

September 28, 2022

GSAI File: 1254-001

(Via Email – minister.mah@ontario.ca)

Hon. Steven Clark

Ministry of Municipal Affairs and Housing

777 Bay Street, 17th Floor

Toronto, ON M5G 2E5

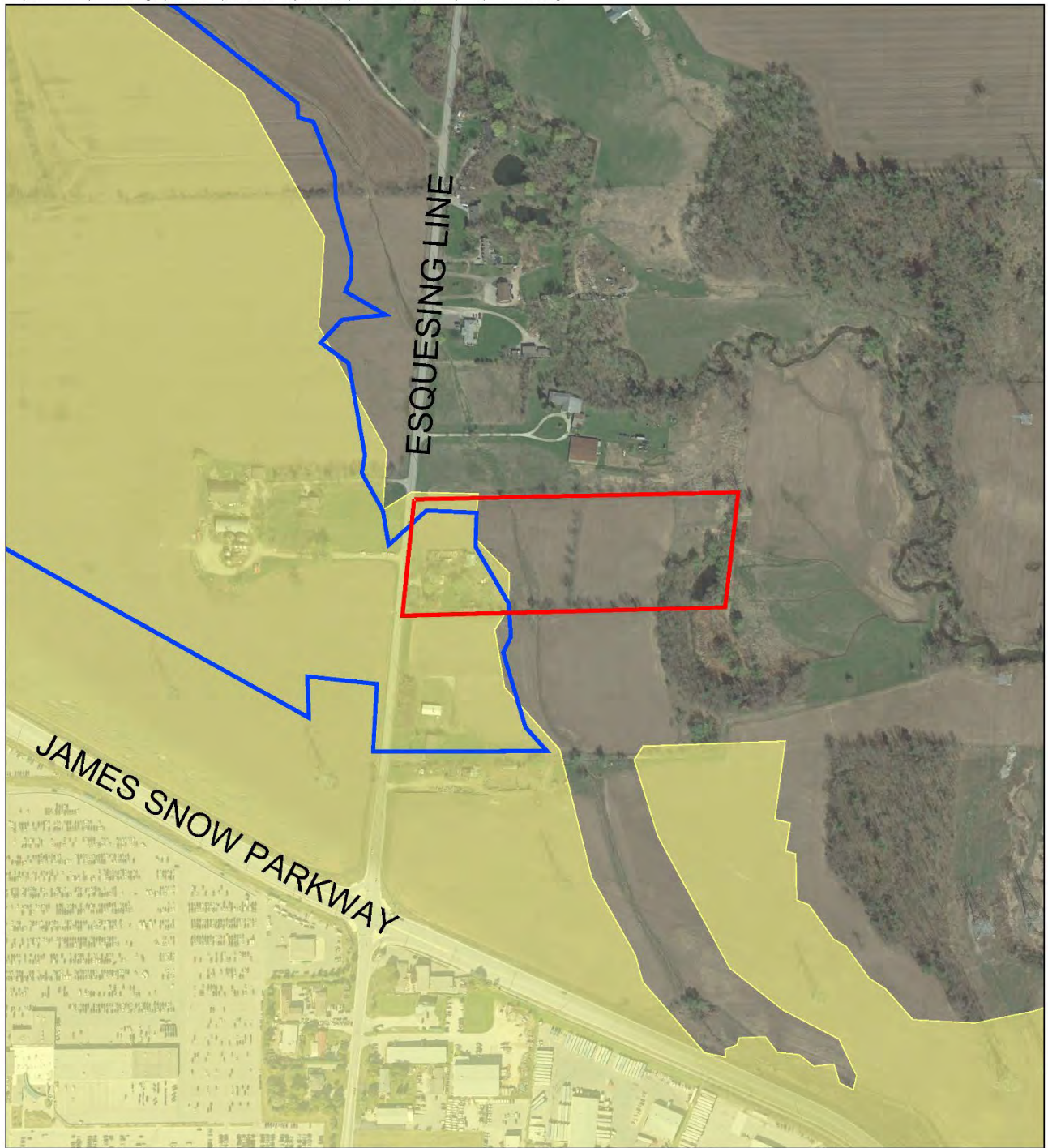
**RE: Halton Regional Official Plan Amendment No. 49
2369219 Ontario Inc.
8329 Esquesing Line Town of Milton**

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to 2369219 Ontario Inc. (the 'Owner') of the lands municipally known as 8329 Esquesing Line, in the Town of Milton (the 'Subject Lands' or 'Site'). The Subject Lands are in proximity to lands that were previously brought into the Region of Halton and Town of Milton Urban Area as part of the Sustainable Halton Regional Official Plan review process ('ROPA 38') as shown in the Aerial Context Map on the next page.

On behalf of the Owner and further to previous correspondences submitted to the Region dated May 17, 2019, September 10, 2020, October 30, 2020, July 15, 2021 and January 14, 2022, included as **Appendix I** to this Letter, we are pleased to provide this Letter to you in relation to the Environmental Registry of Ontario (ERO Number 019-5684 and Ministry Reference Number 21-OP-215006) dealing with the Region of Halton ROPA 49.

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

Prior to adoption of ROPA 49, the Subject Lands were identified as being located in proximity to lands to be included within an expanded Urban Area as new Employment Area lands via a site-specific Settlement Area Boundary Expansion in both the Town of Milton Council approved Urban Expansion Option (see Town of Milton Staff Report, DS-006-22, dated January 17, 2022 attached as **Appendix II** of this Letter) and Regional Staff recommended Preferred Growth Concept (see Region of Halton,



AERIAL CONTEXT MAP

8329 ESQUESING LINE,
TOWN OF MILTON/HALTON HILLS,
REGION OF HALTON

LEGEND

-  Subject Lands
-  Halton Regional Urban Area Boundary
-  North Porta Lands



SCALE NTS
SEPTEMBER 13, 2022

Preferred Growth Concept Report, dated February 2022, attached as **Appendix III** to this Letter). ROPA 49, as adopted, requires that the Subject Lands remain partially within the Town of Milton Urban Area and maintain its 'Future Strategic Employment Area' policy overlay. We note that the Subject Lands also continues to have segments that are components of the Regional Natural Heritage System and Provincial Greenbelt Plan area.

The Subject Lands are located within an area previously under consideration for inclusion in the Town of Milton Urban Area as part of the Town of Milton North Porta Secondary Plan Amendment (Town File LOPA-03/21). As demonstrated in the Aerial Context Plan above, the areas under consideration for addition to the Town of Milton Highway 401/Business Park Secondary Plan included a segment of the Subject Lands. As further described in Town of Milton Staff Report DS-064-21, dated August 23, 2021, the proposed North Porta lands were found to be appropriate location for inclusion in the Secondary Plan and would be consistent with the Regional Official Plan priorities. Based on this, the Subject Lands are an appropriate location for inclusion in an expanded Urban Area as this will enable a natural and logical extension of growth, will support Provincial growth targets, will facilitate development to be situated in proximity to and with easy, reliable access to major transportation corridors, will represent a minor rounding out of the development area, will enable the long-term preservation and health of key Natural Heritage System features and functions and will facilitate cost-efficient development forms and servicing.

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

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

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



Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

A handwritten signature in black ink, consisting of a large, stylized loop at the top and a horizontal line extending to the right.

Colin Chung, MCIP, RPP

Managing Partner

Appendix I / Previous Comment Letters



May 17, 2019

Refer To File: 1254-001

Halton Region
1151 Bronte Road
Oakville, ON
L6M 3L1

Attention: Curt Benson, MCIP, RPP
Director of Planning Services

**Re: Halton Region Official Plan Review
Regional Growth Scenarios – April 10, 2019 Workshop & Presentation
Formal Response from Mr. Dave Walia & 236919 Ontario Inc.**

Glen Schnarr & Associates Inc. (GSAI) attended the Council Workshop and Presentation on April 10, 2019 presenting Regional Growth Scenarios to 2041 and we would like to provide comments on the Growth Scenarios presented. GSAI represents Mr. Dave Walia / 236919 Ontario Inc., who owns approximately 4 hectares (10 acres) of land, and represents 15 hectares (38 acres) of land in the Town of Milton (see *Aerial Context Plan* enclosed). Our client is desirous of the inclusion of their land into the 2041 Urban Area.

As a result of the previous Regional Official Plan process (Sustainable Halton ROPA 38 process), 3 hectares (8 acres) of land our client represents were brought into the Milton Urban Area for employment development. However, 0.63 hectares (1.56 acres) of their land were left outside of the Urban Area on the basis that the Region's employment land budget, calculated to accommodate the 2031 employment growth, was determined by the Region to be fulfilled.

In addition, our client represents approximately 11 hectares (28 acres) of land within the Regional Natural Heritage System and Greenbelt Plan Area, which is 72% of the total land area represented by our client. The inclusion of our client's lands into the Milton Urban Area will enable the natural extension of these natural features and systems into public ownership in the future, for the Town and the Region.

In the recently passed "Places to Grow: Growth Plan for the Greater Golden Horseshoe (2019)", our client's lands have been identified as within a *Provincially Significant Employment Zone*. Therefore, we feel that the inclusion of our client's lands into the Milton Urban Area would be a natural and logical continuation of the existing Urban Area, and would be cost-effective and servicing efficient urban development to accommodate future employment uses. We request that you consider the inclusion of these lands as Urban Area to accommodate Provincial growth targets to 2041.

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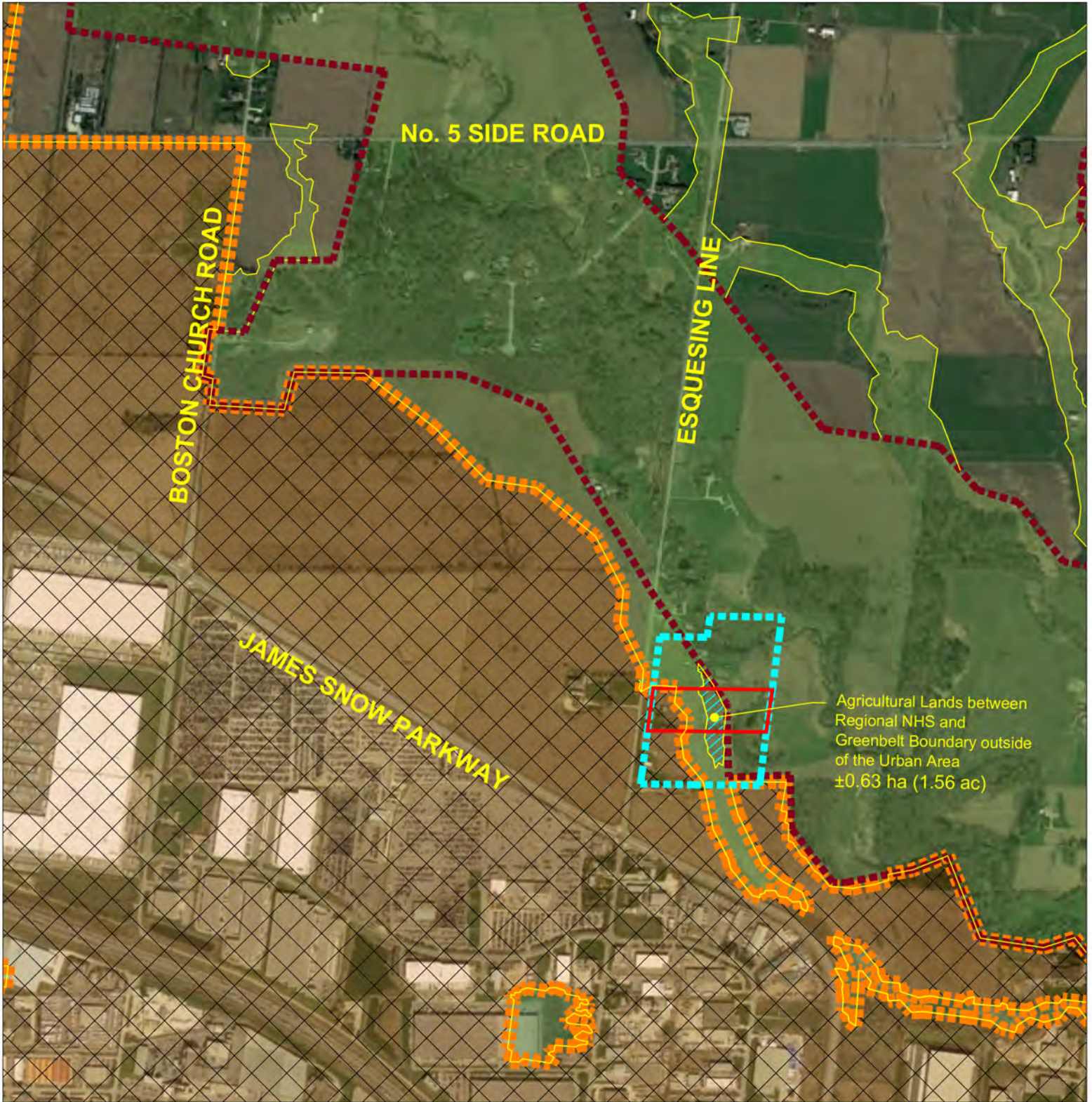


We look forward to the release of the discussion paper in May and to working with you on Halton Region's Growth Scenarios. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.

Yours very truly,







GLEN SCHNARR & ASSOCIATES INC.

Colin Chung, MCIP, RPP
Partner



MR. DAVE WALIA 236919
ONTARIO INC.
AERIAL CONTEXT PLAN

8283 & 8329 ESQUESING LINE, MILTON
 REGIONAL MUNICIPALITY OF HALTON

	Lands Client Represents:	±15.25 ha (37.68 ac)
	Employment/Mixed-use Net Developable Area (NDA):	±3.05 ha (7.54 ac)
	Agricultural Lands:	±1.17 ha (2.89 ac)
	Area Within NHS & Greenbelt:	±11.03 ha (27.26 ac)
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	REGIONAL NATURAL HERITAGE SYSTEM (NHS)	
	EXISTING URBAN AREA	
	EMPLOYMENT AREA	
	GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY	



Scale NTS
 May 9, 2019



September 10, 2020

Refer To File: 1254-001

Halton Region
1151 Bronte Road
Oakville, ON L6M 3L1

Attention: Curt Benson, MCIP, RPP
Director, Planning Services and Chief Planning Official

**Re: Staff Report LPS56-20 – Regional Official Plan Review
Regional Urban Structure Discussion Paper
Formal Response from Mr. Dave Walia & 236919 Ontario Inc.**

Glen Schnarr & Associates Inc. (GSAI) has reviewed the Regional Official Plan (ROP) Review Discussion Papers and we would like to provide comments on behalf of Mr. Dave Walia & 236919 Ontario Inc., specifically regarding the Regional Urban Structure Discussion Paper. GSAI represents Mr. Dave Walia & 236919 Ontario Inc., owner of approximately 4 hectares (10 acres) of land, and represents 15 hectares (38 acres) of land in the Town of Milton (see *Aerial Context Plan* enclosed). As stated previously in correspondence dated May 17, 2019, our client is desirous of the inclusion of their land into the 2041 Urban Area for employment and mixed-use purposes.

As a result of the previous Regional Official Plan process (Sustainable Halton ROPA 38 process), 3 hectares (8 acres) of land our client represents were brought into the Milton Urban Area for employment development. However, 0.63 hectares (1.56 acres) of their land were left outside of the Urban Area on the basis that the Region's employment land budget, calculated to accommodate the 2031 employment growth, was determined by the Region to be fulfilled. The lands are adjacent to existing Employment Area as per the current Regional Official Plan, and are partially within Provincially Significant Employment Zone 18 (Halton, Peel).

In reviewing the Regional Urban Structure Discussion Paper and more notably *Appendix C: Proposed Technical Revisions to Halton's Employment Areas*, we note that the Region has reviewed existing Employment Area boundaries to identify any appropriate minor and technical changes that would increase the accuracy and appropriateness of said boundaries. This review was based on ensuring that boundaries aligned with road and rail right-of-ways, parcel fabric, or existing Provincial, Regional or local planning boundaries where appropriate, and that the boundaries of the Employment Area are delineated in a clear, consistent and logical manner. This initial review identified a number of proposed technical revisions to the boundaries of the Employment Areas currently identified in the current Regional Official Plan.



We note that our client's lands are impacted by the Region's proposed revision ID: "R-M01" which proposes to align the Employment Area boundary with the natural water feature. After conducting an internal mapping exercise, it seems that proposed revision "R-M01" still excludes a sliver of Provincially Significant Employment land from the Urban Area/Employment Area on our client's property (see "Whitebelt Parcel" on *Proposed Employment Revision* map attached).

As shown on the attached map, the Provincially Significant Employment Zone, as delineated by the Province, logically extends to meet the Greenbelt Plan's 'Protected Countryside' Limit. It is our professional opinion that extending the Region's 2041 Urban Boundary (and Employment Area boundary) to be consistent with the PSEZ limit, and to meet the Greenbelt Plan's 'Protected Countryside' limit, is appropriate and logical from a planning perspective. By not extending the Regional Urban Boundary to the limit of the PSEZ, a sliver of whitebelt land, already identified by the Province as PSEZ, will be orphaned, inconsistent with Provincial policy. It is our professional opinion that this is short-sighted, and an inefficient use of land.

Aligning the Regional Urban Area with the PSEZ boundary, so that all PSEZ land in this area is included in the Urban Area, will respect Provincial planning boundaries and conform with policies from the Growth Plan (2019) and the Greenbelt Plan (2017). This would also achieve the Region's goal as stated in the Discussion Paper for a more logical, consistent and definitive urban boundary. As the Discussion Paper states that proposed technical revisions will continue to be reviewed throughout the IGMS process based on review and feedback, we strongly encourage the Region to consider our above-noted points.

The preliminary work for the Growth Scenarios Report estimated 560 to 890 hectares (1,384 acres to 2,199 acres) of land needed for new Employment Area to achieve 2041 employment targets, and now with finalized Amendment 1 to the Growth Plan requiring municipalities to plan to 2051, it is likely that the land budget will determine additional land required to meet 2051 employment targets. The Region should prioritize Provincially Significant Employment lands into the urban area for employment purposes, in conformity with the Growth Plan 2019.

Furthermore, there are active employment land conversion requests that amount to approximately 1,030 net hectares (2,545 net acres) that could displace the employment land supply. The Region should consider additional employment land needs to replace these active employment land conversions when determining land budget for future Employment lands.

The ROP Review is also reviewing the policy approach for Employment Areas. As noted in the Urban Structure Discussion Paper, it is recognized that there are a number of other uses that may be appropriate within Employment Areas due to their character, ancillary nature, or the function they serve by providing support to the primary uses within an Employment Area. As the Region has stated, it is important that Employment Areas can provide an appropriate mix of amenities and open space to serve those who work in the area. It is also important that the ROP enables appropriate opportunities for a fully-diversified economic base, maintaining a range and choice of suitable sites for employment uses and complementary/supportive uses that take into account the needs of existing and future businesses. The ROP currently provides limited policy direction on how ancillary and/or complementary/supportive uses should be planned for within Employment Areas. There is an opportunity to review and refine this policy direction through the current ROP



Review and we support the policy approach of a broad interpretation of complementary/supportive uses in Employment Areas in order to plan for complete and walkable communities.

With respect to the finalized Amendment 1 changes to the Growth Plan, we ask that the Region continue to expedite the Municipal Comprehensive Review (MCR) process based on the current in-effect Growth Plan (2019) with Amendment 1 and we respectfully recommend that the Region incorporate the 2051 forecasts into the current MCR process as soon as possible. This was also supported by the Town of Milton in Staff Report DS-022-20 dated July 20, 2020, which outlined the Town's comments on proposed Amendment 1 changes.

We feel that our client's lands can be serviced cost-effectively and efficiently as they are an extension of existing employment land. Our request to have our client's lands included in the Milton Urban Boundary is consistent with the Provincially recognized Employment Areas (PSEZs). The addition of these lands within the Milton Urban Boundary meets the Region's criteria for a minor and technical employment boundary revision to ensure the Urban Boundary is clear and logical. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.

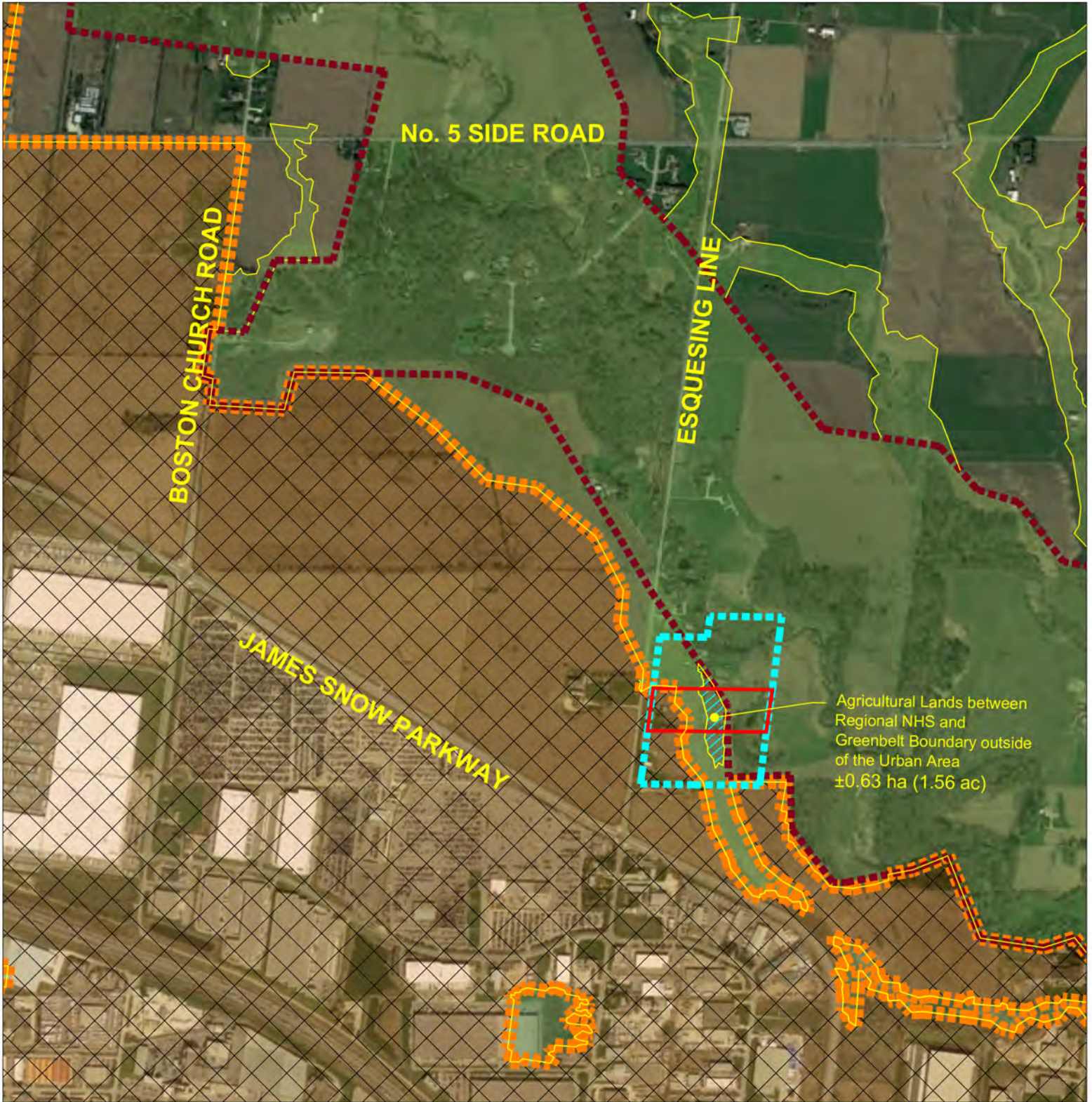
Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.







Colin Chung, MCIP, RPP
Partner

cc: Gary Carr, Regional Chair
Members of Regional Council
Graham Milne, Regional Clerk
Barb Koopmans, Town of Milton
Jill Hogan, Town of Milton



MR. DAVE WALIA 236919
ONTARIO INC.
AERIAL CONTEXT PLAN

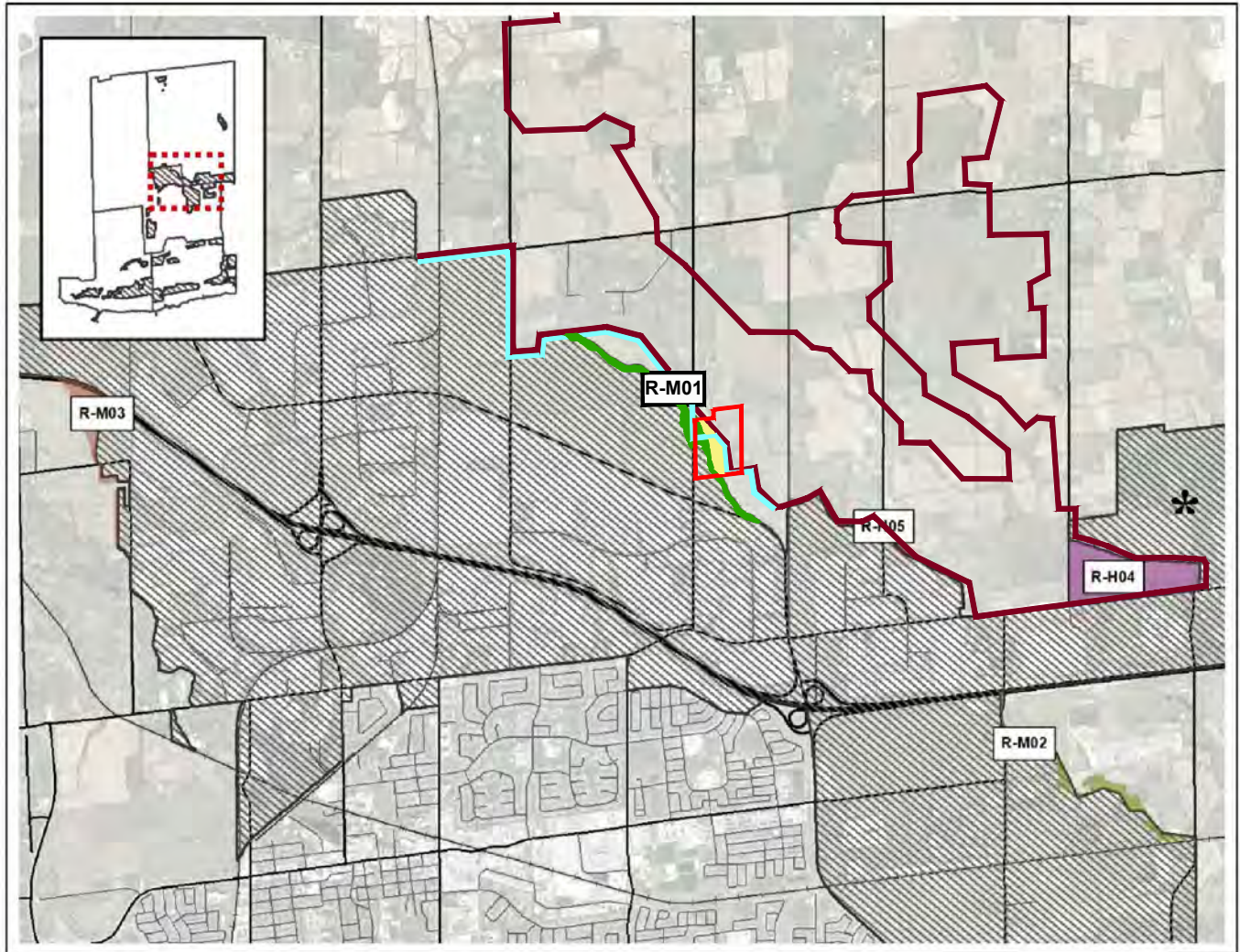
8283 & 8329 ESQUESING LINE, MILTON
 REGIONAL MUNICIPALITY OF HALTON

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	EXISTING URBAN AREA	
	EMPLOYMENT AREA	
	GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY	



Scale NTS
 May 9, 2019

C. Proposed Revisions to the Employment Areas in Halton Hills and Milton



Municipality	ID	Description of Proposed Revision
Halton Hills	R-H04	Refinement to align the Employment Area boundary with the boundary of the Greenbelt Plan Protected Countryside as prescribed by the Province. This proposed change recognizes that lands located within the Greenbelt Plan Protected Countryside are subject to the Greenbelt Plan policies.
	R-H05	Refinement to align the Employment Area boundary with the boundary of the Greenbelt Plan Protected Countryside as prescribed by the Province along the northern part of this area. This proposed change recognizes that lands located within the Greenbelt Plan Protected Countryside are subject to the Greenbelt Plan policies.
	Premier Gateway*	This area is noted for reference only and to note the change to the Employment Area boundary adopted by Regional Council through ROPA 47.
Milton	R-M01	Refinement to align the Employment Area boundary with the natural water feature as identified by the Ministry of Natural Resources and Forestry located immediately to the northeast of the area. This proposed change results in a more logical and definitive boundary and is consistent with the proposed approach to delineate the Settlement Area boundary in this area.

- LANDS CLIENT REPRESENTS
- PROVINCIALLY SIGNIFICANT EMPLOYMENT ZONE
- GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY
- EXISTING URBAN AREA
- REGION'S PROPOSED REVISION R-M01
- WHITEBELT PARCEL



October 30, 2020

Refer To File: 1254-001 & 1259-001

Halton Region
 1151 Bronte Road
 Oakville, ON
 L6M 3L1

Attention: Curt Benson, MCIP, RPP
 Director, Planning Services and Chief Planning Official

**Re: Region of Halton – Municipal Comprehensive Review
 Regional Official Plan Review Discussion Papers
Response from Mr. Dave Walia, 236919 Ontario Inc. and 2661297 Ontario Inc.**

8283 Esquesing Line & 8329 Esquesing Line

Glen Schnarr & Associates Inc. (GSAI) represents Mr. Dave Walia & 236919 Ontario Inc., owners of approximately 4 hectares (10 acres) of land, and represents 15 hectares (38 acres) of land on the east side of Esquesing Line, north of James Snow Parkway in the Town of Milton (see *Aerial Context Plan 1* enclosed). These lands are municipally addressed as 8283 Esquesing Line & 8329 Esquesing Line. As a result of the previous Regional Official Plan process (Sustainable Halton ROPA 38 process), 3 hectares (8 acres) of land our client represents were brought into the Milton Urban Area for employment development. However, 0.63 hectares (1.56 acres) of their land were left outside of the Urban Area on the basis that the Region's employment land budget, calculated to accommodate the 2031 employment growth, was determined by the Region to be fulfilled. The lands are adjacent to existing Employment Area as per the current Regional Official Plan, and are partially within Provincially Significant Employment Zone 18 (Halton, Peel).

In the Regional Urban Structure Discussion Paper and more notably Appendix C: Proposed Technical Revisions to Halton's Employment Areas, we note that our client's lands are impacted by the Region's proposed revision ID: "R-M01" which proposes to align the Employment Area boundary with the natural water feature (please refer to previous correspondence submitted to the Region dated September 10, 2020).

8955 Boston Church Road

GSAI also represents 2661297 Ontario Inc. owner of approximately 12 hectares (30 acres) of land on the southeast corner of Number 5 Side Road and Boston Church Road in the Town of Milton (see *Aerial Context Plan 2* enclosed). This property is municipality addressed as 8955 Boston Church Road. In reviewing the Regional Urban Structure Discussion Paper and more notably

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Figure 30 – Potential Locations for new Employment Area DGA, we note that our client’s above-noted lands are located within “Remaining Future Strategic Employment Areas”. Our client’s lands are part of the Milton North Business Park Tertiary Plan and are adjacent to the urban lands that were brought into the Built Boundary for employment purposes through the previous Regional Official Plan process (Sustainable Halton ROPA 38).

Review of Discussion Papers

We have reviewed the Region’s Discussion Papers, released June 2020, covering the topics of Regional Urban Structure, Climate Change, Natural Heritage and Rural and Agricultural System and we have provided responses in a separate Response Matrix, addressing the Discussion Paper Questions (appended). The key points from the Response Matrix that we wish to highlight include the following:

- With respect to employment conversions, timing for build-out should be considered (likely beyond 2051 horizon) and strategic locations for employment land conversion should be identified where Regional approval is not required;
- The Region should consider Town of Milton’s previously identified whitebelt lands for candidate settlement area boundary expansion;
- Lands within Provincially Significant Employment Zones and within the Region's Future Strategic Employment Areas should be prioritized to be added to the urban area for employment purposes;
- ROP policies for employment lands should permit a broad range of uses to promote complete communities;
- Urban Expansion should be contiguous to existing urban areas where the Region and local municipality have already made commitments and planning for municipal services and community services and amenities;
- The Region should explore Designated Greenfield Area density target of 50 residents and jobs per hectare. Deviation from this housing mix would require justification. This permits a wide range in choice of housing types;
- The Region should assess the true costs of intensification on existing municipal and community services such as water and sanitary sewer infrastructure, parks and schools. The Region has not fully evaluated the tolerance level of existing residents in embracing the amount of intensification that Regional staff are contemplating that goes beyond the Provincial minimum threshold. There are costs to both existing and future residents that need to be considered when contemplating intensification;
- Forthcoming revisions to Land Needs Assessment Methodology should be considered within the context of Regional Urban Structure Discussion Paper. The revised LNAM could affect the original findings of the Discussion Paper;
- The best approach at incorporating the Growth Plan Natural Heritage System is as an overlay rather than a designation. Furthermore, mapping needs to appreciate the policy differences between the Regional Natural Heritage, Greenbelt NHS and Growth Plan NHS,



in accordance with Provincial Policy. NHS in settlement areas should be excluded;

- ROP policies need to acknowledge that there is insufficient, current information available at the Regional-scale to make final decisions on natural boundaries, features and buffers. Decisions need to be made based on a science-based case-by-case analysis. The ultimate Regional Natural Heritage System should be sustainable, based on ground-truthing and completed environmental studies and research; and,
- The Region should focus on programs over policies in curving climate change. The Region has not weighed the benefits to setting programs over policies in curving climate change. There is insufficient rationale/justification from Regional staff that ROP policy is the way to go in dealing with climate change. The Region should explore all climate change solutions equally.

Please see appended Comment Matrix prepared by Glen Schnarr & Associates Inc., dated October 30, 2020 for further detail.

We feel that our clients' lands can be serviced cost-effectively and efficiently as they are an extension of existing employment land. Our request to have our client's lands included in the Milton Urban Boundary is consistent with the Provincially recognized Employment Areas (PSEZs). The addition of these lands within the Milton Urban Boundary meets the Region's criteria for a minor and technical employment boundary revision to ensure the Urban Boundary is clear and logical. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.

We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.

By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.

We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.

Yours very truly,

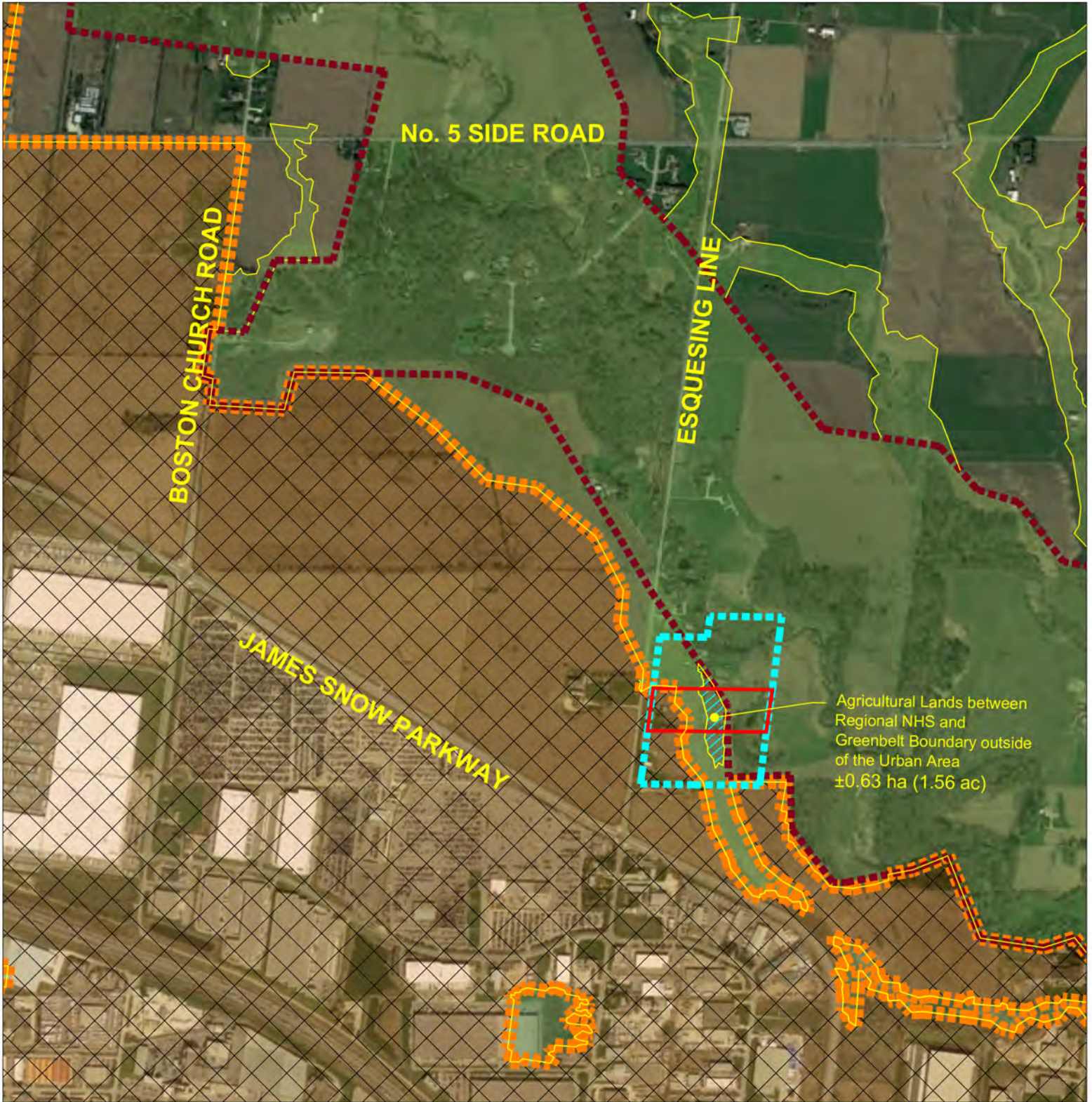
GLEN SCHNARR & ASSOCIATES INC.

