ROPA 48 is to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan for lands within the existing urban boundary. As North Aldershot is located outside the urban boundary it is not within the scope of this amendment.</p> <p>The North Aldershot review is being addressed through the broader ROPR process and is being considered in conjunction with the other ROPR theme areas including the Integrated Growth Management Strategy, Rural and Agricultural System, and Natural Heritage System.</p> <p>The feedback from this submission will be considered in the next phase of the ROPR which will include the development of policy directions for the North Aldershot Policy Area which will then be used as the basis for the development of later amendments to the ROP.</p>

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		<p>Partner cc.Darren Steedman – DG Group cc.Alexa-Rae Valente -DG Group</p>	
37	<p>Teresa and Paul Kovacs, Halton Hills residents</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>June 14, 2021-06-10 Halton Regional Council c/o Regional Clerk Graham Milne E: regionalclerk@halton.ca Re: ROPA 48: An Amendment to Define a Regional Urban Structure"</p> <p>Dear Council,</p> <p>We oppose the ROPA48 amendments as they would apply to Halton Hills. In particular, we oppose application of the Major Transit Station Area designation that would, we believe, result in the destruction of mature and stable neighbourhoods in Georgetown. The regional plan should include protection for the historic neighbourhoods in Georgetown.</p> <p>Preservation</p> <p>A priority for the planning process must be the preservation of our community's history. Many homes in Halton region were built relatively recently, but Georgetown fortunately has four mature and stable neighbourhoods:</p> <ul style="list-style-type: none"> * Main and Arletta Street and surrounding neighbourhood in the downtown * the Silver Creek area with King and Queen Streets and surrounding neighbourhood * the John Street area * The Park District <p>The Silver Creek and John Street neighbourhoods are at risk, however, of destruction if redesignated. Single family homes would be replaced by high density housing. Many homes, like ours, were built in the 1800s. Our neighbourhood was designed to proudly preserve and protect our history. If we can't define ourselves as a small town, we will make a great suburb to another!</p> <p>The train stations in Georgetown and Acton are the only stations in the Halton region that is not supported by public transit. We believe that 99 percent of the people that use the train stations in Georgetown and Action drive to the station. Only one or two bicycles are ever parked at the station and footprints in the winter snow show that few walk to the station. Replacing mature homes near the stations with high density housing would result, we believe, a large number of people moving into the area with vehicles that must be used to get to shopping, schools and many other activities that are largely absent in this mature</p>	

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		<p>neighbourhood. Increased density designation near the Georgetown and Action Go stations will bring more cars to an area that already has narrow streets, some without sidewalks, one lane rail underpass and limited parking.</p> <p>The Region: Upon a quick review of other Halton Region Go Stations outside of the major urban areas it is apparent that most are not centered in historical residential areas. There should be some guidelines in place related to this potentially more than 100 years?</p> <p>Our region contains many farms and most are in the northern part of Halton. We need to decide if the region supports urban sprawl since the current MTSA strategy sets Halton Hills up for a bedroom community for GTA urban centres outside of Halton Region. A significant increase in population will result in loss of farmland. The region needs to decide now. Metrolinx has not made a significant investment in the Halton Hills stations, only in laying dedicated track to get to Guelph and Kitchener.</p> <p>Across Regions (The Kitchener Go Line): Reviewing the MTSA strategy across regions for the Kitchener Go Line, it appears that Halton Hills is the 'end of the line' for the Kitchener line. MTSA strategies are just getting underway for Guelph and Kitchener. Guelph has proposed that their MTSA can be defined by their urban boundaries and Kitchener is just getting underway.</p> <p>Since Halton Hills does not have local transit and the desire of the region is to constrain growth within existing urban areas, the proposed Halton regional plan appears to view Halton Hills as a bedroom community and not an employment area. This is urban sprawl not the creation of healthy sustainable communities. The MTSA concept is ill timed for Halton Hills it should be considered only after Guelph and Kitchener's plans for 2051 are defined. These are larger urban areas on the trajectory driving the MTSA provincial strategy across regions. We would like to know what are the proposed minimum density targets by neighbourhood established by Halton region, but also the current levels? It appears to us that two of the four mature and stable neighbourhoods in Halton Hills are perhaps the only areas where established low density neighbourhoods are to be replaced by high density construction. We oppose the ROPA48 amendments because they will result in the elimination of mature and stable neighbourhoods in Georgetown and Action.</p> <p>Teresa and Paul Kovacs</p>	<p>In April, 2021, the Province and Metrolinx released the preliminary design business case that highlights the benefits of two-way, all-day GO service on the Kitchener rail line from Georgetown to Kitchener which would increase service at the Georgetown GO and Acton.</p> <p>The current density for the Georgetown GO area is 68.8 people and jobs per hectare. Given the level of current and planned service to the Georgetown GO station a minimum density target of 100 residents and jobs per hectare was identified for the MTSA. While the planning horizon for the Growth Plan is 2051, this target may be planned for beyond the horizon of the plan. Given the existing context of the Georgetown GO MTSA and the existing low and medium density neighborhoods, the density target of 100 residents and jobs per hectare was established based on the Region's initial assessment of the area, and supported by the local plans. The balance of the Integrated Growth Management Strategy will confirm the allocation of population and employment to the local municipalities to 2051. ROPA 48 includes a policy that allows for an adjustment to the density target of the area following the completion of the IGMS.</p> <p>ROPA 48 was modified to include an objective for Major Transit Station Areas to maximize the number of potential transit users within walking distance of a</p>

