

WESTON CONSULTING

planning + urban design

Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3

September 28, 2022
File 10236

**Attn: Jennifer Le, Planner, Community Planning and Development (West), Municipal Services Office – Central Ontario
Ministry of Municipal Affairs and Housing**

Dear Ms. Le,

**Re: Environmental Registry of Ontario (ERO No. 019-5684)
Halton Region Official Plan Review, Modified Preferred Growth Concept
8223 Eighth Line & 8466 Trafalgar Road
Halton Hills, ON**

Weston Consulting is the planning consultant for Anatolia Group., the owner of the properties municipally addressed as follows (herein referred to as the “Subject Properties):

- 8223 Eighth Line, Halton Hills
- 8466 Trafalgar Road, Halton Hills

Weston Consulting assisted the owner in participating in Halton Region’s Official Plan Review (OPR) and provided written and oral comments on the mapping and policy updates that were adopted by Regional Council via Regional Official Plan Amendment 49 (“ROPA 49”). The purpose of this letter is to provide comments to the Ministry of Municipal Affairs and Housing (“MMAH”) through the Environmental Registry of Ontario posting number 019-5684. We request that the Province approve ROPA 49 *with modifications*, on the basis of the Original Preferred Growth Concept dated February 2022 rather than the Modified Preferred Growth Concept dated May 2022. This letter is intended as a follow-up to our June 29, 2022 letter to the MMAH and May 3rd Letter to the Region.

Description of Subject Properties

The Subject Properties are located north of Highway 401 adjacent to Trafalgar Road and Eighth Line and are currently utilized for agricultural purposes. Table 1 summarizes the approximate lot dimensions and sizes for each property:

Table 1 Lot Dimensions and Sizes

Address	Lot Area (m ²)	Lot Frontage (m)	Lot Depth (m)
8466 Trafalgar Road	736,520	268	1,367
8223 Eighth Line	584,286	511	995

An air photo of the Subject Properties is provided below:

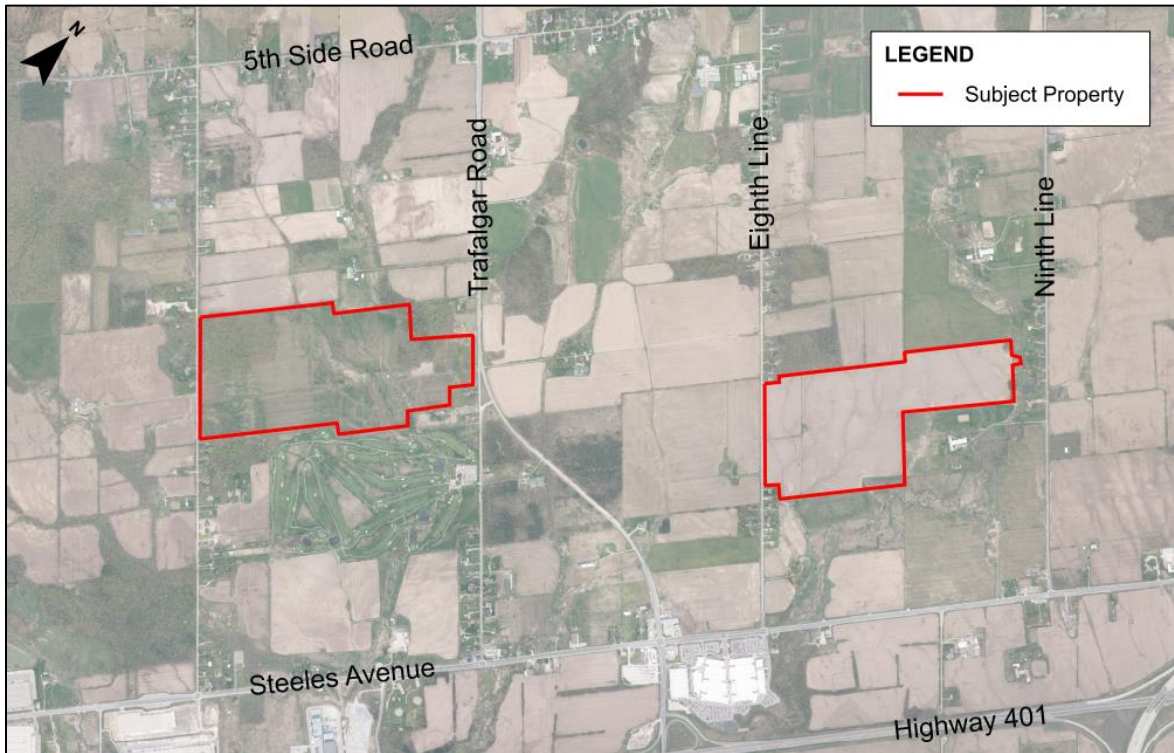


Figure 1 – Air Photo of the Subject Properties

Halton Region Official Plan Review

Provincial Policy Statement 2020 and Growth Plan for The Greater Golden Horseshoe 2020

The Provincial Policy Statement 2020 (“PPS 2020”), through Policy 1.1.2, requires that planning authorities ensure sufficient land is made available to accommodate an appropriate range and mix of land uses to meet projected needs up to a 25-year horizon or an alternative target resulting from a provincial plan. Pursuant to this, the Growth Plan for the Greater Golden Horseshoe (2020) requires planning authorities to plan and manage residential and employment growth up to the 2051 planning horizon per Policy 2.2.1.1 and Schedule 3. If sufficient opportunities to accommodate growth and meet market demand are not available through intensification, redevelopment, and in designated greenfield areas, PPS Policy 1.1.3.8 and Growth Plan Policy 2.2.8.2 permit settlement area boundary expansions to achieve these objectives through a municipal comprehensive review process.

Regional Official Plan Amendment 49 (ROPA 49)

Original Preferred Growth Concept

As part of the OPR process, Regional Staff prepared ROPA 49 and circulated the instrument for public review and comments. ROPA 49 is intended to implement the Region's Integrated Growth Management Strategy (IGMS), which is the second Amendment to be considered by Regional Council as part of the OPR and builds on the Regional Urban Structure defined by ROPA 48. As part of the OPR, ROPA 49 included the completion of background studies, reports, consultation programs and workshops to plan for growth up to 2051. This included a review and analysis of the existing urban boundary and to determine, if and where it is to be expanded.

Following the completion of a Land Needs Assessment (LNA), which concluded that an expansion of the urban boundary would be required for the Town of Milton and Halton Hills to accommodate projected employment growth amidst strong market demand, Regional Staff proposed a boundary expansion as outlined in the Preferred Growth Concept ("Original Preferred Growth Concept") presented at a workshop meeting dated February 9, 2022. The Original Preferred Growth Concept outlined *New Community Areas* and *New Employment Areas* that would accommodate growth up to 2051. The Subject Properties were included within boundary expansion as *New Employment Area*.