Colin Chung, MCIP, RPP
Partner









GLEN SCHNARR & ASSOCIATES INC.
URBAN & REGIONAL PLANNERS, LAND DEVELOPMENT CONSULTANTS

cc: Gary Carr, Regional Chair
Members of Regional Council
Graham Milne, Regional Clerk
Barb Koopmans, Town of Milton
Jill Hogan, Town of Milton



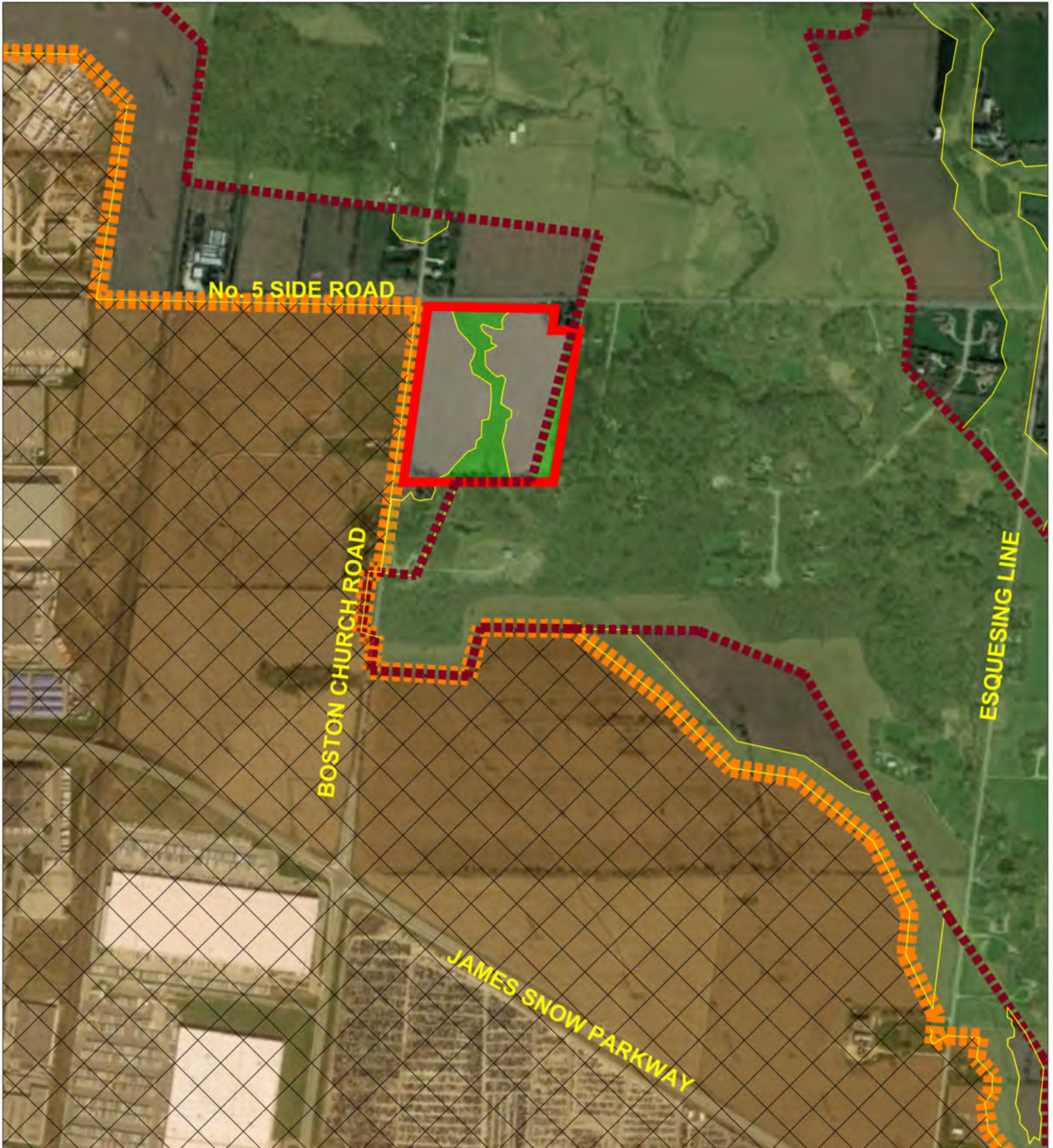
MR. DAVE WALIA 236919
ONTARIO INC.
AERIAL CONTEXT PLAN

8283 & 8329 ESQUESING LINE, MILTON
 REGIONAL MUNICIPALITY OF HALTON

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	EXISTING URBAN AREA	
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	GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY	



Scale NTS
 May 9, 2019



**2661297 ONTARIO INC.
AERIAL CONTEXT PLAN**

8995 BOSTON CHURCH ROAD, MILTON
REGIONAL MUNICIPALITY OF HALTON

- Subject Property - Area:**
 - Employment/Mixed-use Net Developable Area (NDA): ±12.20 ha (30.15 ac)
 - Area Within NHS & Greenbelt: ±8.78 ha (21.70 ac)
 - ±3.42 ha (8.45 ac)

- REGIONAL NATURAL HERITAGE SYSTEM (NHS)**
- EXISTING URBAN AREA**
- EMPLOYMENT AREA**
- GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY**



Scale NTS
July 31, 2019

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

Question #	Halton Region Discussion Paper Question	GSAI Response
Regional Urban Structure – Technical Questions		
9	Are there any other factors that should be considered when assessing Employment Area conversion requests in Halton Region?	We concur with the Town of Milton's comments. Locational context is key in identifying strategic locations for employment areas and should be considered. The Region should consider including a policy that sets out criteria for where the local municipalities can decide on employment conversions and those that require Regional approval, since some conversion requests may have Regional implications. As such, the Region should not be the approval authority for all employment conversions.
10	Are there any areas within Halton Region that should be considered as a candidate for addition to an Employment Area in the Regional Official Plan?	We concur with the Town of Milton's comments that Employment Areas previously identified by the Town should be included into the Settlement Area boundary. Furthermore, as stated by Town of Milton staff in Staff Report PD-011-19, all whitebelt lands identified by the Town should be added to the Settlement Area Boundary. Furthermore, lands within Provincially Significant Employment Zones and within the Region's Future Strategic Employment Areas should be prioritized to be added to the urban area for employment purposes.
11	How can the Regional Official Plan support employment growth and economic activity in Halton Region?	We concur with the Town of Milton, in that employment planning should be located close to populations. A mix of uses should be encouraged to promote complete communities. Detailed economic planning should be determined at the local level, rather than the Regional level.
12	What type of direction should the Regional Official Plan provide regarding planning for uses that are ancillary to or supportive of the primary employment uses in employment areas? Is there a need to provide different policy direction or approaches in different Employment Areas, based on the existing or planned employment context?	We concur with the Town of Milton's comments that this should be specified in policies at the local municipal planning level. Any policies for employment lands should permit a broad range of uses to promote complete communities. As noted in the Urban Structure Discussion Paper (June 2020) it is recognized that there are a number of other uses that may be appropriate within Employment Areas due to their character, ancillary nature, or the function they serve by providing support to the primary uses within an Employment Area. As the Region has stated, it is important that Employment Areas can provide an appropriate mix of amenities and open spaces to serve those who work in the area. It is also noted by the Region that it is important that the ROP enables appropriate opportunities for a fully-diversified economic base, maintaining a range and choice of suitable sites for employment uses and complementary/supportive uses that take into account the needs of existing and future businesses. The ROP currently provides limited policy direction on how ancillary and/or complementary/supportive uses should be planned for within Employment Areas. This MCR is an opportunity to review and refine this policy direction through the current ROP Review. We support the policy approach of a broad interpretation of complementary/supportive uses in Employment Areas in order to plan for complete, healthy, liveable and walkable communities.
13	How can the Regional Official Plan support planning for employment on lands outside Employment Areas, and in particular, within Strategic Growth Areas and on lands that have been converted? What policies tools or approaches can assist with ensuring employment growth and economic activity continues to occur and be planned for within these areas?	We agree with the Town of Milton that mixed use forms of development should be permitted and encouraged. The Region should be bold in allowing mixed use development in employment areas including limited residential. In order to embrace and support principles of complete communities, the Region should consider land use policies to truly support where people live, work and spend leisure time, in the same area.

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

14	<p>Are there other factors, besides those required by the Growth Plan, Regional Official Plan or Integrated Growth Management Strategy Evaluation Framework that Halton Region should consider when evaluating the appropriate location for potential settlement area expansions?</p>	<p>The Region should consider areas previously identified by the local area municipalities as priority areas for settlement area expansion areas, such as Town of Milton's Staff Report PD-011-19.</p> <p>Urban Expansion should be contiguous to existing urban areas where the Region and local municipality have already made commitments and planning for municipal services and community services and amenities.</p>
15	<p>What factors are important for the Region to consider in setting a minimum Designated Greenfield Area density target for Halton Region as whole, and for each of the Local Municipalities? Should the Region use a higher minimum Designated Greenfield Area density target than the 50 residents and jobs per hectare target in the Growth Plan?</p>	<p>A deviation away from the splits identified in the Hemson work (i.e. more apartments) will be a deviation from market-based supply and would require significant justification, which we have not seen to date. We concur with the Town of Milton that the density target should not be arbitrarily increased without significant justification from both demographic and market perspectives. The Region should ensure there is a mix of housing and that the density can meet market-based supply, rather than policy-based objectives.</p> <p>Has the Region assessed the true costs of intensification on existing servicing and community services such as parks and schools? Has the Region assessed the tolerance level of existing residents in embracing intensification? These are costs to both existing and future residents that need to be considered when contemplating intensification.</p> <p>The minimum greenfield density should offer choices for a mix of housing types. This is a 30 year plan and as the world changes as we have just recently experienced with COVID-19, the ROP needs to be flexible to accommodate changing market conditions. We ask Regional staff the following questions:</p> <ul style="list-style-type: none"> - Why do Regional staff think that 50 people and jobs per hectare, that the Growth Plan established as a minimum, is not appropriate for Halton Region? - Why do Regional staff think 60+ people and jobs per hectare is better planning? - Has a sensitivity analysis been undertaken to justify a density greater than 50 persons & jobs/hectare and to determine if it will meet current and future market demand conditions over the next 30 years? <p>If higher density is preferred only to result in less urban land being required and to curb urban sprawl, this justification is policy-driven, is insufficient to warrant planning for communities and does not reflect market needs and demands. This planning tool should not be considered lightly and more analysis is needed to justify going beyond the Provincial minimums.</p>
16	<p>Are there any additional considerations or trends that Halton Region should review in terms of the Regional Urban Structure component of the Regional Official Plan Review?</p>	<p>It is our understanding that the Region will be updating their Land Needs Assessment as part of the next steps in the Official Plan Review. Ensuring that the information being fed into the LNA is accurate is critical.</p>

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

Regional Urban Structure – General Questions		
1	Which areas of the community, such as Major Transit Station Areas, Urban Growth Centres, corridors and other potential strategic growth areas, should be the primary focus for new houses and apartments? Why	The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with the Growth Plan 2020's minimum intensification target. This ratio puts less stress on existing residents and community services while providing a greater range of housing mix and types to meet market demands now and in the future.
2	As the Region plans to accommodate new growth, should it focus on intensification of existing built up areas or on expansion into agricultural and natural areas? What is an appropriate balance?	The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with the Growth Plan 2020's minimum intensification target. This ratio puts less stress on existing residents and community services while providing a greater range of housing mix and types to meet market demands now and in the future.
5	How can the Regional Official Plan support employment growth and economic activity in Halton Region?	The Region could support economic activity by supporting local economic development initiatives. The Region should be bold in allowing mixed use development in employment areas including limited residential. In order to embrace and support principles of complete communities, the Region should consider land use policies to truly support where people live, work and spend leisure time, in the same area.
6	Halton's Employment Areas are protected for employment uses such as manufacturing, warehousing, and offices. How should the Region balance protecting these Employment Areas with potential conversions to allow residential uses or a broader mix of uses?	<p>The Region should focus on high priority employment areas and leave the detailed land use planning to local municipalities. Some mature and older employment lands are not competitive in the market They are more adept to accommodating employment conversions and the Region should support that.</p> <p>As noted above, it is recognized that there are a number of other uses that may be appropriate within Employment Areas due to their character, ancillary nature, or the function they serve by providing support to the primary uses within an Employment Area. As the Region has stated, it is important that Employment Areas can provide an appropriate mix of amenities and open spaces to serve those who work in the area. It is also noted by the Region that it is important that the ROP enables appropriate opportunities for a fully-diversified economic base, maintaining a range and choice of suitable sites for employment uses and complementary/supportive uses that take into account the needs of existing and future businesses. The ROP currently provides limited policy direction on how ancillary and/or complementary/supportive uses should be planned for within Employment Areas. This MCR is an opportunity to review and refine this policy direction through the current ROP Review. We support the policy approach of a broad interpretation of complementary/supportive uses in Employment Areas in order to plan for complete, healthy, liveable and walkable communities.</p>

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

7	The introduction of new sensitive land uses within or adjacent to Employment Areas could disrupt employment lands being used for a full range of business and/or industrial purposes. Are there other land use compatibility considerations that are important when considering where employment conversions should take place to protect existing and planned industry?	Issues of compatibility between employment lands and new sensitive land uses are already addressed in Provincial and Regional land use compatibility guidelines. Duplication could lead to confusion.
8	Having appropriate separation distances between employment uses and sensitive land uses (residential, etc.) is important for ensuring land use compatibility. What should be considered when determining an appropriate separation distance?	Issues of compatibility between employment lands and new sensitive land uses are already addressed in Provincial and Regional land use compatibility guidelines. Duplication could lead to confusion.
Rural and Agricultural System - Technical Questions		
1	Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?	We concur with the Town of Milton comments that a separate and unique land use designation should be used for Prime Agricultural Areas, as required by Provincial policy and especially that a separate and unique Rural land use designation should be applied to non-prime agricultural areas for clarity, transparency, and ease of use.
2	Are there any additional pros and cons that could be identified for any of the options?	Please see response on preferred mapping option below.
3	Do you have a preferred mapping option? If so, why?	We believe that the mapping options presented are not clear and should not be treated as mutually exclusive options. We believe that the mapping should have prime agriculture as a designation (as required by Provincial policy) and that Natural Heritage System should be an overlay (similar to Mapping Option 1). However we also believe it is important to have a Rural Agriculture designation (as shown in Mapping Option 4), and not just designate all agricultural lands as "prime", regardless of soil quality/class.
4	Should the ROP permit the agriculture-related uses as outlined in the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas in its entirety?	We agree with the Town of Milton comments that all agriculture-related uses should be permitted in all prime agricultural areas. The PPS allows for broader uses in prime agricultural areas and the ROP should reflect this.

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

5	<p>What additional conditions or restrictions should be required for any agriculture- related uses?</p>	<p>We agree with the Town of Milton comments that additional restrictions for agriculture related uses Region-wide would be inappropriate. Case-by-case analysis should be considered especially where farm building development and expansion is required to accommodate the agriculture-related use.</p>
6	<p>The Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas limit on-farm diversified uses to no more than 2 per cent of the farm property on which the uses are located to a maximum of 1 hectare. As well, the gross floor area of buildings used for on-farm diversified uses is limited (e.g., 20 per cent of the 2 per cent). Are these the appropriate size limitations for Halton farms?</p>	<p>On-farm diversified uses should be broad and less restrictive to assist with the economics of the farm. We agree that the Region should defer to the local municipalities to identify size requirements.</p>
7	<p>Should the Regional Official Plan permit on-farm diversified uses as outlined in the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas in its entirety?</p>	<p>We agree with the Town of Milton comments, to permitting all on farm diversified uses in prime agricultural areas. We also concur that the list of permitted on-farm diversified uses is not exhaustive and policies should reflect that.</p>
8	<p>What additional conditions or restrictions should be required for any on-farm diversified uses?</p>	<p>We agree with the Town of Milton that further restrictions to on-farm diversified uses should be restricted to the local municipalities.</p>
10	<p>Do the Agricultural Impact Assessment policy requirements in the ROP sufficiently protect agricultural operations in the Prime Agricultural Area and Rural Area? If not, what additional requirements do you think are needed?</p>	<p>We agree with the Town of Milton that the current AIA polices in the ROP are sufficient.</p>

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

11	Should the requirements for an Agricultural Impact Assessment be included in any other new or existing Regional Official Plan policies?	We concur with the Town of Milton that requirements set out in Provincial Policy with respect to renewable energy projects, may not need to be duplicated in municipal policies.
12	Should special needs housing be permitted outside of urban areas and under what conditions?	We concur with the Town of Milton's comments, special needs housing should be expressly permitted in urban and rural areas.
Rural and Agricultural System – General Questions		
1	Should Halton adopt a flexible approach in allowing agriculture-related uses and on-farm diversified use businesses in the agricultural area to support the economic vitality of farms and farmers?	The Region should consider the needs of farm operations to protect farm viability, while balancing potential impacts on surrounding operations.
Natural Heritage - Technical Questions		
1	As required by the Growth Plan, the new Natural Heritage System for the Growth Plan mapping and policies must be incorporated into the Regional Official Plan. Based on options outlined in the Natural Heritage Discussion paper, what is the best approach in incorporating the Natural Heritage System for the Growth Plan into the Regional Official Plan?	<p>In our opinion the best approach at incorporating the Growth Plan Natural Heritage System is as an overlay rather than a designation. Furthermore, mapping needs to appreciate the policy differences between the Regional Natural Heritage, Greenbelt NHS and Growth Plan NHS, in accordance with Provincial Policy. NHS in settlement areas should be excluded.</p> <p>ROP policies need to acknowledge that there is insufficient, current information available at the Regional-scale to make final decisions on boundaries, features and buffers. Decisions need to be made based on a science-based, case-by-case analysis. We believe that the ultimate Regional Natural Heritage System should be based on ground-truthing and completed environmental studies and research. RNHS policies should demonstrate some flexibility in being applied as part of a context-specific approach, avoiding a "one size fits all" framework.</p>

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

2	<p>Regional Natural Heritage System policies were last updated through Regional Official Plan Amendment 38. Are the current goals and objectives for the Regional Natural Heritage System policies still relevant/appropriate? How can the Regional Official Plan be revised further to address these goals and objectives?</p>	<p>NHS features should be delineated separate from linkages/buffers. It is not clear why the Region would consolidate centres for biodiversity, linkages, buffers, and enhancement areas into the overall RHS. Instead, perhaps the Region should establish a clear set of guidelines and criteria for when and how linkages, buffer widths and enhancement areas are needed and there perhaps separate guidelines/criteria for each of those elements.</p>
3	<p>To ease the implementation of buffers and vegetation protection zones, should the Region include more detailed policies describing minimum standards?</p>	<p>“Buffers” and “vegetation protection zone” should not be used interchangeably as they are differentiated in Provincial policy. The ROP should continue to separate and distinguish RNHS from VPZ of the Greenbelt and Growth Plan. We do not support consolidation as one RNHS, since VPZ has different criteria for buffer requirements than the RNHS. Since Greenbelt overlaps with Prime Agricultural Areas, we would recommend that the Prime Agricultural Area be designated and the Greenbelt be an overlay.</p>
4	<p>Given the policy direction provided by the Provincial Policy Statement and Provincial plans, how should policy and mapping address the relationship between natural heritage protection and agriculture outside of the Urban Area or the Natural Heritage System?</p>	<p>We believe that a comprehensive approach is needed for significant woodlands and that they should be assessed on a site-by-site basis. This would ensure groups of dead trees or invasive species are not incorrectly identified as significant. Furthermore, we think that the Region should also consider studies completed locally as part of Secondary Plans and other projects when identifying these woodlands.</p>
5	<p>The Greenbelt Plan 2017 and Growth Plan 2019 require municipalities to identify Water Resource Systems in Official Plans. Based on the two (2) options provided in the Natural Heritage Discussion Paper, how should the Water Resource System be incorporated into the ROP?</p>	<p>We believe Option 2 is the most effective. Policies should appreciate the difference between the Water Resource System and NHS and especially the difference between Key Natural Heritage Features and Key Hydrologic Features versus Key Hydrologic Areas. The inclusion of Key Hydrologic Areas within mapping for the Regional Natural Heritage System would be confusing, since they are not protected within the Regional Natural Heritage System.</p>

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

6	<p align="center">Preserving natural heritage remains a key component of Halton’s planning vision. Should Halton Region develop a Natural Heritage Strategy and what should be included in such a strategy?</p>	<p>There is an existing policy in the ROP that speaks to how the RNHS mapping gets updated. Policy 116.1 states:</p> <p><i>"116.1 The boundaries of the Regional Natural Heritage System may be refined, with additions, deletions and/or boundary adjustments, through:</i></p> <p><i>a) a Sub-watershed Study accepted by the Region and undertaken in the context of an Area-Specific Plan;</i></p> <p><i>b) an individual Environmental Impact Assessment accepted by the Region, as required by this Plan; or</i></p> <p><i>c) similar studies based on terms of reference accepted by the Region.</i></p> <p><i>Once approved through an approval process under the Planning Act, these refinements are in effect on the date of such approval. The Region will maintain mapping showing such refinements and incorporate them as part of the Region’s statutory review of its Official Plan."</i></p> <p>We support this policy and believe this policy objective should be maintained.</p>
7	<p align="center">Should the Regional Official Plan incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</p>	<p>We support parks outside of the urban area. Furthermore, we believe that stormwater management ponds should be allowed in the rural area (outside urban boundary) as long as Prime Agricultural Area is not removed.</p>
9	<p align="center">The Regional Official Plan is required to conform to the updated Natural Hazard policies in the PPS. What is the best approach to incorporate Natural Hazard policies and mapping?</p>	<p>We agree with Town of Milton and Town of Halton Hills comments that the local municipalities should be involved with the mapping of natural hazards and furthermore, we believe the Region should defer the technical mapping to the local municipalities.</p>
10	<p align="center">How can Halton Region best support the protection and enhancement of significant woodlands through land use policy?</p>	<p>As previously noted, the quality of woodland should be considered. Dead trees and invasive species should not be lumped in with woodlots of significance.</p>
Natural Heritage – General Questions		
2	<p align="center">Are there other policies or actions Halton can include in the Regional Official Plan Review to protect and enhance the Natural Heritage System?</p>	<p>We would like to add that NHS in the settlement areas should be excluded. Policies should differentiate between different Provincial Plan areas, not just adopt a blanket, most restrictive approach.</p>

Halton Region Discussion Paper Questions - GSAI Responses
October 30, 2020

Climate Change – Technical Questions		
1	Have you felt the impacts of climate change on your community? What impacts are of most concern to you in the next 20 years?	We believe that putting more density in the built boundary and greenfields is not the best or only way to curve climate change and minimize green house emissions. Is the Region exploring other strategies such as the importance of conservation, reuse and recycle? Or perhaps providing more electric charging stations to promote electric vehicle usage? Land use planning is not the solution to climate change. We encourage Regional staff to diversify their strategies rather than wager all solutions to planning.
2	How do you think the Regional Official Plan can help Halton respond to climate change? What mitigation and adaptation actions would you like to see embedded in the Regional Official Plan?	The Region should focus on programs over policies in curving climate change. Has the Region weighed the benefits to setting programs over policies in curving climate change? Why does Regional staff feel that ROP policy is the way to go in dealing with climate change? Is the Region prepared to provide financial and planning incentives for the industry to implement energy conserving measures to development such as solar heating/cooling, electric vehicle charging stations, active transportation facilities, etc.
3	Halton’s population is forecast to grow to one million people and accommodate 470,000 jobs by 2041. What do you think about policies to plan for climate change through more compact urban form and complete communities? In your opinion, are we growing in the right direction?	We agree with the Town of Milton that a more compact urban form should not be at the expense of meeting community wellness, health and active living for all ages, and these factors need to be considered when assessing if intensification can be supported within the built boundary.



July 15, 2021

Refer To File: 1254-001 & 1259-001

Halton Region
1151 Bronte Road
Oakville, ON
L6M 3L1

Attention: Curt Benson, MCIP, RPP
Director, Planning Services and Chief Planning Official

**RE: Staff Report LPS18-21 – Regional Official Plan Review
Integrated Growth Management Strategy - Growth Concepts
Discussion Paper
Formal Response from Mr. Dave Walia, 236919 Ontario Inc. and
2661297 Ontario Inc.**

8283 Esquesing Line & 8329 Esquesing Line

Glen Schnarr & Associates Inc. (GSAI) represents Mr. Dave Walia & 236919 Ontario Inc., owners of approximately 4 hectares (10 acres) of land, and represents 15 hectares (38 acres) of land on the east side of Esquesing Line, north of James Snow Parkway in the Town of Milton (see *Aerial Context Plan 1* enclosed). These lands are municipally addressed as 8283 Esquesing Line & 8329 Esquesing Line. As a result of the previous Regional Official Plan process (Sustainable Halton ROPA 38 process), 3 hectares (8 acres) of land our client represents were brought into the Milton Urban Area for employment development. However, 0.63 hectares (1.56 acres) of their land were left outside of the Urban Area on the basis that the Region's employment land budget, calculated to accommodate the 2031 employment growth, was determined by the Region to be fulfilled. The lands are adjacent to existing Employment Area as per the current Regional Official Plan, and are partially within Provincially Significant Employment Zone 18 (Halton, Peel).

8955 Boston Church Road

GSAI also represents 2661297 Ontario Inc. owner of approximately 12 hectares (30 acres) of land on the southeast corner of Number 5 Side Road and Boston Church Road in the Town of Milton (see *Aerial Context Plan 2* enclosed). This property is municipality addressed as 8955 Boston Church Road.

As previously noted in correspondence to the Region dated May 17, 2019, September 10, 2020, and October 30, 2020, and during a virtual meeting with Regional staff on April 29, 2021, our clients are desirous of the inclusion of their land into the 2051 Urban Area, for employment and mixed-use purposes.

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We are in receipt of Town of Milton staff report DS-055-21 (appended to this letter) which was endorsed by Town Council on June 21, 2021 and we would like to express our support for Town's position on the Regional Official Plan review and urban expansion. The Town of Milton retained Malone Given Parsons Ltd. ("MGP") as the planning and land economics consultant for the Town of Milton. MGP has peer reviewed the Region's work and provided their own analysis and technical background work related to the Province's Land Needs Assessment ("LNA").

MGP's LNA estimates the land area requirements of the Region would necessitate all of Milton's whitebelt lands to be brought into the Settlement Area to accommodate the growth forecasts 2051 (as per mapping in appended Staff Report Appendix B). Staff Report DS-055-21 summarizes the findings of the MGP work endorsing a modified Concept 4 – "Halton Balanced" concept.

Specifically we agree with Town of Milton staff on the following points:

- Staff has significant concerns with the methodology undertaken by the Region to assess the various concepts. It is critical that these issues be addressed by Halton Region prior to the consideration of a preferred growth concept. The "Halton Balanced" Growth Concept, as presented in this report is based on a Land Needs Assessment (LNA) undertaken by Malone Given Parsons (MGP) that conforms to the requirements of A Place to Grow – Growth Plan for the Greater Golden Horseshoe.
- Milton cannot accept the proposed Growth Concept 3B nor any scenario that does not expand its existing employment lands supply. Unlike some of the other local municipalities, Milton can continue to accommodate in-demand, large-scale stand-alone warehousing and logistics industrial buildings in key locations within Milton's whitebelt fronting 400 series highways. These whitebelt lands are identified in Halton Region's Official Plan as "Future Strategic Employment Lands" and are also identified by the Province as a "Provincially Significant Employment Zone".
- As further explained in the staff report, the Region's LNA must include a Growth Concept that uses assumptions in conformity with A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020 ("Growth Plan") and the Provincial Land Needs Assessment Methodology for the Greater Golden Horseshoe, 2020 ("2020 LNA Methodology"). It is MGP's opinion that using these assumptions results in a requirement for the remaining whitebelt lands in the Town to be brought into the Settlement Area and developed as new Community and Employment Areas to meet the Town's and Region's land needs in this timeframe.
- With regard to the employment allocation, it is MGP's opinion that the Region's allocation to Milton is too low. An additional 20,000 jobs should be allocated to Milton to ensure the ratio of residents to jobs is closer to 2:1 to maintain an appropriate balance.
- Based on this analysis, MGP identified a land requirement quantum that was most similar to that depicted in the Region's Growth Concept 4 for new Community Area and Employment Area land to accommodate growth forecasted in the Region to 2051. The Region's Growth Concept 4 estimates that at the minimum target of 50% intensification, the Region would require at least 2,080 hectares of Community Area land and 1,220 hectares of Employment Area land. Whereas, MGP estimates the Region's land need quantum to be approximately 2,220 hectares of Community Area and between 1,100 – 1,500 hectares of Employment Area



to meet the growth forecast to 2051.

- Although the quantum of land is similar in MGP's LNA and the Region's Growth Concept 4, it is MGP's opinion that a modified Growth Concept 4 (the "Halton Balanced" Growth Concept) should be brought forward. As concluded in the modified Concept 4 – a housing mix that is adjusted to be market-based to the extent possible can be planned by the Region, and would achieve the minimum intensification target (50%) and exceed the minimum designated greenfield density (50 residents and jobs per hectare). The Region must seek to provide a market-based supply of housing to the extent possible.
- The "Halton Balanced" concept has strong regard for the Town of Milton adopted 2051 Vision and Town Structure previously endorsed by Milton Council.

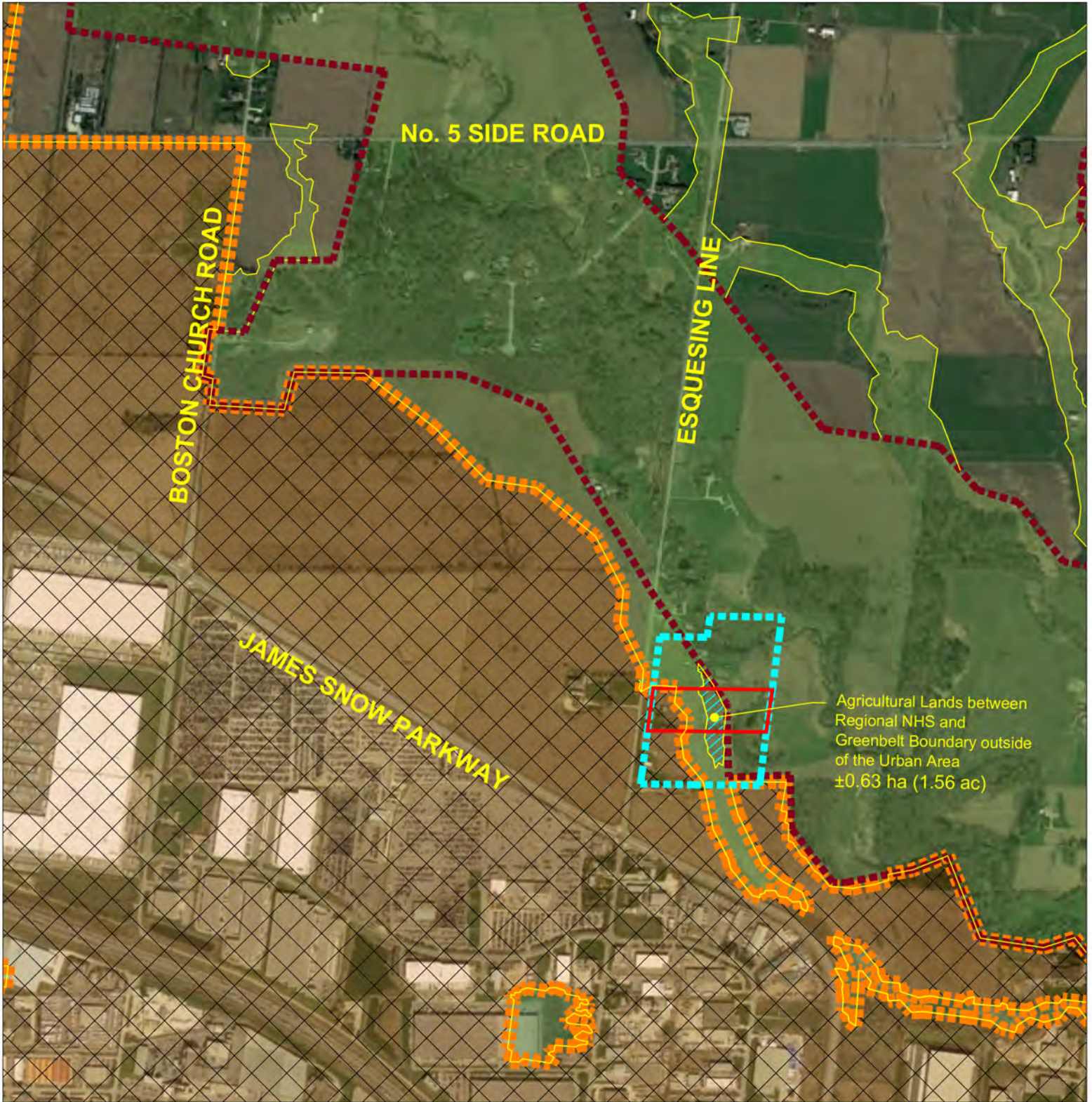
As previously noted, we request that you consider the inclusion of our client's lands as Urban Area to accommodate the Provincial growth target to 2051. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.







Colin Chung, MCIP, RPP
Partner

cc: Gary Carr, Regional Chair
Members of Regional Council
Graham Milne, Regional Clerk
Barb Koopmans, Town of Milton
Jill Hogan, Town of Milton



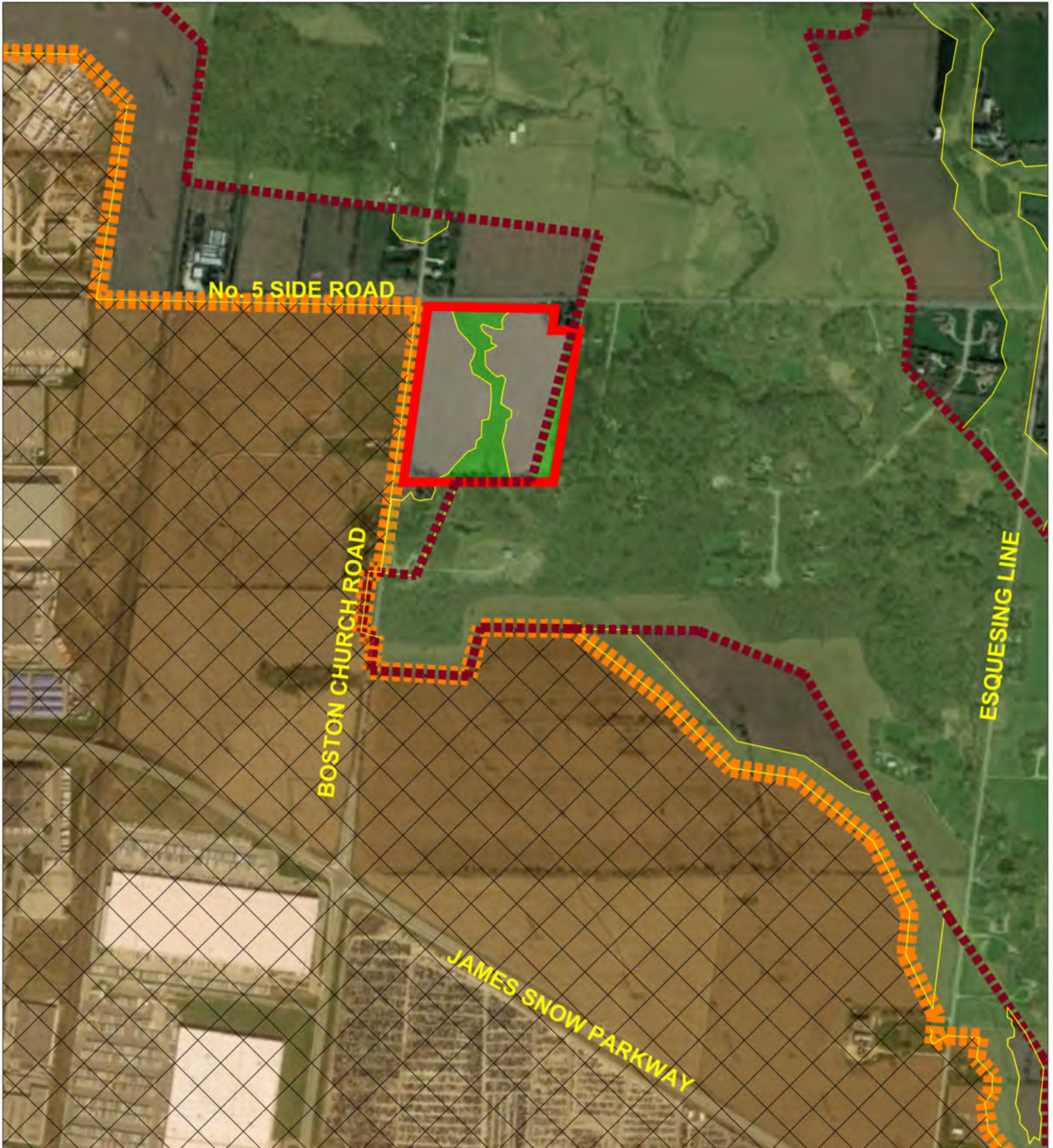
MR. DAVE WALIA 236919
ONTARIO INC.
AERIAL CONTEXT PLAN

8283 & 8329 ESQUESING LINE, MILTON
 REGIONAL MUNICIPALITY OF HALTON

	Lands Client Represents:	±15.25 ha (37.68 ac)
	Employment/Mixed-use Net Developable Area (NDA):	±3.05 ha (7.54 ac)
	Agricultural Lands:	±1.17 ha (2.89 ac)
	Area Within NHS & Greenbelt:	±11.03 ha (27.26 ac)
	Lands Client Owns:	±4.04 ha (9.98 ac)
	Employment/Mixed-use Net Developable Area (NDA):	±1.05 ha (2.59 ac)
	Agricultural Lands:	±0.63 ha (1.56 ac)
	Area Within NHS & Greenbelt:	±2.36 ha (5.83 ac)
	REGIONAL NATURAL HERITAGE SYSTEM (NHS)	
	EXISTING URBAN AREA	
	EMPLOYMENT AREA	
	GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY	








Scale NTS
 May 9, 2019



**2661297 ONTARIO INC.
AERIAL CONTEXT PLAN**

8995 BOSTON CHURCH ROAD, MILTON
REGIONAL MUNICIPALITY OF HALTON

-  Subject Property - Area:
 - Employment/Mixed-use Net Developable Area (NDA): ±12.20 ha (30.15 ac)
 - Area Within NHS & Greenbelt: ±8.78 ha (21.70 ac)
 - ±3.42 ha (8.45 ac)

-  REGIONAL NATURAL HERITAGE SYSTEM (NHS)
-  EXISTING URBAN AREA
-  EMPLOYMENT AREA
-  GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY



Scale NTS
July 31, 2019



The Corporation of the Town of Milton

Report To: Council

From: Barbara Koopmans, Commissioner, Development Services

Date: June 21, 2021

Report No: DS-055-21

Subject: Supplementary Report to DS-028-21 and DS-039-21 regarding Halton Regional Official Plan Review - Milton's Response to the Growth Concepts Discussion Paper

Recommendation: THAT staff be directed to submit comments as outlined in Report DS-028-21 and DS-055-21 to Halton Region in response to the *Growth Concepts Discussion Paper - Integrated Growth Management Strategy* dated March 2021 including commentary on the subsequently added Growth Concept 3B;

AND THAT Council express broad support for a balanced approach to growth, through both intensification and new designated greenfield development;

AND THAT Council endorse a Modified Growth Concept 4 - "Halton Balanced" as supported by a Land Needs Assessment conforming to the Provincial Growth Plan as presented in DS-055-21 as input into Halton Region's Official Plan Review.

EXECUTIVE SUMMARY

- This report builds upon and should be read in conjunction with Reports DS-028-21 and DS-039-21 attached as Appendix 3.
- As a result of the extension to the comment period granted by the Region of Halton, Report DS-028-21 Halton Regional Official Plan Review - Milton's Response to the Growth Concepts Discussion Paper was received for **information only** at the May 3, 2021 session of Milton Council.
- Council subsequently directed staff to complete a further supplementary report addressing the recently added Growth Concept 3B (formerly known as Growth Concept 5 - no urban boundary expansion).
- Council also directed that staff develop an alternative to the Growth Options presented by the Region, responding to Milton's growth requirements to 2051 in a manner that supports the Town's long-term sustainability.

EXECUTIVE SUMMARY

- This report provides commentary on Growth Concept 3B and presents the “Halton Balanced” Growth Concept for Council’s consideration.

REPORT

Background

On April 21, 2021, a Motion was tabled at Regional Council with respect to a “Fifth Growth Scenario”. The Motion directed Halton Region staff to:

- Undertake further analysis for the purpose of engaging the community on a variation of Concept 3 that examines an opportunity to accommodate all employment growth without expanding the settlement area boundary and explore the creation of a new permanent Food/Agriculture Preserve; and,
- Provide an assessment of the relative impact on greenhouse gas emissions that would reasonably be expected to be associated with each of the Growth Concepts.

Report DS-28-21 - Milton’s Response to Halton Region’s Growth Concept Discussion Paper was prepared prior to the inclusion of Growth Concept 3B. In recognition of the inclusion of an additional growth concept, the Region extended the commenting period from May 28, 2021 to July 15, 2021.

In light of this, and as directed by Council on May 3, 2021, staff prepared this supplementary report, which builds upon and should be read in conjunction with Reports DS-028-21 and DS-039-21. It includes a discussion regarding new Growth Concept 3B and presents an alternative Growth Concept for Council’s consideration.

It is important to note, as articulated in report DS-28-21, that staff has significant concerns with the methodology undertaken by the Region to assess the various concepts. It is critical that these issues be addressed by Halton Region **prior to the consideration of a preferred growth concept**. The “Halton Balanced” Growth Concept, as presented in this report is based on a Land Needs Assessment (LNA) undertaken by Malone Given Parsons (MGP) that conforms to the requirements of A Place to Grow - Growth Plan for the Greater Golden Horseshoe.

Discussion

Analysis of Growth Concept 3B

- Concept 3B proposes no greenfield expansion for population or employment.
- From a densification and new development area for housing perspective, Concept 3B is identical to Concept 3.

Discussion

- Needs no land for an urban expansion
 - No new Community Area land is proposed
 - No new Employment Area land is proposed
 - In other words - no urban boundary expansion

This concept would require:

- An unprecedented shift from Employment Land Employment, or jobs in low-rise, industrial-type buildings within business parks and industrial areas, to Major Office Employment, or jobs in office buildings and/or in the office portion of mixed-used development areas; and/or
- An unprecedented degree of intensification for employment lands to accommodate forecasted growth to 2051.
- It risks future jobs and businesses being located outside of the region due to insufficient employment land in Halton to 2051.

Staff Comments - Growth Concept 3B

- Because of Milton's current stage of development, there is the opportunity to plan for the amount of growth that is inevitable given the Town's location in the GTA and to direct it the right locations.
- Current development applications, proposals and market demands project that the majority of the Derry Green employment lands will be largely developed by 2025/2026.
- Milton's urban structure plan continues to support the creation of complete communities and ensures that opportunities for employment growth are maintained and are directed appropriately to achieve both economic development and job creation.
- For Milton, a boundary expansion is critical. This will ensure that Milton is able to strategically manage anticipated growth pressures and to ensure the proper use and allocation of land from now until 2051.
- Milton's plan supports short, medium and long-term economic growth and stability not only locally but regionally.

Milton **cannot** accept the proposed Growth Concept 3B **nor any** scenario that does not expand its existing employment lands supply.

As articulated in Report DS-028-21 (see Appendix 3) in terms of employment growth, Milton has undertaken significant planning work to support and attract new employment forms, which include transit supportive, mixed-use employment communities (i.e. Milton Education Village and the Agerton Secondary Plan); and **unlike** some of our neighbouring

Discussion

municipalities, Milton can continue to accommodate in-demand, large-scale stand-alone warehousing and logistics industrial buildings in key locations within Milton's whitebelt fronting 400 series highways. These whitebelt lands are identified in Halton Region's Official Plan as "*Future Strategic Employment Lands*" and are also identified by the Province as a "*Provincially Significant Employment Zone*".

A summary of the key findings based on the prescribed Regional evaluation criteria for all of the Growth Concepts is contained within Appendix 4. This summary also provides an assessment of the relative impact on greenhouse gas (GHG) emissions that would reasonably be expected to be associated with each of the Growth Concepts. **It is noted that there is very little difference between the various growth options in terms of GHG emissions.**

"Halton Balanced" Growth Concept

Malone Given Parsons Ltd. ("MGP") is the planning and land economics consultant for the Town of Milton. The foregoing provides comments on Halton Region's Land Needs Assessment ("Region's LNA") and assumptions and provides a recommendation with respect to the growth allocations and land need requirements to accommodate growth in the Halton to 2051 **to achieve complete communities**. MGP has provided their own analysis and technical background work, which staff believes demonstrates both the feasibility and priority for inclusion of the Town of Milton's remaining whitebelt lands within the Settlement Area Boundary to 2051. This work is intended as input to the Region's Municipal Comprehensive Review ("MCR").