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		<p>CC: Mayor Rick Bonnette, Regional Councilors Jane Fogal, Clark Somerville, Town Councilors Wendy Farrow-Reed, Moya Johnson</p>	<p>station while also considering contextually appropriate intensification opportunities while protecting the stable residential neighbourhood character as determined through the local area specific planning work.</p>
38	<p>Tom Muir, Burlington resident</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>June 14, 2021. To: Halton Regional Council From: Tom Muir, Burlington resident Subject: Statutory Meeting on ROPA 48.</p> <p>I wish to make the following written submission to the Statutory Public Meeting on ROPA 48. This submission is in 4 parts, with some overlap, so I beg your indulgence for any duplication. It was needed for fuller elaboration of several points of emphasis raised in my submission evidence and argument.</p> <p>I will be unable to attend in person or make a verbal submission, but wish to provide this written submission for the record of the proceedings of this process. Please note that this written submission is focused on the components of ROPA 48 that are dealing with the North Aldershot Planning zone. However, many of the points made on process, and the criticisms, comments and issues raised therein, can in fact be generalized to numerous aspects of the ROPA 48 as a whole.</p> <p>Please excuse me if I have not complied with the exact timing of submission, which I am not clear on. I thought it to be Monday June 14 before 5PM.</p> <p>Thank you Tom Muir 70 Townsend Ave Burlington.</p> <p>Submission of Tom Muir to the Halton Statutory Public Meeting: Proposed Amendment to the Regional Official Plan “ROPA 48: An Amendment to Define a Regional Urban Structure”</p> <p>Part 1</p> <p>The North Aldershot/Eagle Heights issue is not only a Regional issue, but is a citywide and neighborhood issue as well. North Aldershot (NA) is a separate Planning Zone (like Urban and Rural) and has its own policies with very detailed</p>	

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		<p>zoning. The City has had a long history of OP and by-law planning policies specifically for North Aldershot. My experience in this dates back to 1993/94.</p> <p>It is the last remaining parcel of largely undeveloped land in Burlington, and if fully serviced, the last "greenfield". But it's not just any greenfield. It is a distinct mixed landscape, with deeply incised creeks and watercourses, and rolling slopes from the escarpment down to the flats of Plains Road. If you know the area, you know that it is unique and very special, even idyllic I would say. Over many years, public efforts, including the many agencies of the North</p> <p>Aldershot Inter-Agency Review (NAIR), have recognized this distinctiveness, and expressed the goal and principles to keep it distinct, while still trying to allow some development form designed to co-exist, but not replace. I'm writing here because I think that special place is in grave danger from ever increasing demands for more development than we ever contemplated.</p> <p>The crux issue in the development proposals for NA, and specifically Eagle Heights, is density. As you can see, the wanted unit numbers in the applications have steadily increased as time went by, right up to 2019. There is a history in development proposals over 1962 to the present.</p> <p>In 1993/4 the Parkway Belt West Plan policies were in effect as the decision foundation. Under the umbrella of this Plan, at that time, the (NAIR) undertook a lengthy multi-agency and citizen group Land Use Concept exercise for NA. This Review was concurrent with an application for 1100 units from Paletta International Corporation (PIC). This application represented 2 landowners; PIC and Taylor. With the NAIR multi-party conclusions and recommendations that 232 units were acceptable, the City of Burlington chose this number to take back to the developer. The PIC appealed to the OMB.</p> <p>An (8) eight week OMB hearing took place in the spring of 1995 and another eight (8) Weeks in 1996. In subsequent meetings, with no citizens present, the city planning/legal and the PIC planning/legal, negotiated a settlement to take to OMB for a Hearing. The settlement plan was approved by the OMB in October/December 1996.</p> <p>These Settlement negotiations between the parties in October/November 1995 resulted in a plan for 501 units in the Central Sector. The PIC lands included 363 units with a park block and a school block, while the former "Taylor" lands included 46 units. The remaining 92 residential units were permitted on areas owned by other landowners in the Central Sector. This was a very controversial</p>	<p>The focus of ROPA 48 is to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan for lands within the existing urban boundary. As North Aldershot is located outside the urban boundary it is not within the scope of this amendment.</p> <p>The North Aldershot review is being addressed through the broader ROPR process and is being considered in conjunction with the other ROPR theme areas including the Integrated Growth Management Strategy, Rural and Agricultural System, and Natural Heritage System. The North Aldershot Discussion Paper and Appendix J to the Growth Concepts Discussion Paper provide a review of the entire North Aldershot Area and do not get into specific property history. The review is focused on the Provincial policy framework in place today and what updates/changes need to be made to the ROP to be consistent with and conform to that framework as well as on soliciting feedback from the public on their vision for the future of North Aldershot.</p> <p>The feedback from this submission will be considered in the next phase of the ROPR which will include the development of policy directions for the North Aldershot Policy Area which will then be used as the basis for the development of later amendments to the ROP.</p>

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		<p>settlement and the citizens, including myself, were left feeling betrayed. The basis and fact of this is documented, but beyond this space.</p> <p>The OMB approved this settlement in 1996. Then the never ending applications for revisions to increase the unit count began. On July 19, 2002, PIC and Taylor submitted Official Plan Amendment, Zoning By-law Amendment draft plan of subdivision applications to the City of Burlington. An application was made for residential development for a total of up to 665 (596 PIC, 69 Taylor) residential units. The owners appealed the applications to the Ontario Municipal Board (OMB) in October 2002 for lack of decision. This decision was appealed twice by City but both rulings went to the applicant.</p> <p>In December 2010, PIC and Taylor submitted revised draft plans of subdivision to permit the development of 870 residential units (815 units on the PIC lands and 55 units on the Taylor lands). This 2010 application revision included 4, four story apartment condominium buildings in the Paletta lands. The 2010 proposal revision was subject to a public meeting, comment, and multiagency staff refusal as inadequate. The present development application as of 2019 is the following, totaling 924 units.</p> <p>The proposed development of the PIC property, a 97-hectare parcel on the north side of Flatt Road, is for 203 single-detached houses and 587 cluster houses (attached units) for a total of 790 units. The apartment buildings from 2010 are still part of this application. The proposed development of a 9.6-hectare parcel on the south side of Flatt Road, is for 32 single-detached houses and 102 cluster houses for a total of 134 units. The applications have been appealed to the Local Planning Appeal Tribunal by the applicants.</p> <p>This history is important for people to know and note as most people don't know this or are confused by the changing numbers. Also, as most important, only the 1996 unit counts are approved. None of the other amendment applications submitted has been moved into a Hearing at LPAT(OMB), either contested or negotiated settlement.</p> <p>What citizens want to see is a detailed, concrete, and replicable evidence trail that leads to the decision, or staff advice, about what density is defensible and can be recommended under current science and policy regimes. Agency and public concerns and comments number in the hundreds, and we want to see them answered explicitly.</p> <p>Part 2.</p>	