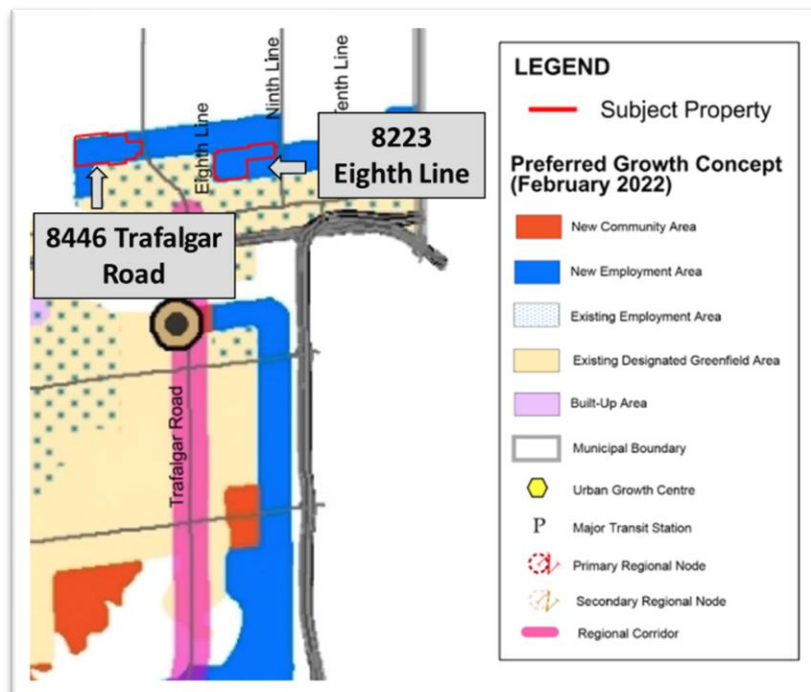


Figure 2 – Original Preferred Growth Concept, February 2022

Modified Preferred Growth Concept

At the February 16, 2022 Regional Council meeting, it is our understanding that Council adopted a motion directing staff to prepare a Regional Official Plan Amendment to implement a Modified Preferred Growth Concept that advances growth in Halton to 2051 in two phases:

- For growth prior to 2041, where population and employment growth will be directed to the existing approved urban boundary; and,
- For growth between 2041 and 2051, where a clear framework is provided for when and how planned growth will be distributed based on principles of minimizing land consumption, making the most efficient use of land and infrastructure, and achieving other principles of the Growth Plan.

At the June 15, 2022 Regional Council meeting, Planning Staff presented a Modified Preferred Growth Concept (dated May 2022) and an updated ROPA 49 which did not include updates to the existing approved urban boundary and thereby removed the Subject Properties from the 2041 planning horizon. The Subject Properties remained outside the urban boundary as agricultural lands within the Modified Preferred Growth Concept. We note that the property at 8223 Eight Line is identified as a “Future Strategic Employment Area” per Map 1C

The Modified Preferred Growth Concept is intended to meet the Region’s growth targets up to the 2041 planning horizon solely within the existing Built-Up Area, with a framework for distributing planned growth between 2041 and 2051 to be prepared and enacted through a future amendment.

Request - To Approve ROPA 49 With Modifications

On May 3, 2022 Weston Consulting submitted a letter to the Region requesting that ROPA 49 maintain the Original Preferred Growth Concept as recommended by the IGMS. However, ROPA 49 was adopted by Regional Council at the June 15 meeting on the basis of the Modified Preferred Growth Concept. A Notice of Decision was subsequently circulated on June 22, 2022.

We maintain our position that the Modified Preferred Growth Concept does not meet the intent of the PPS 2020 and the Growth Plan 2020 as it relates to the 25-year planning horizon, and request that the Ministry approve ROPA 49 using the Original Preferred Growth Concept. A detailed review of our position is provided in the section below:

Demonstrated Need for an Urban Boundary Expansion

The LNA that was conducted as part of the preparation for the Original Preferred Growth Concept provided a breakdown of projected employment growth in the office-use category versus the more land-intensive warehousing and logistics sectors, and determined that the bulk of the employment growth in the Region would be within the latter category. The LNA found that only two-thirds of the projected employment growth can be absorbed within the existing built-up area and designated greenfield areas. The LNA concluded that an urban boundary expansion would be required for the

Towns of Milton and Halton Hills to accommodate projected employment growth, and estimated that an addition of approximately 400 acres *New Employment Area* lands were required.

Further to the LNA, a Draft Preferred Growth Concept Report (“DPGCR”) dated February 2022 and prepared by Regional Planning Staff determined that facilitating an urban boundary expansion and creating *New Employment Areas* would accommodate strong market demand for advanced manufacturing, logistics/warehousing, and supporting uses, all of which are land-intensive employment uses that require access to the 400-series highways.

Maintaining Long-Term Economic Viability and Responding to Market Demand

Policy 1.1.1a) of the PPS 2020 seeks to sustain healthy, liveable and safe communities by “*promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term.*” Further to this, PPS Policies 1.3.1a), b), c), and 1.7.1a) speak to providing sufficient employment opportunities to ensure economic development and competitiveness and meet long-term needs. Growth Plan Policy 2.2.5.1b) further specifies that economic development and competitiveness in the Greater Golden Horseshoe will be promoted by “*ensuring the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employment growth to the horizon of this Plan,*”.