As further explained in this report, the Region's LNA must include a Growth Concept that uses assumptions in conformity with *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020* ("Growth Plan") and the *Provincial Land Needs Assessment Methodology for the Greater Golden Horseshoe, 2020* ("2020 LNA Methodology"). It is MGP's opinion that using these assumptions results in a requirement for the remaining whitebelt lands in the Town to be brought into the Settlement Area and developed as new Community and Employment Areas to meet the Town's and Region's land needs in this timeframe.

Appendix A summarizes MGP's Land Needs Assessment ("MGP's LNA"), which was undertaken on behalf of the Town of Milton to estimate land needs throughout Halton Region. MGP's LNA is used to determine the population and employment allocation and requirements for Community Area and Employment Area land in the Town of Milton. This LNA for Halton Region utilizes the Designated Greenfield Area supply analysis previously prepared by MGP to assess the Settlement Area Boundary Expansion required to 2051 to accommodate Halton Region's forecasted population and employment growth.

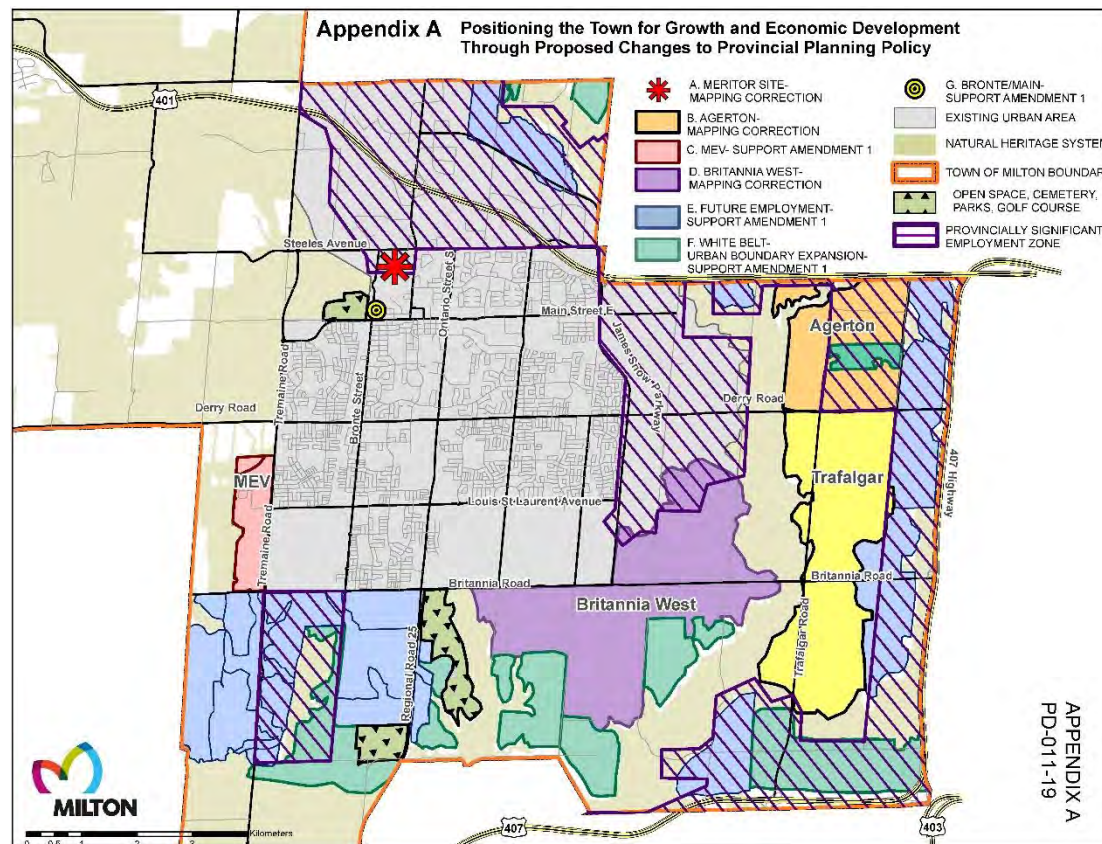
Appendix B illustrates the proposed Settlement Area Boundary Expansion and associated redesignation of Milton's whitebelt lands as Community Area and Employment Area. The proposed designations reflect the Town's Council adopted 2051 Vision (shown in Figure

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1) which is intended to realize the creation of a complete community with an appropriate mix of housing and jobs.

The remainder of this report provides the basis of MGP's comments and recommendations.

Figure 1: Town of Milton Council adopted 2051 Vision



Source: Report PD-011-19 Town of Milton, 2019

As part of the MCR, Halton Region is required to plan to accommodate 482,000 new people and 222,000 new jobs to meet the Growth Plan forecast for the Region of 1,100,000 people and 500,000 jobs by 2051. The 2020 LNA Methodology is to be used in conducting this assessment.

To address this, and as explained in Report DS-028-21, Halton Region prepared four (4) Growth Concepts, as part of their Integrated Growth Management Strategy ("IGMS"), that provide varying options on how to accommodate the growth allocations to 2051. These Growth Concepts generally assume a reduced growth allocation to the Town of Milton from 2031-2051 than the Town is currently allocated in the Regional Official Plan growth forecasts for 2006-2031, 56% of population growth and 50% of employment growth in the

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Region during this time. This results in directing a greater share of the Region's growth to Oakville, Burlington, and Halton Hills in the future horizon.

Based on the Region's proposed growth allocations in the Growth Concepts, Milton would be planned to accommodate approximately 30% of the population growth and 18% of the employment growth in the Region during the 2031-2051 horizon. This would result in Milton accommodating a total population of approximately 334,000 and 135,000 jobs by 2051.

In MGP's opinion, the population allocation of approximately 335,000 people to Milton proposed by the Region is appropriate relative to the potential for Milton to accommodate population growth in keeping with the Council adopted 2051 Vision.

With regard to the **employment allocation**, it is MGP's opinion that **the Region's allocation to Milton is too low**. It is essential that Milton maintain an appropriate balance of residents and jobs in the town during the 2031-2051 forecast period to allow the Town to continue developing as a complete community. **An additional 20,000 jobs should be allocated to Milton to ensure the ratio of residents to jobs is closer to 2:1 to maintain an appropriate balance**. This adjustment would result in the allocation of jobs to Milton being increased to 155,000 jobs by 2051, with the Town accommodating approximately 38% of the Region's total employment growth between 2031-2051.

As mentioned, MGP has undertaken an LNA for Halton Region, on behalf of the Town of Milton, to understand the land needs required to accommodate the 2051 growth forecast. A summary of MGP's LNA is provided as Appendix A. Based on this analysis, MGP identified a land requirement quantum that was most similar to that depicted in the Region's Growth Concept 4 for new Community Area and Employment Area land to accommodate growth forecasted in the Region to 2051. The Region's Growth Concept 4 estimates that at the minimum target of 50% intensification, the Region would require at least 2,080 hectares of Community Area land and 1,220 hectares of Employment Area land. Whereas, MGP estimates the Region's land need quantum to be approximately 2,220 hectares of Community Area and between 1,100 - 1,500 hectares of Employment Area to meet the growth forecast to 2051. The Employment Area estimate is based on the increase from 2031-2051 of employment lands type employment in the Region, and uses a density range of jobs per hectare to estimate this land need.

MGP's Recommendation:

Although the quantum of land is similar in MGP's LNA and the Region's Growth Concept 4, it is MGP's opinion that a modified Growth Concept 4 (the "Halton Balanced" Growth Concept) should be brought forward. The modified Growth Concept 4 should reflect MGP's LNA, with key assumptions adjusted as described in this report to conform to the Growth Plan and the 2020 LNA Methodology. As concluded in the modified Concept 4 - a housing mix that is adjusted to be market-based to the extent possible can be planned by the Region, and would achieve the minimum intensification target (50%) and exceed the minimum designated greenfield density (50 residents and jobs per hectare).

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As currently presented by the Region, Growth Concept 4 **should be amended to conform with the Growth Plan as presented in the “Halton Balanced” concept and address the following:**

- Have strong regard for the Town of Milton Council adopted 2051 Vision to include all of the Town’s whitebelt lands within the Settlement Area;
- Provide a unit mix that provides, to the extent possible, a market-based supply of housing;
- Utilize persons per unit estimates that are realistic, stable and consistent with estimates already utilized by the Region;
- Adjust the distribution of growth to Milton to ensure an allocation that results in a balanced accommodation of population and employment growth; and,
- Provide a sufficient quantum of employment lands to allow for comprehensive planning and support the Town’s economic competitiveness.

Based on the above adjustments, MGP’s LNA estimates the land area requirements of the Region **would necessitate all of Milton’s whitebelt lands to be brought into the Settlement Area to accommodate the growth forecasts 2051**. The mapping provided in Appendix B, illustrates the proposed designation of Milton’s whitebelt for Community Area and Employment Area land to accommodate this growth in a manner consistent with the Town’s Council adopted 2051 Vision (shown in Figure 1).

The following subsections provide a summary of the requirements and key assumptions used in undertaking a Land Needs Assessment (“LNA”).

Policy and Methodological Requirements

- I. ***Growth Plan Policy 2.2.1.5 states that “The Minister will establish a methodology for assessing land needs to implement this Plan, including relevant assumptions and other direction as required. This methodology will be used by upper-and single-tier municipalities to assess the quantity of land required to accommodate forecasted growth to the horizon of this Plan.”***

The 2020 LNA Methodology forms part of the Growth Plan and is not merely a guide. Upper- and single-tier municipalities **must** use the 2020 LNA Methodology to determine land needs to 2051. The 2020 LNA Methodology includes assumptions and other directions for accommodating forecasted growth that upper- and single-tier municipalities should follow. Accordingly, **municipalities that deviate from the 2020 LNA Methodology do not conform to the Growth Plan**. MGP’s LNA assesses land needs in accordance with the 2020 LNA Methodology to provide input into the Region’s MCR.

- II. ***A key component of the 2020 LNA Methodology is that upper and single-tier municipalities are required to consult with lower-tier municipalities in their implementation of the Growth Plan through the municipal comprehensive review.***

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“The projected housing need can be allocated among the lower-tier municipalities (if applicable). If allocating, upper-tier municipalities should, in consultation with lower-tier municipalities and the public, make the allocation among the municipalities based on such factors as the planned urban structure, housing affordability, a mix of housing types, servicing capacity and the potential for intensification. (2020 LNA Methodology, pg. 8)”

Lower-tier municipal consultation is required in conducting a LNA. The assessment must incorporate and have a strong regard for matters such as the planned urban structure at a local planning level. In this regard, Milton Council has adopted a resolution requesting that the Region include all of the Town’s whitebelt lands within the Settlement Area Boundary to accommodate growth needs to 2051. The inclusion of all the lands will allow the Town to plan these areas comprehensively. Failing to take account of lower-tier municipal decisions when allocating growth does not conform to the Growth Plan. Accordingly, it is imperative that Town Council’s adopted vision to 2051, which includes all whitebelt lands within the Settlement Area Boundary, must be a determining factor for the Region in preparing the Region’s LNA.

- III. ***The LNA must be based on population and housing estimates that lead to a mix and range of housing to meet the projected needs of current and future residents.***

A key component of the projections is the determination of appropriate persons per unit (“PPU”) assumptions for individual unit types. These estimates are generally stable and reflect changes over time relative to the propensity of households to occupy particular dwelling types. In general, these estimates should be aligned with those used in the Region’s master planning and financial studies, including later implementation in development charge studies. It is, therefore, imperative that PPU assumptions be as realistic and stable as possible when considering growth forecasts to ensure that the appropriate infrastructure and fiscal decisions are made in alignment with growth allocations.

The Region’s IGMS work varies PPU assumptions (particularly in apartments) to achieve higher densification targets. The increasing assumption of more people living in apartments region-wide from one scenario to another **fundamentally deviates from the use of these assumptions as projections and strays into the realm of unrealistic expectations** with regard to the number of people likely to be housed in an apartment. Such adjustments represent a policy-led approach to changing the housing preferences of residents, as opposed to projecting housing preferences based on market and demographic factors. The housing mix that results from applying policy-led PPUs will not conform to the Provincial Policy Statement and Growth Plan requirements to provide a market-based supply of housing to meet the projected needs of current and future residents.

Unrealistic PPU assumptions should be avoided as they will result in distortions of service levels, infrastructure requirements, and fiscal impact. MGP’s LNA utilizes the Halton Region 2017 Development Charge Background Study PPU assumptions to better align

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the growth estimates with housing propensities that have been approved by the Region and are being used to plan and finance growth in new communities.

IV. *The Community Land Needs portion of the LNA must be determined based on dwelling unit type estimates from the demand forecast, not by assuming a Greenfield Density.*

Housing by dwelling type must be used to determine the need for new Community Area land to ensure a sufficient land supply for all housing types. The former Provincial LNA Methodology (2016) used a blended greenfield density approach (e.g., assuming a general density such as 60 residents and jobs per hectare over the entire land area) to estimate land needs. The current 2020 LNA Methodology removed this approach as it obscured the certainty in providing for the housing types required to meet the projected needs of current and future residents. The greenfield density is a target of the Growth Plan and functions as a minimum outcome related to the planned urban structure; it should not be used to determine the housing mix or land requirements. **LNAs that do not include the calculation of land by unit type do not conform with the Growth Plan.**

MGP's LNA estimates the amount of new land required through Settlement Area Boundary Expansion to accommodate growth to 2051 by applying a gross density to each dwelling unit type category. The gross density assumption by dwelling type includes an allowance for population-related and major office employment. This gross density must also account for all Community Area uses including, residential, roads, public service facilities, and other uses.

The dwelling types listed in the 2020 LNA Methodology are as follows:

- Single/Semi-detached houses;
- Row Houses - including all forms of townhomes except for back-to-back townhouses;
- Apartments, which may be subdivided into:
 - Low-rise apartments - dwelling unit attached to other dwelling units including back-to-back townhouses, commercial units, or other non-residential space in a building that has less than five storeys;
 - High-rise apartments - dwelling unit in a building which has five or more storeys; and,
- Other dwellings - All others. (2020 LNA Methodology, pg. 10)

V. *The Provincial Policy Statement (2020), Growth Plan (2020), and the associated 2020 LNA Methodology require municipalities to provide a market-based supply of housing to the extent possible.*

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Since the Region began the current MCR, there have been two versions of the Provincial Policy Statement, three versions of the Growth Plan, and two versions of the LNA Methodology it has had to adapt to be consistent with or conform to.

The latest changes in Provincial policy occurred in 2020 with a revised Provincial Policy Statement (May 2020), Growth Plan (June 2020), and 2020 LNA Methodology (August 2020). One of the changes consistent throughout these documents is to require a market-based approach to housing that is projection-based and requires an adequate supply of housing to accommodate current and future needs. This change stands in contrast to preceding policy-led approaches that intentionally limited housing choices (irrespective of market demand for housing) to restrict the potential for new grade-related housing in favour of intensification in existing areas around transit infrastructure. The market-based approach to housing provides a balanced approach that continues to encourage intensification (particularly transit-supportive development) and compact built form while ensuring people will have the homes they want and need.

In particular, Provincial Policy Statement policies 1.1.1 b), 1.1.3.8 a), 1.4.1, and 1.4.3 require planning authorities to provide for an appropriate range of market-based housing to meet current and projected needs. Moreover, the Region must undertake conformity work with the Growth Plan using the 2020 LNA Methodology. The 2020 LNA Methodology requires that the Region accommodate sufficient land to the Growth Plan horizon (2051). It further provides guidance when determining the need for additional land:

“Conformity with the intensification and designated greenfield area density targets is confirmed or adjustments are made to ensure conformity with the Plan. This may require adjusting the mix of housing types while ensuring the provision of a market-based supply of housing to the extent possible. For the purposes of alternative intensification and designated greenfield area density targets, the ability to provide a market-based supply of housing is an important consideration in determining whether a target can be achieved.”
(LNA pg. 9.)

It is clear in a review of the current Provincial policy that **the Region must seek to provide a market-based supply of housing to the extent possible**. This approach would ensure that all housing types are provided to achieve a market-based demand forecast while meeting the minimum targets of the Growth Plan. Using a market-based supply of housing is good planning and in the public interest, particularly as it reduces the potential of erroneously planning for housing that does not meet the needs or wants of residents and is therefore unrealistic. A market-based supply of housing reduces the risk that the municipality may have unrealized housing growth along with the associated financial shortfalls resulting from committing to development-related growth costs without the reciprocal growth-related revenue.

Market-based demand is generally determined by considering regional-level historical trends of housing mix while estimating the needs and wants of existing and future residents. In contrast, policy-driven demand seeks to restrict the way residents are housed by aspiring to achieve higher densities (resulting in a higher proportion of rows and

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apartments) than would occur if left to market forces. The market-based demand for the Greater Golden Horseshoe unmodified by the Growth Plan targets is contained in Hemson's technical background report to the Growth Plan titled the *Greater Golden Horseshoe: Growth Forecasts to 2051* dated August 2020. Hemson also confirmed a similar market-based forecast specifically for Halton Region in their IGMS background technical memo titled *Lands Needs Assessment Methodology for IGMS Growth Concepts and Municipal Population, Employment and Land Allocations for IGMS Growth Concepts* dated January 2020. In general, Hemson's Halton Region market-based demand forecast results in a housing mix that is 50% singles and semis, 25% row houses, and 25% apartments and other dwelling types (see Figure 2). It is important to note that conformity with the Growth Plan minimum intensification and greenfield density targets represents a significant policy-driven shift away from the housing mix the market would deliver.

In this regard, the 2020 LNA Methodology requires that settlement area expansion calculations be based on a market-based forecast. The market forecast is to be adjusted only to the extent necessary to meet the density target in the Growth Plan (i.e., 50 residents and jobs per hectare). Municipalities should not seek to arbitrarily go beyond these targets when estimating land needs as the resulting land area and mix of housing would be more of a departure from the market forecast than is necessary. Planning to densities beyond the Growth Plan targets that do not increase the market-based supply of housing does not conform with the Growth Plan, its 2020 LNA Methodology, or the Provincial Policy Statement requirements for a market-based supply of housing.

The Region's IGMS work provides a housing mix forecast for each of its four Growth Concepts. However, the forecasts are not provided by the dwelling types identified in the 2020 LNA Methodology and rather provides the forecast by grade-related and apartment dwelling types only (see Figure 3). Further, each of the Region's Growth Concepts deviate from Hemson's recommended market-based unit mix forecast by heavily relying on growth in apartment dwelling types, representing (at minimum) 48% of unit growth (see Figure 3).

MGP's LNA achieves a market-based supply of housing, to the extent possible. MGP's LNA balances, to the extent possible, a shift away from historic lower-density housing trends to higher-density more compact forms, while still achieving the targets established by the Growth Plan and providing, to the extent possible, a market-based supply of housing. MGP's LNA housing mix is illustrated as Growth Plan and LNA Conformity Forecast 2016-2051 in Figure 2 below.

Figure 2: Halton Region Housing Growth and Forecasts

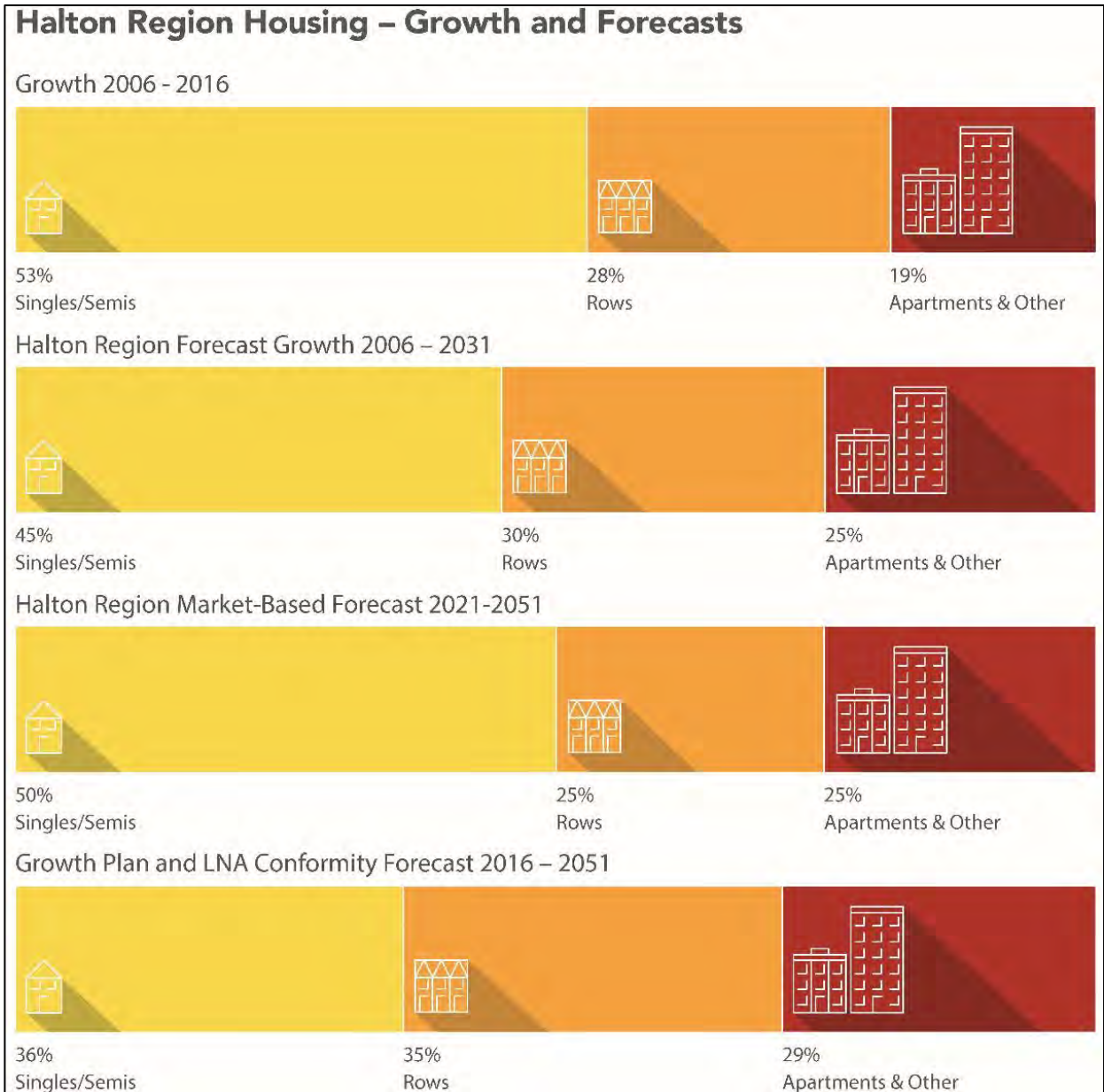
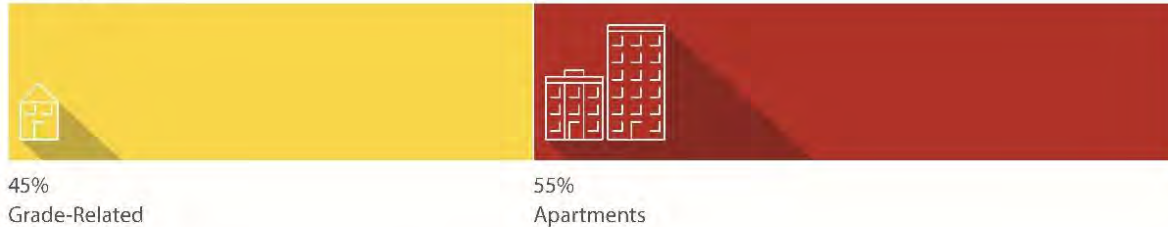


Figure 3: Halton Region IGMS Growth Concept Forecasts

Halton Region Growth Concept Forecasts 2021 - 2051

Concept 1:



Concept 2:



Concept 3:



Concept 4:



VI. *The Region's LNA should ensure that the 2051 housing mix provides a sufficient market based supply of all housing types and a realistic housing supply from intensification.*

The minimum Growth Plan intensification (50%) and density (50 residents and jobs per hectare) targets would typically be assumed as a baseline in the Region through its LNA work. In the current Official Plan, the Region is assumed to achieve a 40% intensification



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rate, which would require an average of 1,250 apartment units per year to be completed between 2006-2031. Over the past 15 years (2006-2020) of Growth Plan implementation, the Region has produced an average of 986 apartment units per year, according to CMHC housing complete data, falling short by 250 apartment units per year (~5,800 units) in the Region during this time.

Based on MGP's LNA estimate, the Region will have to forecast even higher levels of apartment growth (~1,540 units/year) to comply with the 50% intensification target in general alignment with an adjusted Growth Concept 4. It is MGP's opinion that this level of apartment growth, while aspirational, can be achieved with some degree of certainty and will deliver a market-based supply of apartment dwellings in the Region to 2051.

Since the Growth Plan intends that growth is planned to be achieved, the rate of intensification must be realistic. Unrealistic intensification assumptions undermine the achievement of the Growth Plan and put municipalities at risk of not providing sufficient housing in the forecast period. In this regard, the LNA Methodology states that:

"In order to establish a realistic supply of the units that will be achieved within the Plan horizon, the municipality should estimate the number of units by type likely to be created under current or anticipated conditions. Where applicable, the upper-tier municipality may work collaboratively with lower-tier municipalities to determine the potential to achieve housing by dwelling type through intensification within the forecast period." (2020 LNA Methodology, pg. 11)

In MGP's opinion, the level of apartment growth proposed in the Region's IGMS Growth Concepts (between 2,800-3,900 apartments per year) reflects an unrealistic increase in the level of apartment growth in the Region. Maintaining 50% intensification with an adjusted Growth Concept 4, as MGP's LNA does, represents the most realistic housing mix that still moves the Region substantially towards a more compact and dense form of housing overall by maintaining an aggressive policy-driven shift in housing. Such a scenario would have the primary effect of providing a sufficient land supply to better achieve a realistic housing mix to 2051.

VII. *The Region's LNA should provide sufficient land and employment opportunities to ensure the economic competitiveness of the Region.*

While employment forecasts are difficult to make with certainty, the Region can and should be planning for sufficient employment land to ensure the Region can provide places to work in balance with places to live in each municipality. In particular, employment lands should be designated and protected along major goods movement corridors such as 400 series highways. The Growth Plan does not specify a minimum density for employment lands. The Region should ensure that sufficient employment lands are designated to meet the forecasted employment growth and that designated employment lands are within competitive locations that meet the needs of businesses. This should include estimates for land-extensive uses with lower employment densities (such as logistics and warehousing uses). As per the 2020 LNA Methodology, the Region should consider a

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number of factors that go beyond estimating employment land needs based solely on an assumed job density:

“It must be recognized that employment area lands have different qualities and potential to achieve jobs; municipalities should ensure that employment area lands are provided in sufficient quantity to meet the overall employment demand and that they include lands that meet the attributes that are important to businesses, including:

- Servicing (either existing or near-term potential);
- Visibility, access to highways, proximity to other major goods movement facilities and corridors as well as public transit access;
- A range and size of available sites to meet market choice, including:
 - *vacancy factors to account for lands that may not develop to the Plan Horizon.*
 - *a sufficient supply of large parcels to accommodate land extensive uses; and,*
 - *strategic investment sites to attract employment investment that may otherwise choose to locate outside of Ontario;*
- Proximity to sensitive uses; and,
- Other factors that reflect the changing needs of businesses.” (2020 LNA Methodology, pg. 18)

As noted above, the Region can and should allocate employment growth and designate employment lands in accordance with the Town’s Council adopted 2051 Vision to ensure the Town’s economic prosperity and a balance of places to work and live.

VIII. *The Region’s LNA should adjust its supply assumptions to ensure that lands will develop within the forecast period to logical boundaries.*

Sufficient land must be provided to achieve the forecasted growth; municipalities should adjust the land needs to ensure this occurs as anticipated by the 2020 LNA Methodology. Assessments that do not provide a sufficient supply of land for a market-based supply of housing that can be achieved within the Plan horizon do not conform to the Growth Plan. The 2020 LNA Methodology notes that minor upward adjustments to the land area required for Settlement Area Boundary Expansion should be made to ensure logical boundaries when final settlement area boundaries are determined. When undertaking the LNA and proposing potential settlement area boundaries, the Region should make necessary adjustments to provide a sufficient supply of achievable land using logical boundaries. As per the 2020 LNA Methodology, the Region can and should consider adjusting its assumptions on supply to account for the following:

“Final adjustments to land need may be made in order to account for:

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- Extremes of need because of unusually low or high vacancies at the time of analysis such as a vacancy adjustment related to maintaining a healthy rental vacancy rate over the planning horizon;
- Constrained land within the settlement area that requires additional infrastructure (e.g., servicing, transit, highways);
- Lands that may not develop within the horizon of the Plan due to other factors such as landowner choice to not develop for the purposes they are designated for;
- The length of the planning process to make lands ready for development; and,
- Other economic (e.g., provision for major businesses) and demographic (e.g., increases in immigration and emigration) considerations not anticipated in growth scenarios used in the initial municipal analysis.” (2020 LNA Methodology, pg. 13-14)

Concluding Remarks:

This report presents the “Halton Balanced” Growth Concept as input into Halton Region’s Official Plan Review that is supported by a Land Needs Assessment (LNA) undertaken by MGP that conforms to the Provincial Growth Plan and would ensure a balanced ratio of residents to jobs in Milton.

To reiterate, as currently presented, Halton Region’s LNA should be adjusted as follows to ensure conformity to the Provincial Growth Plan:

- Provide a unit mix that provides, to the extent possible, a market-based supply of housing;
- Utilize persons per unit estimates that are realistic, stable and consistent with estimates already utilized by the Region;
- Adjust the distribution of growth to Milton to ensure an allocation that results in a balanced accommodation of population and employment growth; and,
- Provide a sufficient quantum of employment lands to allow for comprehensive planning and the Town’s economic competitiveness.

The “Halton Balanced” Growth Concept would support sustainable future growth in Milton and Halton Region through the following important growth objectives:

- Directing growth strategically by reinforcing intensification along transit corridors and Major Transit Station Areas in the Region;
- Providing a market-based, realistic and achievable supply of housing for the Region;
- Facilitating the efficient use of land in line with existing and planned Regional infrastructure;



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- Ensuring a healthy inventory of employment lands;
- Increasing densities in greenfield areas; and
- Creating mixed-use, compact, complete communities, while protecting the Provincial Greenbelt, the Region's Natural Heritage System and a large proportion of Agricultural lands in the Region.

Financial Impact

There are no financial implications arising from this report. However, impacts of the implementation of the Region's ultimate growth management strategy will be evaluated through subsequent fiscal impact studies, in conjunction with future secondary planning exercises.

Respectfully submitted,

Barbara Koopmans, MPA, MCIP, RPP, CMO
Commissioner, Development Services

For questions, please contact: Jill Hogan, MCIP, RPP Director, Phone: Ext. 2304
Planning Policy & Urban
Design

Attachments

Appendix A - Halton Region Land Needs Assessment (undertaken by MGP)
Appendix B - "Made in Milton" Growth Concept
Appendix C - Reports DS-028-21 and DS-039-21
Appendix D - Key Findings - Growth Concept Evaluation

CAO Approval
Andrew M. Siltala
Chief Administrative Officer

Date:	May 28, 2021
Project:	Milton Planning and Growth Management
MGP File:	20-2894
Subject:	Halton Region Community Area Land Needs Assessment Methodology

Appendix A outlines the Land Needs Assessment Methodology used to determine the amount of Community Area land required within Halton Region to accommodate the forecasted growth to 2051, as specified in *A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020* (“Growth Plan”). This analysis was performed by Malone Given Parsons Ltd. (“MGP”) on behalf of the Town of Milton.

There are six (6) main components involved in the process.

- 1) Population Forecast: Establish the total population growth based on the 2016 Census and 2051 population forecast in the Growth Plan.
- 2) Housing Need: Forecast total housing need by dwelling type to achieve the population forecast.
- 3) Housing Needs Allocation: Allocate the projected housing need by dwelling type among lower-tier municipalities, if applicable.
- 4) Housing Supply Potential by Policy Area: Allocate residential units by dwelling type to the three policy areas: Built-Up Area, Designated Greenfield Area (“DGA”) and Rural Area.
- 5) Community Area Jobs: Determine the number of jobs estimated to be accommodated in the Community Areas to the 2051 horizon.
- 6) Need for Additional Land:
 - Calculate existing DGA unit supply.
 - Determine the amount of growth needed to be accommodated in the new DGA and calculate the Community Area land need requirement based on the unit mix.
 - Verify the density to ensure compliance with the density targets established by the Growth Plan.

1.0 Population Forecasts (Component 1)

Component 1 of the Land Needs Assessment Methodology for calculating Community Area requires a population forecast to 2051. Municipalities may use the forecasted numbers in Schedule 3 of the Growth Plan or an alternate growth scenario. In this analysis, the Schedule 3 2051 population forecast for Halton Region of 1,100,000 is used, with the 2016 Census population used as the base year. It is assumed that the net undercount and the non-household population rates from the 2016 Census are applied to 2016 and beyond. The forecasted population growth from 2016 to 2051 is 527,222 and is used to estimate a unit forecast in Component 2.

Table 1: Halton Region Population Forecasts

	2016 Census ¹	2051 Forecast	Growth 2016-2051
Population	548,435	1,053,250	504,815

Household Population	540,980	1,038,933	497,953
Non-Household Population ²	7,455	14,317	6,862
Net Undercount Rate ³	4.25%	4.25%	
Total Population	572,778	1,100,000⁴	527,222

Sources:

¹Statistics Canada, 2016 Census Profile.

²Statistics Canada, 2016 Census Profile. Assumed a rate of 1.36% for non-household population. Carried forward to 2051.

³Statistics Canada, 2016 Census net undercount rates for the Toronto CMA. Carried forward to 2051.

⁴A Place to Grow, 2020, Schedule 3, Distribution of Population and Employment for the Greater Golden Horseshoe to 2051.

2.0 Housing Need (Component 2)

The population forecast is converted into a unit forecast by dwelling type as part of Component 2. Based on Hemson's technical report *Greater Golden Horseshoe: Growth Forecasts to 2051* dated August 2020, the 2051 unit forecast is 387,600 units with a growth of 194,620 units from 2016 to 2051. Table 2 summarizes the housing need by dwelling type. Dwelling types include the following categories: single/semi-detached houses, row houses and apartments.

Table 2: Hemson Forecasted Housing Need for Halton Region

	Singles/Semis	Rows	Apartments	Total
2016 Census	123,015	33,815	36,150	192,980
2051 Forecast	219,300	83,700	84,600	387,600
Unit Growth	96,285	49,885	48,450	194,620
Growth Mix (%)	49%	26%	25%	100%

Sources:

¹Statistics Canada, 2016 Census Profile.

²Hemson Technical Report, *Greater Golden Horseshoe: Growth Forecasts to 2051, August 2020*.

Given the Growth Plan objectives to match housing supply with market demand and the requirement to achieve a population target, a revised unit mix is required. The revised housing mix is more reflective of market demands while still achieving the Growth Plan objectives of a more compact built-form and reflects the constraints of directing growth within the Built-Up Area where there are limited opportunities for new family-oriented housing. Given this, the unit growth should be distributed to allocate higher density housing forms to the Built-Up Area while providing for lower density family-oriented housing in the DGA.

Table 3 translates the forecasted housing unit growth into a total projected population. Similar to Table 1 above, the net undercount and non-household population rates are carried forward to calculate the total population. The key point of this step is to generally match the total forecasted population growth based on the Growth Plan (527,255 people) with the forecasted population growth resulting from the revised unit growth mix.

Table 3: Housing Need Adjusted to Achieve Population Target

	Singles/Semis	Rows	Apartments	Total
Revised 2051 Unit Forecast	190,000	100,200	90,000	380,200
Revised 2051 Unit Mix (%)	50%	26%	24%	100%
Revised Unit Growth	66,985	66,385	53,850	187,220
Revised Unit Growth Mix (%)	36%	35%	29%	100%
PPU ¹	3.52	2.67	1.58	

Household Population Growth	235,787	177,248	85,083	498,118
Non-Household Population Rate ²	1.36%	1.36%	1.36%	1.36%
Non-Household Population	3,205	2,409	1,157	6,771
2016 Census Population	238,992	179,657	86,240	504,889
Net Undercount Rate ³	4.25%	4.25%	4.25%	4.25%
Total Population	249,600	187,632	90,067	527,299

Sources:

¹Region of Halton 2017 Development Charges Background Study, December 2016.

²Statistics Canada, 2016 Census Profile. Assumed a rate of 1.36% for non-household population. Carried forward to 2051.

³Statistics Canada, 2016 Census net undercount rates for the Toronto CMA. Carried forward to 2051.

3.0 Housing Need Allocation (Component 3)

Component 3 of the Community Area Land Needs Assessment Methodology involves allocating the projected housing need among the lower-tier municipalities (if applicable). Halton Region will consult with the lower-tier municipalities and the public when making such allocations. Based on the Region's proposed growth allocations in the Growth Concepts, Milton would be planned to accommodate approximately 30% of the population growth and 18% of the employment growth in the Region during the 2031-2051 horizon. This would result in Milton accommodating a total population of approximately 334,000 and 135,000 jobs by 2051.

The population allocation of approximately 335,000 people to Milton proposed by the Region is appropriate relative to the potential for Milton to accommodate population growth in keeping with the Council adopted 2051 Vision.

With regard to the employment allocation, it is our opinion that the Region's allocation to Milton is too low. It is essential that Milton maintain an appropriate balance of residents and jobs in the municipality during the 2031-2051 forecast period to allow the Town to continue developing as a complete community. An additional 20,000 jobs should be allocated to Milton to ensure the ratio of residents to jobs is closer to 2:1 to maintain an appropriate balance. This adjustment would result in the allocation of jobs to Milton being increased to 155,000 jobs by 2051, with the Town accommodating approximately 38% of the Region's total employment growth between 2031-2051.

4.0 Housing Supply Potential by Policy Areas (Component 4)

Component 4 determines the potential housing supply by policy areas. The policy areas include the Built-Up Area, Designated Greenfield Area and Rural Area.

Table 4 forecasts household growth by planning periods by dwelling type. The forecast periods reflect the changes in intensification targets for new development that is required under the 2020 Growth Plan. For reference, the following are the planning periods used in this analysis:

- 2016 – 2022: this is the period from the Census to the completion of the Municipal Comprehensive Review (MCR). For the purposes of this analysis, we have assumed this is 2022. During this period, the minimum intensification target is 40%; and,
- 2023 – 2051: this is the period from the completion of the MCR to 2051. During this period, the minimum intensification target is 50%.

It is also assumed that a small portion (0.5%) of the growth will be accommodated in the Rural Area to reflect the

limited growth potential in Rural Areas.

With the established intensification targets, along with an estimated number of units by dwelling type likely to be created within the Built-Up Area, the DGA units and Rural Area units are calculated. Table 4 distributes the revised unit growth, established as part of Component 2, among the policy areas. It generates a unit demand for the Built-Up Area, DGA and Rural Area. It is the DGA unit demand that is used in Component 6 to help calculate the new DGA Community Area land requirement.

Table 4: Distribution of Units by Policy Area

2016-2022	Singles/Semis	Rows	Apartments	Total
Built-Up Area Units (40%)	642	5,135	7,061	12,838
% Units	5%	40%	55%	100%
DGA Units (59.5%)	10,548	5,181	708	16,437
% Units	64%	32%	4%	100%
Rural Area Units (0.5%)	160	0	0	160
% Units	100%	0%	0%	100%
2023-2051				
Built-Up Area Units (50%)	3,878	31,025	42,659	77,563
% Units	5%	40%	55%	100%
DGA Units (49.5%)	50,981	25,043	3,422	79,446
% Units	64%	32%	4%	100%
Rural Area Units (0.5%)	776	0	0	776
% Units	100%	0%	0%	100%
Total Distribution	66,985	66,385	53,850	187,220
Built-Up Area Unit Demand	4,520	36,160	49,720	90,401
DGA Unit Demand	61,529	30,225	4,130	95,883
Rural Area Unit Demand	936	0	0	936
DGA Unit Mix (%)	64%	32%	4%	100%

5.0 Community Area Jobs (Component 5)

While the purpose of Component 5 is to estimate the number of jobs estimated to be accommodated in the Community Areas, it does not have any impact on the land requirement. Community Area jobs are calculated as part of Component 6 when ensuring the density targets set out in the Growth Plan are met.

6.0 Need for Additional Community Land (Component 6)

Component 6 converts the housing need requirements established in Component 4, into the amount of additional land required to accommodate the 2051 population targets in the Growth Plan. This component includes the following steps:

- Calculate existing supply;
- Determine Community Area land requirement; and,
- Verify Growth Plan density.

6.1 Calculate Existing Supply

It is first necessary to calculate the supply of the existing DGA Community Area. This analysis was undertaken by MGP and resulted in the Halton Region Designated Greenfield Area Density Analysis, dated May 2021, which includes a breakdown of planned and vacant units.

Planned units include all units estimated to be built beyond Spring 2016, those under construction, or included within development applications submitted to the municipalities that are either registered, draft approved or in progress. Table 5 is a summary of all planned units by lower-tier municipality.

Table 5: Halton Region Planned Designated Greenfield Area Unit Supply by Municipality

Municipality	Singles/Semis	Towns	Apartments	Total
Burlington	981	1,074	1,195	3,250
Halton Hills	747	39	0	786
Milton	5,788	4,941	3,107	13,836
Oakville	4,630	6,148	5,552	16,330
Total Halton Region	12,146	12,202	9,855	34,203

Vacant units are the potential units for all vacant residential land, as designated in the lower-tier Official Plan/Secondary Plans. The units are calculated based on the vacant land area available and the corresponding Official Plan policy permissions related to density and permitted residential dwelling types. A summary of vacant units is found in Table 6.