No.	Source	Submission	Response
		<p>In Part 1 of this discussion, I provided some context of the NA issue, and history and timeline of changes in the proposed development at Eagle Heights. Recall that this consists of two sets of development applications and two property ownership's: Paletta (PIC) and Taylor lands. PIC is applicant for both properties. There is one component of this history I left out, in part because to explain it adequately needed an overview of its own, and because it is such an important matter not well known to City residents.</p> <p>It is an open question as to what this matter, the Minutes of Settlement between PIC and the City that covers the Eagle Heights development in particular, means in terms of the Regional Official Plan Review outcome, and really, more generally, how we move ahead with process and decisions about Eagle Heights.</p> <p>Recall part of the timeline that is relevant to identifying where in the timeline history the Settlement took place. 2007: Revised Applications: 870 units. Proposal not circulated. 2009: Minutes of Settlement: City and PIC entered into negotiations on several properties including Eagle Heights. 2010: Revised Applications: 870 units. Studies submitted and applications were circulated. As indicated, in 2009, the City and PIC entered into negotiations pertaining to several properties in Burlington. In Ontario, citizens and developers have the right to appeal to the Ontario Municipal Board (OMB).</p> <p>According to a City presentation at a Ward One Semi-Annual Open House of Councillor Rick Craven, on April 11, 2012, the reasons why were summarized as follows. PIC had numerous (20 –25) appeals to the OMB going back to the 1980s. Appeals by PIC had become a financial burden. Appeals had complicated the land use structure and caused uncertainty in the planning process of the City.</p> <p>Had begun to affect the ability of the City to achieve important strategic economic objectives related to development of employment lands and remaining residential lands. Why a legal agreement? – to hold both parties to their promises.</p> <p>Why did the discussions take place in secret? In camera discussion can take place in certain circumstances, including litigation when the City is in court –the OMB is a court Month-long discussion among planners and lawyers in early 2009. In June 2009 the minutes of settlement signed.</p> <p>The key problem that emerged was that the Minutes of Settlement never became widely known to the NA involved residents, were never distributed, or</p>	

No.	Source	Submission	Response
		<p>announced to residents at key meetings on NA, particularly a significant May 18, 2011 public meeting exclusively on the latest revisions to the Eagle Heights application of 2010. Furthermore, as my experience documented at the time, there was emergent resistance to making the Minutes public at other public meetings. It took until the April 12, 2012 meeting referenced above that there was an open disclosure that described the process.</p> <p>Part 3.</p> <p>From a reading of the entire Minutes of Settlement, I found the following sections and related correspondence, and without excluding other sections, these are of particular concern because they indicate to me that the City has already put itself in a prejudiced position by supporting the development proposal, and limiting its own capacity to question and modify independently.</p> <p>None of these sections has been mentioned to assembled citizens since the formal public consultation process began on May 18, 2011 at the neighborhood public meeting. Only the first one was disclosed to me, despite repeated discussion, and a meeting with the City on Sept. 9, all before I obtained the entire Minutes on September 21.</p> <p>Overall, I find this a shocking lack of good faith. I don't know how an honest review of the current application can be done when the City planning representatives in charge have already agreed in the Minutes to support the application without any current review that is visible. It has also agreed to modify its Official Plan policy to promote intensification everywhere in the City it seems, including all of North Aldershot, not just the Central Sector in which Eagle Heights exists.</p> <p>In further correspondence with the City in 2012, I received the following, including excerpts from the Minutes. "Please note that the Eagle Heights applications are still at the early stages of processing; however as part of the approved Minutes of Settlement between Paletta International Corporation (PIC) and the City of Burlington dated June 1, 2009, Council endorsed the following paragraph: (From Schedule D – Eagle Heights (pages 13 1nd 14: Section 1): "The City recognizes Eagle Heights as an approved residential development and as a required component of Burlington's future housing inventory. "An application has been made for a residential development for a total of up to 870 units. Given current provincial policies on intensification and the need to balance the scope of development and costs of services, the City supports an increase in density provided:</p>	

No.	Source	Submission	Response
		<p>1) the development is confined to the land areas ("pods") as previously approved for development in Amendment No. 197 of the City of Burlington Official Plan and Regional OPA No. 2, and 2) the proposed development and the increased density comply with all applicable provincial law, policies or regulations."</p> <p>"The City and PIC agree that any planned development must comply with the Principles of the North Aldershot Inter-Agency Review (NAIR) and that the design, configuration, density and height of all development cannot result in significant harm to the environment."</p> <p>Section 6 of the Settlement Minutes states: "The City agrees that it will not take steps to modify the proposed development, and will not adopt the issues of other agencies, unless, after conducting its own independent assessment and review of the issue identified with respect to the proposed development, and acting in good faith, the City is of the opinion that good planning requires the City to take steps to seek a modification to the proposed development. In the event agreement cannot be reached on such modifications, either party may address the dispute before the Board as part of a hearing process, as described in paragraph 9, below. "From Schedule M - OPA Policy Appeals (page 26 of Minutes): Part I - Section 3(h) -</p> <p>"The parties agree that this policy shall be modified to read: "The Plan addresses the need to promote intensification of residential and other land uses in the Urban Planning Area, the Settlement Areas, the Central Sector of North Aldershot Planning Area, and to a limited extent in the East and West Sectors of the North Aldershot Planning Area, to fulfill Provincial Growth Management objectives."</p> <p>The message clearly indicates that the City agreed in 2009 to allow more units (up to 870 even before the applications of 2010 and up from 665 in 2002-2004), and as a reason states, "Given current provincial policies on intensification and the need to balance the scope of development and costs of services, the City supports an increase in density.</p> <p>I could comment severally on what these sections mean to me as a reasonable person, however, that is beyond the present scope. I will only say here that they look like the City has already given PIC the application review result wanted, and it only remains to fill in the details with appropriate language.</p> <p>a). failure to disclose Minutes of Settlement at May 18/11 public neighborhood meeting, and subsequently, as I have recorded in previous correspondence.</p>	