The Modified Preferred Growth Concept does not adequately accommodate the projected employment growth and satisfy market demand, nor does it appropriately accommodate growth up to the 2051 planning horizon as prescribed by the PPS 2020 and Growth Plan 2020. By not facilitating a boundary expansion which the LNA determined was required to accommodate projected employment growth, and which staff through the DPGCR agreed with, the Modified Preferred Growth Concept does not ensure that sufficient land will be available in appropriate locations to accommodate forecasted employment growth/demand for advanced manufacturing, logistics/warehousing, and supporting uses to ensure long-term economic prosperity.

In contrast, a ROPA 49 with the Original Preferred Growth Concept would advance a boundary expansion that would meet the employment land requirements and satisfy strong market demand as outlined in the LNA and DPGCR.

Accommodating Growth up to the 2051 Planning Horizon

Accommodating growth up to 2051 is outlined as a Provincial objective in Policies 1.1.2, 1.2.4a), and 4.6 of the PPS 2020 and Policies 2.2.1.1 and 5.2.4.2 of the Growth Plan 2020. As adopted, ROPA 49 meets growth only up to the 2041 planning horizon. We understand that Regional Staff will prepare a clear framework for distributing planned growth between 2041 and 2051 at a later date. However, in the absence of this framework being prepared and endorsed by Regional Council, we consider adoption of the Modified Preferred Growth Concept premature at this time, and thus inconsistent with the intent of the PPS 2020 and the Growth Plan 2020.

While we recognize and appreciate that the Map 1C provides for a Future Strategic Employment Land overlay, in our opinion this does not adequately meet the requirement of planning for the 25-

year horizon until 2051, which is the stated intent of ROPA 49. The Future Strategic Employment overlay does not provide enough certainty to ensure that there will be enough supply to meet market demands.

Meeting Projected Growth Forecasts

The Town of Milton and Halton Hills are to be allocated 85,600 jobs and 40,400 jobs, respectively, by 2051 per the LNA, most of which would be in land-intensive employment sectors. Without a boundary expansion, both municipalities do not have sufficient land for to meet their growth obligations up to 2051.

These issues of inconsistency and non-conformity would be resolved by approving ROPA 49 on the basis of the Original Preferred Growth Concept. This Growth Concept identifies and allocates growth projects up to 2051 across the Region and lower-tier municipalities and provides sufficient land to meet growth forecasts, and would thus be consistent with the PPS 2020 and conform to the Growth Plan 2020.

Conclusions

Based on the foregoing, we request that the MMAH modify and approve ROPA 49 that includes the Original Preferred Growth Concept as the Growth Management Strategy. The Original Preferred Growth Concept appropriately considers the findings of the LNA and DPGCR and establishes *New Employment Areas* to meet strong market demand for large-format traditional employment uses along the 400-series highways. As well, the Original Preferred Growth Concept appropriately plans up to the applicable planning horizon of 2051 and will better meet projected growth forecasts. Overall, the modified ROPA 49 with the Original Preferred Growth Concept is consistent with the PPS 2020 and conforms to the Growth Plan 2020.

We further request that the comments contained herein be kept on record within the Ministry's review process.

We request to be notified of any further studies, revisions, approvals and/or notices applicable to the Ministry's review process and reserve the right to provide further comments as more information becomes available. Should you have questions or require anything further, please do not hesitate to contact the undersigned (ext. 308).

Yours truly,

Weston Consulting

Per:

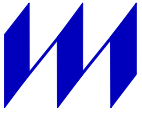


Alfiya Kakal, HBA, MPI, RPP
Senior Planner

c. Josh Berry, Anatolia Group

List of Attachments

- Weston Consulting Letter of Record to Regional Planning Staff dated May 3, 2022;
- Weston Consulting Letter of Record to Ministry of Municipal Affairs and Housing dated June 29, 2022;
- Halton Region Municipal Comprehensive Review – Original Preferred Growth Concept dated February 2022; and,
- Halton Region Municipal Comprehensive Review – Modified Preferred Growth Concept dated June 2022.