Table 6: Halton Region Vacant Designated Greenfield Area Unit Supply by Municipality

Municipality	Singles/Semis	Towns	Apartments	Total
Burlington	134	0	0	134
Halton Hills	2,986	2,705	1,016	6,707
Milton	12,935	13,201	7,793	33,929
Oakville	2,255	4,033	1,503	7,791
Total Halton Region	18,309	19,939	10,313	48,560

6.2 Determine Community Area Land Requirement

The planned and vacant units are combined for a total existing DGA supply. This existing supply is deducted from the forecasted housing need to generate the new DGA unit requirement as shown in Table 7.

Table 7: New Designated Greenfield Area Unit Requirement

	Singles/Semis	Rows	Apartments	Total
Planned Units	12,146	12,202	9,855	34,203
Vacant Units	18,309	19,939	10,313	48,560
Total Existing DGA Supply	30,455	32,141	20,167	82,763
DGA Unit Demand	61,529	30,225	4,130	95,883
New DGA Unit Requirement	31,074	0	0	31,074
New DGA Unit Mix	100%	0%	0%	100%

Having established the new DGA unit requirement, the new Community Area land requirement is generated by applying a standard gross density (units/ha) to each dwelling type as shown in Table 8.

Table 8: Additional Land Requirement to 2051

	Singles/Semis	Rows	Apts	Total
New DGA Unit Requirement	31,074	0	0	31,074
Gross Density (units per hectare)	14	25	100	
Land Requirement (ha.)	2,220	0	-	2,220

As a result, 2,220 hectares of additional land in Halton Region are necessary to be designated as new Community Area through expansion of the settlement area boundary to meet the population projection set forth in the Growth Plan.

6.3 Verify Growth Plan Density

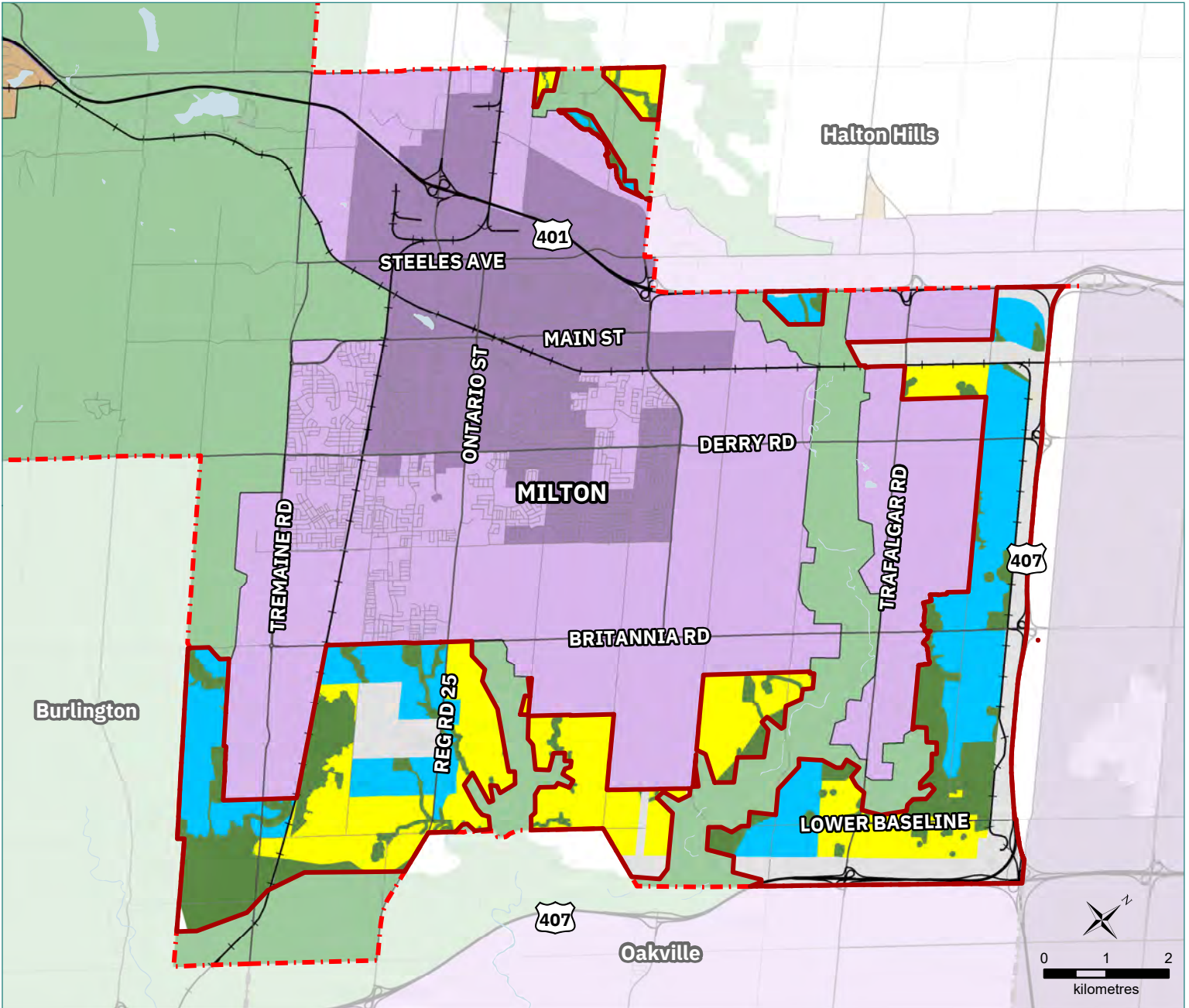
Once the Community Area land need requirement is calculated, it is important to ensure that the DGA achieves the density target of 50 residents and jobs per hectare set out in the Growth Plan. This is calculated by estimating the full population and employment of the DGA and dividing it by its gross developable area. To calculate the total residents and jobs, a population-related jobs rate of one (1) job per six (6) people is applied along with the same PPU's and net undercount rate as used in Table 3.

Table 9: Density Analysis

	Land Area (ha)	People & Jobs	Density
Built DGA (as of 2016 Census)	1,516	91,415	60.3
Planned & Vacant DGA	2,302	148,184	64.4
ROPA	1,942	115,174	59.3
Existing DGA Subtotal	5,760	354,773	61.6
New DGA Requirement	2,220	120,871	54.5
Total DGA	7,980	475,643	59.6

As demonstrated here, both the Region's existing DGA and new DGA requirement are planned to exceed the Growth Plan target of 50 residents and jobs per hectare.

MILTON COUNCIL ADOPTED 2051 VISION



- - - Municipal Boundary
- Greenbelt Plan Area
- Built-Up Area
- Designated Greenfield Area
- Whitebelt
- New Community Area
- New Employment Area
- Natural Heritage System
- Non-Developable Area

Sources: Town of Milton Report No. PD-011-19 - Making it Possible: Positioning the Town for Growth and Economic Development Through Proposed Changes to Provincial Planning Policy, February 2019. Contains information licensed under the Open Government Licence – Ontario



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APPENDIX C
DS-055-21

Report To: Council

From: Barbara Koopmans, Commissioner, Development Services

Date: May 3, 2021

Report No: DS-028-21

Subject: Halton Region Official Plan Review - Milton's Response to the Growth Concepts Discussion Paper

Recommendation: **THAT staff be directed to submit comments as outlined in Report DS-028-21 to Halton Region in response to the *Growth Concepts Discussion Paper - Integrated Growth Management Strategy* dated March 2021;**

AND THAT Council express broad support for a balanced approach to growth, through both intensification and new designated greenfield development as illustrated in Growth Concept 4.

EXECUTIVE SUMMARY

- The Province requires Halton Region to plan to accommodate one million people and nearly half a million jobs from 2031-2051.
- Phase 2 of Halton's Regional Official Plan Review is underway and involves research, technical analysis and community engagement.
- The review will inform the update to Halton Region's Official Plan, to bring it into conformity with the 2019 Growth Plan for the Greater Golden Horseshoe.
- As part of the review, Halton has released a series of reports, the latest is the Growth Concepts Discussion Paper.
- This report presents an overview of the Growth Concepts Discussion Paper and provides comments from town staff.
- The growth concepts will inform the distribution of population and employment to Milton.

REPORT

Background

At present, the Regional Official Plan Review (ROPR) is finishing Phase 2 of the program and moving into Phase 3, where a Preferred Growth Concept and Policy Directions Report will be presented for Regional Council's consideration. Attachment 1 presents the ROPR timeline and key milestones.

Halton is required to plan for an additional 20 years from 2031-2051 to accommodate a total population of 1.1 million and total employment of 500,000. At present, there are 621,000 people and 281,000 jobs in Halton. The 2051 forecast is nearly double the number of people and jobs found in Halton today.

To assess how this future can be accommodated, Halton has released *The Growth Concepts Discussion Paper*. The paper describes four Growth Concepts that have been prepared to show how and where Halton could grow to 2051. It also provides an analysis of the concepts and identifies potential urban boundary expansions for accommodating different types of growth.

This purpose of this report is to introduce Milton Council to the Growth Concepts Discussion Paper and to provide comments from a "Milton Lens".

In support of the Town's Strategic Initiatives and Future Urban Structure (see Attachment 2), it should be noted that Milton Council has previously provided input into the Region's Official Plan Review through the following reports: ES-013-17, PD-023-18, ES-003-18, PD-003-20 and DS-035-20. Through these reports, Milton Council has consistently expressed broad support for a balanced approach to growth, through both intensification and new designated greenfield development.

Discussion

Growth Concepts Overview

The Discussion Paper provides a full description of each concept including the provincial planning policy requirements and related technical work. Attachment 3 to this Report contains an Executive Summary of the paper.

The Discussion Paper and feedback from public engagement and further analysis will be used to determine a Preferred Growth Concept that will be advanced as part of the Growth Plan conformity exercise through a future draft Regional Official Plan Amendment.

Outlined below are the concepts and their relative *intensification* and *densification* rates. The four concepts are distinguished by varying amounts of new designated greenfield area (i.e. urban boundary expansions), ranging from a scenario with no new designated greenfield area to a scenario with 3,300 net hectares of new designated greenfield.



Land Requirements by Concept:

Concept 1: 60% Densification/Moderate Greenfield (Urban Boundary) Expansion

New Community Area Land = 1,460 hectares

New Employment Area Land = 1,170 hectares

Total New Land Area (net) = 2,630 hectares

Total New Land Area (gross) = 3,430 hectares

Concept 2: 70% Densification/Limited Greenfield (Urban Boundary) Expansion

New Community Area Land = 730 hectares

New Employment Area Land = 1,100 hectares

Total New Land Area (net) = 1,830 hectares

Total New Land Area (gross) = 2,320 hectares

Concept 3: 80% Densification/Employment Only Greenfield (Urban Boundary) Expansion

New Community Area Land = 0 hectares

New Employment Area Land = 980 hectares

Total New Land Area (net) = 980 hectares

Total New Land Area (gross) = 1,270 hectares

Concept 4: 50% Intensification/Greatest Greenfield (Urban Boundary) Expansion

New Community Area Land = 2,080 hectares

New Employment Area Land = 1,220 hectares

Total New Land Area (net) = 3,300 hectares

Total New Land Area (gross) = 3,900 hectares

Key Terms and Their Meanings:

The Term *Delineated Built-Up Area* or “DBA” is a defined term in the Growth Plan. It means the limits of the developed urban area as defined by the Province. In Milton, this geography is contained by Bronte Street to the west, James Snow Parkway to the east, Louis St. Laurent Boulevard to the south and extends just north of Highway 401.

The term *Designated Greenfield Area* or “DGA” is defined in the Growth Plan. It means lands located within the urban boundary, but outside of the *DBA* described above. The following Secondary Plan areas are considered *DGA* in Milton: Boyne, Trafalgar, Agerton, Milton Education Village and Britannia.

The term *Intensification* is a defined term in the Growth Plan. It generally means the development of a property, site or area at a higher density than exists and would apply to Milton’s *DBA* described above. In Milton, this means key areas in our *DBA*, like the Mobility Hub (lands around existing GO Station) and “Old Milton”.

The term *Densification* is not rooted in provincial policy and is not a defined term in the Growth Plan. It is a new term used in the Region’s Discussion Paper to describe additional density on lands that are outside of the *DBA* described above. In Milton, this would mean adding additional density/housing units to the already comprehensively planned areas like the Milton Education Village, Boyne Secondary Plan, Trafalgar Secondary Plan and the



The Corporation of the Town of Milton

in-progress Britannia Secondary Plan. Staff has significant concerns with this approach/methodology as described later in this report.

The term *Whitebelt* means land that is outside of the Niagara Escarpment, Greenbelt and Oak Ridges Moraine Plan areas. In Milton, this represents approximately 4,400 hectares of land, located in southeast Milton and along the edge of Highways 401 and 407 where future development may be permitted as new DGA.

Evaluation Framework

The Discussion Paper presents technical analysis of the Growth Concepts in key areas including water and wastewater, transportation, and fiscal impacts. See the Executive Summary contained in Attachment 3 for a high-level snapshot.

The Discussion Paper uses an Evaluation Framework based around the following themes to evaluate the Growth Concepts:

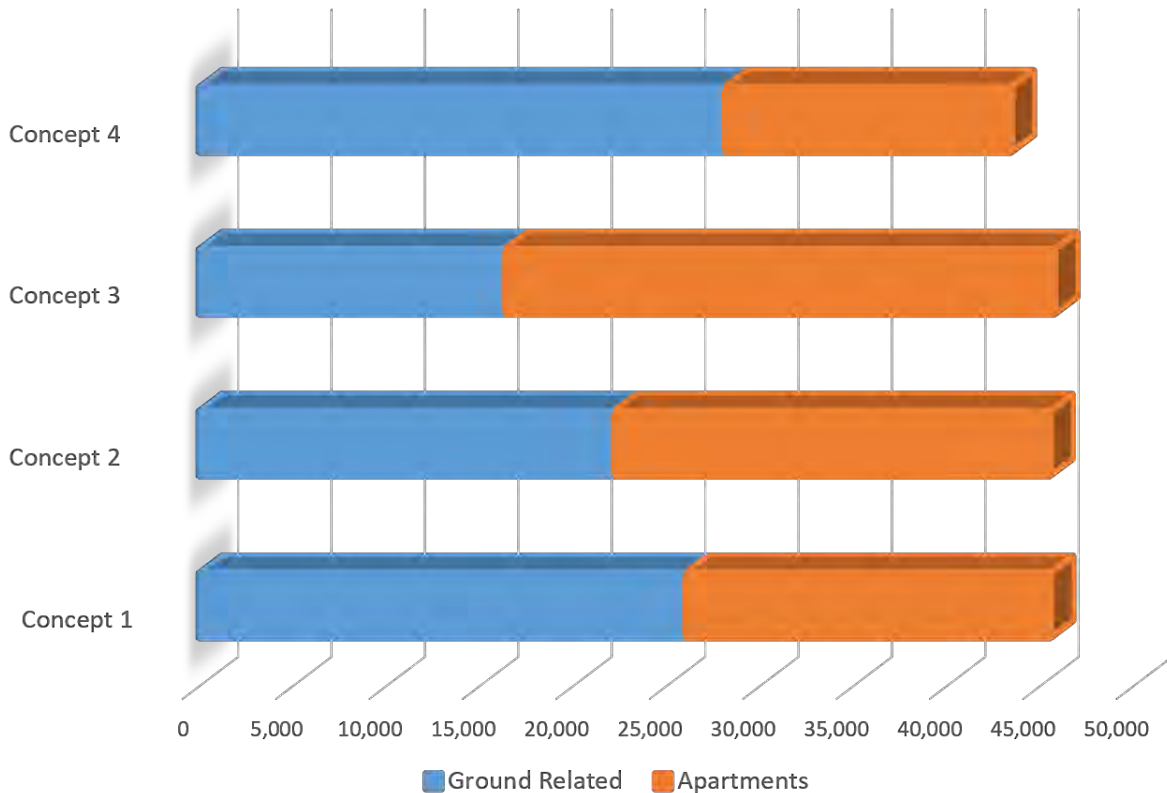
- Theme 1: Regional Urban System and Local Urban Structure
- Theme 2: Infrastructure and Financing
- Theme 3: Agriculture, Environment and Climate Change
- Theme 4: Growth the Economy and Moving People and Goods

Under each theme, there are a series of measures to provide an assessment on how each growth concept best achieves the measure, and how the concept performs relative to the other concepts related to each measure.

What would this all mean for Milton?

Where is growth proposed in Milton 2021-2051?				
	Household Growth			
Growth Concept	1	2	3	4
Built-up Area	20,400	21,000	21,700	20,400
Existing DGA	28,000	30,200	30,800	27,900
Additional High Density Units in Existing DGA	4,700	7,400	12,900	1,200
New DGA	12,100	6,500	0	13,600
Total	65,200	65,100	65,400	63,100

Town of Milton - Total Household Growth by Structure Type, 2031 - 2051						
	Ground Related		Apartments		Total Households	
	Units	Share of Total	Units	Share of Total	Units	Share of Region
Concept 1	26,050	57.18%	19,510	42.82%	45,560	38.10%
Concept 2	22,220	48.80%	23,310	51.20%	45,530	38.10%
Concept 3	16,380	35.78%	29,400	64.22%	45,780	38.30%
Concept 4	28,130	64.73%	15,330	35.27%	43,460	36.40%



Methodology Behind the Growth Concepts

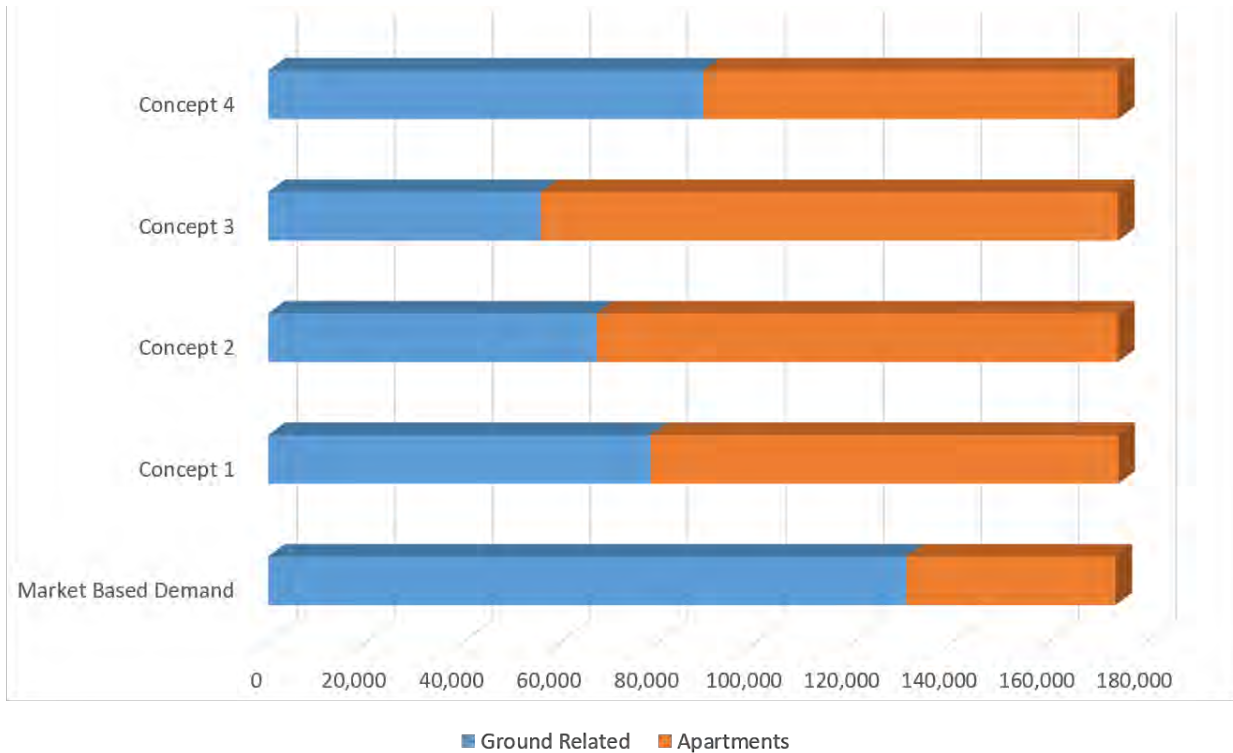
The Growth Concepts have been formulated using the province’s updated Land Needs Assessment Methodology (LNA). Along with the policies of the 2019 Growth Plan, Halton is required to use the methodology to assess the quantity of land required to accommodate forecasted growth. A key consideration in the methodology is addressing **market-based** housing in relation to long-term growth.

Recognizing that local needs are diverse, the LNA “provides the key components to be completed as municipalities plan to ensure that sufficient land is available to: accommodate all housing market segments; avoid housing shortages; consider market demand; accommodate all employment types including those that are evolving; and plan

for all infrastructure that is needed to meet the complete communities objectives to the horizon of the Plan”.¹

The following illustrates Halton’s market based housing demand. It is staff’s opinion that the growth concepts substantially **underestimate** the demand for ground related housing (singles, semis, towns) and **overestimate** the demand for apartments, to the point it can be considered **unrealistic**.

Halton Region Market Based Housing Demand(1) and Projected Housing Growth by Unit Type(2), 2021 to 2051					
Type	Demand	Housing Growth			
	Market Based	Concept 1	Concept 2	Concept 3	Concept 4
Ground Related	130,700	78,300	67,300	55,800	89,100
Apartments	42,800	95,800	106,700	118,200	84,900
Total	173,500	174,100	174,000	174,000	174,000
(1) LNA Component 2, Table 6					
(2) LNA Component 6, Tables 16, 17, 18 and 19					



¹ Land Needs Assessment Methodology for the Greater Golden Horseshoe - 2020

Staff has reviewed the LNA undertaken by Halton Region and **flag the following inconsistencies that must be addressed prior to the consideration of a preferred option:**

- Staff generally agrees with the Market Housing Type Forecast Housing Mix described in Tables 4 through 7. Should the Growth Concepts be revised to generally reflect the delivery of this housing mix in all cases? Or if not in all cases, with an analysis of the deviation from this mix that still reasonably meets the projected needs of current and future residents? In general, it appears that the market forecast has occurred after the primary analysis for the concepts - the two need to be reintegrated if not already accomplished?
- How can the number of total housing units stay the same in all concepts? While the overall household demand would be the same in all forecast scenarios, the actual potential to occupy housing unit types will be impacted by the market trends and projected people per unit (PPU) assumptions that should remain relatively fixed. Contrary to this, we note that the PPUs have dramatic shifts (particularly in the apartments) from one concept to another.
- Should the PPUs by unit type stay relatively fixed in all concepts to reflect the background population forecast? In concepts with more people assumed to occupy apartments to meet housing demand at a lower/fixed PPU then more units would be required given that these units house less people and are not generally family-oriented. It appears that the concepts assume increasing (and likely unrealistic) people per unit in smaller units from one concept to another to make the higher intensification targets work with a greater proportion of apartments. **This policy-led shift is not appropriate and would not comply with the policies and intent of the Provincial Policy Statement and the Growth Plan, particularly in meeting projected needs of residents.**
- **It appears that the proportion of apartments in all scenarios is unrealistic in terms of what the market would demand, especially in Milton and Halton Hills.**
- Staff has **significant concerns** with the concept of *Densification* as defined in the Region's work to-date. Adding additional density to already comprehensively planned "new" areas like the Milton Education Village, Boyne Secondary Plan, Trafalgar Secondary Plan and the in-progress Britannia Secondary Plan would place unanticipated pressure on planned roads, servicing infrastructure and community services including parks and schools. Further, these Secondary Plan areas have been planned with significant community input. **Any substantial change to the planned function of these communities as illustrated in Growth Concepts, 1, 2 and 3 is not appropriate and cannot be supported by Milton.**
- What are the units by type (single/semi, rows, and apartments/accessory apts.) for each of the concepts? While the concepts use assumptions "on a spectrum between market-based supply and policy factors" the only true way to understand the balance of these assumptions is to see the unit mix associated with each concept. While the concepts express a unit division between grade-related and

apartments, the LNA requires the generation of land requirements by unit types - this should be shown in the analysis to understand the unit mix, and land requirements to 2051.

- Will the Region run another growth concept that delivers on the Market Housing Type Forecast to 2051? Staff is of the opinion that this additional evaluation should be completed to demonstrate land needs to accommodate market-based demand, which may require the consideration of alternative targets permitted in the Growth Plan.
- Should the Region use higher employment forecasts to include all future strategic employment lands in the settlement area boundary to 2051? It is staff's opinion that Milton has some of the most strategically located employment lands in the GGH. **These areas should be included to enable Milton and the Region to nimbly and quickly respond to employment opportunities, particularly in pandemic recovery mode in the early part of the forecast.**
- Should the Region calculate the need for employment lands using both the LNA employment lands type job forecast as well as a land extensive users (e.g. warehousing and logistics) land estimate? In the case of the latter, the determination of land requirements is not easily derived based solely on the employment forecast as opposed to estimated industry-specific growth forecasts to reflect increased demand in e-commerce and retailing which could have its own discrete requirement to ensure sufficient land is made available for these uses.
- Should the Region carry contingency land amounts for both community and employment area assumptions? Staff is of the opinion that the Region should carry in the order of 5 to 10 per cent contingency for lands to be included in addition to the lands required for forecasted growth to allow flexibility, particularly due to the potential for property owners in community areas who do not participate in the allocation program. This would allow sufficient lands to be brought forward to meet growth in a timely fashion and accounts for lands that may not develop during the forecast period.
- Will the Region acknowledge and build into all concepts the base assumption that supply includes all of Milton's Whitebelt to 2051? The urbanization of the remaining whitebelt lands reflects Milton Council's resolution and comments to the Region during this MCR. Further, it is clear that addressing some or all of the comments above will require the inclusion of the entire Milton Whitebelt into the settlement boundary to meet growth needs to 2051. The Region should confirm this as a base assumption going forward.

Additional Comments for Halton Region's Consideration: Milton's Role - Overall Growth in the Region

Milton staff report DS-003-20 acknowledged that there are a number of challenges and opportunities directly related to the number of people who will be coming to the Region.

To reiterate each local municipality has the potential to provide a certain role in the overall growth of the Region, based on:

- Each municipality's local growth objectives (i.e., current/future urban structure); and
- Each municipality's current phase or stage of growth, maturity, and evolution.

Milton's "growth maturity" is at an adolescent stage. Through detailed planning, Milton is establishing a vision for its ultimate maturity and long-term growth, beyond planning horizons through over-arching themes, goals and strategic policies to ensure the development of complete communities and the realization of our Council endorsed Future Urban Structure;

- In terms of residential growth, similar to our neighbouring municipalities, Milton has capacity to respond to certain market demands by accommodating medium/high density forms of housing through future intensification (i.e., townhouses, apartments, etc.);
- However, *unlike* some of our neighbouring municipalities, Milton also has capacity to respond to other market demands by accommodating low and medium density forms of housing (i.e., singles, semis, townhouses); through new designated greenfield expansions;
- In terms of employment growth, Milton has undertaken significant planning work to support and attract new employment forms, which include transit supportive, mixed-use employment communities (i.e. Milton Education Village and the Agerton Secondary Plan); and
- *Unlike* some of our neighbouring municipalities, Milton can continue to accommodate large-scale stand-alone industrial buildings for wholesale trade, transportation/warehousing.

A **balanced** approach to future development best reflects Milton's growth trajectory:

- careful management of and comprehensive planning for growth;
- efficient use of land and infrastructure;
- emphasis on intensification;
- protection of employment lands;
- increased densities in greenfield areas; and
- creation of mixed-use, compact, complete communities.

Balanced Approach - Building Complete Communities vs Urban Sprawl

- Unlike urban sprawl, where there is little or no planning, greenfield development in Milton is about efficient urban planning that provides sustainable complete communities to accommodate our growing urban population.
- This is illustrated through the comprehensive planning exercises undertaken for the MEV and Trafalgar/Agerton Secondary Plan areas to ensure the development of

complete communities with densities supportive of transit where homes, jobs, schools, community services, parks and recreation facilities are easily accessible.

- Growth needs in Milton include **both infill development, as well as greenfield development. Given the relatively small size of Milton's DBA, while infill and intensification is planned in key locations, there is less capacity to accommodate a higher proportion of growth through intensification and as such balance is key.**
- Our future and planned neighbourhoods are sustainable through more compact community design.
- It is important to Milton that an Urban Boundary expansion is contemplated.
- Current market demands project that the majority of the Derry Green employment lands will be developed by 2025/2026. To continue to support the creation of complete communities and ensure that employment growth is accommodated appropriately in specific areas, for example, in the MEV and near the transit hub, a boundary expansion is critical to accommodate larger-scale employment developments like warehousing and logistics. This will ensure that Milton is able to strategically manage anticipated growth pressures and to ensure sufficient land to accommodate both employment uses and job creation from now until 2051.
- Milton has room to grow into the Whitebelt for residential and a mix of other uses as a logical extension to the Britannia Secondary Plan in southeast Milton.
- Milton is in an excellent position - we have the farmland protected throughout the west and north and urban development (current and planned) focussed around the Region's infrastructure program in the south and east.

Concluding Remarks:

Milton Council has consistently expressed broad support for a balanced approach to growth, through both intensification and new designated greenfield development that is currently best illustrated through Growth Concept 4. To ensure Milton's plan for growth is reflected, it is imperative that the commentary in this report be addressed prior to the selection of a preferred growth concept.

Financial Impact

There are no financial implications arising from this report. However, impacts of the implementation of the Region's ultimate growth management strategy will be evaluated through subsequent fiscal impact studies, in conjunction with future secondary planning exercises.

Respectfully submitted,

Barbara Koopmans, MPA, MCIP, RPP, CMO
Commissioner, Planning and Development



The Corporation of the Town of Milton

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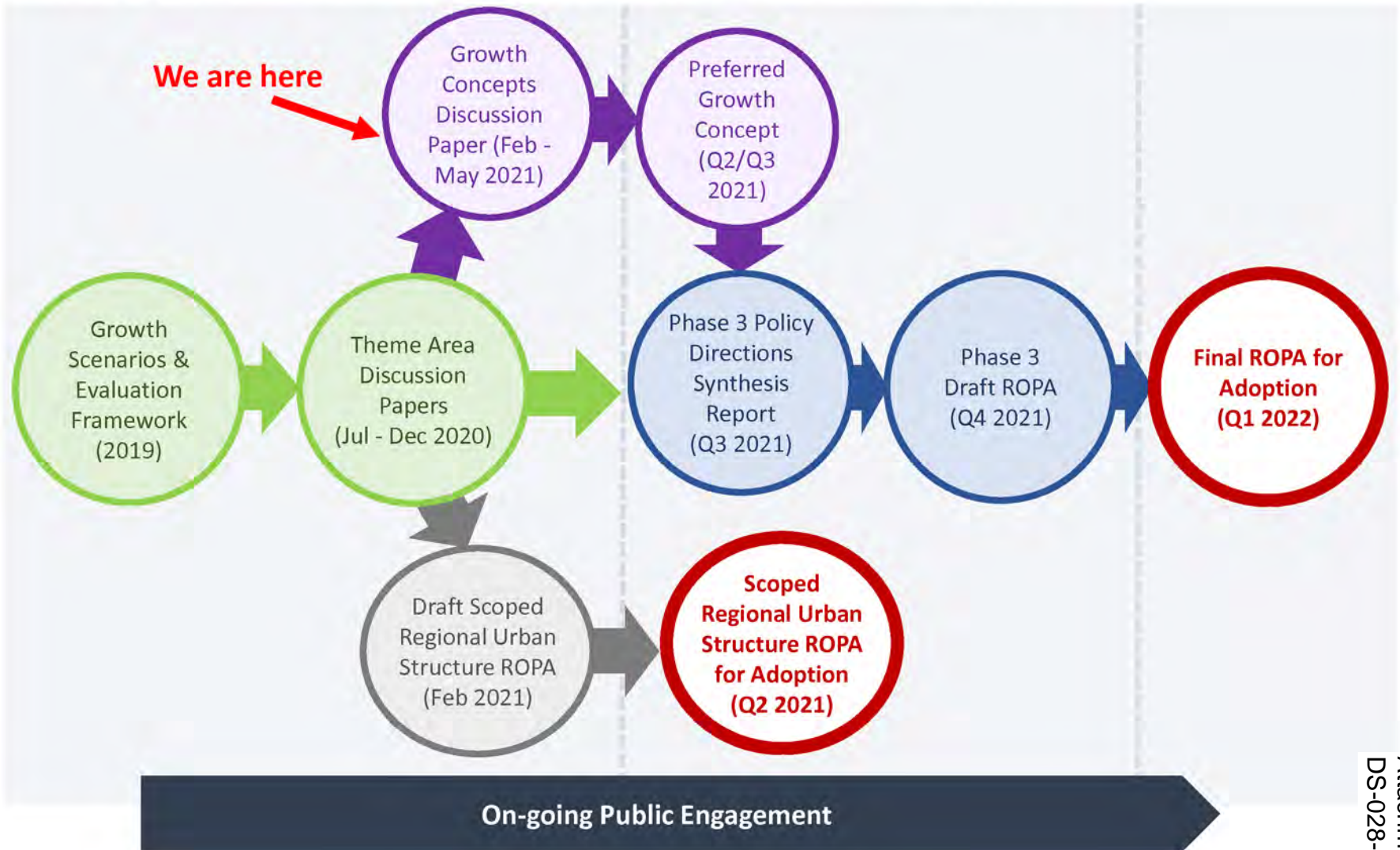
For questions, please contact: Jill Hogan, MCIP, RPP

Phone: Ext. 2304

Attachments
Attachment 1 - Region Official Plan Review - Timeline
Attachment 2 - Milton's Future Urban Structure
Attachment 3 - Executive Summary - Growth Concepts Discussion Paper

CAO Approval
Andrew M. Siltala
Chief Administrative Officer

Regional Official Plan Review Timeline



Building Possibility: Future Urban Structure

MAJOR TRANSIT STATION



401 BUSINESS PARK



URBAN GROWTH CENTRE



MAJOR TRANSIT STATIONS



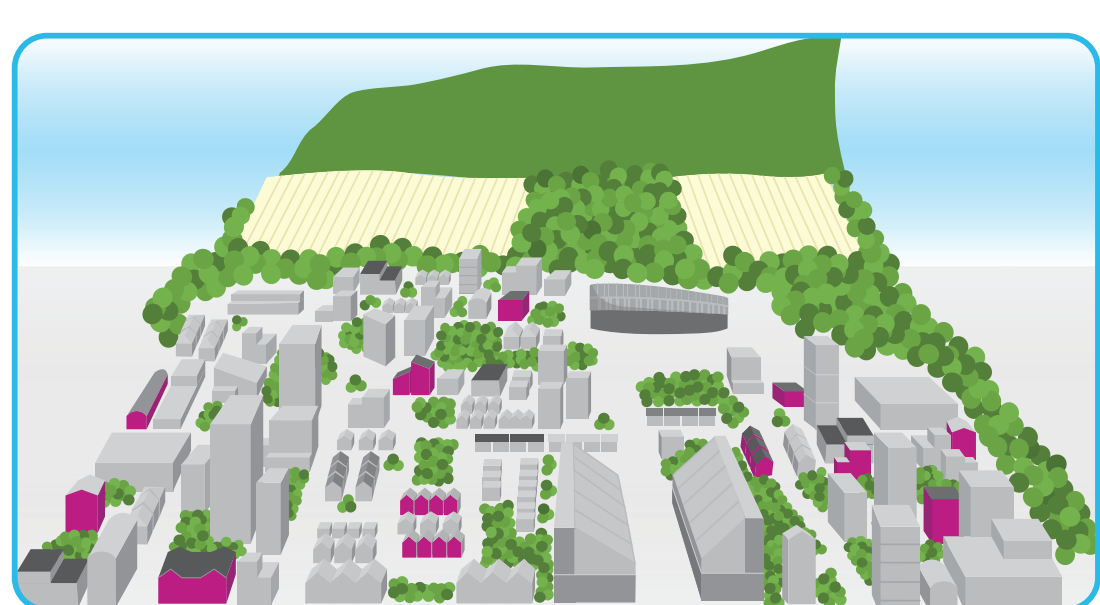
HISTORIC DOWNTOWN MILTON



CIVIC PRECINCT



STABLE NEIGHBOURHOODS



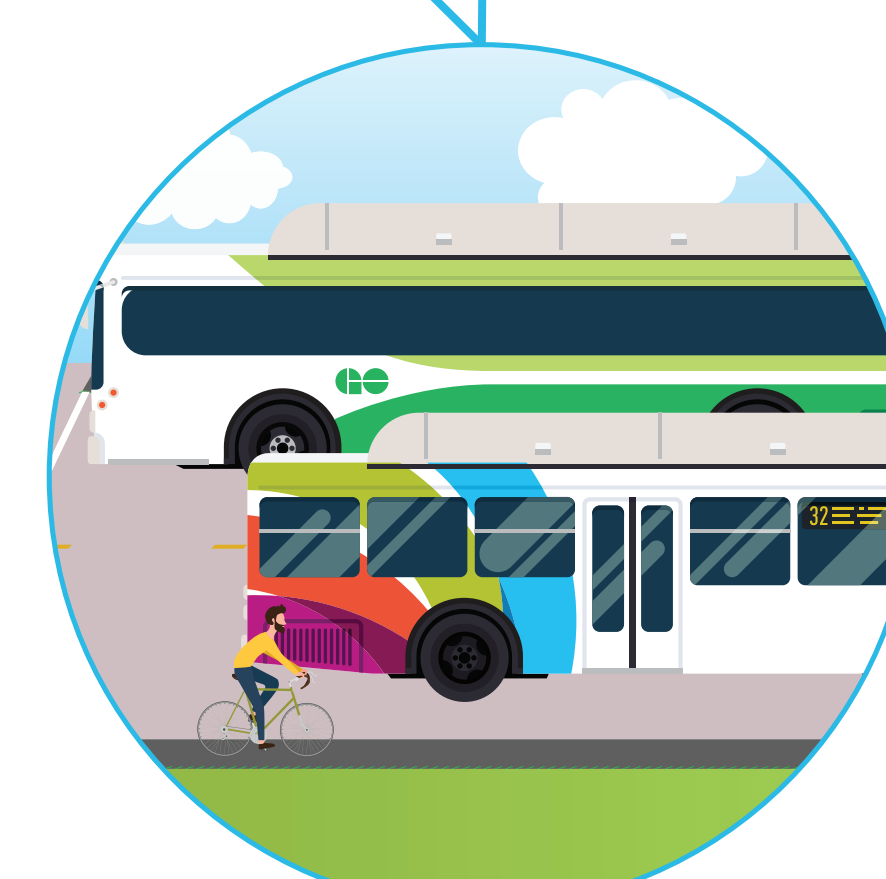
MILTON EDUCATION VILLAGE



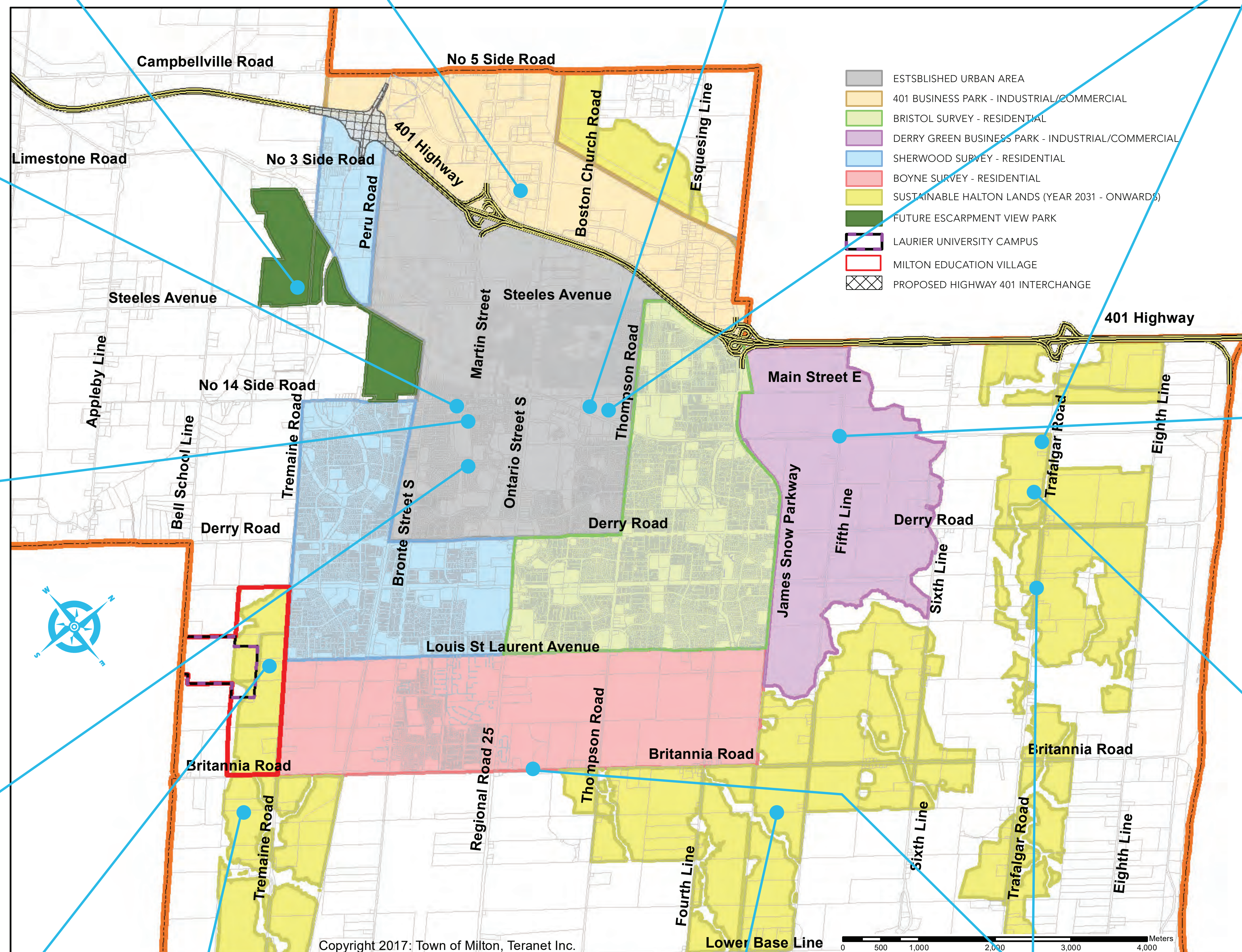
COMPLIMENTARY MEV EMPLOYMENT LANDS



SUSTAINABLE HALTON - 2031



HIGHER ORDER TRANSIT CORRIDOR



DERRY GREEN BUSINESS PARK



TRAFALGAR CORRIDOR



Executive Summary

The Growth Concepts Discussion Paper is a critical component of the the Integrated Growth Management Strategy (IGMS), which is a key element of Halton’s Official Plan Review. The Paper describes the basis for and the evaluation of four Growth Concepts, elements of which will be used to develop the Preferred Growth Concept for the accommodation of population and employment growth to 2051. Figure 1 below illustrates the overall process.