No.	Source	Submission	Response
		<p>(b). no admission of this oversight, or efforts to rectify.</p> <p>(c). decision-making appears to be done behind closed doors, which is a repeat of what occurred in 1995/96. Minutes supports additional units up to 870 with no public consultation, and the stated conditions are vague and soft.</p> <p>(d). assertions are made in the Minutes regarding the need to balance the scope of development with costs of service, the rationale always used to rationalize applications to seek more units here. The City has no evidence or report to support this major assertion and rationale that it made some commitments on the basis of.</p> <p>(e). the lack of public input or consultation into the negotiated Minutes of Settlement, and particularly, in this submission, concerning Eagle Heights, is an example of the closed door planning issue. This area of North Aldershot has a history of extensive and formal public representation and consultation, despite the eventual outcome of 1996. These Minutes clearly make commitments to PIC that most concerned citizens have not been made aware of, or at best, reminded of. And none of them had any say.</p> <p>(f). among these commitments are two opening statements in Schedule D, Section 6, where the City agrees that it will not take steps to modify the proposal, and will not adopt the issues of other agencies. These are the primary clauses of the Section, consisting of clear, unarguable agreements by the City to do nothing, or not take certain actions, regarding certain things. Although it was pointed out that there is an "unless" clause that could be invoked, this appears secondary in the Section. This "unless" clause consists of a set of linked actions the City must undertake to justify and raise issues, and seek modifications. By the stated description of these actions, this would inevitably involve planning opinion arguments between the City and developer, unlike the first two clauses, which involve no determinations of anything except the City's inaction.</p> <p>Although there is also a clause allowing the taking of the dispute to the OMB, as part of a hearing process, absent this referral action, there is again no provision for public involvement in the decision-making.</p> <p>What residents have always wanted is a transparent, responsible and accountable explanation of the rational and policy framework for decision-making and advice. For example, there are numerous elements in the policy framework used to assess the PIC proposal, and what the citizens want to see clearly is how key aspects like NAIR; the "areas adjacent to" (heritage, water, ESA's, ANSI's, SARs,) restriction stipulations from the PPS and Places to Grow documents; and ROPA 38, etc, etc, are actually interpreted and translated in the end. That's always been what I was asking questions about and never got any answers. It's in my submissions from Dec, 2011, and lastly in April 2012.</p>	

No.	Source	Submission	Response
		<p>Residents want to know what the concrete basis is that they use in their professional duties to determine what all of the various constraining factors and policies mean in assessing the PIC proposal. Right now, it looks like a secret, a black box, that seems to treat all these factors like they are putty, and that is not acceptable. They will provide their professional opinions to Council (like we eventually will), but we want to know what they are made of.</p> <p>Part 4.</p> <p>I sat in on the NA PIC May 17, and for the most part I found it useful and interesting. However, as the presentation on the Regional OP Growth Concepts ended, I was really left hanging waiting, in vain, for any mention at all of the biggest elephant in the room regarding growth in NA, particularly the Central Sector and Eagle Heights.</p> <p>I was happy to hear that the results of the NA Special Policy Review were suggestive of a hopeful future, all consistent with the current Provincial Policy frame and the current Regional OP objectives.</p> <p>However, it struck me as true that the Settlement Agreement of 2009, at OMB/LPAT, between the City and Paletta (PIC) has already decided many of the planning policy objectives we were discussing in the PIC that were supposedly to be decided by the ROPR. But, as I said, this conflict and disconnect was never mentioned at all despite this reality. I asked the question about this Settlement being missing in their plan, and how they were accounting for its existence in their policy design and assessment for the ROPR. I never got a real answer about this accounting.</p> <p>I think the consultant avoided a real answer that would be a considerate response to my point, as it is a very politically sensitive topic. He went all over the place in this effort to not answer the elephant in the room. They all avoided the issue, as no one else, including any staff present said anything. I was told that ROPR was about "The Future" (Minutes of Settlement are 2009), and is "Big Picture." But the Minutes are a big part of the present reality for NA and to some extent involve legal aspects that are constraints to actions. And in the "future" whenever it emerges, the Settlement will have to be dealt with. The Minutes are in conflict all over the place with the ROPR presentation we saw.</p> <p>Then the reply that I was getting went all over the place not answering me or avoiding the central issue. But there was a spoiler alert going off, as the most</p>	

No.	Source	Submission	Response
		<p>important something of the history and present development planning reality of the NA context was sorely missing.</p> <p>There was a ringing disconnect between the Policy Review results and this reality. They said they were not going to discuss single areas or developments. It was speculated that proposals could be cancelled or taken back, approved or not. I think it lacked a measure of credibility.</p> <p>The policy review section on Settlement Boundary Review Assessment said that none of the Growth Concepts include the expansion of the urban area in the North Aldershot Planning Area. Urban Expansion Assessment undertaken for North Aldershot considers the criteria of the Growth Plan for expansion and analysis of the 'most appropriate location.' This criteria was stated as not being met – urban expansion does not fit in NA, it's not judged appropriate.</p> <p>Other key components of this assessment include extent of the Regional Natural Heritage System and review of water and wastewater servicing. Much of NA is under some special provincial restrictive policy net, and about 50% is in the NHS. None of these components are supportive of NA development.</p> <p>From a reading of the entire Minutes of Settlement, I found the following sections and related correspondence, and without excluding other sections, these are of particular concern because they indicate to me that the City has already put itself in a prejudiced position by supporting the development proposal, and limiting its own capacity to question and modify independently. In further correspondence with the City in 2012, I received the following, including excerpts from the Minutes.</p> <p>"Please note that the Eagle Heights applications are still at the early stages of processing; however as part of the approved Minutes of Settlement between Paletta International Corporation (PIC) and the City of Burlington dated June 1, 2009, Council endorsed the following paragraph: (From Schedule D – Eagle Heights (pages 13 1nd 14: Section 1): "The City recognizes Eagle Heights as an approved residential development and as a required component of Burlington's future housing inventory.</p> <p>"An application has been made for a residential development for a total of up to 870 units. Given current provincial policies on intensification and the need to balance the scope of development and costs of services, the City supports an increase in density provided: 1) the development is confined to the land areas ("pods") as previously approved for development in Amendment No. 197 of the</p>	