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Halton Region
Planning and Development Department
1151 Bronte Road
Oakville, ON L6M 3L1

May 3, 2022
File 10236

**Attn: Curt Benson, Director of Planning Services and Chief Planning Official
Planning and Development Department**

Dear Mr. Benson,

**Re: Halton Region Official Plan Review
8466 Trafalgar Road & 8223 Eighth Line
Halton Hills, ON**

Weston Consulting is the planning consultant for Anatolia Group., the owner of the properties municipally addressed as follows:

- 8223 Eighth Line, Halton Hills
- 8788 Trafalgar Road, Halton Hills
- 8466 Trafalgar Road, Halton Hills
- 0 East Lower Baseline, Milton

Weston Consulting has been engaged to assist the owner in participating in Halton Region's Official Plan Review (OPR). The purpose of this letter is to comment on the Modified Preferred Growth Concept dated March 2022 proposed in the Draft Regional Official Plan Amendment 49 (ROPA 49), and to request that Planning Staff recommend the Original Preferred Growth Concept dated February 2022 to Council for approval.

This letter of record is intended to be read in conjunction with the letter submitted by Paul Brown & Associates Inc. dated April 11, 2022 on behalf of the owner.

Background

The properties located at 8223 Eighth Line and 8466 Trafalgar Road (herein referred to as the "Subject Lands") were identified in the New Employment Area on the Preferred Growth Concept provided at the Council Workshop Meeting on February 9, 2022 which have since been removed from the urban boundary through the Modified Preferred Growth Concept plan dated March 2022.

Description of Subject Lands

The Subject Lands are located north of Highway 401 adjacent to Trafalgar Road and Eighth Line and are currently utilized for agricultural purposes. Table 1 summarizes the approximate lot dimensions and sizes for the Subject Lands:

Table 1 Lot Dimensions and Sizes

Address	Lot Area (m ²)	Lot Frontage (m)	Lot Depth (m)
8466 Trafalgar Road	736,520	268	1,367
8223 Eighth Line	584,286	511	995

An air photo of the Subject Lands is provided below:

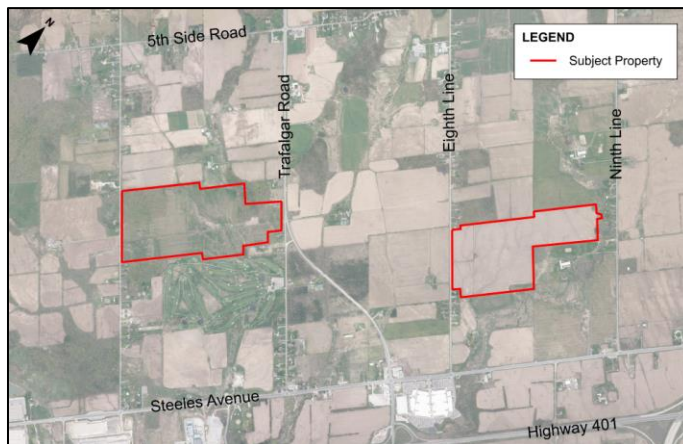


Figure 1 – Air Photo of the Subject Lands

Halton Region Official Plan Review

It is our understanding that Regional Planning Staff are undertaking an OPR to update its Regional Official Plan (ROP) to accommodate growth and development up to the 2051 planning horizon. We further understand that ROPA 49 is intended to implement the Region's Growth Management Strategy, which is the second Amendment to be considered by Regional Council as part of the OPR and builds on the Regional Urban Structure defined by ROPA 48.

Original vs. Modified Preferred Growth Concept

As part of the OPR and ROPA 49, Regional Planning Staff presented a draft Preferred Growth Concept (Original Preferred Growth Concept) at a workshop meeting dated February 9, 2022. The Original Preferred Growth Concept outlined New Community Areas and New Employment Areas that would comprise the Region's Settlement Area Boundary Expansion and assist in meeting the Region's growth targets up to the 2051 planning horizon. We understand that Regional Planning Staff also prepared a Draft Preferred Growth Concept Report providing

justification for the Settlement Area Boundary Expansion. The Subject Lands were included within the New Employment Area.