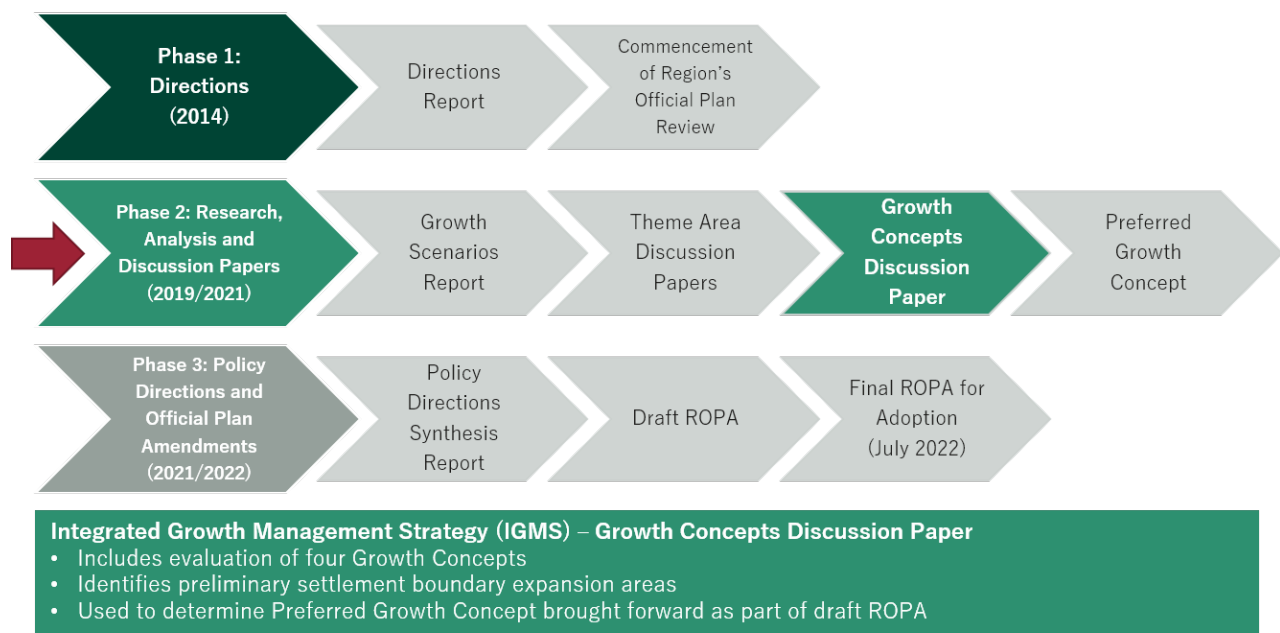


Figure 1: Overview of IGMS Process
Source: Hemson Consulting, 2020

The Integrated Growth Management Strategy is being undertaken within the framework of Provincial policies and the approach to growth management. At the heart of the framework is the Growth Plan (2019) the purpose of which is to ensure that growth is focused in “complete communities” that emphasize elements such as the designated Built-Up Areas (BUA), Urban Growth Centres (UGCs), Major Transit Station Areas (MTSAs), and Designated Greenfield Areas (DGA). Municipalities are required to integrate climate change considerations in planning and managing growth.

Figure 2 below describes the type of uses proposed within existing and future Community Areas and Employment Areas in the Region.

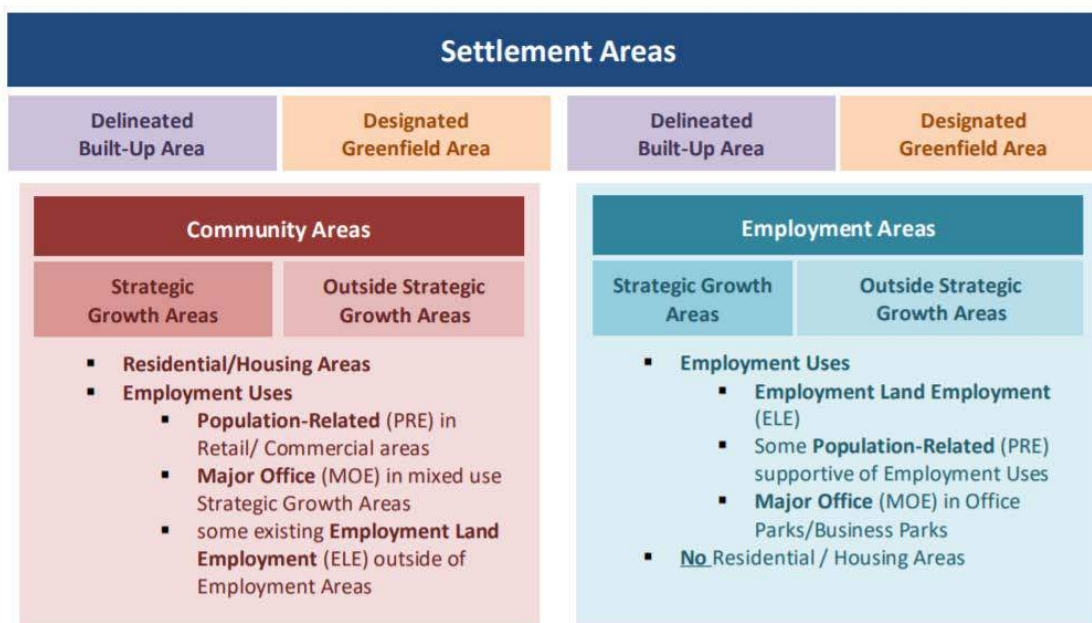


Figure 2: Community Areas versus Employment Areas
 Source: Halton IGMS Regional Urban Structure Discussion Paper, July 2020

While Halton Region is largely planned to 2031, through the Sustainable Halton comprehensive planning exercise, implemented through Regional Official Plan Amendment No. 38, there are important decisions to be made through this IGMS process.

The Region must plan for an additional 20 years of population and employment growth. With the 2051 horizon, accommodation must be planned for 1,100,000 people and 500,000 jobs by 2051. These are large increases compared to the 2019 population of 596,000 and employment of 293,000. Climate change impacts will be a major consideration. Intensification within existing centres, nodes and corridors as well as MTSA's will be crucial. Within this context, it will be essential to carefully plan the sequencing of development and infrastructure requirements and investment.

The approach used by the Region to reach the important decisions involved in a Municipal Comprehensive Review (MCR) and related Regional Official Plan Amendment (ROPA) is through the development and evaluation of growth scenarios. The **IGMS Growth Scenarios: Halton Region to 2041** report identified eight growth scenarios. Council directed that the four 'Local Plans and Priorities' Scenarios be used as the basis for the development of four detailed Growth Concepts.

The Discussion Paper provides an overview of the assumptions that underpin each concept. Climate change considerations are central to all four concepts. They also consider the issues of affordable housing, heritage and cultural resources, employment trends and the preservation of agricultural land. The COVID-19 pandemic is having a dramatic impact on every aspect of life and has to be considered in relation to uncertainties regarding factors such as remote working, the work home relationship, and the increase in e-commerce.

The key difference between concepts is the amount of densification, as shown in Figure 3.

Concept 1: 60% Densification / Moderate Greenfield Expansion	Concept 2: 70% Densification / Limited Greenfield Expansion	Concept 3: 80% Densification / Employment Area Only Greenfield Expansion	Concept 4: 50% Intensification / Greatest Amount of Greenfield Expansion
<ul style="list-style-type: none"> • 50% densification to 2031 then 60% densification* to 2051 • Lower share of employment growth in Employment Areas relative to Concept 4 	<ul style="list-style-type: none"> • One-half the amount of new community DGA of Concept 1 • 70% densification* (2031-51) • Share of employment growth in Employment Areas midway between Concepts 1 and 3 	<ul style="list-style-type: none"> • Build out of existing DGA only • About 80% densification* (2031-51) • Least share of employment growth in Employment Areas 	<ul style="list-style-type: none"> • 50% intensification in BUA (2021-51) • Greatest share of employment growth in Employment Areas

Figure 3: Overview of Growth Concepts

*Share densification approximates the share of apartments in the mix of total housing growth
 Densification from 2031 to 2051 in Concepts 1, 2, 3 and 4 include 10%, 17%, 24% and 2.5% of units as DGA densification, apartment development in DGA strategic growth areas such as Trafalgar Road in north Oakville and Milton

All four concepts meet or exceed the Growth Plan minimum intensification rate with at least 50% of all new units assigned to be built within the BUA and the new Community DGA is planned for a density of 65 persons and jobs per hectare. New designated employment areas planned at 26.8 employment land employees per gross hectare (or 32.5 employment land employees per net hectare), which is higher than Milton and Halton Hills today.

There are a number of outstanding applications for Employment Land conversions which, depending upon the outcome, would affect the amount of land available for employment uses and in most cases residential uses. An assessment of the potential

conversions was undertaken and the likely outcome factored into the land supply analysis.

The report provides a full description of each concept, the key characteristics of which are as follows:

- Concept 1: 60% Densification/Moderate Greenfield Expansion
- Concept 2: 70% Densification/Limited Greenfield Expansion
- Concept 3: 80% Densification/Employment Only Greenfield Expansion
- Concept 4: 50% Intensification/Greatest Greenfield Expansion

The first step considered in developing the Growth Concepts is the amount of land that would be required to accommodate the Schedule 3 population and employment forecast. This was followed by the delineation of the Primary Study Area which collectively encompassed sufficient land to meet the requirements of the four Growth Concepts. The areas were defined applying sound planning principles.

For Community Areas considerations including:

- Logical extension and adjacency/proximity to existing settlement areas;
- Appropriate topography for development;
- Logical potential for servicing; and
- Minimization of conflicts with the Natural Heritage and Agricultural System.

For Employment Areas considerations including:

- Logical extension and adjacency/proximity to existing settlement areas;
- Servicing potential;
- Appropriate topography for development;
- Range of potential parcel sizes;
- Visibility;
- Goods movement potential; and
- Minimization of conflicts with the Natural Heritage and Agricultural System.

Potential settlement areas were defined based on the policy requirements of the Growth Plan and the Region's Official Plan. They also considered, technical analysis and professional judgment, which is being tested through the Growth Concepts and related technical studies. The actual location of the future settlement areas will be determined as part of the Preferred Growth Concept.

The land need for each concept are as follows. Densification rate refers to 2031-2051 at least a minimum of 50% of units are located within the BUA, plus units in the current greenfield areas that will be within high-density mixed-use communities

Concept 1: 60% Densification / Moderate Greenfield Expansion

- New Community Area Land = 1,460 ha
- New Employment Area Land = 1,170 ha
- Total New Land Area = 2,630 ha

Concept 2: 70% Densification / Limited Greenfield Expansion

- New Community Area Land = 730 ha
- New Employment Area Land = 1,100 ha
- Total New Land Area = 1,830 ha

Concept 3: 80% Densification / Employment Area Only Greenfield Expansion

- New Community Area Land = 0 ha
- New Employment Area Land = 980 ha
- Total New Land Area = 980 ha

Concept 4: 50% Intensification / Greatest Greenfield Expansion

- New Community Area Land = 2,080 ha
- New Employment Area Land = 1,220 ha
- Total New Land Area = 3,300 ha

Several important matters were considered in relation to the appropriate location of future urban lands.

- North Aldershot Special Policy Area
- Agricultural Area Assessment
- Aggregate Resource Impact Assessment
- Natural Heritage/Water Resource System Sensitivity Analysis

As infrastructure is critical to the development of the Halton IGMS, assessments of water, wastewater and transportation infrastructure and their associated financial impact were undertaken based on the four proposed growth concepts. The key findings relating to these services are:

Water and Wastewater

- Potential future deficiencies occur in common locations across all concepts and only vary in overall magnitude. None of the concepts have unique, specific deficiencies. However, due to the location of growth and absence of new Community DGA lands beyond the 2031 time horizon in Concept 3, this concept shows potentially lower requirements for storage, pumping and linear infrastructure when compared to the other concepts.

Transportation

- The analysis demonstrated that for transportation infrastructure, there are no substantial differences in infrastructure opportunities and constraints to 2051 when the four Growth Concepts are compared relative to one another. From a transportation performance point of view, no Growth Concept stands out more than another from a technical or capital cost perspective.

Fiscal Impact Assessment

- In addition the technical analyses their fiscal impacts in relation to the four Growth Concepts were assessed. Table 1 below illustrates order of magnitude percentage impact to property taxes for the Region and local municipalities under each concept. Average annual tax increases from 2021-2051 provide a measure of the net fiscal impact from growth associated to each growth concept.

Table 1: Average Annual Tax Increases 2021-2051

Municipality	Concept 1	Concept 2	Concept 3	Concept 4
Burlington	3.90%	3.92%	3.97%	3.91%
Oakville	2.96%	3.03%	3.10%	2.93%
Milton	3.56%	3.60%	3.64%	3.51%
Halton Hills	2.38%	2.53%	2.63%	2.19%
Halton Region	2.47%	2.53%	2.56%	2.42%

Note: Tax impacts related to growth related costs do not include inflation.

There is little variation in tax impacts between concepts a result expected, given that expenditures and revenues are driven by the development forecasts in each individual concept, which also show low variability.

The final chapter of the report discusses the Evaluation Framework that has been endorsed by Council. The framework was developed in collaboration with local municipalities.

Ultimately, the goal of the Evaluation Framework is to summarize the results of the background technical work and build consensus among the Consulting Team, Regional staff, local municipalities, and key external agencies on the planning merits of each Growth Concept.

Evaluation Framework

The purpose of the Evaluation Framework is to guide the evaluation of the four Growth Concepts in comparison to each other, based on a set of criteria or measures, derived from Growth Plan and other provincial policies. The framework is organized around four themes, each with a series of measures. The themes are:

- Theme 1: Regional Urban Structure & Local Urban Structure
- Theme 2: Infrastructure & Financing
- Theme 3: Agriculture, Environment & Climate Change
- Theme 4: Growing the Economy and Moving People and Goods

Of note, the effects of climate change have been considered in establishing the measures for all four themes in the Evaluation Framework. Measures specific to climate change adaptation and mitigation of greenhouse gas emissions are included in Theme 3.

The following key considerations were identified through the evaluation of the Growth Concepts and will be deliberated in developing the Preferred Growth Concept.

1. Growth Management Considerations

- What intensification rate should be used and over what planning horizon?
- If new Designated Greenfield Lands are required, where should they be located in Georgetown and Milton?
- To what degree can Halton municipalities shift employment demand in a desired direction?
- Where in the vicinity of Highways 407, 401 and GTA West should new employment land be located?
- Which parts of the adjusted Downtown Burlington UGC, Aldershot MTSAs, and Bronte MTSAs need to be converted for mixed-use development in order to support residential growth?

2. Infrastructure Considerations

- To reduce the total water and wastewater infrastructure needed to service growth, should Halton focus more on growth through intensification in built-up areas to better utilize existing infrastructure?
- Growth planned in the south portion of the lake based system will generally require less new water and wastewater infrastructure than similar growth planned further north. This is due to increased pumping and conveyance requirements when moving water north to supply upper pressure zones and, conversely, collecting and conveying wastewater from north to south for treatment. To what extent should capital infrastructure needs be considered in designating future Designated Greenfield Lands?
- Should mobility, regardless of mode (transit, auto, active transportation), dictate the location and density of growth to 2051 such that the overall transportation system potential is optimized?
- Even Concept 4, which has the least amount of intensification, focuses a very significant amount of development in higher density forms and areas associated serviced, or planned to be serviced, by higher order transit. To what degree is growth needed to support transit infrastructure?

3. Fiscal Impact Assessment Considerations

- How can the Region and local municipalities manage financial impacts associated with growth in a fiscally sustainable manner?
- What residential unit mix (e.g. ground-related and apartment units) is most appropriate?
- How will the Region and local municipalities fund future infrastructure needs?

4. Agricultural Considerations

- Where, if any, should new Designated Greenfield Lands be located to avoid and/or minimize adverse impacts on the agricultural system?
- How can agricultural lands be maximized to support the agricultural system while accommodating growth?

5. Mineral Aggregate Considerations

- If new Designated Greenfield Lands are required, can mineral aggregate operations and mineral extraction areas be avoided?
- What is the appropriate proximity of new Designated Greenfield Lands, if required, to mineral aggregate operations and mineral extraction areas?

6. Climate Change Considerations

- To what extent can climate change be mitigated through compact built form, developing a sustainable transportation system, protection of agricultural lands and soils, and protection of natural heritage and supporting healthy watersheds?
- How can future communities in Halton be adaptable to climate change through compact built form, developing a sustainable transportation system, protection of agricultural lands and soils, and protection of natural heritage and supporting healthy watersheds?

7. Natural Heritage Systems and Healthy Watershed Considerations

- All Growth Concepts avoid the Natural Heritage System; however, development occurring adjacent to the system can cause negative impacts. To what degree can the adverse impact on the Natural Heritage System caused by adjacent development be mitigated/avoided?
- What features or areas of the Natural Heritage System can be enhanced through linkages?
- Does the orientation and location of the Natural Heritage System create development challenges that may necessitate encroachments and crossings of Natural Heritage features and areas?

8. Multi-Modal Transportation, Transit-Supportive Densities, and Goods Movement Considerations

- Where should growth be located to promote transit-supportive densities?
- Where should growth be located so that it provides the best opportunity for a sustainable and the multi-modal transportation network?
- Where should new Employment Areas be located to best support goods movement and proximity to existing and planned major transportation infrastructure investment?

This report has described the process through which the four Growth Concepts have been developed and evaluated. The appendices provide considerable additional background information. The next step in the IGMS process is to identify a Preferred Growth Concept. To do so, a number of key factors will need to be considered including:

- Growth Management
- Infrastructure
- Fiscal Impact
- Agriculture
- Mineral Aggregate Resources
- Climate Change
- Natural Heritage and Healthy Watershed
- Multi-Modal Transportation, Transit-Supportive Densities, and Goods Movement

1. Introduction

The Integrated Growth Management Strategy (IGMS) is one of the major themes of the Region's Official Plan Review (ROPR) process. The IGMS process includes four discussion papers, including:

- IGMS Growth Scenarios/Report Evaluation Framework, June 2019 (see staff report [LSP41-19](#));
- IGMS Regional Urban Structure Discussion Paper, June 2020 (found as Attachment 1 in staff report LSP56-20);
- IGMS Growth Concepts Discussion Paper, February 2021 (this report); and
- IGMS Preferred Growth Concept Report (pending).

Analysis and findings presented in the *IGMS Growth Scenarios* report and *Regional Urban Structure Discussion Paper* have informed the Growth Concepts and related evaluation described in this report. Figure 1 provides a schematic overview of the IGMS process completed to date.



The Corporation of the Town of Milton

Report To: Council

From: Barbara Koopmans, Commissioner, Development Services

Date: May 3, 2021

Report No: DS-039-21

Subject: Supplementary Report to DS-028-21 regarding Halton Regional Official Plan Review - Milton's Response to the Growth Concepts Discussion Paper

Recommendation: THAT Staff Report DS-039-21 be received;

AND THAT, as a result of the extension to the comment period granted by the Region of Halton, Report DS-028-21 Halton Regional Official Plan Review - Milton's Response to the Growth Concepts Discussion Paper, be received only for information at this time;

AND THAT Halton Region staff be requested to provide responses to the questions raised in Report DS-028-21;

AND THAT Staff complete a further supplementary report for Council's consideration on June 21, 2021 addressing new Growth Concept 5

EXECUTIVE SUMMARY

- On April 21, 2021, Halton Region Council directed that a Growth Concept 5 be included for contemplation as part of Halton Region's Official Plan review.
- Growth Concept 5 would not allow any urban boundary expansions, for both residential and employment uses.
- Report DS-028-21 - Milton's Response to Halton Region's Growth Concept Discussion Paper was prepared prior to the inclusion of Growth Concept 5.
- In recognition of the inclusion of an additional growth concept, the Region has extended the commenting period from May 28, 2021 to July 15, 2021.
- In light of this, staff will prepare a supplementary report for Council's consideration on June 21, 2021, which will include a discussion regarding new Growth Concept 5.

REPORT



Background

At the April 21, 2021 Halton Regional Council Meeting, Report LPS45-21 - "Additional Information relating to Growth Concepts with the Integrated Growth Management was received for information. Further, the following was resolved by Regional Council:

THAT Halton Region be requested to develop and add to the public consultation work an analysis that builds on Concept 3 and proposes to accommodate growth to 2051 based on no expansion at all of the existing Halton settlement area boundary; and

BE IT FURTHER RESOLVED THAT Halton Region be requested to provide an assessment of the relative impact on greenhouse gas emissions that would reasonably be expected to be associated with each of the Growth Concepts; and

BE IT FURTHER RESOLVED THAT Halton Region communicate this Resolution to the public, City of Burlington, Town of Halton Hills, Town of Milton, Town of Oakville, Conservation Halton, Credit Valley Conservation, Grand River Conservation Authority, Halton MPPs and MPs, Federation of Canadian Municipalities, Association of Municipalities of Ontario and the Ministry of Municipal Affairs and Housing.

In light of the above, Halton Region has extended the public consultation period to July 15, 2021.

Discussion

Report DS-28-21 - Milton's Response to Halton Region's Growth Concept Discussion Paper was prepared prior to the inclusion of Growth Concept 5. In recognition of the inclusion of an additional growth concept, the Region has extended the commenting period from May 28, 2021 to July 15, 2021. In light of this, staff will prepare a supplementary report for Council's consideration on June 21, 2021, which will include a discussion regarding new Growth Concept 5. This extended time frame will also allow the Region to undertake the planned public consultation in May and June, prior to Milton Council tabling a report on the proposed growth concepts

It is important to note, as articulated in staff report DS-28-21, staff has significant concerns with the methodology undertaken by the Region to assess the various concepts. It is critical that these questions be addressed by Halton Region prior to the consideration of a preferred growth concept.

Financial Impact

None arising from this Report.



The Corporation of the Town of Milton

Report #:
DS-039-21
Page 3 of 3

Respectfully submitted,

Barbara Koopmans, MPA, MCIP, RPP, CMO
Commissioner, Development Services

For questions, please contact: Jill Hogan, MCIP, RPP,
Director Policy Planning

Phone: Ext. 2304

Attachments
None

CAO Approval
Andrew M. Siltala
Chief Administrative Officer

The Evaluation Framework



- Urban structure
- Employment land supply
- Healthy and complete communities



- Financial impact
- Efficient use of infrastructure



- Agricultural land base and system
- Natural heritage protection
- Climate change



- Travel by multiple means of transportation
- Transit-supportive development
- Moving goods to business, consumers, and industries
- Employment areas

Themes 1 & 4: Key Findings



Urban Structure and Employment Land Supply

- Urban structure
- Employment land supply
- Healthy and complete communities
- Concepts 1, 2 and 3A embrace intensification and higher-density mixed-use development
- Concepts 1 and 4 better achieve a balanced unit mix, and better protect existing employment uses
- Concept 3A offers the least protection for existing designated employment areas
- Concept 3B does not perform as in providing an adequate supply of employment land to accommodate Employment Land Employment to 2051



Growing the Economy & Moving People and Goods

- Multi-modal transportation
- Transit-supportive development
- Moving goods
- Employment areas
- All Concepts direct significant growth to nodes and corridors, and foster connectivity of future development and the Region's transportation network
- All Concepts provide opportunities to enhance connectivity of goods movement and location of Employment Areas
- Concepts that direct growth to Strategic Growth Areas best support transit and multi-modal infrastructure



Theme 2: Key Findings



- Financial impact
- Efficient use of infrastructure

Transportation

- No one Growth Concept is preferred from a Transportation perspective
- All Growth Concepts will use the existing capacity of the road network prior to the identification of any capacity expansion
- Concept 3A/3B and 4 exhibit potential for marginally higher transportation capital costs depending on the transportation solution

Water and Wastewater

- The location and configuration of growth has a direct impact on the capacity and size requirements of future Regional infrastructure
- Intensification has the potential to better utilize existing infrastructure
- Concepts 3A/3B exhibits potential for lower water/wastewater capital costs

Fiscal Impact Assessment

- There is some variation between Growth Concepts at the Regional level
- Concepts 1 and 4 would result in a slightly more favourable Regional financial impact, however, the tax revenue potential of high-density development may improve over time.
- Higher rates of intensification in Concepts 2 and 3A would likely result in changes to sizes and configuration of apartment units

Theme 3: Key Findings



- Agricultural land base and system
- Natural heritage protection
- Mineral Aggregates
- Climate Change

Agricultural land base and system

- Concepts 3A/3B retain the largest prime agricultural area contiguous to settlement areas and agricultural lands to support the agricultural system.
- Concepts 3A/3B best protect prime agricultural lands with the most productive and fertile soils

Natural Heritage Protection

- None of the Growth Concepts encroach on the Natural Heritage System
- Concepts 3A/3B best achieve additional metrics such as minimizing Natural Heritage System fragmentation

Mineral Aggregates

- Concepts 3A/3B best limits the proximity of incompatible uses to mineral aggregate areas, and retains the greatest area for mineral extraction

Climate Change

- All four Growth Concepts exhibit the same level of emissions measured as vehicle kilometres travelled and average speed
- Concept 3A would best achieve compact built-form as it has the greatest amount of growth located in Strategic Growth Areas serviced by transit

Climate Change – GHG Emissions Assessment

High-level comparative emissions estimates were completed by SSG

- The analysis was based on Halton Hills emissions data and scaled up for Halton Region – the results are considered high-level estimates and are not the result of rigorous modelling
- Expected emissions in 2051 were modelled for new buildings and transportation and were assessed on a per capita basis
- tCO₂e = tonnes carbon dioxide equivalent of greenhouse gas emissions
- GHGs like methane (primarily from burning natural gas) and nitrous oxide (primarily from burning gas and diesel) are converted to tCO₂e
- Analysis examined emissions intensity by dwelling type (ground-related vs. apartment), average emissions per employee, and emissions per vehicle based on location
- Comprehensive GHG modelling will be completed for the Preferred Growth Concept

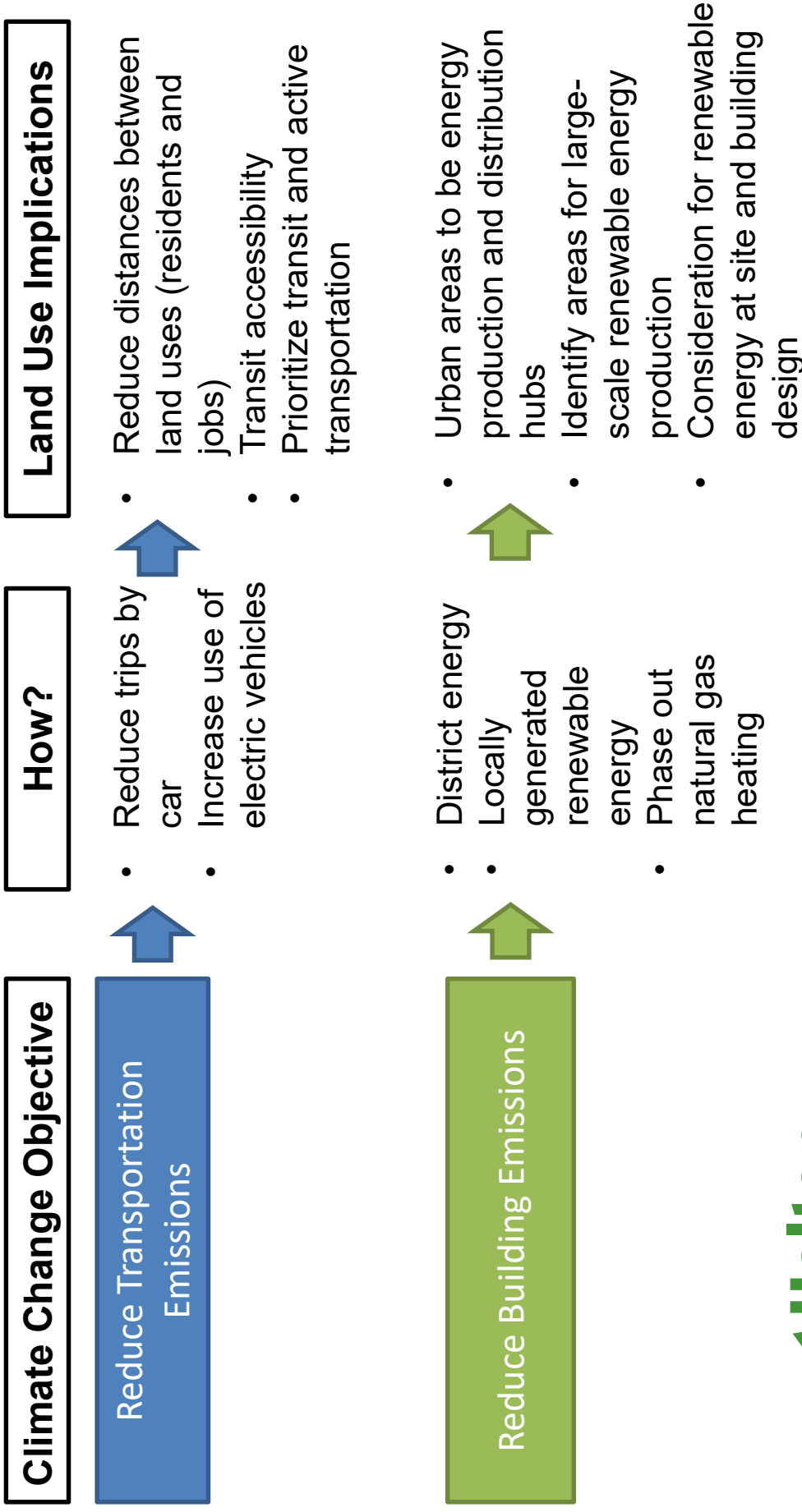
Results (tCo2e) by Emissions Total

Concepts, ranked lowest to highest emissions	New residential building emissions	New commercial building emissions	New PUV transportation emissions	New other transportation emissions	New industrial emissions	New waste emissions	New water emissions
Concept 3A	764,947	343,526	944,240	555,016	179,716	138,753	6,335
Concept 2	775,278	343,526	971,809	555,016	179,716	138,753	6,335
Concept 1	784,663	343,526	992,505	555,016	179,716	138,753	6,335
Concept 4	797,141	343,526	1,011,721	555,016	179,716	138,753	6,335

Concepts, ranked lowest to highest emissions	Total new emissions	Difference	Emissions per capita new population
Concept 3A	2,932,532	-	6.08
Concept 2	2,970,433	+1.3%	6.16
Concept 1	3,000,513	+2.3%	6.23
Concept 4	3,032,208	+3.3%	6.29

- Concepts 1, 2 and 4 were compared relative to Concept 3A
- Concept 3A has the least amount of emissions per capita, but generally the other concepts were within a 1-3% range
- Likely that Concept 3B would perform similar to Concept 3A, or potentially better

How Does Climate Change Relate to the Growth Concepts?





January 14, 2022

GSAI File: 1254 – 001

Halton Region
1151 Bronte Road
Oakville, ON L6M 3L1

Attn: Curt Benson
Director of Planning Services

RE: Halton Regional Official Plan Review
Preferred Growth Scenario
8329 Esquesing Line, Town of Milton

Dear Mr. Benson,

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to 2369219 Ontario Inc. (the 'Owner') of the lands municipally known as 8329 Esquesing Line, in the Town of Milton (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are pleased to provide this Comment Letter in relation to the ongoing Halton Regional Official Plan Review ('ROPR') initiative.

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

The Subject Lands are located on the east side of Esquesing Line, north of James Snow Parkway North. Currently, the Site contains portions of lands that are within the current Town of Milton Urban Area. This portion of land, currently subject to a 'Future Strategic Employment Area' policy overlay in the in-effect Halton Regional Official Plan, was previously added to the Town's Urban Area as a result of the previous Sustainable Halton Regional Official Plan Review process. The Site also contains a portion of lands that are within the Town's Rural Area, a portion of lands that contain Natural Heritage System ('NHS') lands and a portion of lands that are within the Provincial Greenbelt Plan area. We note that approximately 28% of the Site is occupied by NHS and Greenbelt Plan area lands.

When considered collectively, the in-effect policy framework identifies the Subject Lands as an appropriate location for future employment development to occur. We are requesting that the

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Preferred Growth Concept be revisited to include that portion of the Site currently buttressed between the Regional NHS and the Greenbelt Plan as lands to be included within the adjusted Town of Milton Urban Area (see *Growth Concept Figure* enclosed). Inclusion of this portion of land would facilitate a natural and logical continuation of the existing Urban Area, is reasonable for inclusion in this current Regional Official Plan Review initiative and would furthermore enable cost-efficient servicing of lands in the surrounding area to accommodate future employment uses. For the reasons outlined above, we request that you consider the inclusion of the Subject Lands as Urban Area to accommodate Provincial growth targets and enabling a minor rounding out of existing development.

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

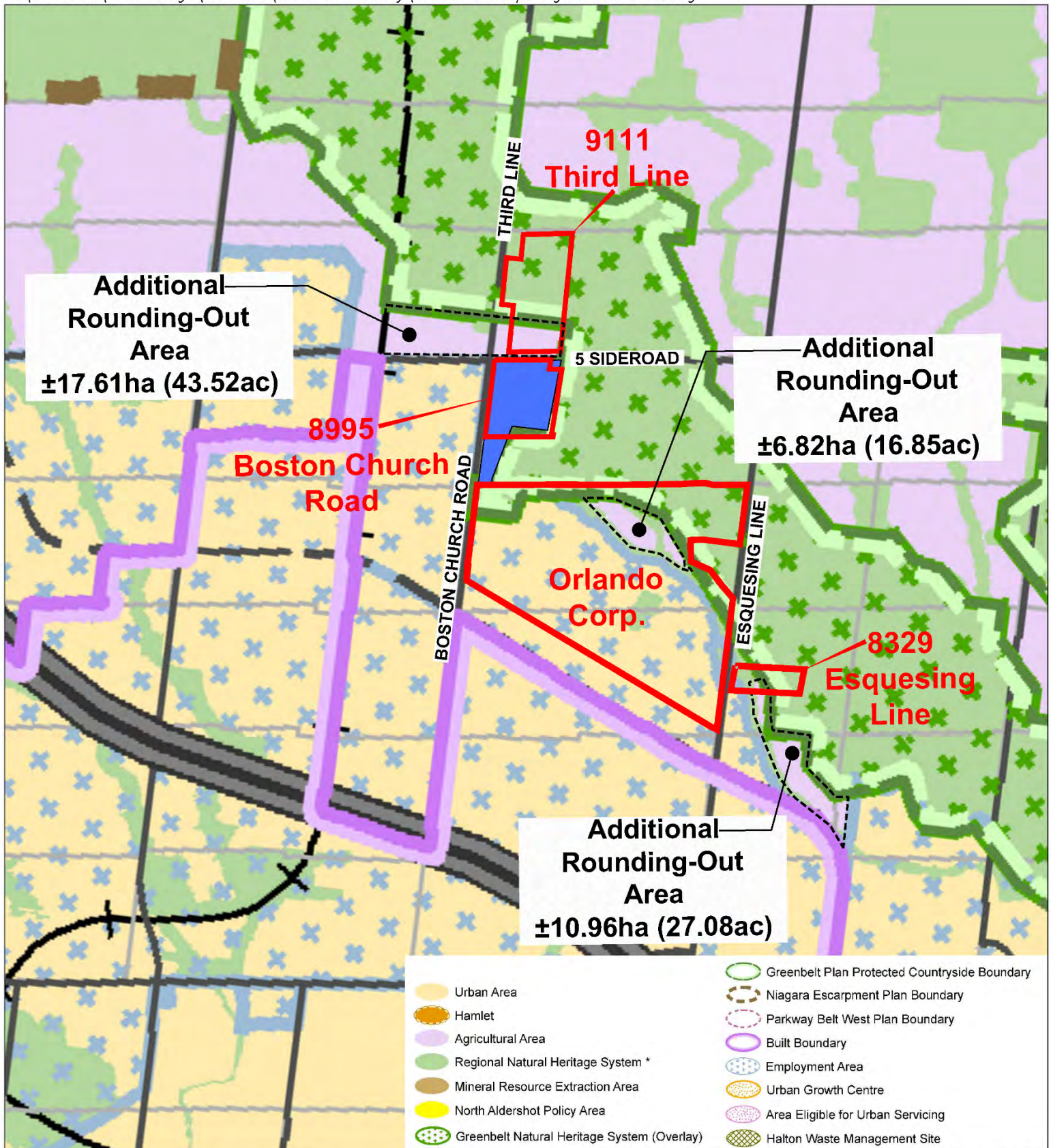
We look forward to being involved. Please feel free to contact the undersigned if there are any questions.

Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.

Colin Chung, MCIP, RPP
Partner

cc. Steven Burke, Halton Region
Jill Hogan, Town of Milton
Barbara Koopmans, Town of Milton



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

Town of Milton/Halton Hills, Region of Halton

LEGEND

- Subject Properties
- New Employment Area

Additional Rounding-Out Areas within Subject Properties

9111 Third Line:	±3.84ha (9.49ac)
Orlando Corp.:	±6.82ha (16.85ac)
8329 Esquesing Line:	±0.48ha (1.19ac)

All areas are approximate only

FOR DISCUSSION PURPOSES ONLY



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



Appendix II / Town of Milton Staff Report, DS-006-22



The Corporation of the Town of Milton

Report To: Council

From: Jill Hogan, Acting Commissioner, Development Services

Date: January 17, 2022

Report No: DS-006-22

Subject: Halton Region Official Plan Review - Draft Preferred Growth Concept and Draft Land Needs Assessment.

Recommendation: THAT Council endorse Halton Region's Preferred Growth Concept;

AND THAT Council requests that Halton Region phase a concurrent and steady stream of development land in Milton, through updated "Best Planning Estimates" to ensure shovel-ready employment land and an appropriate balance between residential intensification and new greenfield development to 2051.

EXECUTIVE SUMMARY

- This report provides a summary of Halton Region's Draft Preferred Growth Concept (PGC) and Draft Land Needs Assessment (LNA).
- The Region has made significant changes to their work to reflect the Town's comments and concerns as articulated in the Town of Milton's "Halton Balanced" Growth Concept.
- The Region's PGC necessitates urban boundary expansions for Community Area and Employment Area within Milton and Halton Hills.
- This report recommends Milton Council support the quantum and location of the urban boundary expansion in Milton.
- This report further requests that Halton Region phase a concurrent and steady stream of development land in Milton, to ensure shovel-ready employment land and an appropriate balance between residential intensification and new greenfield development to 2051.

REPORT

Background

In April 2021, Milton Council directed staff to develop an alternative to the Growth Options presented by the Region. In June 2021 through report DS-55-21, Milton Council

REPORT

Background

endorsed the “Halton Balanced” Growth Concept as input into Halton Region’s Official Plan review.

Malone Given Parsons Ltd. (“MGP”) is the planning and land economics consultant for the Town of Milton. MGP has provided their own analysis and background work, which staff believes demonstrates both the feasibility and priority for inclusion of the Town of Milton’s remaining whitebelt lands within the Settlement Area Boundary to 2051. This work was intended as input to the Region’s Municipal Comprehensive Review (“MCR”). This work also provided the technical rationale behind the “Halton Balanced” Growth Concept.

The “Halton Balanced” Growth Concept would support sustainable future growth in Milton and Halton Region through the following important growth objectives:

- Directing growth strategically by reinforcing intensification along transit corridors and Major Transit Station Areas in the Region;
- Providing a market-based, realistic and achievable supply of housing for the Region;
- Facilitating the efficient use of land in line with existing and planned Regional infrastructure;
- Ensuring a healthy inventory of employment lands;
- Increasing densities in greenfield areas; and
- Creating mixed-use, compact, complete communities, while protecting the Provincial Greenbelt, the Region’s Natural Heritage System and a large proportion of Agricultural lands in the Region.

On November 17, 2021, a workshop was convened for Halton Region Council. Halton Region staff provided a detailed presentation on the Draft Preferred Growth Concept (PGC) and Land Needs Assessment (LNA) to Regional Council. The workshop presentation can be accessed via the following link: <https://edmweb.halton.ca/OnBaseAgendaOnline/Meetings/ViewMeeting?id=4266&doctype=1>

This report provides a summary of Halton Region’s Draft PGC and LNA and compares the Region’s PGC and the Town of Milton’s “Halton Balanced” Growth Concept

Discussion

With assistance from Malone Given Parson (MGP) the following provides a summary and comments on Halton Region’s Preferred Growth Concept (PGC) and Land Needs Assessment (LNA) in relation to the Town of Milton.