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		<p>City of Burlington Official Plan and Regional OPA No. 2, and 2) the proposed development and the increased density comply with all applicable provincial law, policies or regulations."</p> <p>"The City and PIC agree that any planned development must comply with the Principles of the North Aldershot Inter-Agency Review (NAIR) and that the design, configuration, density and height of all development cannot result in significant harm to the environment."</p> <p>Section 6 of the Settlement Minutes states: "The City agrees that it will not take steps to modify the proposed development, and will not adopt the issues of other agencies, unless, after conducting its own independent assessment and review of the issue identified with respect to the proposed development, and acting in good faith, the City is of the opinion that good planning requires the City to take steps to seek a modification to the proposed development. In the event agreement cannot be reached on such modifications, either party may address the dispute before the Board as part of a hearing process, as described in paragraph 9, below. "From Schedule M – OPA Policy Appeals (page 26 of Minutes): Part I – Section 3(h) - "The parties agree that this policy shall be modified to read: "The Plan addresses the need to promote intensification of residential and other land uses in the Urban</p> <p>Planning Area, the Settlement Areas, the Central Sector of North Aldershot Planning Area, and to a limited extent in the East and West Sectors of the North Aldershot Planning Area, to fulfill Provincial Growth Management objectives."</p> <p>The message clearly indicates that the City agreed in 2009 to allow more units (up to 870 even before the applications of 2010 and up from 665 in 2002-2004, and the original and only LPAT/OMB approval of 1996 for 409 units for PIC)), and as a reason states, "Given current provincial policies on intensification and the need to balance the scope of development and costs of services, the City supports an increase in density.</p> <p>This assertion regarding the need to balance the scope of development with costs of service, is the rationale always used to rationalize applications to seek more units here. The City has no evidence or report to support this major assertion and rationale that it made some commitments on the basis of. Obviously, the tremendous inflation in house prices ought to be seen as putting the lie to the cost of production claim, and it sounds like a ridiculous claim right now.</p>	

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		<p>The overall message here is to provide relevant text from the Minutes of Settlement to show clearly the critical disconnect with the assertions and judgements made in the ROPR Growth Concepts PIC. It will also illustrate the basis of my question asked about why the Settlement was not considered or mentioned, and really was avoided in terms of an answer.</p>	
39	<p>Nancy Smith, Turkstra Mazza, on behalf of Emshih Developments Inc.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>VIA EMAIL</p> <p>Chair and Members of Council Regional Municipality of Halton 1151 Bronte Road Oakville, ON L6M 3L1 Attention: Graham Milne, Regional Clerk</p> <p>Nancy Smith</p> <p>15 Bold Street Hamilton Ontario Canada L8P 1T3</p> <p>Jennifer Meader</p> <p>15 Bold Street Hamilton Ontario Canada L8P 1T3 Dear Mr. Milne: June 14, 2021</p> <p>Re: WRITTEN SUBMISSIONS Emshih Developments Inc. Regional Official Plan Amendment No. 48 ("ROPA 48")</p> <p>We are counsel to Emshih Developments Inc., owner of the properties known municipally as 380 and 433-439 Brant Street, all within the downtown area of the City of Burlington. Our client is opposed to ROPA 48 and the proposal to significantly reduce the size of Burlington's Urban Growth Centre ("UGC").</p> <p>Enclosed, please find correspondence from MHBC Planning, Urban Design & Landscape Architecture ("MHBC"), setting out detailed comments and planning rationale for maintaining the current boundaries of the UGC. To date, MHBC's comments have gone unanswered. We would expect a response to these comments before a decision is rendered on ROPA 48.</p> <p>We request that the attached correspondence be circulated to all members of Regional Council in advance of the Statutory Public meeting scheduled for Wednesday June 16, 2021.</p>	<p>Please refer to the response provided for Submission #20 above.</p>

No.	Source	Submission	Response
		<p>Yours truly, Nancy Smith</p> <p>Jm</p> <hr/> <p>[ATTACHED LETTER]</p> <p>Dear Chair Carr and Members of Regional Council: RE: REGION OFFICIAL PLAN AMENDMENT NO. 48: STATUTORY PUBLIC MEETING WRITTEN SUBMISSION: Emshih Developments Inc. – 380 Brant St. and 433-439 Brant St. OUR FILE: 1583</p> <p>MacNaughton Hermesen Britton Clarkson Planning Limited (“MHBC”) are retained by Emshih Developments Inc. (“Emshih”) in relation to various properties located throughout the City of Burlington. Over the last several years there have been multiple studies and reviews that have impacted Emshih’s Downtown properties. Emshih have made several submissions to both the City of Burlington and the Region of Halton in response to these studies and most recently to the Interim Control By-law Study, the Re-examination of the Downtown through the City of Burlington’s Official Plan Review process and the resulting new Official Plan and policies for the Downtown approved but now under appeal.</p> <p>Within the City’s new Official Plan approved by the Region and now under appeal, Downtown Burlington is the City’s Urban Growth Centre as established through the Growth Plan. The new Official Plan is to provide for growth for the next 10 years, to 2031. The proposed Regional Official Plan Amendment No 48 (“ROPA 48”) is seeking to “adjust” the boundary of the current Downtown by removing 94% of the land area from the Urban Growth Centre, presumably starting in 2031 although this is not clear. The existing MTSA for Burlington GO which is also a primary growth area is to become the new Downtown Urban Growth Centre for Burlington in addition to its existing role as a Major Transit Station Area.</p> <p>Following the release of the Supplemental Discussion Paper, in December, 2020, Emshih made a formal submission to the Region of Halton, requesting that the Region maintain the Downtown UGC boundaries along with its</p>	