The Original Preferred Growth Concept was presented to Council on February 16, 2022, where Council carried a Motion to Amend requesting Regional Planning Staff to prepare a Modified Preferred Growth Concept for ROPA 49 that did not include a Settlement Area Boundary Expansion. The Modified Preferred Growth Concept was released for public review on March 24, 2022 and is intended to meet the Region's growth targets up to the 2041 planning horizon solely within the Built-Up Area. The Growth Plan for the Greater Golden Horseshoe (Growth Plan) provides that the applicable time horizon for land use planning is 2051. Therefore, in our opinion the Modified Preferred Growth Concept and associated time horizon of 2041 do not conform to the Growth Plan. We understand that a clear framework for distributing planned growth between 2041 and 2051 is to be prepared. However, in the absence of this framework being prepared and endorsed, adopting the Modified Preferred Growth Concept is considered premature and does not conform to the Growth Plan.

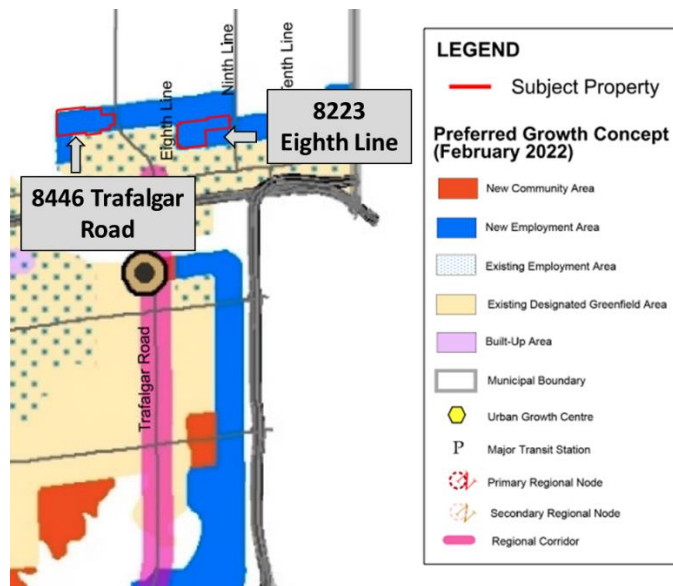


Figure 2 – Original Preferred Growth Concept, February 2022

Request to Council and Regional Planning Staff

As part of the Original Preferred Growth Concept, a Land Needs Assessment (LNA) was prepared by Hemson Consulting dated February 2022. The LNA provides a breakdown of projected employment for office uses versus the more land extensive employment sectors and determined that the bulk of the employment growth in Halton would be within the latter category. The LNA further provides that only two-thirds of the projected employment growth can be absorbed within the existing built-up area and designated greenfield areas. The LNA concluded that an Urban Boundary expansion would be required for the Towns of Milton and Halton Hills, to

accommodate projected employment growth and estimates an additional of approximately 400 acres New Employment Area lands.

Based on the foregoing, we request that Council adopt the February 2022 version of ROPA 49 which proposed the Original Preferred Growth Concept, as it takes into consideration the findings of the LNA. We have also reviewed the Draft Preferred Growth Concept Report dated February 2022 and concur with the findings in the Report. In particular, we agree that facilitating a Settlement Area Boundary Expansion that would result in New Employment Areas would accommodate strong market demand for advanced manufacturing, logistics/warehousing, and supporting uses, which require access to the 400-series highways. The Modified Preferred Growth Concept would force intensification of existing employment areas; however, large-format traditional employment uses are not suitable for intensification within the Built-Up Area due to the potential land use compatibility issues. Existing Employment Areas along the 400-series highways have already been developed and cannot accommodate large-format employment uses. Therefore, it is critical the New Employment Areas within proximity of the 400-series highway be established to accommodate projected growth, as required by the Growth Plan.

We believe that directing all of the Region's growth and development solely within the Built-Up Area would constrain its economic vitality and development, along with its employment growth. As a result, it is our opinion that the Original Preferred Growth Concept represents good planning and should be recommended to Council for adoption as part of ROPA 49.

We further request that the lands located at 8788 Trafalgar Road, Halton Hills and 0 East Lower Baseline, Milton also be considered for urban expansion. We recognize that these sites were not identified in the New Employment Area of the Original Preferred Growth Concept; however, the noted lands are adjacent to the proposed urban boundary expansion, are within close proximity to 400-series highways, and would assist in meeting market demand for traditional, large-format employment uses requiring highway access.