Discussion

Preferred Growth Concept

Halton Region’s PGC necessitates settlement area boundary expansions for Community Area and Employment Area within Milton and Halton Hills. The portion of land allocated to Milton is summarized in Table 1 below and Attachment 1.

Table 1: Milton’s Land Allocation According to Halton Region’s Preferred Growth Concept

	Halton Region	As Measured by MGP
New Community Area	695	705
New Employment Area	620	660
Total NEW DGA	1,315 ha	1,365 ha

In an attempt to confirm the land areas generated by Halton Region’s LNA, a measurement was performed by MGP showing a 50-hectare discrepancy of an unknown source.

Preferred Growth Concept Comparison

The PGC is closest in nature to Halton’s Growth Concept 4, which was based on 50% intensification in the Built-Up Area. The following table summarizes the differences between the Preferred Concept and Concept 4. It is noted that the requirement for new land in Milton is similar to that shown in Concept 4.

Table 2: Halton Region’s Preferred Concept in Comparison with their Concept 4

	Preferred Concept	Concept 4	Difference
Community Area	695	720	-25
Employment Area	620	550	70
Non-Developable Area	445	660	
Gross Area	1,760 ha	1,930 ha	

The Milton “Balanced Option” included adding the entire whitebelt into the Settlement Area Boundary. The comparison of this option to the PGC is found in Table 3 below and Attachment 2. The “Balanced Option” assumed a greenfield density of 50 residents and jobs per hectare; whereas, the PGC assumes a greenfield density of 65 residents and jobs per hectare. **The difference in Greenfield density largely accounts for the difference in community land area required through settlement area boundary expansion between the two options.**

Table 3: Halton Region’s Preferred Concept in Comparison with Milton’s “Balanced Option”

Discussion

	Preferred Concept	Milton's Balanced-Option	Difference
Community Area	695	1,000	-305
Employment Area	620	1,300	-680
Total Developable Area	1,315	2,300	-985
Non-Developable Area	445	1,680	
Gross Area	1,760 ha	3,980 ha	

Summary of Preferred Growth Concept

Table 4 contains the proposed allocation of population from 2031 to 2051 under the Draft Preferred Growth Concept (PGC). The allocations are based on direction of:

- 116,000 people to the Built-Up Area throughout the Region, focused predominantly in Oakville and Burlington, in Urban Growth Centres, Major Transit Station Areas and other important Strategic Growth Areas, such as Midtown Oakville, Downtown Burlington, and Uptown Oakville;
- 150,000 people to the existing Designated Greenfield Area of the Region, predominantly in Milton and Oakville, and including “densification” of Strategic Growth Areas such as the Trafalgar Urban Core and Hospital District in Oakville, and the Milton Education Village; and,
- 62,000 people to the proposed new Designated Greenfield Area in Milton and Halton Hills.

Table 4: Draft Preferred Growth Concept: Population Growth by Local Municipality

Municipality	Population		
	2021	2031	2051
Burlington	195,000	218,000	267,500
Oakville	222,000	280,000	373,500
Milton	138,000	187,000	334,500
Halton Hills	66,000	82,500	124,500

The Draft PGC has been based on a Region-wide intensification rate of 45 percent, with a densification/intensification target of 85 percent of housing units directed within the existing urban area, thereby meeting the “intensification first” and minimization of urban expansion objectives of the Growth Plan.

Employment Growth:

- Over 27 percent of employment growth in the Major Office category between

Discussion

2031 and 2051, representing a significant shift towards office employment in the Region, and directed to mixed use Strategic Growth Areas within the Built-up Area, supporting local and Regional Urban Structures;

- Only 42 percent of employment growth in the Employment Land Employment category predominantly on employment lands, accommodating in-demand logistics/warehousing and other manufacturing uses, necessitating a measured urban boundary expansion;
- The remaining 43 percent of employment growth in the Population-Related Employment category to serve the residential communities throughout the Region.

Table 5: Draft Preferred Growth Concept: Employment Growth by Local Municipality

Municipality	Employment		
	2021	2031	2051
Burlington	98,000	106,000	123,000
Oakville	111,000	138,000	177,000
Milton	44,500	70,000	133,000
Halton Hills	24,500	36,000	68,000
Halton Region	278,000	350,000	500,000

Table 5 contains the proposed allocation of employment to 2051 under the Draft PGC. The allocations are based on the direction of:

- 61,000 predominantly Major Office and Population-Related jobs to the Built-Up Area throughout the Region, focused in Urban Growth Centres, Major Transit Station Areas and other important Strategic Growth Areas;
- 61,000 jobs to the existing Designated Greenfield Area of the Region, predominantly in Milton and Halton Hills, and including “densification” of Strategic Growth Areas; and,
- 27,000 Employment Land Employment and Population-Related jobs to proposed new Designated Greenfield Area, **predominantly located along the Highway 407 and 401 corridors in Milton** and the Highway 401 corridor in Halton Hills.

Concluding Remarks - Preferred Growth Concept (PGC)

- Overall, the Region has made great progress in advancing the review to this stage.
- The Region has made significant changes to their work to reflect the Town’s comments and suggestions.

Discussion

- While the proposed quantum of NEW employment and community areas in Milton is less than what was recommended through the “Halton Balanced” Growth Concept, staff is of the view that the new community area in Southeast Milton and employment land along 401/407 will provide a sufficient supply of new development land to 2051.
- Staff are also pleased to see the quantum of development in the Built-Up Area (Old Milton) has been “right sized”.
- Staff recommend the Milton Council endorse the PGC.

The Town of Milton’s “Ask” of Halton Region

While it is noted that the Nov 2021 Region Workshop did not speak to phasing (Region staff will be making phasing recommendations in the Feb 2022 Report), it is critical that the following is raised NOW for consideration:

EMPLOYMENT LANDS:

- Milton needs a steady flow of investment ready employment lands. Planning work for delivery on new employment lands to accommodate warehouse/logistics will need to commence prior to 2031.
- Derry Green will be built out by 2031 and Milton can’t afford to have a 10 year gap of shovel ready employment lands. This would not be practical or fiscally responsible for the Town and Region.

COMMUNITY LANDS:

- Milton’s NEW community (whitebelt) lands must be phased to ensure a continuous supply of market based housing beyond 2031.
- The Region must bring forward the **CONCURRENT** delivery of existing areas (Agerton/Trafalgar/Britannia/MEV to pre-2031) to ensure Milton has land for innovation/knowledge based job creation in a mixed-use areas.
- Substantial build-out of the Boyne area must be recognized within the 2021-2031 horizon.

Other Considerations - Best Planning Estimates

Development phasing in Halton is predicated on the “Best Planning Estimates (BPEs)”. The BPEs are a planning tool used to identify where and when development is expected to take place across the Region. The BPEs provide direction in determining the timely provision of both hard infrastructure (roads, water and wastewater) and community infrastructure (schools, community recreation etc.). The current BPEs were approved by Regional Council in 2011 for growth to 2031 and will need to be updated following the approval of the updated

Discussion

Regional Official Plan. It is critical that the updated BPE's facilitate development phasing in Milton that is:

- Practical and fiscally responsible.
- Ensures a market-based supply of housing.
- Ensures a shovel-ready supply of employment lands.
- Allows a **concurrent** steady stream of developable land balanced between greenfield and intensification.

Next Steps

It is the intent of Region staff to bring forward a recommendation on the Preferred Growth Concept in February 2022, together with a comprehensive set of technical studies addressing:

- climate change;
- water and wastewater infrastructure;
- transportation infrastructure;
- agricultural impact;
- natural heritage/water resources; and,
- financial impact.

If endorsed by Regional Council, the Preferred Growth Concept will form the foundation of the Integrated Growth Management Strategy, which will be implemented through an amendment to the Regional Official Plan.



Financial Impact

As noted above, Halton Region is expected to present further financial analysis as part of the final package of comprehensives studies in February 2022. Findings of the financial analysis that has been undertaken to date by Hemson Consulting on behalf of the Region have included that:

- the capital investment required for each of the scenarios was fairly consistent;
- pressure on the tax rates in excess of the rate of inflation can be expected in all local municipalities. This pressure was slightly less in scenarios that involved a higher degree of low and medium density residential development;
- the non-residential assessment base was relatively consistent between scenarios, and is expected to grow from being 20% of the overall property tax base to 25% by 2051.

These finding relied on a number of assumptions with respect to service levels, municipal policies, infrastructure assumption and the pace of growth.

The Town has separately undertaken fiscal impact analysis for the planning horizon to 2041 (exclusive of the proposed new growth areas as considered in the Region's Official Plan process). The most recent such study was presented in November 2021 through report CORS-056-21. The Town's fiscal analysis also highlights the importance of the timely development of non-residential areas as is recommended in this report. Management of the timing of the construction of new infrastructure and the expansion of services will also remain critical to influencing future changes in the Town's property tax rates. Should the Town continue with the annual funding strategies that are associated with the existing infrastructure deficit, the fire services and transit master plans, and other priorities of Council, it can be expected that Milton will be better positioned to expand services to the proposed new urban areas.

Respectfully submitted,

Jill Hogan, MCIP, RPP
Acting Commissioner, Development Services

For questions, please contact: Jill Hogan

Phone: Ext. 2304

Attachments

Attachment 1: Halton Preferred Concept for Milton as measured by MGP

Attachment 2: Halton Preferred Growth Concept Compared to Milton Balanced Growth Concept.

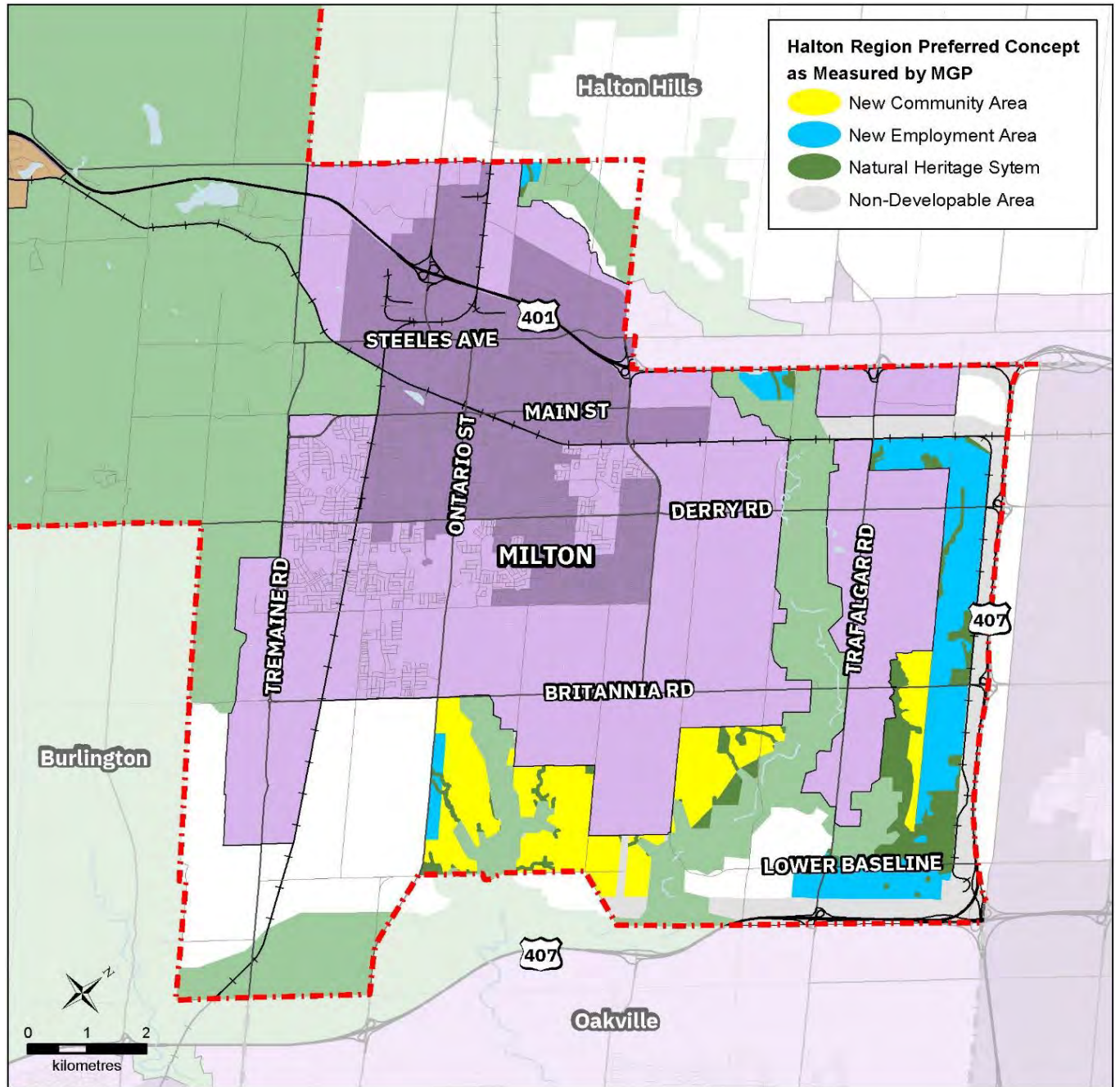


CAO Approval
Andrew M. Siltala
Chief Administrative Officer

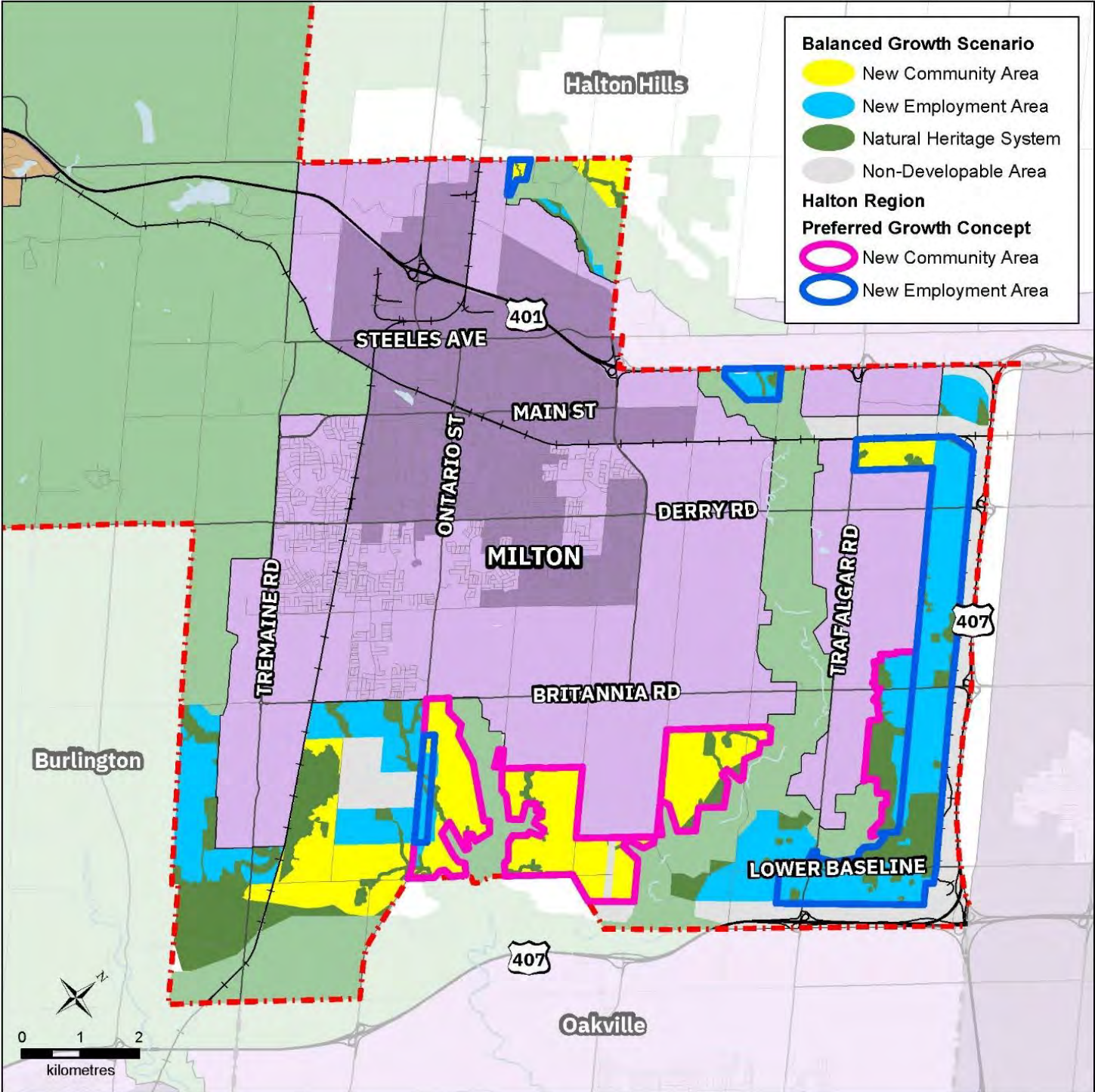
Recognition of Traditional Lands

The Town of Milton resides on the Treaty Lands and Territory of the Mississaugas of the Credit First Nation. We also recognize the traditional territory of the Huron-Wendat and Haudenosaunee people. The Town of Milton shares this land and the responsibility for the water, food and resources. We stand as allies with the First Nations as stewards of these lands.

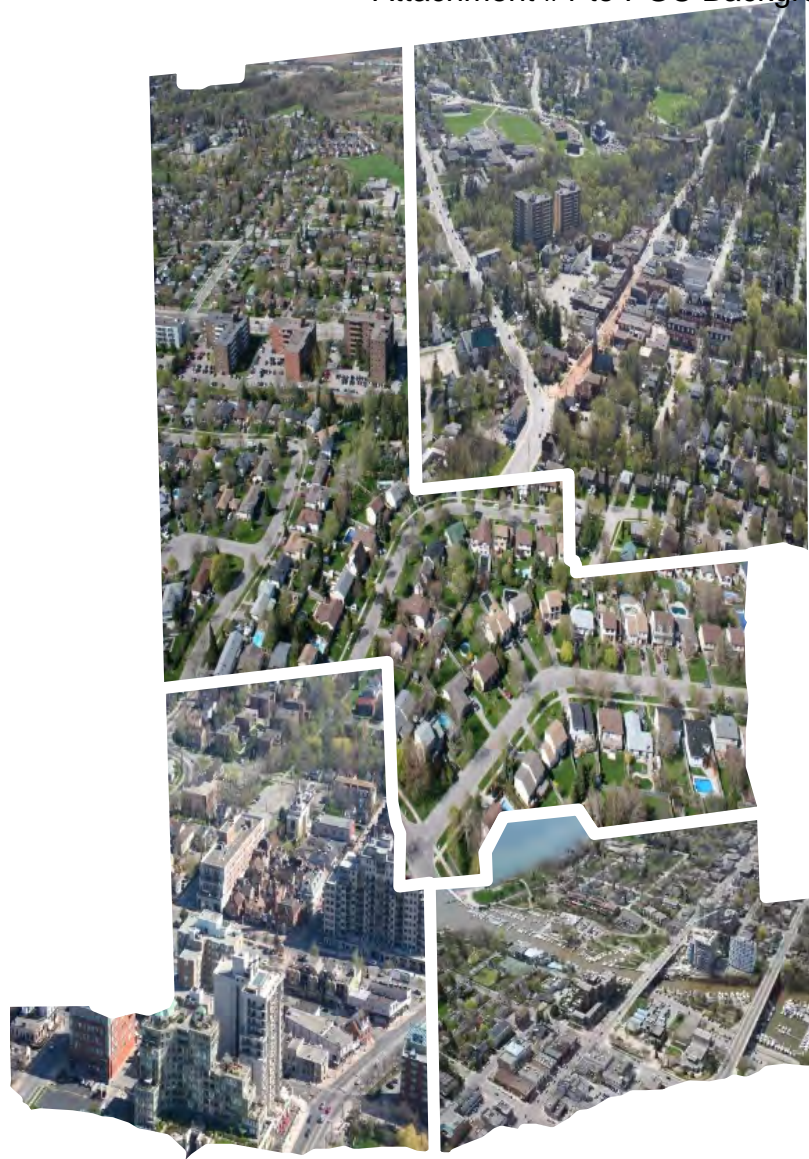
Attachment 1 - Halton Preferred Concept for Milton as measured by MGP



Attachment 2 - Halton Preferred Growth Concept Compared to Milton Balanced Growth Concept



*Appendix III / Region of Halton, Integrated Growth Management Strategy,
Preferred Growth Concept Report*



Integrated Growth Management Strategy Preferred Growth Concept Report (Draft)

February 2022

Regional Official Plan Review



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- H. Fiscal Impact Analysis

Executive Summary

The Preferred Growth Concept Report is a critical component of the Integrated Growth Management Strategy (IGMS), which is a key element of Halton's Official Plan Review. The IGMS is being undertaken within the framework of Provincial approach to growth management. At the heart of this framework is the Growth Plan (2019), the purpose of which is to ensure that growth is focused in "complete communities".

The Report describes the Preferred Growth Concept, how it conforms to the Growth Plan, and its basis as developed through the consultation on and evaluation of the four Growth Concepts prepared and presented in the IGMS Growth Concepts Discussion Paper (2021).

Halton Region is largely planned to 2031 through the Sustainable Halton comprehensive planning exercise implemented through Regional Official Plan Amendment No. 38. Through the IGMS process, the Region will plan for an additional 20 years of population and employment growth to the 2051 planning horizon, accommodating 1,100,000 people and 500,000 jobs by 2051 in accordance with the Provincial Growth Plan. The Preferred Growth Concept is the outcome of a Municipal Comprehensive Review process required to address such growth. Its development has been guided by a number of key principles and themes constant throughout the IGMS process.

As described in this Report, the Preferred Growth Concept includes population, household, and employment forecasts intended to be brought forward as part of a Regional Official Plan Amendment (ROPA) to guide growth in the Region to 2051. The Preferred Growth Concept also directs a significant amount of growth to Halton's existing Urban Areas while also identifying the amount of new Community Area and Employment Area land required to accommodate this growth, identified through the Land Needs Assessment (LNA). The following are major elements of the Preferred Growth Concept which support planning for the forecasted growth for Halton Region from 2031 to 2051:

- Implementing a compact and transit-supportive Regional Urban Structure by directing significant population and employment growth to strategic growth areas, including around GO Stations and planned higher order transit corridors;
- Accommodating more than 80 percent of population growth (contained in more than 85 percent of new housing units) and almost 80 percent of employment growth between 2031 and 2051, within the Region's existing urban areas;

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- A significant shift in the future housing mix of the Region towards apartments, from approximately 25 percent to more than 50 percent of total housing units, directed to strategic growth areas, between 2031 and 2051;
- A measured urban boundary expansion of 1,120 ha of new community land in Milton and Halton Hills, for residential, commercial and institutional uses, to provide a market-based supply of ground-related housing as directed by the Province, and accommodate important community uses (i.e. hospitals, parks);
- A major shift in the future employment mix of the Region towards mixed use office employment, directed to strategic growth areas, between 2031 and 2051;
- A measured urban boundary expansion of 1,070 ha of new employment land in Milton and Halton Hills, to accommodate market demand for advanced manufacturing, logistics/warehousing, and supportive uses, which require access to 400-series highways.

In addition, the Report provides an overview of the assumptions and technical assessments that underpin the Preferred Growth Concept. Climate change considerations are central to the Preferred Growth Concept. In addition, a Settlement Area Boundary Expansion analysis has been undertaken, which includes assessments for natural heritage, mineral and aggregate resources, and agricultural Impact.

Infrastructure is also critical to the long-term planning of Halton Region. As such, assessments of water, wastewater and transportation infrastructure, in addition to their associated fiscal impacts were undertaken on the Preferred Growth Concept. Findings from the infrastructure and Settlement Area Boundary Expansion assessments are summarized in this report, and provided in appendices as appropriate. Final technical assessments, based upon a final Council-endorsed Preferred Growth Concept, and the public and agency input on the implementing Draft Regional Official Plan Amendment, will be provided to support Regional Council's deliberation, together with Regional staff's recommendation report.

The final chapter outlines next steps in the IGMS process. To implement the Preferred Growth Concept and applicable IGMS policy directions, if endorsed by Council, it is recommended that staff be directed to prepare a draft Regional Official Plan Amendment. Building upon ROPA No. 48, this ROPA would form the second phase of the Region's Official Plan Review to achieve conformity with Provincial Plans, and to implement a strategy to accommodate growth in Halton to the 2051 planning horizon.

1. Introduction

The Integrated Growth Management Strategy (IGMS) is one of the major themes of the Region's Official Plan Review (ROPR) process. The IGMS process includes four key milestone reports:

- IGMS Growth Scenarios/Report Evaluation Framework, June 2019 (see staff report [LSP41-19](#));
- IGMS Regional Urban Structure Discussion Paper, June 2020 (found as Attachment 1 in staff report [LPS56-20](#));
- IGMS Growth Concepts Discussion Paper, February 2021; (found as Attachment 5 in staff report [LPS18-21](#)); and
- IGMS Preferred Growth Concept Report (this report)

Analysis and findings presented in the reports completed to date as well as public consultation has informed the Preferred Growth Concept (PGC) described in this report. Figure 2 provides a schematic overview of the IGMS process completed to date.

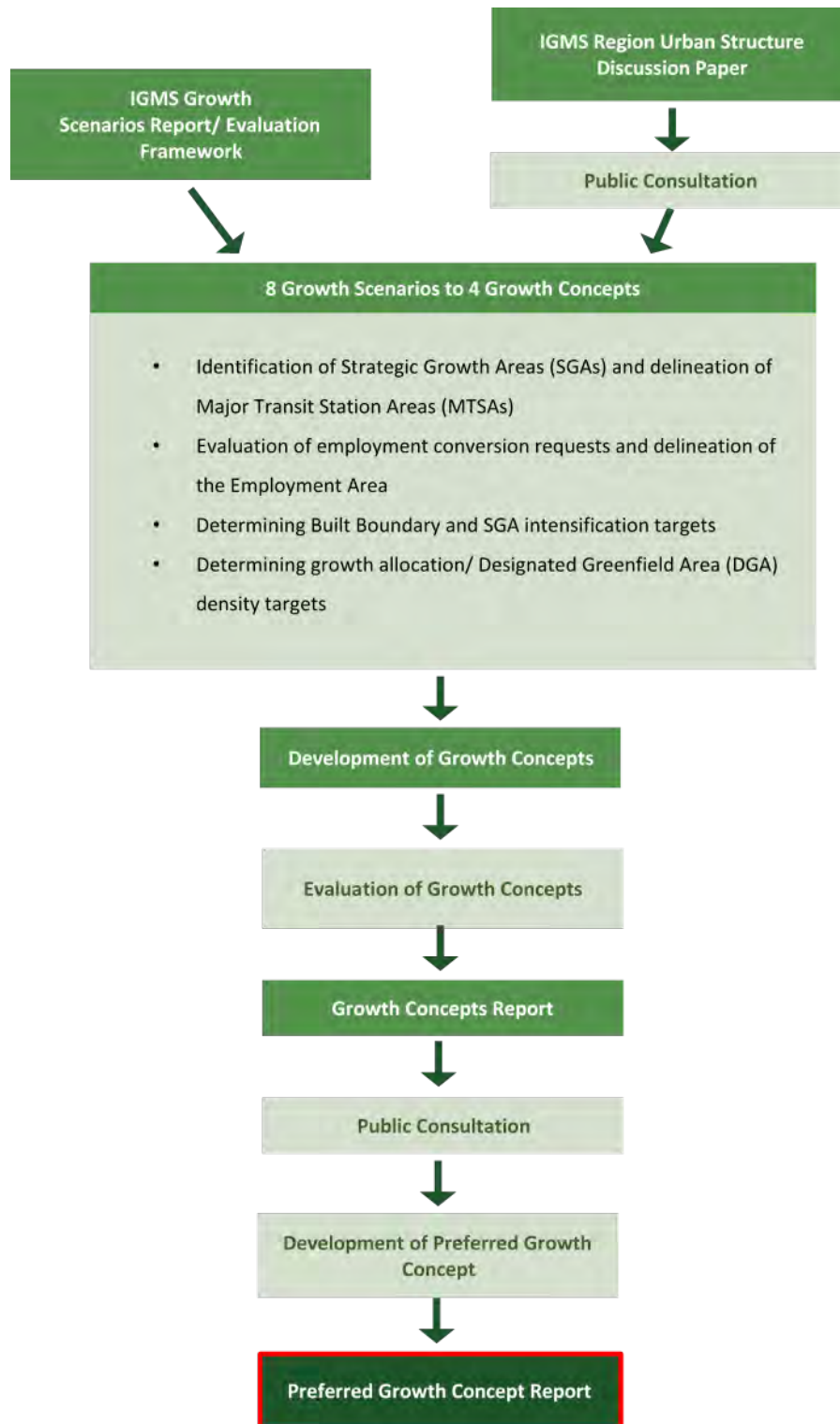


Figure 1: IGMS Reports in the Context of IGMS Process
Source: Halton Region, 2021

A. Purpose of this Report is to Present the Preferred Growth Concept

The purpose of this report is to describe the Preferred Growth Concept (PGC) and the technical analysis that underpins it. The PGC was developed from previous IGMS work related to the four discussion papers and related stakeholder consultation.

What is the Preferred Growth Concept?

The Preferred Growth Concept contains the major elements of a growth strategy to accommodate population, housing unit, and employment growth within the Region from 2031 to 2051, based on:

- the Planning Vision of the Regional Official Plan founded in the concept of sustainable development, moving the Region towards sustainability, and building on the themes of land stewardship and healthy communities;
- incorporating the Local Plans and Priorities of the Local Municipalities to the extent possible;
- responding to the Climate Change emergency through growth management that mitigates climate change impacts; and,
- reinforcing the Regional Urban Structure while protecting the Agricultural System and Natural Heritage System by minimizing urban boundary expansion.

The PGC includes the population, household, and employment forecast intended to be brought forward as part of a Regional Official Plan Amendment (ROPA) which will guide growth in the Region to 2051.

The PGC directs a significant amount of growth to the Region's existing Urban Areas, including emphasis on accommodation of growth within the hierarchy strategic growth areas identified in the Regional Urban Structure, and also sets out the total amount of new Community Area and Employment Area land required to accommodate growth to 2051 in accordance with the Provincial Land Needs Assessment methodology. The PGC is supported by technical analysis related to Regional infrastructure (water, wastewater and transportation) and associated fiscal impact assessment as well as analysis related to agriculture, aggregates, greenhouse gas (GHG) emissions, and natural heritage systems.

The PGC is not one of the Growth Concepts presented in the *IGMS Growth Concepts Discussion Paper*, rather it has been developed based on the feedback received through

consultation with Regional staff, local municipalities and other stakeholders on the Growth Concepts presented as part of that report.

The PGC is intended to be implemented into the Region's Official Plan by Amendment, building upon ROPA 48 (Regional Urban Structure), comprising the Integrated Growth Management Strategy.

B. The Preferred Growth Concept Builds Upon the Regional Urban Structure Based Upon Local Plans and Priorities (ROPA 48)

Regional Official Plan Amendment No. 48, approved by the Province in November 2021, was the first phase of the Integrated Growth Management Strategy, and amended the Regional Official Plan in the following ways to assist in achieving conformity with the Growth Plan to the 2051 planning horizon:

- Established a Regional Urban Structure of Strategic Growth Areas consisting of: Urban Growth Centres, Major Transit Station Areas, Regional Nodes and Regional Corridors, in which to focus population and employment growth, through intensification of the Built-Up Area or transit-supportive, compact urban form in the Designated Greenfield Area;
- Extended the planning horizon of the Regional Official Plan to 2051, and incorporates the population and employment forecast for the Region as a whole in Schedule 3 of the Growth Plan;
- *Urban Growth Centres* – confirmed the boundaries of the Downtown Burlington, Midtown Oakville and Downtown Milton Urban Growth Centres, for which minimum density targets apply;
- *Major Transit Station Areas* – provided defined boundaries for all Major Transit Station Areas and set minimum density targets, and policy changes to identify the MTSAs as Protected MTSAs;
- *Regional Nodes* – identified additional strategic growth areas beyond the UGCs and MTSAs, recognized in Local Official Plans, that have a Regional role in accommodating growth through intensification, and policies for the planning of these areas;

- *Employment Area Conversions* – implemented a set of strategic employment land conversions, which support the Regional Urban Structure, local urban structures, and the implementation of local municipal plans related to mixed use intensification.

The Preferred Growth Concept builds upon the new Regional Urban Structure by directing substantial population and employment growth to the Strategic Growth Areas to the 2051 planning horizon.

C. The Preferred Growth Concept Builds Upon the IGMS Growth Concepts Discussion Paper

The IGMS Growth Concepts Discussion Paper presented four Growth Concepts, based upon Local Plans and Priorities, developed to outline alternative approaches to accommodating population and employment growth in the Region to 2051, as required by the Growth Plan. The Paper also evaluated each of the Growth Concepts according to how it addressed a comprehensive Evaluation Framework of Growth Plan and Regional Official Plan policies on growth management, informed by a number of technical background studies addressing: water/wastewater infrastructure, transportation infrastructure, agricultural impact, natural heritage/water resources, climate change/greenhouse gas emissions, and fiscal impact.

The Evaluation of the Growth Concepts, combined with the technical analysis, and informed by significant public engagement led to the identification of a set of Key Principles guiding the development of a Preferred Growth Concept.

The IGMS Growth Concepts Discussion Paper was comprehensive and included a discussion of:

- [Provincial Growth Management Policies](#) (pg. 17-24)
- [History of Land Use Planning in the Region](#) (pg. 25-33)
- [Factors that Influence Growth Management](#) e.g. COVID-19, Schedule 3 of the Growth Plan, Land Needs Assessment Methodology, Phasing of Development (pg. 34-41)
- [Regional Urban Structure Elements](#) (pg. 42-56)

D. Major Elements of the Preferred Growth Concept

The major elements of the Preferred Growth Concept include:

- Implementing a compact and transit-supportive Regional Urban Structure by directing significant population and employment growth to strategic growth areas, including around the GO Stations, and on other planned higher order transit corridors, such as Trafalgar Road and Dundas Street;
- Accommodating more than 80 percent of population growth (contained in more than 85 percent of new housing units), and almost 80 percent of employment growth, over the 20 years between 2031 and 2051, within the existing approved urban areas of the Region;
- A significant shift in the future housing mix of the Region towards apartments, from approximately 25 percent to more than 50 percent of total housing units, directed to strategic growth areas, between 2031 and 2051;
- A measured urban boundary expansion of 1,120 hectares of new community land in the south and east of Milton (710 hectares) and a southerly expansion of Georgetown in Halton Hills (410 hectares), for residential, commercial and institutional uses, to provide a market-based supply of ground-related housing as directed by the Province, and accommodate important community uses (i.e. hospitals, parks);
- A major shift in the future employment mix of the Region towards mixed use office employment, directed to strategic growth areas, between 2031 and 2051; and,
- A measured urban boundary expansion of 1,070 ha of new employment land in Milton and Halton Hills, to accommodate market demand for advanced manufacturing, logistics/warehousing, and supportive uses, which require access to 400 series highways.

E. How Does the Preferred Growth Concept Differ from Other Forecasts

The PGC represents a new forecast being prepared as part of the Region's MCR update, which:

- Will not align with other forecasts currently used for master plans, development charge background studies, budgets etc. It is expected that these documents will be updated to reflect the new Official Plan growth forecasts once they are enacted

- Is based on the best available information at the time of this analysis – includes updating the assumptions used to determine the 2031 forecasts in Sustainable Halton

F. Technical Assessments Inform the Preferred Growth Concept

Technical assessments have informed the growth management exercise and are:

- Used to determine suitable location for new Community and Employment Area lands
- Not intended to replace rigorous, comprehensive analysis that will occur in subsequent stages of the implementation and planning process (e.g. master plans, secondary plans, technical reports etc.)
- To be updated as final technical assessments, based upon a final Council-endorsed Preferred Growth Concept. The technical assessments supporting the implementing Draft Regional Official Plan Amendment will be provided at the time of Regional Council’s consideration together with Regional staff’s recommendation report.

Table 1: Summary of IGMS Preferred Growth Concept Report Technical Analysis

Appendix	Description	Relationship to IGMS Process
Preferred Growth Concept Land Needs Assessment		
Appendix A – Land Needs Assessment and Local Municipal Allocation	Describes the methodology used to determine community and employment land need for future development and details the allocation of growth to the local municipalities	Identifies future community and employment land need for the Preferred Growth Concept
Appendix B – Existing Employment Area Delineation Recommendations	Technical assessment of recommended employment conversions, additions, and revisions	Provides final recommendations on existing Employment Area conversions, additions, and revisions
Preferred Growth Concept Settlement Area Boundary Expansion Assessment		
Appendix C – Agricultural Impact Assessment	Technical assessment of the impact of settlement boundary expansion on agricultural resources (i.e. farmland, soils, farm operations) in the Region, utilizing Canada Land Inventory (CLI) soils mapping, LEAR (Land Evaluation and Area Review) studies, and a preliminary inventory of farm operations (i.e. potential livestock facilities).	Identifies agricultural impacts, which inform the Preferred Growth Concept.

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Appendix	Description	Relationship to IGMS Process
Appendix D – Natural Heritage and Water Resources Assessment	Technical screening assessment of the impacts of settlement boundary expansions presented in the Preferred Growth Concept on the Region’s Natural Heritage System and Water Resource features and areas.	Identifies natural heritage impacts, which inform the Preferred Growth Concept.
Preferred Growth Concept Technical Assessment		
Appendix E – Greenhouse Gas Emissions Assessment	Technical assessment of greenhouse gas emissions arising from future development	Identifies greenhouse gas emissions impacts, which inform the Preferred Growth Concept.
Appendix F – Water and Wastewater Assessment	Technical assessment of Regional water and wastewater infrastructure needs arising from future development	Identifies water and wastewater infrastructure impacts, which inform the Preferred Growth Concept.
Appendix G – Transportation Assessment	Technical assessment of Regional transportation and transit infrastructure needs arising from future development	Identifies transportation infrastructure impacts, which inform the Preferred Growth Concept.
Appendix H – Fiscal Impact Analysis	Technical assessment of Regional and local municipal revenues and expenditures as well as associated tax rate impacts. The analysis is informed by the Transportation and Water & Wastewater Assessment technical reports.	Identifies fiscal impacts, which inform Preferred Growth Concept.

2. Key Principles for the Preferred Growth Concept

In undertaking the review of the Regional Official Plan, Regional Council directed staff to build on the strong foundational vision, goals and policies in the Regional Official Plan. The Planning Vision contained in the Regional Official Plan is based on the concept of sustainable development, moving the Region towards sustainability, and building on the themes of land stewardship and healthy communities.

According to the Regional Official Plan, a healthy community is one:

- that fosters among residents a state of physical, mental, social and economic well-being;
- where residents take part in, and have a sense of control over, decisions that affect them;
- that is physically so designed to minimize the stress of daily living and meet the life-long needs of its residents;
- where a full range of housing, employment, social, health, educational, recreational and cultural opportunities are accessible for all segments of the community;
- where mobility is provided primarily through an affordable, convenient, safe and efficient public transportation system and non-motorized travel modes; and
- where the principles of sustainability are embraced and practised by residents, businesses and governments.

Building on this strong foundation, the Growth Concepts Discussion Paper outlined a set of key considerations or questions that provide a framework for the development of a Preferred Growth Concept, focused around the themes of growth management, infrastructure, fiscal impact assessment, agriculture, mineral aggregate resources, climate change, natural heritage systems and healthy watersheds, and multi-modal transportation, transit-supportive densities and goods movement.

In recognition of these considerations and the extensive public input received throughout the Integrated Growth Management Strategy process to that point in time, as well as input from Local Municipal Councils, Region advisory committees, and representatives of the development industry, Report No. LPS51-21 outlined a set of **Key Principles** which staff used as the foundation for a balanced approach to the accommodation of growth to 2051 and carried through to the Preferred Growth Concept.

As noted in Report No. LPS51-21, the Preferred Growth Concept was to be based on a significant shift to more compact, mixed use urban form, and the advancement of critical objectives such as meeting the challenge of climate change and maximizing the protection of our agricultural land base. The Preferred Growth Concept must also represent an achievable plan that takes into consideration the housing market, choice and affordability, and the financing and construction of infrastructure to service the growth.

The **Key Principles** are as follows:

Table 2: Summary of Key Principles of the IGMS Preferred Growth Concept

<p>1. Confirming and supporting a Regional Urban Structure</p> <p>A cornerstone of the Preferred Growth Concept is the direction of as much population and employment growth to 2051, as is achievable, to Strategic Growth Areas within a Regional Urban Structure, comprised of Urban Growth Centres, Major Transit Station Areas, and Regional Nodes and Corridors.</p>
<p>2. Setting an Ambitious and Achievable Intensification Target</p> <p>The accommodation of growth to 2051 is also based on the setting of a Region-wide intensification/densification target that exceeds the minimum 50 per cent intensification target contained in the Growth Plan, and directs a clear majority of population growth within the Built-up Area (i.e. intensification) <u>and</u> existing Designated Greenfield Area (i.e. densification) of the Region. The specific intensification target and rate of densification that is achievable is determined through the completion of a Land Needs Assessment, as required by the Growth Plan.</p>
<p>3. Meeting the Challenge of Climate Change</p> <p>The Preferred Growth Concept is based on a Greenhouse Gas Emissions modelling exercise that demonstrates it minimizes greenhouse gas emissions compared to a baseline scenario, thereby addressing the Climate Change Emergency declared by the Region and its Local Municipalities.</p>
<p>4. Establishing a Broad Range and Mix of Housing</p> <p>Another key principle of the Preferred Growth Concept is the establishment of an appropriate range and mix of housing that both maintains an adequate supply of ground-related housing, while significantly shifting the mix towards higher density apartment housing types. This housing mix considers the provision of a market-</p>

based supply of housing as required by the Provincial Land Needs Assessment Methodology.