No.	Source	Submission	Response
		<p>extension to the Burlington GO MTSA. A copy of the detailed submission and planning analysis is attached as Appendix A. Since that time, neither the City nor the Region have engaged in any discussions with Emshih regarding their comments or the impacts of an altered urban structure on the Downtown properties which have also been substantially impacted by COVID-19 and the development freeze that remains in place by the City. There has also been no assessment or analysis of how these comments have or have not been addressed through ROPA 48.</p> <p>This information has not been presented to Council since December 2020 and there was no report prepared by Staff (by their own acknowledgement) to review and assess the comments on the Supplemental Discussion Paper before ROPA 48 was drafted other than the high level consultation summary document. No further analysis of the submissions or comments has been made public to our knowledge. This is extremely disappointing as we believe ROPA 48 as it applies to the Downtown is a fundamental change in planning policy that appears to be moving forward without proper planning analysis and consideration.</p> <p>The submission made in December 2020 is clear on the significant issues raised through ROPA 48 in relation to the boundary “adjustment” which in fact is a substantial removal of 94% of the existing Urban Growth Centre. In the letter a number of matters are raised, to which there has still been no response provided:</p> <ul style="list-style-type: none"> i) What planning rationale, analysis or justification at the Regional or Provincial level has occurred since November 30, 2020 to justify the changes proposed? Prior to that, planning staff provided no planning rationale, analysis or justification that questioned the role of the downtown as a UGC or its capacity as a UGC and in fact fully support the current Downtown boundary as the UGC in full conformity with the Growth Plan; ii) How is the removal of 94% of an UGC considered a boundary “adjustment” by the Province; iii) What engagement with landowners and business owners has taken place in relation to the removal of their businesses and investments from the Downtown and future opportunities for employment development? The change in designation from an Urban Growth Centre and Primary Growth Centre to Other Strategic Growth Node is not even recognized in the Region’s urban structure chart. On what basis under the Growth Plan is the removal of the Downtown Area founded? There appears to be an assumption that if the Downtown Bus Terminal is removed there is no basis for the Downtown to remain as an Urban Growth Centre which is fundamentally incorrect. 	

No.	Source	Submission	Response
		<p>The removal and relocation of the Downtown UGC will have a detrimental effect on the continued growth and prosperity of Downtown Burlington and on the ability of the Region to accommodate growth to 2051.</p> <p>Given the level of investment and detailed planning for the Downtown to date, the shift of intensification outside of the current Downtown UGC will negatively impact:</p> <ul style="list-style-type: none"> • The supply of new, attainable and affordable housing Downtown; • The viability of businesses and employment in the Downtown; • The ability to secure continued investment in future housing, employment and transit Downtown. <p>We recommend that ROPA 48 be amended as set out in our detailed submission to retain the Downtown boundary with the Burlington GO MTSA. We also recommend that existing Downtown land owners and business owners be afforded a meeting with the Province, Regional and City planning staff and Council to discuss the implications and issue of the recommended changes in policy well before any decision is made that in our opinion will have un reversible long term impacts on the</p> <p>Downtown.</p> <p>Yours Truly,</p> <p>Dana Anderson, FCIP, RPP <i>Attach.</i> Emshih Developments Inc Submission to Halton Region, December 2020 cc: Curt Benson, Region of Halton Heather MacDonald, City of Burlington Dr. Michael Shih, Emshih Developments Inc.</p>	
40	Professional Planners Group E-mail dated June 16, 2021 (Statutory Public Meeting)	<p>Dear Chair Carr and Members of Regional Council:</p> <p>RE: Proposed ROPA 48</p> <p>Thank you for the notification and release of materials regarding proposed ROPA48. We have previously submitted comments as a group on ROPA48 and issues related to the removal of lands from the Burlington Urban Growth Centre. We appreciate the opportunity afforded us through a meeting with senior City and Regional staff. Please find enclosed our initial submission which we request,</p>	

No.	Source	Submission	Response
		<p>with this letter, be forwarded to members of Regional Council. We look forward to receiving a written response.</p> <p>Thank you.</p> <hr/> <p>[ATTACHED LETTER</p> <p>Dear Mr. Benson and Ms. MacDonald:</p> <p>Professional Planners Group RE: MEETING REQUEST TO DISCUSS THE CITY OF BURLINGTON URBAN GROWTH CENTRE</p> <p>We currently represent 13 professional planners from 10 leading urban planning firms in Ontario who are engaged in planning and development projects for both the public and private sector throughout Ontario. As professional planners (Registered Professional Planners in Ontario), we provide objective, professional planning advice and work with communities and our development clients to plan for and develop communities in conformity with Provincial policy, all of which is done in the public interest.</p> <p>Each of us have been or are currently engaged in planning matters in the City of Burlington. It is in that capacity that we are requesting a meeting as soon as possible with you to express our serious concerns in relation to a request by the City of Burlington Council to remove the Urban Growth Centre (Downtown Burlington) from local and Regional Official Plans. We understand this change would require an amendment to A Place to Grow. We believe such a change would set a precedent for local municipalities facing growth pressures and local opposition to simply state that such provincially identified and planned centres have "done their job" as a rationale for what would be a decision contrary to Provincial and Regional policies, Provincial interests as well as the greater public interest.</p> <p>There is considerable history to the planning and development of Burlington's Urban Growth Centre. Since its identification in the 2006 Growth Plan, Downtown Burlington has seen significant investment in its infrastructure, parks, schools, hospitals and community facilities. The Downtown remains well located and structured to accommodate new growth with existing and planned infrastructure. It is clearly reflected and supported as an Urban Growth Centre</p>	<p>The Downtown Burlington Urban Growth Centre is not being removed, however, the Region, in consultation with the City, has adjusted the boundary in ROPA 48 to focus new growth around the Burlington GO station, an area served by provincial infrastructure investment in conformity with the Growth Plan, 2019 as amended. Section 2.2.3.1 of the Growth Plan identifies that the Urban Growth Centres are planned to accommodate population and growth which support investments in regional transit. Further, Section 5.2.2.1 provides the Minister of Municipal Affairs and Housing the ability to update the size and location of Urban Growth Centres. It is Regional staff opinion that the adjustment as identified in ROPA 48 would not require an amendment to the Growth Plan, 2019. This is confirmed by the June 15, 2021 announcement by the Minister that the City and the Region have the ability to adjust the boundary of the UGC to focus growth new provincial transit infrastructure investment at the Burlington GO station.</p>