Conclusions

Based on the foregoing, we request that Regional Planning Staff provide a recommendation to Council to adopt ROPA 49 with the Original Preferred Growth Concept. The Original Preferred Growth Concept takes into consideration the findings of the LNA and establishes New Employment Areas to meet market demand for large-format traditional employment uses along the 400-series highways. As well, the Original Preferred Growth Concept is in line with the applicable time horizon (2051) for land-use planning provided by the Growth Plan.

We further request that the comments contained herein be kept on record within the Official Plan Review process.

We request to be notified of any further studies, revisions, approvals and/or notices applicable to the Official Plan Review process and reserve the right to provide further comments as more information becomes available. Should you have questions or require anything further, please do not hesitate to contact the undersigned (ext. 308) or Kevin Bechard (ext. 236).

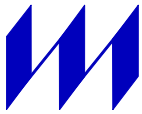
Yours truly,
Weston Consulting
Per:

A handwritten signature in black ink, appearing to read 'Alfiya', with a long horizontal stroke extending to the right.

Alfiya Kakal, HBA, MPI, RPP
Senior Planner

- c. Josh Berry, Anatolia Group
Kevin Bechard, Senior Associate, Weston Consulting

Attachment 1 – Air Photo of Subject Property
Attachment 2 – Modified Preferred Growth Concept Plan



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Attachment 2 - Weston
Consulting Letter of Record
to Ministry of Municipal
Affairs and Housing dated
June 29, 2022

Ministry of Municipal Affairs and Housing
777 Bay Street, 13th Floor
Toronto, ON M7A 2J3

June 29, 2022
File 10236

**Attn: Heather Watt, Manager, Community Planning & Development, MSO-Central (West)
Ministry of Municipal Affairs and Housing**

Dear Ms. Watt;

**Re: Request for Notice of Decision - Approval of ROPA 49 to Halton Region Official
Plan
8223 Eighth Line, 8788 Trafalgar Road & 8466 Trafalgar Road - Town of Halton Hills
0 East Lower Baseline - Town of Milton**

Weston Consulting is the planning consultant for Anatolia Group, the owner of the property municipally addressed as follows:

- 8223 Eighth Line, Halton Hills
- 8788 Trafalgar Road, Halton Hills
- 8466 Trafalgar Road, Halton Hills
- 0 East Lower Baseline, Milton

The purpose of this letter is to request that the Ministry of Municipal Affairs and Housing (MMAH) provide us with their Notice of Decision regarding Regional Official Plan Amendment (ROPA) 49 to the Halton Region Official Plan, which was recently adopted at the June 15, 2022 Halton Region Council meeting, once the MMAH has rendered their decision on the ROPA.

Description of Subject Lands

The Subject Lands are located north of Highway 401 adjacent to Trafalgar Road and Eighth Line and are currently utilized for agricultural purposes. Table 1 summarizes the approximate lot dimensions and sizes for the Subject Lands:

Table 1 Lot Dimensions and Sizes

Address	Lot Area (m ²)	Lot Frontage (m)	Lot Depth (m)
8466 Trafalgar Road	736,520	268	1,367
8788 Trafalgar Road	407,885	309	1,291
8223 Eighth Line	584,286	511	995
0 East Lower Baseline	362,982	670	545

An air photo of the Subject Lands is provided below:

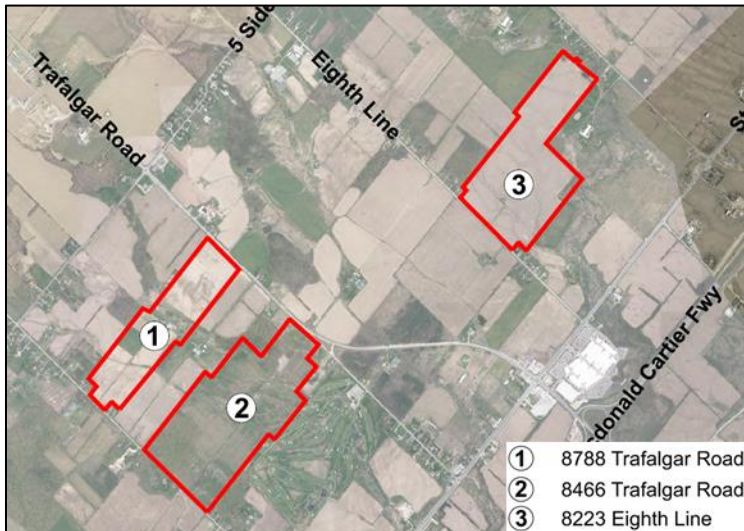


Figure 1 – Air Photo of 8788 & 8466 Trafalgar Road, and 8223 Eighth Line



Figure 2 – Air Photo of 0 East Lower Baseline

Halton Region Official Plan Review & ROPA 49

Weston Consulting has been assisting the owner of the Subject Property in participating in the Region's Official Plan Review (OPR) to accommodate growth and development up to the 2051 planning horizon. As part of the OPR process, Regional Staff prepared ROPA 49 and circulated the instrument for public review and comments. ROPA 49 is intended to implement the Region's Growth Management Strategy, which is the second Amendment to be considered by Regional Council as part of the OPR and builds on the Regional Urban Structure defined by ROPA 48.

Regional Planning Staff presented a Modified Preferred Growth Concept (dated May 2022) for Council's consideration at the June 15, 2022 meeting, which did not include a Settlement Area Boundary Expansion. Weston Consulting had prepared and submitted a letter to the Region requesting that ROPA 49 be revised such that it once again considers the Original Preferred Growth Concept dated February 2022. The Original Preferred Growth Concept had contemplated

a Settlement Area Boundary Expansion, inclusive of *New Community Areas* and *New Employment Areas*, to meet the Region's growth targets up to the 2051 planning horizon. 8466 Trafalgar Road and 8223 Eighth Line were identified in the New Employment Area of the Original Preferred Growth Concept.

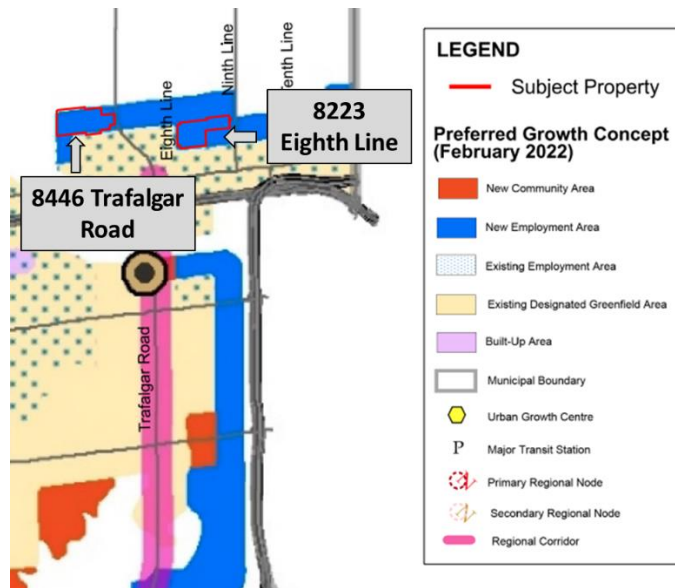


Figure 3 – Original Preferred Growth Concept, February 2022

Request for Notice of Decision

On June 15, 2022, Halton Region Council carried a motion to enact By-Law 35-22 and adopt ROPA 49 pursuant to Sections 17 and 26 of the *Planning Act*. A Notice of Decision regarding this adoption was provided by Regional Planning Staff on June 22, 2022.

We understand that the newly adopted ROPA 49 is subject to approval by the MMAH, and that any person or public body is entitled to receive a Notice of Decision from the approval authority. It is on this basis that we request that on behalf of the owner of the Subject Property, Weston Consulting be provided with the Notice of Decision once the MMAH renders its decision.

Should you have questions or require anything further, please do not hesitate to contact the undersigned (ext. 308) or Kevin Bechard (ext. 236).

Yours truly,

Weston Consulting

Per:

A handwritten signature in black ink, appearing to read 'Alfiya', with a long horizontal stroke extending to the right.

Alfiya Kakal, HBA, MPI, RPP
Senior Planner

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