5. Providing a Complete Spectrum of Employment Opportunities

The provision of a complete spectrum of employment opportunities to accommodate employment growth to 2051 includes:

- a. Shifting employment to the Major Office category to both recognize its role in creating mixed-use, transit-supportive complete communities, and its benefit in minimizing the need for additional employment land;
- b. Providing an adequate supply of new employment land to accommodate manufacturing, logistics/warehousing (i.e. Employment Land Employment) growth to 2051, ensuring that the strong demand for larger sites with highway access can be met in the Region.

6. Advancing Strategic Employment Land Conversions

The Preferred Growth Concept is also based on the removal of certain strategic areas from the Regional Employment Area to permit residential uses and facilitate mixed-use development of Strategic Growth Areas, including within Urban Growth Centres and Major Transit Station Areas.

7. Setting Bold yet Achievable Community Area & Employment Area Density Targets

A minimum density target for any new Community Designated Greenfield Area, which substantially exceeds the minimum 50 people/ jobs per hectare target of the Growth Plan, and is 65 people/jobs per ha or greater, reflecting densities being achieved in the existing Designated Greenfield Area, is a key building block of the Preferred Growth Concept. The Preferred Growth Concept is also based on a minimum Employment Area density target, which is achievable based on the market for employment uses, yet encourages greater densities in Employment Areas, as determined by the Land Needs Assessment.

8. Maintaining Strong Development Phasing Policies

A key principle of the Preferred Growth Concept pertains to the phasing of development, ensuring that it proceeds in a manner that prioritizes efficient use of land, and financing and construction of infrastructure.

9. Ensuring Growth Proceeds without negative Fiscal Impacts

The Preferred Growth Concept is based on a Fiscal Impact Analysis, which demonstrates that the proposed accommodation of population and employment

<p>growth results in no negative fiscal impact for the Region and its Local Municipalities.</p>
<p>10. Maximizing Agricultural Land Protection</p> <p>The Preferred Growth Concept minimizes the loss of agricultural land through urban expansion, based on an Agricultural Impact Assessment that demonstrates it minimizes impacts to the agricultural system and agricultural support network, and considers local food production and food security.</p>
<p>11. Further Enhancing the Natural Heritage System</p> <p>The Preferred Growth Concept does not encroach on the enhanced Regional Natural Heritage System, and generally directs population and employment growth to areas which minimize adjacency impacts on the Regional Natural Heritage System from urban expansion, informed by a Natural Heritage Assessment.</p>

To illustrate how the Key Principles have been incorporated into the Draft Preferred Growth Concept, a description of how each key principle relates to elements of the Draft Preferred Growth Concept is provided in Table 7 below.

Table 3: Relationship of Key Principles with Elements of Draft Preferred Growth Concept

Key Principle	Element of Draft Preferred Growth Concept
1. Confirming and supporting a Regional Urban Structure	<ul style="list-style-type: none"> The Preferred Growth Concept directs significant growth to mixed-use Strategic Growth Areas (Urban Growth Centres, Major Transit Station Areas, Regional Nodes) identified in a Regional Urban Structure, based upon Growth Plan and local municipal structures The Preferred Growth Concept directs growth to Regional Corridors, such as Trafalgar Road and Dundas Street to support transit
2. Setting an Ambitious and Achievable Intensification Target	<ul style="list-style-type: none"> The Preferred Growth Concept addresses the ‘intensification first’ intent of the Growth Plan by accommodating over 80 per cent of residential development within the combined Built-Up Area and existing Designated Greenfield Area to 2051, minimizing urban expansion

Key Principle	Element of Draft Preferred Growth Concept
	<ul style="list-style-type: none"> • This strategy is based on a proposed alternative intensification target of 45 per cent, as contemplated by the Growth Plan (compared to the minimum intensification target for growth directed to Built-Up Area of 50 percent) • The Preferred Growth Concept includes additional “densification” of Strategic Growth Areas outside the Built-Up Area, particularly corridors, recognizing planned growth within these areas
<p>3. Meeting the Challenge of Climate Change</p>	<ul style="list-style-type: none"> • The Preferred Growth Concept minimizes Greenhouse Gas emissions when compared to a baseline scenario, through compact and transit-supportive growth as part of the Region’s overall strategy to address the Climate Change Emergency
<p>4. Establishing a Broad Range and Mix of Housing</p>	<ul style="list-style-type: none"> • The Preferred Growth Concept significantly shifts the housing mix towards apartments to address the ‘intensification first’ objectives of the Growth Plan, while accommodating a significant number of apartments within strategic nodes and corridors outside the Built-Up Area, achieving a housing mix between 2031 and 2051 of 50 percent apartment units • The Preferred Growth Concept provides an adequate supply of ground-related housing, including singles/ semis to address market demand
<p>5. Providing a Complete Spectrum of Employment Opportunities</p>	<ul style="list-style-type: none"> • The Preferred Growth Concept shifts significant future employment from Employment Land Employment into Major Office Employment directed to Strategic Growth Areas and existing employment areas to foster mixed-use, transit-supportive communities • The Preferred Growth Concept provides an adequate supply of new Employment Area in Milton and Halton Hills to accommodate Employment Land Employment and ensure the Region continues to attract manufacturing and logistics/warehousing uses

Key Principle	Element of Draft Preferred Growth Concept
6. Advancing Strategic Employment Land Conversions	<ul style="list-style-type: none"> • The Preferred Growth Concept and ROPA 48 advance several strategic employment conversions to address local municipal objectives and foster mixed-use, transit-supportive communities, in Strategic Growth Areas • A summary of the assessment of changes to the Regional Employment Areas, including conversions, is included as Appendix B
7. Setting Bold yet Achievable Community Area & Employment Area Density Targets	<ul style="list-style-type: none"> • The Preferred Growth Concept sets a Region-wide Community Designated Greenfield Area minimum density target of 65 residents/jobs per hectare, significantly exceeding the Growth Plan minimum target, which is achievable given that new Designated Greenfield Area in the Region is currently meeting or exceeding this standard • The Preferred Growth Concept sets a Region-wide Employment Designated Greenfield Area minimum density target, encouraging employment intensification, while recognizing that employment densities will not be the same for all employment areas, depending on their role/function
8. Maintaining Strong Development Phasing Policies	<ul style="list-style-type: none"> • The Preferred Growth Concept will be based on logical development phasing policies to ensure orderly development of the Region and the local municipalities, and ensuring intensification targets can be met
9. Ensuring Growth Proceeds without negative Fiscal Impacts	<ul style="list-style-type: none"> • The Preferred Growth Concept is supported by a <i>Fiscal Impact Assessment</i> that demonstrates the population and employment growth results minimizes fiscal impact for the Region or its Local Municipalities
10. Maximizing Agricultural Land Protection	<ul style="list-style-type: none"> • The Preferred Growth Concept minimizes agricultural land consumption by directing significant growth within the Built-Up Area and the existing Designated Greenfield Area, and is supported by an <i>Agricultural Impact Assessment</i> that demonstrates the impact on the agricultural system has been

Key Principle	Element of Draft Preferred Growth Concept
	minimized, considering local food production and food security
11. Further Enhancing the Natural Heritage System	<ul style="list-style-type: none"> • The Preferred Growth Concept does not encroach on the overall Natural Heritage System, and generally directs growth to areas that minimize impact on the overall Natural Heritage System from urban expansion, supported by a <i>Natural Heritage Assessment</i>

3. Land Needs Assessment Overview

The amount of new urban area, if any, to accommodate population and employment growth to 2051 is determined through a Land Needs Assessment (LNA) analysis in accordance with the Province's Land Needs Assessment Methodology. The purpose of the LNA is to address how the Region will accommodate population and employment growth to 2051. While the LNA presented in this section is for the Region in total, it is based on considerations of detailed local land use information including local municipal planning priorities and local municipal population and employment allocations. In addition, the LNA includes an explanation of two key assumptions: the residential intensification rate and the conversion of some Employment Area lands to Community Area. The LNA informs the Preferred Growth Concept as presented in this Report. A final LNA, based upon a final Council-endorsed Preferred Growth Concept, and the public and agency input, will be provided for submission to the Province with the adopted Council endorsed amendment implementing the Preferred Growth Concept.

The LNA addresses the Community Area and the Employment Area land needs separately, where the Employment Area represents all lands within the Employment Area overlay shown in Map 1H of the Regional Official Plan and the Community Area represents all other urban area lands that are primarily residential uses within developed areas along with the supporting institutional, commercial and infrastructure land uses. Within the Community Area, there is a further important geographic division between the Delineated Built-Up Area and the Designated Greenfield Area (DGA). The Delineated Built-Up Area accommodates the portion of housing growth described as intensification and the Designated Greenfield Area accommodates greenfield housing development, including any Settlement Area expansion for Community Area use. The uses and the geographic policy areas are shown in Figure 3.

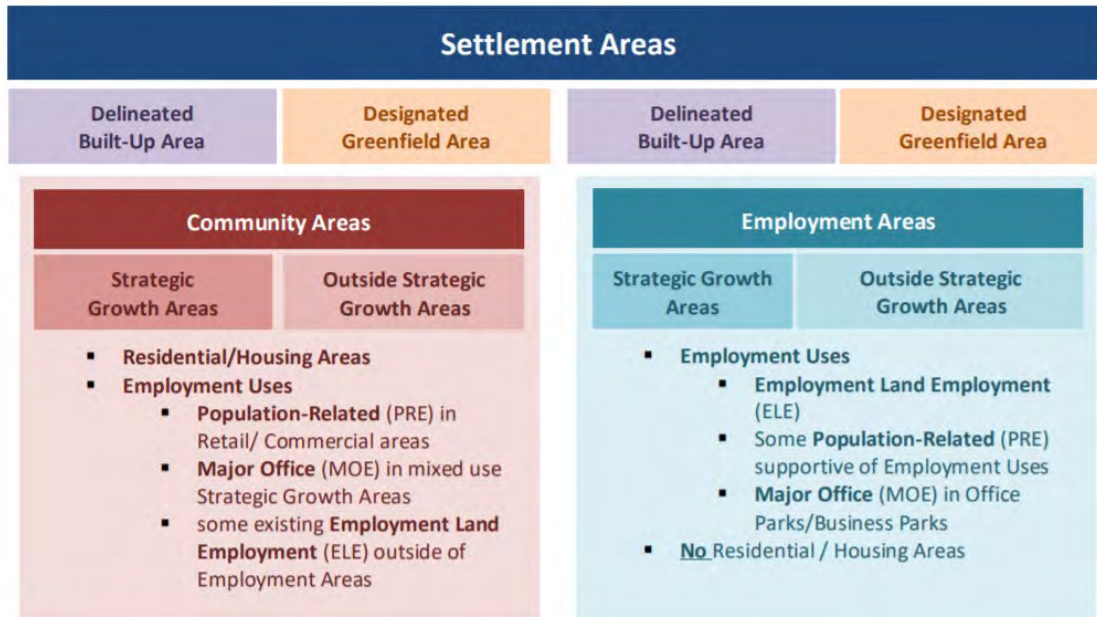


Figure 2: Community Areas versus Employment Areas
 Source: Halton IGMS Regional Urban Structure Discussion Paper, July 2020

A. Community Area Forecast and Land Need

In principle, the LNA for the Community Area is a relatively straight-forward undertaking involving the following components:

- determine the total number of housing units required to meet the population forecast to 2051;
- allocate the housing units between the Delineated Built-Up Area and the Designated Greenfield Area (including a very small allocation to the rural areas);
- estimate the future supply potential in the existing Designated Greenfield Areas and compare that supply to allocation of housing units in Designated Greenfield Areas between 2021 and 2051; and
- calculate the new urban area land need based on the housing units in the Designated Greenfield Area that cannot be accommodated within the existing Designated Greenfield Areas.

The details of some of these components and related assumptions add a level of complexity as shown in the LNA document in Appendix A.

1. Provincial Direction on Providing a Market-Based Supply of Housing

A significant new policy in the Province’s 2020 revision to the LNA Methodology requires the “provision of a market-based supply of housing to the extent possible.” This means that the LNA analysis needs to address housing units by type. The four housing types for the IGMS are: single/semi; row/townhouse units, apartments in multiple-unit buildings; and accessory apartments (secondary suites).

A market-based supply of housing in Halton means a mix of housing types heavily weighted to singles/semis and rows, much like the housing mix of units built in the Region over the past 20 years (when rows came to be a significant part of the new housing market). In Halton, as elsewhere, singles/semis and rows are typically highly preferred by family households and most of the household growth anticipated in Halton over the next 30 years are family households. Growth management policies, particularly those flowing from the Provincial Growth Plan, seek a significant shift in housing mix in favour of apartment units in order to reduce consumption of new urban land for housing.

The intensification rate and the housing mix are closely linked because 75 to 80 per cent of units built in the Delineated Built-Up Area will be apartment units. Table 4 compares the housing mix of a market-based supply to the four concepts presented in 2021 and the Preferred Growth Concept presented in this report. All the concepts are significantly denser and rely on intensification far more than a market-based supply as demonstrated by the higher share of apartments in the mix.

Table 4: Regional Housing Mix for All Housing Unit Growth 2021-2051, Comparison of a Market-Based Supply to the 2021 Growth Concepts and the Preferred Growth Concept

	Market Based Supply	Concept 1: 60% Densification	Concept 2: 70% Densification	Concept 3A/3B: 80% Densification	Concept 4: 50% Intensification	Preferred Growth Concept
Single/Semi	50%	22%	19%	17%	25%	23%
Row	25%	23%	20%	18%	26%	25%
Apartment Buildings	24%	53%	59%	63%	47%	50%
Accessory Apartments	1%	2%	2%	47%	2%	2%
Total	100%	100%	100%	100%	100%	100%

The reason for highlighting and comparing the housing mix in the Preferred Growth Concept is to demonstrate two important matters in the LNA:

- Any option that meets the intensification policy requirements has a housing mix with many more apartments and fewer ground-related units than the market-based supply. The Preferred Growth Concept is closer to the market mix than most of the other Concepts and, therefore, meets the Province’s “to the extent possible” test. Also notable is that the new Community Area land in the Preferred Growth Concept is approximately midway between that of Concepts 1 and 2, though it does not require as great a shift in housing types as Concept 1.
- In providing the housing mix shown in Table 4, the Preferred Growth Concept is meeting the goals of the intensification policy by accommodating most housing growth in existing planned areas to maximize the use of existing community infrastructure and reduce the amount of new urban area land required.

While the Preferred Growth Concept exceeds the goals of the intensification policy, it cannot reasonably meet the letter of the policy since much of the planned higher-density mixed-use development is well within the existing urban area, but just beyond the Built Boundary that defines the Delineated Built-Up Area. The proposed resolution to this problem is an alternative intensification target.

2. Alternative Intensification Target

The Growth Plan directs that a minimum of 50 percent of all residential development within the Region by the time that the municipal comprehensive review (i.e. Regional Official Plan Review) is approved be within the Delineated Built-Up Area (as delineated in 2006). In Halton Region, the urban structure demands that a significant amount of growth be allocated to lands within the existing settlement area boundary but beyond the Built Boundary. For example, specific growth nodes in North Oakville north of Dundas, and along the Trafalgar Road corridor in Oakville and Milton are outside of the Built Boundary. The higher density mixed-use development planned and currently being built in these areas cannot be counted as “intensification” as defined by the Growth Plan. Adhering to the 50 per cent intensification target in the Growth Plan would result in a significant under-allocation to these nodes and would compromise key planning objectives to ensure transit-supportive densities are achieved in these communities.

The Preferred Growth Concept is premised on an ambitious target of 85 percent of new housing units to be accommodated within the existing Urban Area (the Delineated Built-

Up Area and existing Designated Greenfield Area combined) from 2031 to the 2051 planning horizon.

Policy 2.2.2.4 of the Growth Plan permits Regional Council to request an alternative target to the 50 per cent minimum intensification target. This request must be based on a demonstration that:

- the 50 per cent minimum target cannot be achieved, and,
- the alternative target will be appropriate given the size, location, and capacity of the Delineated Built-Up Area.

The Preferred Growth Concept proposes to direct a significant percentage of Region-wide housing unit growth to the Delineated Built-Up Area (45 per cent), but is also premised on direction of considerable housing unit growth to key growth nodes in the existing Designated Greenfield Area. This approach has merit and meets the objectives of the Growth Plan as it:

- Allocates growth to strategic Regional Corridors (such as Trafalgar Road and Dundas Street) with planned investment in higher-order transit (i.e. Dundas Bus Rapid Transit) in keeping with the objectives of the Growth Plan;
- Supports the Town of Oakville approved Urban Structure (OPA 15) and important Regional Nodes identified in the Regional Urban Structure (ROPA 48) and Corridors;
- Directs growth (referred to as “densification” in the Growth Concepts Discussion Paper) – which is “intensification” in the sense that it concentrates development to areas within the existing approved urban area – to locations where it is reasonable to expect it could occur by 2051;
- Recognizes that the geographic location of the Built Boundary was established in 2006 by the Province to delineate the developed areas within approved urban areas. As the visualization in Figure 4 indicates it does not reflect the current extent of the developed area of the Region. In Halton’s specific circumstances, it is not reasonable to drive future housing allocation to the 2006 Built Boundary. Rather, by clear Growth Plan goals growth should be directed to existing and planned strategic growth areas well served by transit. In short, the issue is not the 50 per cent minimum intensification target itself, but the geographic area to which the target is applied;
- While continuing to direct significant growth to the Built-Up Area, including the Urban Growth Centres and Major Transit Station Areas, the alternative target acknowledges

the challenges and risks of allocating too much growth to those areas by 2051, given their size, location and capacity. The Preferred Growth Concept however does allocate a very significant amount of growth to the Strategic Growth Areas within the Built-Up Area (i.e. Urban Growth Centres and Major Transit Station Areas).

Therefore, the Preferred Growth Concept has been based on a Region-wide intensification rate of 45 percent within the Built-Up Area, but a direction of more than 85 percent of housing units within the existing approved urban area between 2031 and 2051, thereby meeting the “intensification first”, and minimization of urban expansion, objectives of the Growth Plan.



Figure 3: Community Areas versus Employment Areas
Source: Halton IGMS Regional Urban Structure Discussion Paper, July 2020

3. Community Area Land Need and Local Municipal Housing and Population Allocations

Having established the need for the Province to permit Halton to use the recommended alternative intensification target, the Community Area land need can be calculated. Details are provided in the LNA document in Appendix A and are briefly summarized in Table 5. The density of 65 persons plus jobs per hectare incorporates all Community Area land uses including housing, transportation and stormwater management infrastructure, community uses including schools and parks and commercial uses mainly retail and services uses, but also some offices that may occur in the mixed-use areas.

Table 5: Summary of Community Area Land Need Assessment

Total New Housing Units 2021-2051			175,800
Allocation	Rural Area	0.8%	1,400
	Intensification within Delineated Built-Up Area	45.0%	79,100
	Densification (concentrations of high-density units in DGA)	13.1%	23,000
	General DGA development (primarily ground-related units)	41.1%	72,300
Land Need	Less existing DGA supply consumed by 2051		(55,700)
	Shortfall in units allocated to new urban area		16,700
	Land need at 65 persons plus jobs per hectare (approximately 17 units per hectare)		1,070 ha
	In addition, the Town of Halton Hills owns a parcel of about 50 ha within the proposed expansion area. It is partly being used for stormwater management for existing urban areas on the adjoining areas and is being planned for other town-wide uses. As well, there may be a need to locate the planned new hospital on a site within this area. 50 ha is added for these community uses. The total 1,120 ha of which 410 ha would be in Halton Hills also allows for a clear logical boundary in for the expansion area proposed for south Georgetown, making use of existing roads and lot lines.		1,120 ha

The 1,120 ha is recommended to be accommodated with 710 ha in Milton, including 30 ha of Community Area to be added to the northeast quadrant of the proposed Trafalgar GO Station MTSA to provide a complete area surrounding the proposed station. In Halton Hills there is 410 ha of lands, including the 50 ha for town-wide community uses.

While not required for the Land Needs Assessment itself, there are other important descriptors of the Preferred Growth Concept that are based on much the same information. For official plan purposes, there is a need to allocate units by policy area and the population by local municipality. These are shown in Tables 6 and 7.

Table 6: Housing Unit Growth, 2021-2051, Allocated to Policy Area

Municipality	Housing Units by Policy Area				Total
	Rural	Delineated Built-Up Area	Designated Greenfield Area		
			Existing	New	
Burlington	700	30,500	2,500	0	33,700
Oakville	0	28,700	33,600	0	62,300
Milton	300	14,400	34,800	11,000	60,500
Halton Hills	300	5,600	7,800	5,600	19,300
Halton Region	1,300	79,200	78,700	16,600	175,800

Table 7: Population Growth to 2051 by Municipality

Municipality	Population	
	2021	2051
Burlington	194,000	265,000
Oakville	222,000	375,000
Milton	139,000	335,000
Halton Hills	66,000	125,000
Halton Region	619,000	1,100,000

B. Employment Area Forecast and Land Need

The second part of the LNA concerns the land need for Employment Area purposes, that is, just the portion of employment that occupies land and buildings in the jobs-only industrial-type employment areas of the Region. In principle, the Employment Area LNA is even more straight-forward than that for the Community Area, as there are no policy area distinctions required concerning which parts of the Region’s Employment Area are within the BUA or the DGA. The process involves:

- Forecasting the amount of total employment in 2051 that is likely to be accommodated in Employment Areas;

- Determining how much of that employment would likely be accommodated within the existing supply of developed lands and currently vacant Employment Area land;
- Accounting for any conversion of employment lands to non-employment uses in the supply of land (conversions have their own set of planning policies and tests);
- Employment that does not “fit” within the planned employment area requires the designation of additional urban lands.

Each of these steps is detailed in the LNA document in Appendix A. The employment land conversions are addressed before providing the results of the LNA for Employment Areas.

1. Incorporating the Employment Conversions into the LNA

The current Employment Areas in Halton are those lands identified on Map 1H and Map 1C of the Halton Official Plan, all of which are in the current urban designated area (Future Strategic Employment Areas shown on Map 1C provide direction as to the location of future Employment Area designations, but are not part of the current designated supply). In 2021, ROPA 48 brought some initial Official Plan Review conclusions into the Halton Regional Plan. The amendment mainly relates to the Region’s urban structure and brings many of the Strategic Growth Areas into the Plan. These areas included six MTSAs, some of which required Employment Land conversions in order to redevelop as mixed-use areas. The Preferred Growth Concept incorporates the employment conversions adopted by Regional Council through Regional Official Plan Amendment 48, which will enable compact, mixed-use development within Strategic Growth Areas. In addition, based on further analysis, employment conversions related to the Agerton lands east of Trafalgar Road in Milton as well as the Neyagawa Urban Core lands in Oakville are also included in the Preferred Growth Concept.

The proposed conversions and designations of lands near the Trafalgar GO MTSA and the Agerton Employment Area are shown on Figure 5. The area west of Trafalgar road (shown in bright green on the map) was removed from the Employment Area through ROPA 48. The current Urban Area east of Trafalgar Road and generally within an 800 metre radius of the proposed GO transit station is proposed to be removed from the Employment Area (shown in crimson on the map). In tandem with the addition of Community Area lands to the north, this approach will enable mixed-use development supportive of the proposed Trafalgar GO Major Transit Station Area and the Trafalgar Road corridor, while continuing to maintain lands to the east for employment. The approximately 30 hectares of Community Area land proposed to be added to the urban

area to complete the northeast quadrant of the Trafalgar GO MTSA is part of the 1,120 hectares of Community Area land need identified in the LNA (shown in orange on the map). Proposed new designations of urban land for Employment Area use in the Agerton area are also shown on the map (in bright blue on the map), but are discussed in the next part of this section and elsewhere in the report.

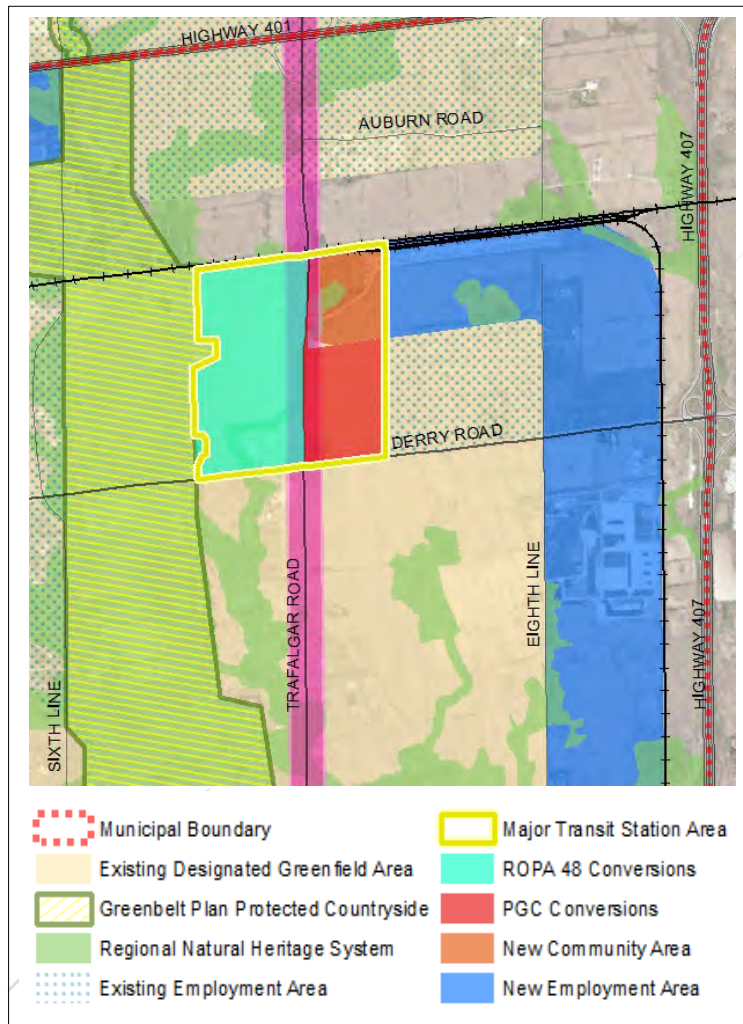


Figure 4: Agerton Lands Employment Conversion
Source: Halton IGMS Regional Council Workshop, November 2021

For the Neyagawa Urban Core lands in Oakville, the conversion of the lands on the west and east sides of Neyagawa Boulevard expands the existing mixed-use area on the east side of Neyagawa Boulevard and on the south side of Burnhamthorpe Road West. The expanded area is proposed as a Regional Node, consistent with Town’s urban structure

and vision for a mixed-use growth area at Neyagawa Boulevard and Burnhamthorpe Road West. A number of site-specific conversions that were identified as supported in the Growth Concepts Discussion Paper have also been incorporated into the Preferred Growth Concept. The remaining conversion requests were not supported by Regional staff and are not included in the Preferred Growth Concept.

A document summarizing the recommended changes to Halton's Employment Areas through the Regional Official Plan Review and municipal comprehensive review process is in Appendix B to this report. The document includes recommendations on areas removed from the Employment Areas through conversions, areas within the existing Urban Area added to the Employment Areas, and minor technical revisions. These recommendations are reflected in the Preferred Growth Concept and LNA and support the designation of Employment Areas in the Regional Official Plan in accordance with the Growth Plan.

For the LNA, there is an important distinction in the conversion of Employment Areas where some conversions need to be "replaced" in the future Employment Area land supply and others do not. Any existing Employment Area lands currently developed for larger-scale retail or institutional uses and that are proposed to be converted do not need to be replaced in the future supply, since they are not currently accommodating the employment land employment for which Employment Areas are planned. Similarly, location-specific infrastructure, i.e. GO commuter parking lots, also do not need replacement in the supply as it is not a business or activity that could operate on a site elsewhere. Conversion of all other Employment Area lands with any existing employment use or non-residential building do need replacement in the land supply. These businesses (or equivalent employment) will occupy Employment Area elsewhere as converted employment lands redevelop for mixed use. Similarly, any converted vacant Employment Area would need replacement in the supply, since the lands would no longer be expected to accommodate the type of employment for which they were planned.

The LNA incorporates the conversions already approved through ROPA 48, including the areas converted and those requiring replacement in the future supply of Employment Area. The additional conversions now being proposed to Regional Council for approval are considered in a similar manner, with their impact on the total Regional land supply considered and addressed in the LNA.

2. Employment Area Land Need and Local Municipal Employment Allocation

The details of the Employment Area land need are provided in the LNA document in Appendix A and can be briefly summarized as shown in Table 8.

Table 8: Summary of Employment Area Land Need Assessment

Employment Area land need driven by the lands used to accommodate Employment Land Employment For Land Needs Assessment		<u>Net ha</u>
Total net occupied lands in Employment Areas	occupied	3,970
Less occupied by large-scale retail, major office or are converted	occupied	<u>(520)</u>
2021 Lands occupied by Employment Land Employment after removing ROPA 48 and currently proposed conversions		3,450
Vacant lands available for future development for employment land employment		<u>Net ha</u>
Total net vacant lands in Employment Areas	vacant	2,470
Less long term vacancy, conversion of vacant lands and future Major Office	vacant	(630)
Net effective vacant supply for employment land employment purposes		1,840
Employment Land Employment job growth		
Employment Land Employment job growth accommodated on vacant lands	jobs	80,700
Less jobs accommodated in existing supply (1,840 ne ha @ 30.7/net ha	jobs	<u>(56,600)</u>
Employment land employment accommodated in new urban employment areas	jobs	24,200
Density of new urban employment land employment in Employment Areas	Jobs/net ha	29.0
Net hectares required	net ha	830
Net hectares required after adding 3% long term vacancy	net ha	860
Gross (developable) land required after accounting for roads and utilities (80%)		
New Urban Land Need	gross ha	1,070

The 1,070 ha is recommended to be added to the urban area for Employment Area purpose. It is proposed to be accommodated with 670 ha in Milton and 400 ha in Halton Hills. Included in the proposed new Employment Area expansion area are the lands in Agerton occupied by the CP Intermodal facility and adjoining lands. A small amount of additional land need could be justified by the fact that full site cannot be considered vacant and available. However, the land need and vacant land designation are relatively close and logical boundaries for new employment areas are being proposed, so it is recommended that no further adjustment to the land need or the proposed expansion area is warranted.

The result of the distribution of all employment types to the land base in each local municipality results in the employment distribution in Table 9. This table may be paired with the population distribution already presented in Table 10.

Table 9: Employment Distribution by Municipality

Municipality	Employment	
	2021	2051
Burlington	99,000	125,000
Oakville	111,000	180,000
Milton	44,000	130,000
Halton Hills	25,000	65,000
Halton Region	278,000	500,000

4. Preferred Growth Concept Overview

The Preferred Growth Concept allocates population, housing units and employment to each Local Municipality to 2051. This allocation of growth is based on the Land Needs Assessment as outlined in the previous section and detailed in Appendix A. An overview of the Preferred Growth Concept and its key elements is provided on Figure 6 and Table 10. The remainder of this section provides additional information that describes and explains the Preferred Growth Concept.

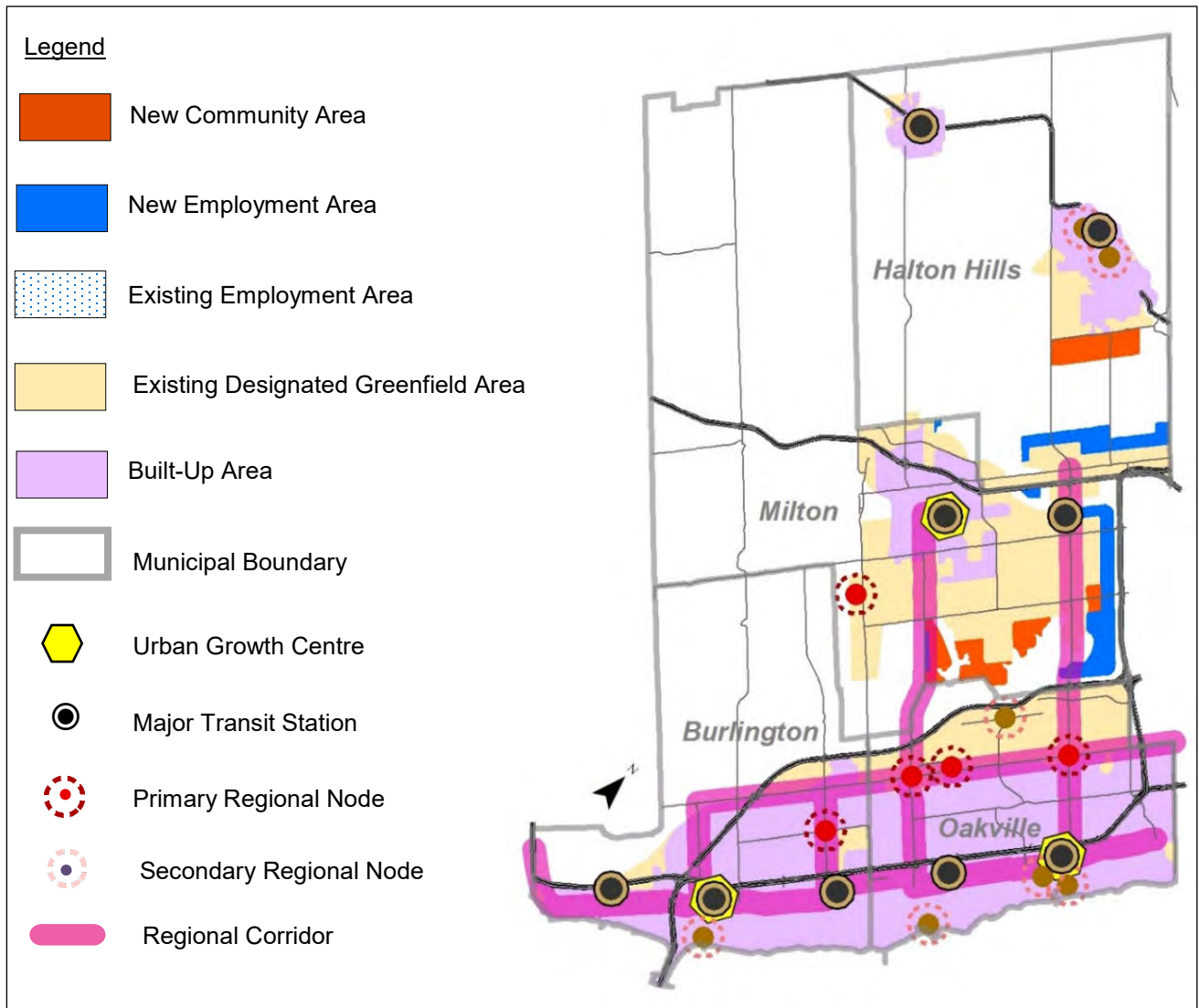


Figure 5: Map of Preferred Growth Concept, Draft Recommendation, February 2022

Table 10: Population & Employment Allocation by Policy Area, 2031-2051, Draft Recommendation, February 2022

	Population	% of Total	Jobs	% of Total
Built-Up Area	116,500	35%	57,000	38%
Existing Designated Greenfield Area	150,500	45%	61,000	41%
New Community Area	62,000	18%	31,500	21%
New Employment Area	n/a	-		
Rural Area (incl. Hamlets)	4,000	1%	500	<1%
Total	333,000		150,000	

A. The Role of the Urban Structure

The Preferred Growth Concept reinforces the compact and transit-supportive Urban Structure adopted under Regional Official Plan Amendment No. 48 (ROPA 48). The following sections describe the function of policy areas and the growth in population, housing units, and employment to be accommodated within them.

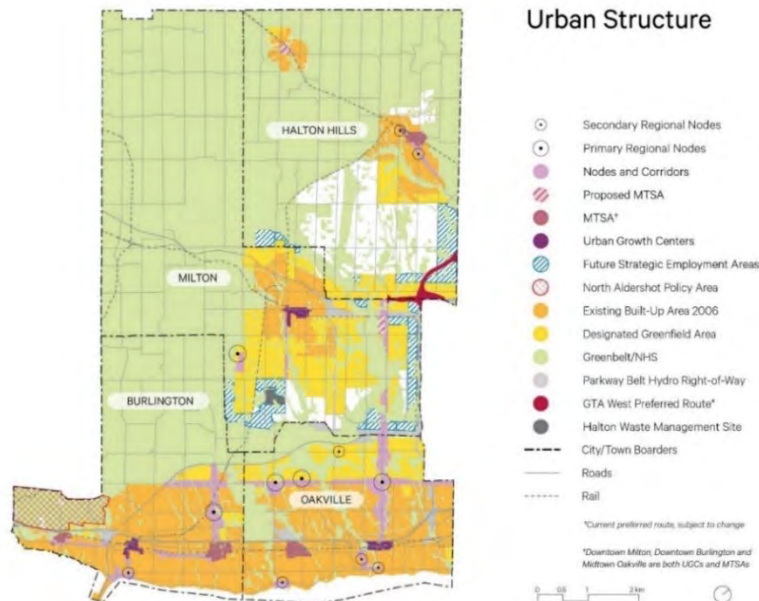


Figure 6: Halton’s Regional Urban Structure
 Source: Halton Growth Concepts Discussion Paper, February 2021

1. Built-Up Area

The Built-Up Area consists of existing communities as delineated by the Province based on the limit of the developed urban area in June 2006.

Centres (UGCs, MTSAs, Regional Nodes)

Regional Centres are focal areas for the accommodation of higher densities and mixed uses. The hierarchy of centres within Halton's Built-Up Area include Urban Growth Centres (UGCs), Major Transit Station Areas (MTSAs) and Regional Nodes.

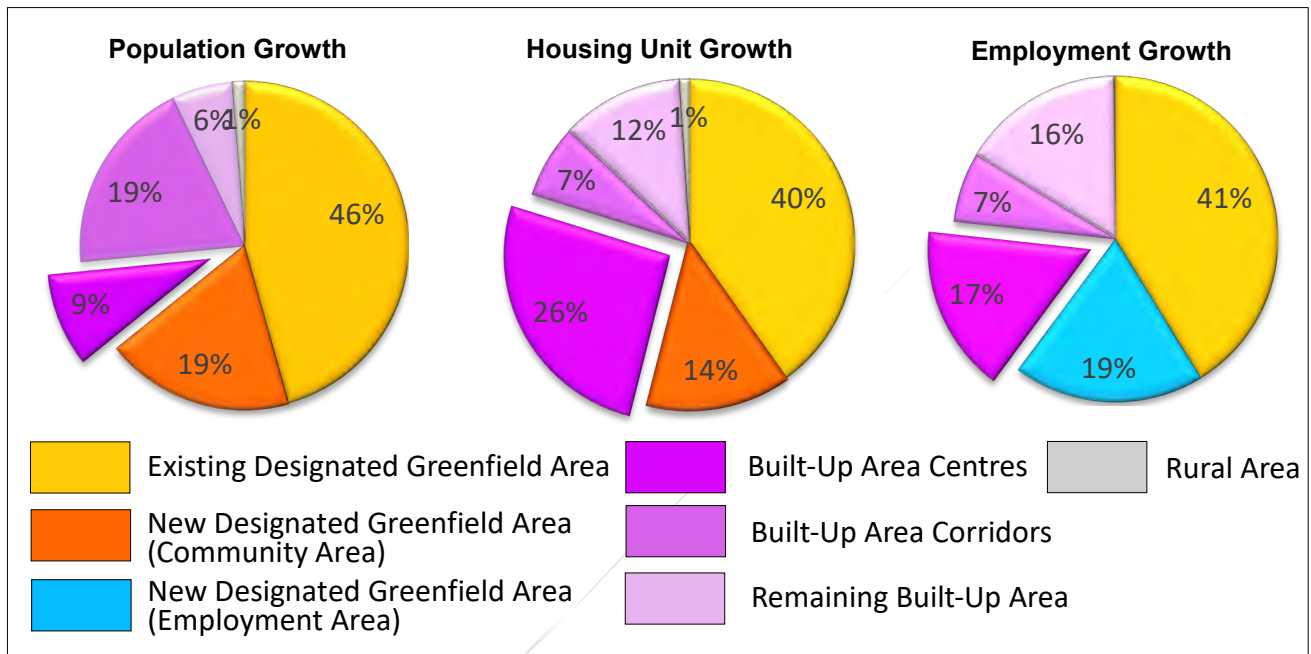


Figure 7: Shares of growth within Built-Up Area Centres

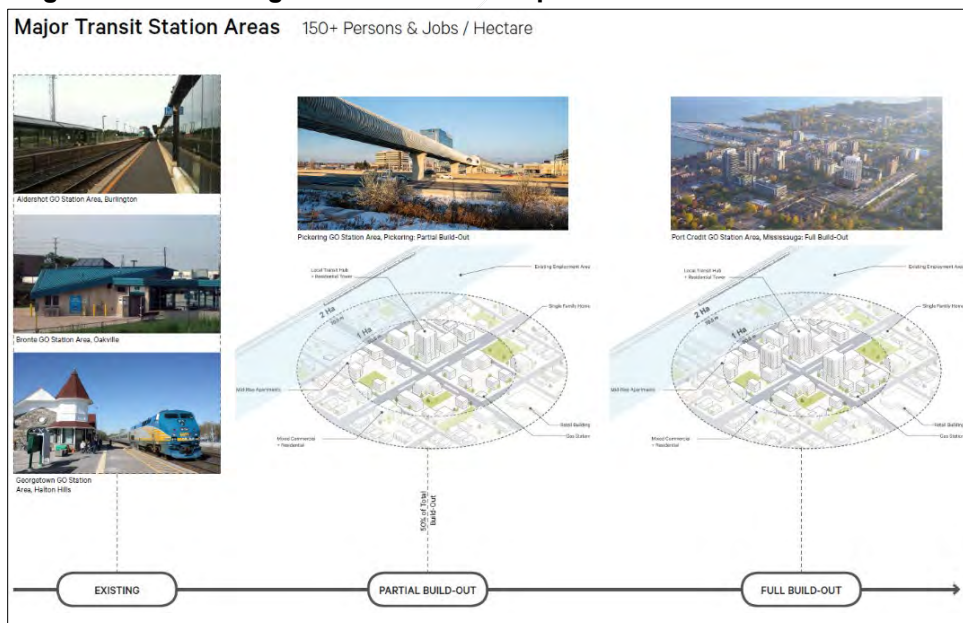


Figure 8: Partial and Full Build-Out Major Transit Station Areas
Source: SvN, 2020

Corridors

Regional Corridors are strategic growth areas identified along major roads or higher order transit corridors that are planning to accommodate a significant amount of growth.