No.	Source	Submission	Response
		<p>and has been since ROPA 38 was approved. The Region's response to the City's adopted Official Plan in 2018 through its statement of non-conformity did not raise any issue with the Downtown as the Urban Growth Centre or with any urban structure issues related to the Downtown in its planning context.</p> <p>As professional planners in this Province, we believe any decision to now remove and relocate or even alter the boundary of the Urban Growth Centre would have a detrimental effect to the following, given the level of investment and detailed planning to date:</p> <ul style="list-style-type: none"> • the available supply of housing in Downtown Burlington; • the sustainability and viability of businesses and employment in Downtown Burlington; • the supply of market and affordable ownership units as well as market and affordable purpose built rental units; • the ability to achieve sustainability objectives; • the ability to achieve increased transit use and transit oriented development; • the minimization of costs for housing in Downtown Burlington; and, • the ability to secure continued investment in future housing, employment and transit. <p>The current planning status in the City of Burlington's Downtown is also of concern due to the delays with current planning projects that remain without approvals or certainty. Currently there are a significant number of units (over 1,700) that are either frozen in the City's recent Interim Control By-law, or under appeal at the LPAT. A complete shift in planning policy could impact certainty around these applications and continued investment in the Downtown.</p> <p>The removal of the Downtown as the Urban Growth Centre in Burlington is not consistent with Provincial policy. As planners we are very concerned that the removal of the Urban Growth Centre will, in effect, close off the Downtown to many socio-economic groups due to the inability to develop more accessible and affordable units. Further limitation of choice, reduction in transit service and further restrictions on housing supply are not in the public interest especially in a walkable and accessible part of the City that is reflected by the Downtown. The request was not supported by any land use planning rationale, nor has there been any consultation or "collaboration" with the development community or planning consultants, prior to the request. Planning in the public interest should always remain objective and seek to inform political decisions. In response to political direction, it should remain objective to ensure the public interest is upheld.</p>	<p>Growth and development will still continue in the downtown. The City of Burlington's Official Plan will guide development by the policy framework and vision established through the City's scoped re-examination of the downtown and Official Plan policies. These policies support growth in the Downtown to 2031 that will respect the existing character.</p> <p>The Downtown Burlington Urban Growth Centre and MTSA Supplemental Discussion paper was released by the Region in October 2020 for the purposes of consultation. Section 3.2 of the Discussion paper presents the proposed Burlington UGC boundary adjustment options. These options are supported by an assessment of the options against the relevant Growth Plan guiding principles and Urban Growth Centre policies.</p>

No.	Source	Submission	Response
		<p>Any decision to remove, relocate or alter the boundary of an Urban Growth Centre without planning evidence and rationale would set an unprecedented reversal of Provincial policy. Such a decision would also reflect mixed messages to investors in Downtown Burlington as well as other Urban Growth Centres and create economic instability at a time when economic certainty must be at the forefront of government decisions.</p> <p>We look forward to an opportunity to meet with you both to have an honest and informed discussion through which we can present our concerns and information.</p> <p>We appreciate your timely consideration of our request.</p> <p>Sincerely,</p> <p>Dana Anderson, MA, FCIP, RPP, Partner, MHBC Planning Limited Glenn Wellings, MCIP, RPP, Wellings Planning Consultants Inc. Cyndi Rottenberg-Walker, FCIP, RPP, MScPI, Partner, Urban Strategies Inc. Melanie Hare MCIP, RPP, LEED AP, Partner, Urban Strategies Inc. Karen Bennett, MCIP, RPP, Senior Associate, GSAI Martin Quarcoopome, BES, MCIP, RPP, Associate, Weston Consulting Mary Lou Tanner, FCIP, RPP, Principal Planner, Niagara Planning Group John R Henricks, MCIP, RPP, President, Niagara Planning Group David Falletta, MCIP, RPP, Partner, Bousfields Inc. Tyler Grinyer, BURPI., MCIP, RPP, Partner, Bousfields Inc Brenda Khes, MCIP, RPP, Associate - Senior Planner, GSP Group inc. Ed Fothergill, MCIP, RPP, President Fothergill Planning & Development Andrew Ferancik, MCIP, RPP, Principal, WND Associates</p>	<p>Following the release of the Supplemental Discussion paper, the Region commenced public consultation which included two Public Information Centres, meetings with Regional and City advisory committees, and stakeholder meetings with the development community, interested residents and landowners. A meeting was held with the Professional Planners Group on February 20, 2021.</p>
41	<p>Michele Camacho</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p>	<p>Hello:</p> <p>I attended the statutory public meeting today and am writing to voice my support of the proposed Adjusted Urban Growth Centre Boundary in Burlington. I am the current Chair of the Heritage Burlington Advisory Committee. I have been a member of this Committee since 2016 and have seen first-hand how the current boundary has been extremely detrimental to the conservation of heritage properties, the largest number of which are in downtown Burlington. It has been used as a very effective weapon to demolish residences over 100 years old and to justify the construction of 24-28 storey condominium buildings in their place in</p>	<p>Comments noted.</p>

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		<p>areas zoned for 4-10 storeys. Unless this change is made now, Burlington will forever be changed for the worse.</p> <p>Sincerely,</p> <p>Michele Camacho</p>	
42	<p>Terrance Glover, Urban in Mind, on behalf of 1069 Brant Inc.</p> <p>E-mail dated June 16, 2021 (Statutory Public Meeting)</p> <p>(1040, 1041, 1045, 1048, 1049, 1052, 1053, 1056, 1060, 1066, 1069, 1070, 1076, 1077 Brant Street, 1435 Leighland Avenue and 2006 Churchill Ave)</p>	<p>Good day,</p> <p>Although we have already submitted this report previously as part of this ROPA review, we would like to resubmit this document on behalf of our client 1069 Brant Inc.), to ensure we reserve our right of appeal by providing comments for the Statutory Public meeting.</p> <p>Best Regards,</p> <p>Terrance Glover, RPP, CPT</p> <hr/> <p>[ATTACHED LETTER]</p> <p>1.0 Introduction:</p> <p>1.1 Purpose of this Report:</p> <p>Urban in Mind has been retained to investigate the development potential of properties fronting onto Brant St in Burlington, Ontario. Upon completing a planning review, it has come to our attention that the proposed boundaries for the future 'Burlington GO Major Transit Station Area (MTSA)' and the 'Burlington GO Mobility Hub Study Area' do not include the below noted properties that have direct frontage onto the Brant St major transportation corridor. The purpose of this report is to provide sound justification for enlarging the proposed boundaries of the future Burlington GO Major Transit Station Area and Burlington GO Mobility Hub Study Area (Figure 1 & 2) to include the grouping of properties that have frontage onto Brant St in between Leighland Road and the QEW/Hwy 403 interchange (Figure 3). 89 More pages.</p>	<p>The subject lands are located north of Leighland Road, south of the hydro corridor and along the east and west side of Brant. The lands contain a mix of commercial and residential uses.</p> <p>The Region's methodology, as identified in the Regional Urban Structure discussion paper, establishes a 500-800m radius representing a 10-minute walk to identify lands that would enable transit supportive densities. The subject lands are located outside of the 800m radius taken from the station midpoint established in the Region's current Official Plan and therefore not considered for inclusion within the station boundaries.</p> <p>It is noted that the lands were not identified for inclusion in the boundary of the City's Burlington GO Mobility Hub study work and are located outside of the City's Burlington GO MTSA Special Planning Area in the City's Official Plan. It is also noted that the lands are within the City's Urban Corridor designation and Secondary Growth Area, while the lands to the east and west are designated Low Density residential and</p>

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			<p>within the established neighbourhood area in the City's Official Plan.</p> <p>The Urban Corridor designation in the City's Official Plan will allow for structures of two to six storeys including residential uses above grade. The Area Specific Planning process for the Downtown Burlington GO UGC.MTSA would likely determine appropriate transitions from the focal core around the GO station to the boundaries, with consideration of the City's land use policies for adjacent areas.</p>
43	<p>Carol Holmes</p> <p>E-mail dated June 22, 2021</p>	<p>June 22, 2021 Halton Regional Council c/o Regional Clerk Graham Milne E: regionalclerk@halton.ca</p> <p>Re: ROPA 48: An Amendment to Define a Regional Urban Structure</p> <p>Dear Council,</p> <p>This letter is in reference to the proposed ROPA 48, regarding the Georgetown MTSA and my concerns for the detailed future state.</p> <p>When reviewing the proposed MTSA's for Halton region, I did notice that the Georgetown MTSA is very different solely based on the current land use. The primary land use in the Georgetown MTSA boundary is already existing low and medium density family neighbourhoods. The other proposed MTSA in the region, excluding Acton, are existing high density residential, commercial and employment opportunities. Without adjustments to the proposed Georgetown MTSA minimum density target, the area residences will have no protection from the same policies that will apply to the rest of the MTSA regions in Halton.</p> <p>In reviewing that the current Georgetown MTSA does house existing stable low to medium density neighbourhoods, the policies that will be implemented to grow the MTSA area does not respect the residential land use currently in place. Mainly, it is unclear how the Region will implement new schools, green space and parks to support the increased population growth.</p> <p>Looking at the Georgetown Go Station Secondary plan and the Secondary node of the Guelph Street Corridor, I ask that the Council consider the proposed area</p>	<p>ROPA 48 implements a Regional Urban Structure and establishes a hierarchy of strategic growth areas. This hierarchy is identifying areas that could accommodate growth and intensification based on their locational context in the Region. Stations that are not on the Growth Plan Priority Transit Corridor (Lakeshore West GO Line) but could accommodate a level of intensification appropriate for their context and level of transit service include the Aldershot GO, Georgetown GO and Acton GO.</p> <p>Given the level of current and planned service to the Georgetown GO station a minimum density target of 100 residents and jobs per hectare was identified for the MTSA. While the planning horizon for the Growth Plan is 2051, this target may be planned for beyond the horizon of the plan. Given the existing context of the Georgetown GO MTSA and the existing low and medium density neighborhoods, the density target of 100 residents and jobs per hectare was established based on the Region's initial assessment of the area, and supported by the local plans. The balance of the Integrated Growth Management Strategy will confirm the allocation of population and employment to the local municipalities to 2051. ROPA 48 includes a policy allowing for the revision of the minimum density target through the subsequent ROPA implementing the Integrated Growth Management Strategy, based</p>

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		<p>of the Georgetown MTSA and work towards the approved 2019 Georgetown GO Station Secondary plan while also redistributing the population in other areas within Georgetown.</p> <p>While I do agree with the growth and development in the Georgetown area, I ask that the Council reconsider the current MTSA plan and review the distribution of the population across Georgetown to better support the growth for our region.</p> <p>Sincerely,</p> <p>Carol Holmes 12 Albert Street</p> <p>CC: Mayor Rick Bonnette, Regional Councilors Jane Fogal, Clark Somerville, Town Councilors Wendy Farrow-Reed, Moya Johnson</p>	<p>on further consultation with residents and Local Municipalities.</p> <p>The delineated boundary and established density target for the Georgetown GO MTSA are not land use designations. That level of detail would be determined through the detailed Area Specific Planning work to be undertaken by the Town of Halton Hills. The Town's work would identify appropriate areas within the MTSA that are able to accommodate an appropriate amount of growth in order to plan to achieve the density target established in the Regional Official Plan. The detailed local planning work will follow the Region's Official Plan review and will also consider appropriate implementation of new public service facilities including schools, green space and parks to support the community.</p>