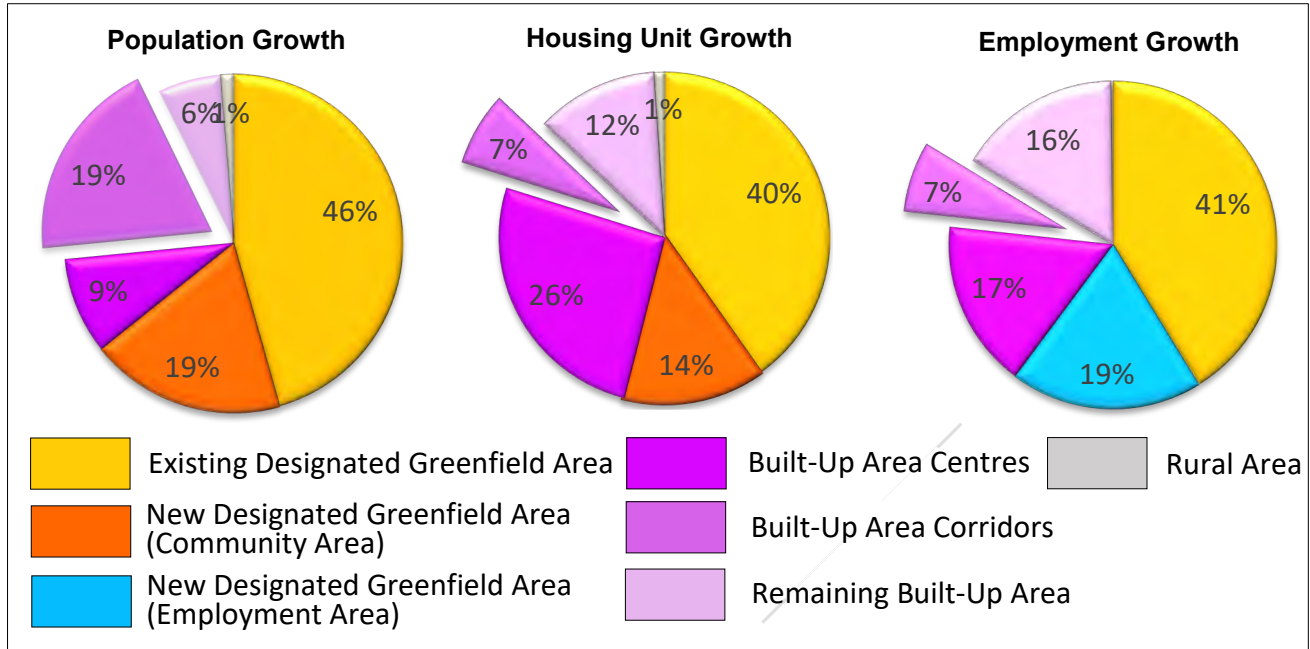


Figure 9: Shares of growth within Built-Up Area Corridors

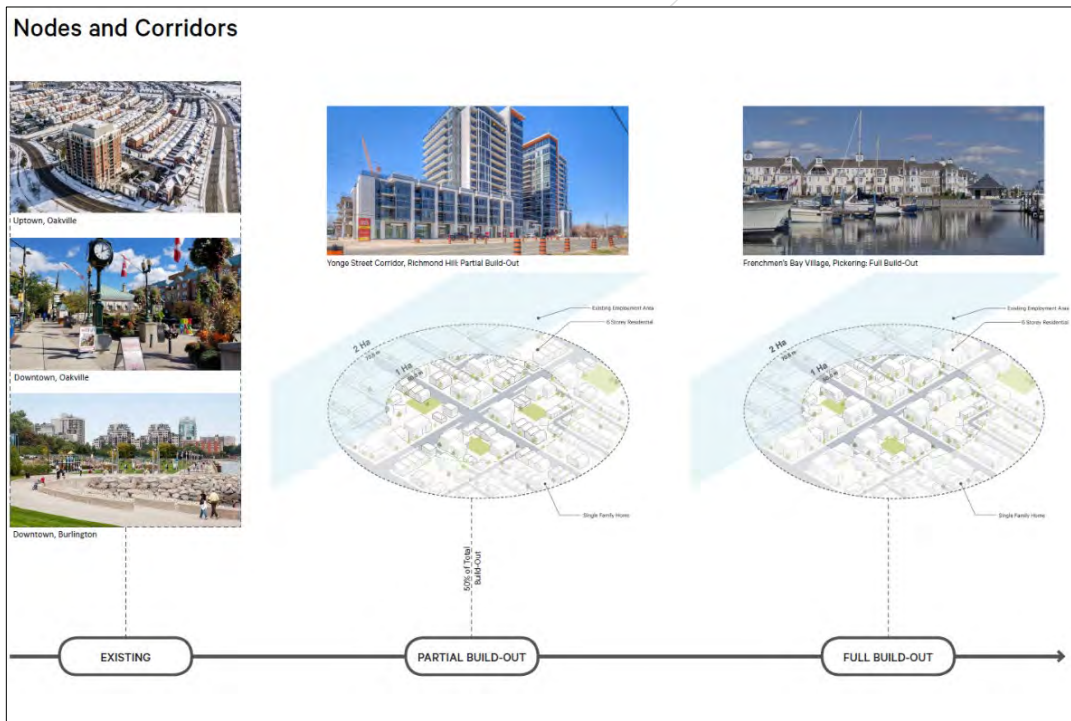


Figure 10: Partial and Full Build-Out Regional Nodes and Corridors Source: SvN, 2020

2. Existing Designated Greenfield Area

Existing Designated Greenfield Area (DGA) are those areas outside the Built-Up Area but within Halton's approved settlement area (ROPA 38). Existing Designated Greenfield Areas also include Centres which will function as focal areas for public services, and other uses which support accommodation of a significant amount of growth.

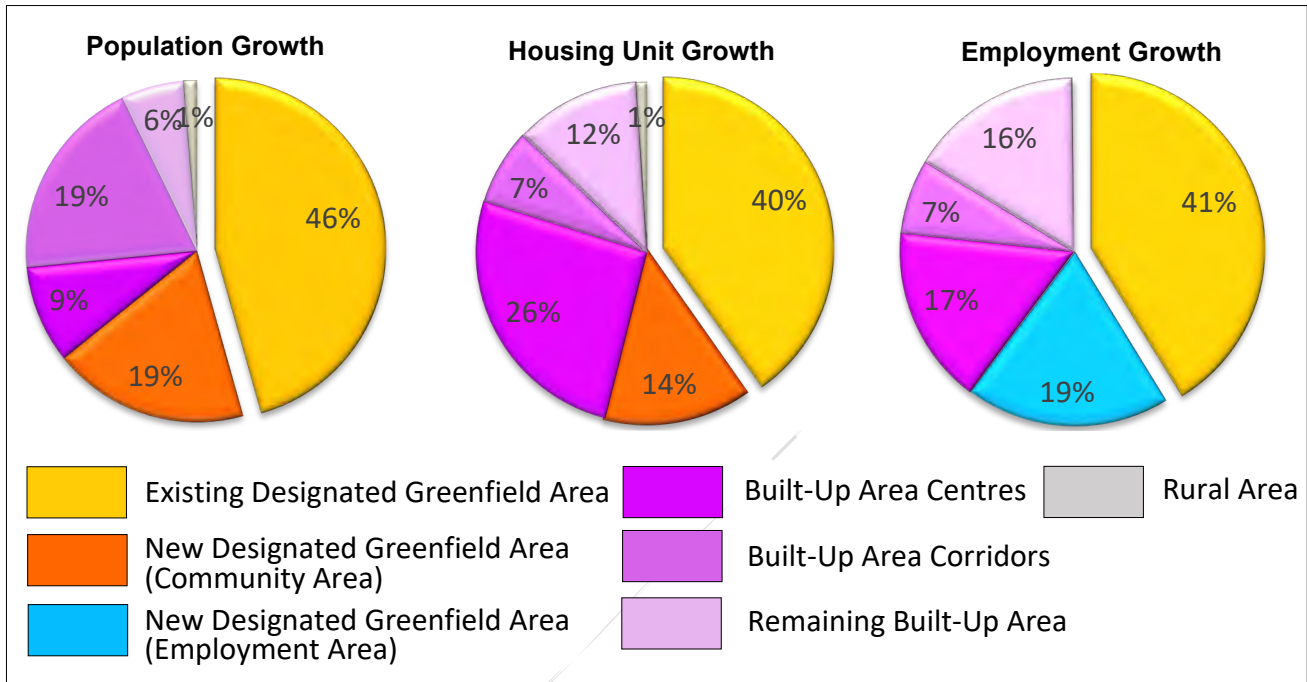


Figure 11: Shares of growth within Existing Designated Greenfield Areas

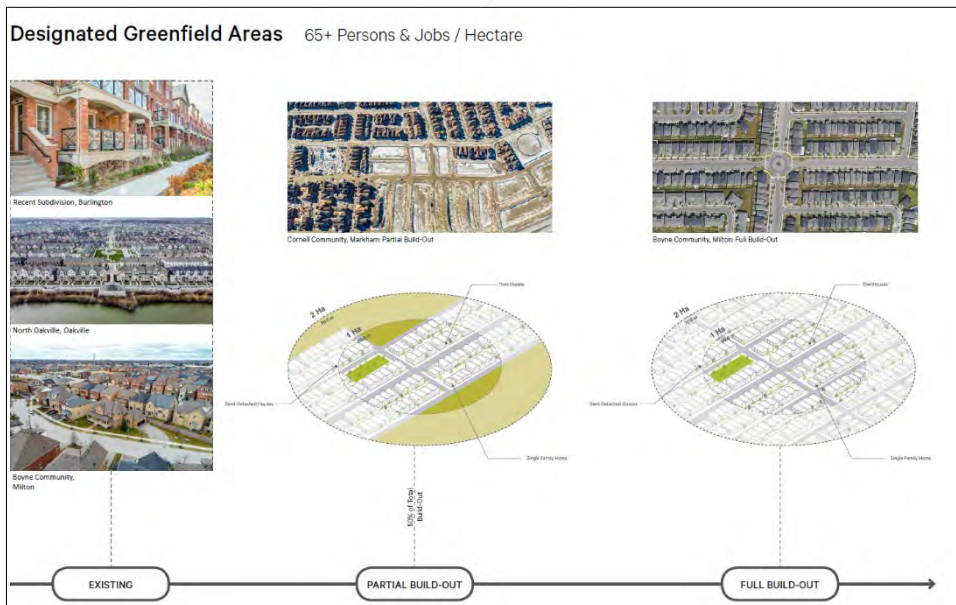


Figure 12: Partial and Full Build-Out Regional Nodes and Corridors
Source: SvN, 2020

3. New Designated Greenfield Area

New Designated Greenfield Area (DGA) are those areas outside both the Built-Up Area and Existing DGA which are now proposed to accommodate new community and employment areas under the Preferred Growth Concept.

New Community Area

New Community Areas are intended to accommodate a range of residential, commercial and institutional uses, to provide a market-based supply of ground-related housing as directed by the Province, and to accommodate important community uses (i.e. hospitals, parks), located in Milton and Halton Hills.

Additional detail is provided within Chapter 5. (Settlement Area Boundary Expansion Analysis).

New Employment Area

New Employment Areas are intended to accommodate market demand for advanced manufacturing, logistics/warehousing, and supportive uses, which require access to 400 series highways, located in Milton and Halton Hills.

Additional detail is provided within Chapter 5. (Settlement Area Boundary Expansion Analysis).

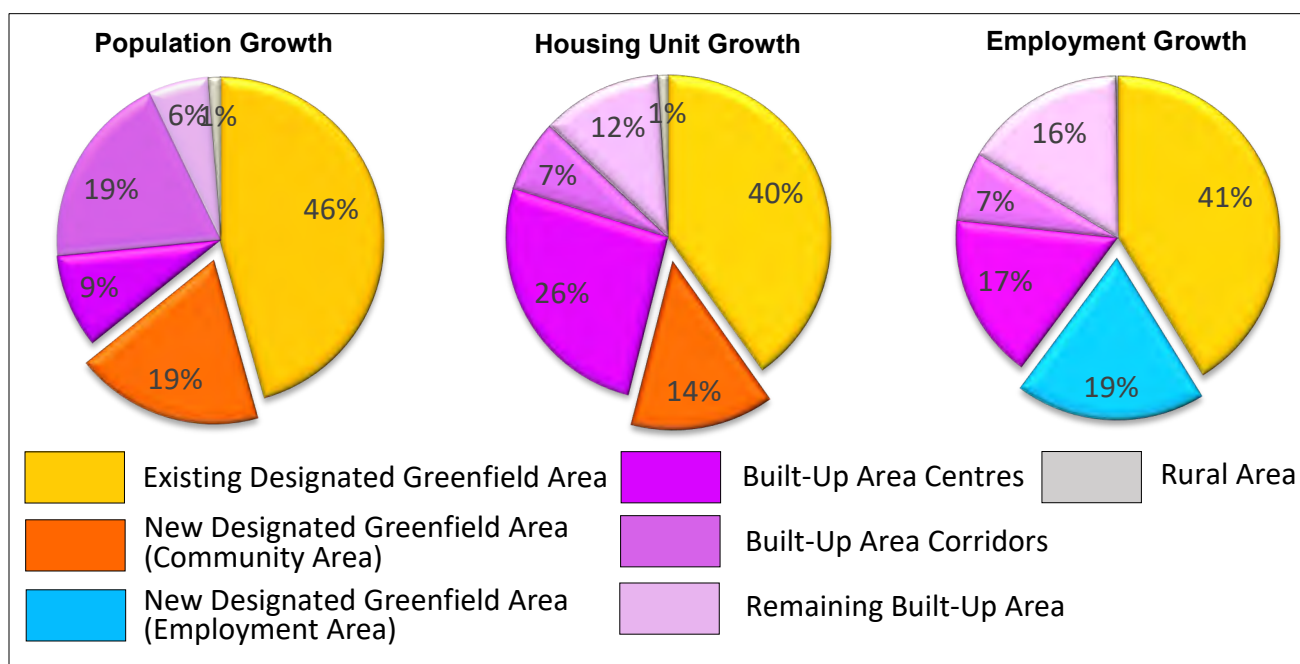


Figure 13: Shares of growth within New Designated Greenfield Areas

B. Population/Housing Growth in the Preferred Growth Concept:

The Preferred Growth Concept represents a balanced approach to accommodating population and housing growth in Halton to 2051 in accordance with the Provincial Growth Plan and Land Needs Assessment methodology:

- Over 85 per cent of new housing units directed within the existing approved settlement area boundary (i.e. Built-Up Area and existing Designated Greenfield Area), representing over 80 percent of the 2031-2051 population growth;
- A significant shift in the housing mix of the Region to more than 50 per cent apartments and less than 23 per cent single/semi-detached housing units, between 2031 and 2051;
- More than one-third of new housing units, representing one-quarter of total population growth directed to mixed use Strategic Growth Areas within the Built-Up Area, including Midtown Oakville, Downtown Burlington, Downtown Milton, and around GO stations on the Lakeshore GO Priority Transit Corridor, supporting local and Regional Urban Structures;
- Less than 14 per cent of predominantly ground-related new housing units directed to new Designated Greenfield Area, necessitating a measured urban boundary expansion.

1. Population Growth in the Preferred Growth Concept

Table 1 contains the proposed allocation of population from 2031 to 2051 under the Preferred Growth Concept, also shown on Figure 1. The allocations are based on direction of:

- Approximately 116,000 people to the Built-Up Area throughout the Region, focused predominantly in Oakville and Burlington, in Urban Growth Centres, Major Transit Station Areas and other important Strategic Growth Areas, such as Midtown Oakville, Downtown Burlington, and Uptown Oakville;
- Approximately 151,000 people to the existing Designated Greenfield Area of the Region, predominantly in Milton and Oakville, and including “densification” of Strategic Growth Areas such as the Trafalgar Urban Core and Hospital District in Oakville, and the Milton Education Village; and,
- Approximately 62,000 people to the proposed new Designated Greenfield Area in Milton and Halton Hills.

Table 11: Draft Recommendation for a Preferred Growth Concept – Population Growth

<u>Municipality</u>	Population			
	<u>2021</u>	<u>2031</u>	<u>2051</u>	<u>2031-2051 Growth</u>
Burlington	193,500	216,800	265,000	48,200
Oakville	221,500	282,700	375,000	92,300
Milton	138,500	185,600	335,000	149,400
Halton Hills	65,600	81,800	125,000	43,200
Halton Region	<u>619,100</u>	<u>766,900</u>	<u>1,100,000</u>	<u>333,100</u>

2. Housing Unit Growth in the Preferred Growth Concept

Table 2 contains the allocation of housing unit growth between 2031 and 2051 in the Preferred Growth Concept compared to the four Growth Concepts (Note: Concepts 3A and 3B do not differ for housing unit growth allocation). As shown, the Preferred Growth Concept directs 86 per cent of housing growth to the existing urban area (Built-Up Area and existing Designated Greenfield Area), and only 14 per cent of growth to new Designated Greenfield Area.

Table 12: Allocation of Housing Unit Growth (%) by Growth Concept, 2031-2051

	Concept 1: 60% Densification	Concept 2: 70% Densification	Concept 3A/3B: 80% Densification	Concept 4: 50% Intensification	Preferred Growth Concept
Built-Up Area Intensification	51%	54%	55%	50%	45%
A. BUA and Existing DGA Total	80%	90%	100%	71%	86%
B. New DGA (Urban Expansion)	20%	10%	0%	29%	14%
Total (A+B)*	100%	100%	100%	100%	100%

* Total includes less than 1% allocated to the Rural Area

C. Employment Growth in the Preferred Growth Concept:

The Preferred Growth Concept represents a balanced approach to accommodating employment growth in Halton to 2051 in accordance with the Provincial Growth Plan and Land Needs Assessment methodology:

- Over 27 per cent of employment growth in the Major Office category between 2031 and 2051, representing a significant shift towards office employment in the Region, and directed to mixed use Strategic Growth Areas within the Built-up Area, supporting local and Regional Urban Structures;
- Only 32 per cent of employment growth in the Employment Land Employment category predominantly on employment lands, accommodating in-demand advanced manufacturing, logistics/warehousing and other related employment uses, necessitating a measured urban boundary expansion;
- 40 per cent of employment growth in the Population-Related Employment category to serve the residential communities throughout the Region; and,
- Less than 1 per cent employment growth in the Rural Area of the Region.

Table 13 contains the proposed allocation of employment to 2051 under the Preferred Growth Concept, as shown on Table 7. The allocations are based on direction of:

- Approximately 57,000 predominantly Major Office and Population-Related jobs to the Built-Up Area throughout the Region, focused in Urban Growth Centres, Major Transit Station Areas and other important Strategic Growth Areas;
- Approximately 60,000 jobs to the existing Designated Greenfield Area of the Region, predominantly in Milton and Halton Hills, and including “densification” of Strategic Growth Areas; and,
- Approximately 28,000 Employment Land Employment and Population-Related jobs to proposed new Designated Greenfield Area, predominantly located along the Highway 407 and 401 corridors in Milton and the Highway 401 corridor in Halton Hills.

Appendix B provides additional summary information on employment growth by Local Municipality and Policy Area.

Table 13: Draft Recommendation for a Preferred Growth Concept – Employment Growth

Municipality	Employment			
	2021	2031	2051	<u>2031-2051 Growth</u>
Burlington	98,400	106,800	124,900	18,100
Oakville	110,800	139,300	180,100	40,800
Milton	44,500	67,900	130,100	62,200
Halton Hills	24,600	35,800	64,900	29,100
Halton Region	<u>278,400</u>	<u>349,800</u>	<u>500,000</u>	<u>150,200</u>

D. The Roles of the Local Municipalities

The Preferred Growth Concept is based on Local Plans and Priorities within a Region-wide context, and to achieve the planning objectives that result from its implementation each Local Municipality must perform an important but different role. The allocation of growth is described below and further highlighted in Table 6:

- Oakville must accommodate 28 per cent of population growth and 27 per cent of employment growth within its mixed use, transit-supportive nodes and corridors, both in the Built-Up Area south of Dundas Street, and in the existing Designated Greenfield Area north of Dundas Street;
- Burlington must accommodate 15 per cent of population growth and 12 per cent of employment growth within its mixed use, transit-supportive nodes and corridors within the Built-Up Area;
- Milton must accommodate 44 per cent of population growth, including 57 per cent of the ground-related housing (i.e. singles/semis/rows), and two-thirds of the new Community Area land, as well as 41 per cent of employment growth, and 58 per cent of new Employment Area land;
- Halton Hills must accommodate 13 per cent of population growth, including 17 per cent of the ground-related housing, and one-third of the new Community Area land,

as well as 20 per cent of employment growth, and 32 per cent of new Employment Area land.

Table 14: Draft Recommendation for a Preferred Growth Concept: Shares of Growth by Local Municipality

Municipality	Population(%): 2031-2051	Housing (%): 2031-2051	Employment (%): 2031-2051
Burlington	15%	19%	12%
Oakville	28%	32%	27%
Milton	44%	37%	41%
Halton Hills	13%	12%	20%
Halton Region	100%	100%	100%

E. Development Phasing

Phasing of development is established to ensure the logical and orderly development of urban areas in a sustainable and cost-effective manner. Policies also call for this phased growth to contribute to the creation of complete communities while ensuring that new urban expansion does not affect the achievement of intensification targets.

The Regional Official Plan allocates the growth forecasts to 5-year periods out to 2031, differentiating growth in new Designated Greenfield Areas from intensification (growth in the Built-Up Area) for the Region as a whole as well as for each local municipality.

The build out of the Designated Greenfield Area to accommodate growth to 2031, delineated by the Sustainable Halton Plan, is behind the schedule anticipated when the Plan was prepared. Among the reasons why the build out of these lands and growth is currently behind the pace anticipated, include:

- Densities that are being achieved in the current DGA are higher than originally anticipated;
- The recovery from the slowdown in population growth and urban development initially associated with the recession of 2008 took several years longer than had been anticipated; and



- Secondary Plans that provide for the development of Designated Greenfield Areas now have to be supported by detailed technical studies, therefore requiring additional time for planning of new growth areas.
- In preparing the Draft Land Needs Assessment for the 2031-2051 growth, it is assumed all undeveloped Designated Greenfield Area identified through the Sustainable Halton Plan (and the earlier Halton Urban Structure Plan) will be nearing full developed prior to any development occurring within any new urban expansion areas. It is anticipated that these lands can reasonably satisfy greenfield demand into the 2031-2041 period, and the Preferred Growth Concept has been based on these lands only near build-out around 2036.

5. Settlement Area Boundary Expansion Analysis

As concluded in the Land Needs Assessment discussed earlier in this document, the Preferred Growth Concept proposes an urban expansion that includes:

- 1,120 gross ha (net of the Natural Heritage System) new Community Area urban expansion for residential and related community uses; and,
- 1,070 gross ha (net of the Natural Heritage System) new Employment Area urban expansion for employment uses.

This proposed new urban area is:

- Located predominantly to the south and east of the Milton Urban Area, and as a southerly expansion to Georgetown for new Community Area; and,
- Located predominantly along the Highway 407 and 401 corridors in Milton and the Highway 401 corridor in Halton Hills for new Employment Area.

Figure 6 is a map showing conceptually the Preferred Growth Concept, including the proposed new Community Area and Employment Area. Table 15 compares the urban area expansion of the Preferred Growth Concept to the five growth concepts, indicating that by comparison, it represents a measured urban expansion between Growth Concepts 1 and 2.

Table 15: Urban Area Expansion by Growth Concept

	Concept 1	Concept 2	Concept 3A	Concept 3B	Concept 4	Preferred Growth Concept
New Community Area (ha)	1,460	730	0	0	2,080	1,120
Milton/Halton Hills split (%)	49:51	55:45	N/A	N/A	34:66	64:36
New Employment Area (ha)	1,170	1,100	980	0	1,220	1,070
Milton/Halton Hills split (%)	42:58	54:46	54:46	N/A	45:55	62:38
Total Urban Expansion (ha)	2,630	1,830	980	0	3,300	2,190

Based on the conclusions of the LNA and in accordance with the Growth Plan, settlement area boundary expansion assessments were undertaken to inform the location of proposed new Urban Area under the Preferred Growth Concept.

A. Agricultural Impact Assessment

The preparation of an agricultural impact assessment (AIA) is a requirement of Provincial policy when considering settlement area boundary expansions. The purpose of the AIA is to document the existing agricultural character of the PGC, identify potential existing (or future) agricultural impacts, and provide avoidance or mitigation measures as necessary to offset any potential or existing impacts. It should be noted that the AIA was based on draft PGC mapping, which has now been superseded by updated PGC mapping – with the only significant changes in a portion of the proposed new Employment Area in Halton Hills. When the implementing amendment is brought to Council for consideration, it will be accompanied by a final AIA containing updated PGC mapping and analysis, where appropriate.

The AIA contains:

- An explanation of the AIA methodology;
- A review of relevant Provincial, Regional and Local Municipal land use planning policies;
- An assessment of the agricultural resource potential of the PGC area, including physical characteristics, existing land use, agricultural investment, Minimum Distance Separation (MDS1) analysis, fragmentation, CLI soils, and other data sources;
- Resource allocation and conflict potential; and,
- Summary and conclusions.

Major conclusions of the AIA are:

- Any urban development in the PGC area will result in impacts on Class 1 to 3 (Canada Land Inventory) soils;
- The PGC area and surrounding lands are considered Prime Agricultural Land;

- The PGC land use consists of a variety of uses including: built up, common field crop, forage/pasture, market garden, nursery stock, open field, orchard, planted, plowed, pond, recreation, scrubland, small grains, unknown and woodlands;
- There is no investment in irrigation or landforming for agricultural purposes in the PGC or surrounding areas;
- There are no agricultural services within the PGC, but agricultural services exist in the surrounding area;
- Land fragmentation represents a major impact to the long-term viability of agriculture in the areas surrounding the PGC area, and is typical of areas under pressure from non-agricultural land uses

In general, the AIA concludes that the proposed future development of the PGC would result in the loss of prime agricultural lands, but should have minimal impact on agriculture in the areas surrounding the PGC.

B. Natural Heritage/Water Resources Assessment

The purpose of the Natural Heritage and Water Resources Assessment is to provide a summary of Halton's natural heritage system (NHS) and water resource features and areas within the PGC, reflect on the PGC and Halton's Planning Vision for the NHS, and clearly articulate how the NHS, water resource features and areas have been considered through selection of the PGC and how they will continue to be considered through the planning process. Major sections of the assessment are: natural heritage summary, water resource features and areas summary, preliminary constraints analysis, reflection back on vision for Halton's Natural Heritage Planning, and guidance for future environmental studies in support of land use planning, including system and feature functions, interactions and interdependencies (including climate change), impacts assessment, avoidance and mitigation, enhancement and restoration, and monitoring.

The Natural Heritage and Water Resources Assessment observes that while the PGC is land consumptive (~2,836 ha including the Natural Heritage System) it performs well at avoiding Key Features and reducing potential impacts to the RNHS when compared against early concepts being considered demonstrating that in selection of the PGC, effort was expended to minimize potential impacts to the NHS where possible.

Similarly, the PGC performs well at avoiding and/or minimizing capture of water resource features and areas. Of specific note, effort to avoid key hydrologic areas in the final PGC can be seen in the minimized area contained therein.

With respect to a preliminary constraints analysis, the PGC performs very well and better than any of the original growth concepts, with respect to areas representing High Constraint, Medium Constraint or Low Constraint in the assessment.

The Natural Heritage and Water Resources Assessment recognizes that the interactions and interdependencies of natural heritage features, their functions, water (ground and surface), and other factors are complex. It is acknowledged that for the PGC, additional subwatershed study through Area-Specific Planning will be required to further inform their management as part of the permanent landscape in Halton Region. The PGC and discussion provided in the assessment report highlight these interactions and sets out preliminary guidance for their further assessment and approaches to long-term management through Area-Specific Plans that will support Halton Region's Vision and the goal and objectives of the NHS.

C. Mineral Resources Aggregate Assessment

The Mineral Aggregate Resources Assessment, addressed through Appendix I to the Growth Concepts Discussion Paper, reviewed the Provincial policy framework requiring the protection of mineral aggregate resource areas contained in the Growth Plan (2019), and the Provincial Policy Statement (2020). It also summarized pertinent information from Ontario Geological Survey reports, and the analysis conducted as part of the Sustainable Halton exercise, and reflected in the Regional Official Plan. Finally, the report contained mapping and tabular information to support a comparative analysis of the four Growth Concepts with respect to their relative impact on mineral aggregate resource areas (i.e. shale resources).

While retention of areas of aggregate resource potential is an important factor in the determination of the Preferred Growth Concept, it must be evaluated against other planning priorities identified by the Province. The Province's 1997 Non-Renewable Resources Training Manual (1997 Manual) does provide some insights on how to deal with preservation of aggregate resources as a long term public interest. In this regard, the 1997 Manual states the following: Before development is approved in or adjacent to a known deposit area, it must be demonstrated the development meets a high level of public need and that alternative locations for the proposed development are not available. An example of a high level of public need would be additional lands needed to accommodate

significant population and employment growth. The Preferred Growth Concept proposes an urban expansion comprising 2,190 ha, which would consume 620 ha of Identified Mineral Resource Areas as shown on Map 1F of the Regional Official Plan, preserving the remaining balance of 2,200 ha.

D. North Aldershot Policy Area Assessment

The North Aldershot Policy Area Urban Expansion Assessment and North Aldershot Water and Wastewater Constraints and Opportunities Assessment, addressed through Appendices J and J1 respectively, to the Growth Concepts Discussion Paper, reviewed the Provincial policy framework regarding growth management, water and wastewater servicing, and protection of natural heritage and water resources, among other matters as contained in the Growth Plan (2019), and the Provincial Policy Statement (2020). It also summarized information regarding Halton's historical approach to growth management, including analysis conducted as part of the Sustainable Halton exercise, and reflected in the Regional Official Plan. Finally, the report contained mapping and tabular information to support consideration for how where growth could be accommodated in the North Aldershot Policy Area.

As summarized in Report No. LPS18-21, the review concluded that urban expansion within the North Aldershot Policy Area as a whole is not supportable given the overriding policy considerations of the Growth Plan, 2019. This conclusion was based on considerations such as the prevalence of significant and sensitive natural heritage features and functions; the challenge of optimizing major infrastructure investment to service very limited and dispersed pockets of developable land; and, the challenge of achieving a complete community through more compact urban form and a complete range and mix of housing.

In addition, upon further analysis undertaken during the development of the Preferred Growth Concept, it has been concluded that any other areas contiguous to the existing settlement boundary that may have limited potential for redevelopment, are in comparison to the areas identified in the Preferred Growth Concept, not appropriate for urban expansion given considerations such as feasibility of servicing, protection of the natural heritage system and water resources, and financial viability. It should be noted that existing, historical development approvals will be taken into consideration in the North Aldershot Policy Area.

6. Climate Change

In 2019, Regional Council unanimously approved a Notice of Motion that declared a Climate Change Emergency for the purposes of deepening the Region's commitment to protecting and improving resiliency of the economy, environment and community from climate change. The Regional Official Plan Review has long-held objectives related to sustainability and climate change that serves as a strong foundation for defining future growth and development.

Building on this foundation, the Preferred Growth Concept is based on a Greenhouse Gas (GHG) Emissions modelling exercise that demonstrates it minimizes greenhouse gas emissions compared to a baseline scenario, thereby addressing the Climate Change Emergency declared in by the Region and its Local Municipalities.

A. Climate Change Lens

The Preferred Growth Concept was modelled for energy use and GHG emissions production over the next 30 years, as build-out occurs. The modelling determined energy and GHG emissions outlooks across all community sectors, including buildings, transportation, energy generation, waste and wastewater, industry, agriculture, and natural systems. Modelling results show that the Preferred Growth Concept minimizes greenhouse gas emissions compared to a baseline scenario, thereby addressing the Climate Change Emergency declared by the Region and its Local Municipalities. Guiding development according to the Preferred Growth Concept thus contributes to the Region's GHG emissions reduction commitments under its Climate Change Emergency declaration.

Climate change is an important consideration in every growth management decision as urban structure locks in energy use and related emissions for decades to come. Such decisions also affect community resilience and the ability of communities to adapt to climate change impacts, such as extreme weather. The Provincial planning framework requires inclusion of climate change mitigation and adaption considerations in the IGMS process, as discussed in the Growth Concepts Discussion Paper. Halton's planning framework, based in sustainable planning, provides a strong basis for climate change policies through the goals of compact urban form, complete communities, and transit-supportive development.

The Preferred Growth Concept builds on existing Regional Official Plan policies and

objectives and addresses climate change mitigation through energy and GHG emissions reductions by planning for complete communities and compact urban form. The Preferred Growth Concept directs more than 80% of population growth and almost 80% of employment growth between 2031 and 2051 into the existing Built-Up Area in line with the approved Regional Urban Structure. This represents an ambitious shift when compared to standards included in the current Regional Official Plan and greater reliance on accommodating growth in apartment buildings as a means to optimize the use of land in the existing urban area. In addition, the planned density of Designated Greenfield Areas is 65 people/jobs per hectare, with a planned mix of land uses and a mix of housing type, tenure, and affordability to encourage the workforce to live within the community.

This concept supports existing and planned transit, directing development to strategic growth areas including those around GO stations and other planned higher order transit corridors. The concept reduces the amount of new road required as much as possible by proposing new urban areas be contiguous with existing and planned urban areas in Milton and Halton Hills. Climate change mitigation goals include reduced travel distances between home and everyday destinations and to provide jobs within communities to reduce commuting.

The Preferred Growth Concept addresses climate adaptation by minimizing the amount of new urban land to be designated, thus limiting the size of the Natural Heritage System to be brought into the urban area, while limiting the loss of agricultural land to support farming and food security. Halton and Local Municipalities will maintain strong urban boundaries to limit urbanization of rural lands and ensure that over 50 per cent of the Region remains protected for Natural Heritage. Additional adaptation measures are discussed in the Natural Heritage Assessment, Agricultural Impact Assessment, and future impacts addressed through water/wastewater system planning.

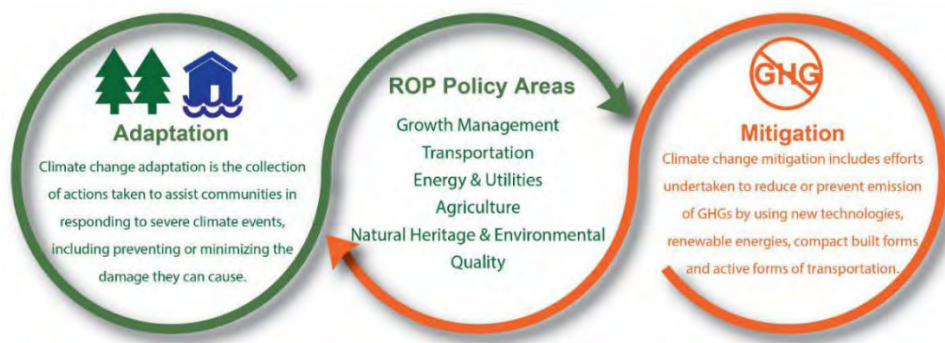


Figure 14: Adaptation and mitigation through the Regional Official Plan
Source: Climate Change Discussion Paper, Regional Official Plan Review, June 2020

B. Greenhouse Gas Emissions Modelling/Assessment

Appendix E includes the Halton Region Growth Concepts GHG Emissions Analysis. As discussed in the Climate Change Discussion Paper for the Regional Official Plan Review (June 2020), almost 90 per cent of all GHG emissions in Halton are estimated to be from the transportation (50 per cent) and buildings (39%) sectors. The GHG emissions modelling exercise provided a comparative assessment of growth choices by determining GHG emissions produced over the next 30 years. The study confirms that complete, compact communities have more energy efficient homes and less personal vehicle transportation is required, resulting in fewer GHG emissions. Emissions from the existing Built-Up Area are included in the model but the study's focus was on comparing growth concepts, where the Preferred Concept was found to emit a moderate amount of cumulative emissions compared to the other growth concepts, with the exception of the Growth Concept 3B not to expand the urban boundary. While Growth Concept 3B was evaluated as the concept that generates the least amount of community GHG emissions, as part of its evaluation it did not score well in addressing many other important community planning and housing objectives. The study highlights that while technological advancement will have a substantial role in reducing GHG emissions, land use patterns do impacts GHG emissions.

Climate change considerations going forward will require policies and implementation approaches, which work in concert with the Preferred Growth Concept, to address detailed local area planning to guide retrofitting and redevelopment of the existing Built-Up Area and planning of Existing Designated Greenfield Area and New Designated Greenfield Area

7. Technical Studies of the Preferred Growth Concept

Infrastructure is critical to the development of the IGMS and the Preferred Growth Concept. The Region must consider the capacity of its existing water, wastewater, and transportation infrastructure and planned capital improvements in order to identify the potential infrastructure/system improvements and their associated fiscal impacts based on the growth forecasts as outlined for the Preferred Growth Concept.

This section contains a summary of the results of the infrastructure technical assessments prepared as part of the development of the Preferred Growth Concept. The infrastructure technical assessments were based on the assumptions and growth allocations underpinning the Draft Preferred Growth Concept. As there have been updates to the Preferred Growth Concept presented in this report, the technical assessments are also supported by opinion letters that provide a qualitative assessment of potential findings related to the Preferred Growth Concept as recommended. The recommendations made in this section will be confirmed through final assessments undertaken in concert with the amendment implementing the Preferred Growth Concept. The technical assessments are summarized below and can be found in full in Appendices F-H of this report.

A. Water and Wastewater Assessment

A range of water and wastewater infrastructure, including treatment plants, storage facilities, pumping stations, and pipe networks were analyzed for the purposes of the Draft Preferred Growth Concept. For this analysis, the planned 2031 capacities of infrastructure were compared to the projected 2041 and 2051 growth requirements to identify the impact the Preferred Growth Concept population and employment numbers could have on the existing and planned water and wastewater infrastructure. This provides a high-level understanding of opportunities and constraints in Halton's water and wastewater systems.

Based on the opportunities and constraints identified in this analysis, conceptual water and wastewater servicing strategies were developed. The conceptual servicing strategies accommodate the Draft Preferred Growth Concept population and employment estimates and provide a reasonable basis for infrastructure cost estimates. It is important to note that the conceptual servicing concept and associated costs are subject to refinement and detailed planning through the Region's next infrastructure master plan update.

For further detail regarding all aspects of this assessment, see Section 4 and Appendix F of this report.

1. Background Studies

The water and wastewater assessments undertaken to support the Preferred Growth Concept build upon a series of water and wastewater-related studies which defined the Regional Water and Wastewater Capital Program to 2031. These include:

- Sustainable Halton Water and Wastewater Master Plan
- 2017 and 2022 Development Charges Updates

2. Technical Analysis and System Impact

Analysis of the 2041 and 2051 water and wastewater infrastructure needs for the Draft Preferred Growth Concept is based on the assessment of the existing infrastructure components' ability to accommodate the proposed growth. The results of the analysis are summarized below:

- The lake-based water system has sufficient capacity to support growth to 2041, but requires additional capacity to support growth to 2051.
- The Acton and Georgetown groundwater systems have sufficient capacity to service projected growth to 2051. However, the Milton groundwater system requires a capacity upgrade or other water servicing solution post-2031 to support significant growth in the groundwater service area.
- Three water pressure zones were identified as having deficiencies in water storage capacity to the 2041 and 2051 planning horizons. Likewise, five water pressure zones were identified as having deficiencies in water pumping capacity to the 2041 and 2051 planning horizons.
- The Acton and Oakville SE WWTPs have sufficient capacity to service growth to 2051. However, the planned Mid-Halton WWTP expansion, Oakville SW, and Skyway WWTPs will provide capacity to service growth to 2041 but will require capacity expansions or other measures to reduce or manage flows at the plants to support growth beyond 2041.
- Wastewater pumping station deficiencies were identified for two existing pumping stations. In addition, two proposed/planned WWPSs will require adjustments to their planned capacities.

- Intensification in the PGC requires 4.6km of watermain upgrades from 2031 to 2041 and 7.1km of upgrades from 2041 to 2051. Similarly, 12.7km of sewer pipes see deficiencies from 2031 to 2041 with an additional 8.6km requiring upgrade from 2041 to 2051. Extension of the water and wastewater network will also be required to service greenfield areas such as Halton Hills / Georgetown, Halton Hills 401 Corridor, and South Milton.

3. Water and Wastewater Servicing Costs

A cost assessment was completed to determine the high-level cost of the potential water and wastewater capital improvements required to service growth to 2051 based on the above analysis as well as the high-level servicing strategies identified in the technical report. Given the similarity of growth forecasts for each of the concept, there is little variation on the cost requirements to service the growth between the growth concepts. All concepts show similar fiscal outcomes that are within a 1% difference as noted in Appendix F to the Growth Concepts Discussion Paper. Table 10 summarizes the cost assessment for water and wastewater infrastructure, and Table 11 presents a high-level cost for the operation and maintenance of water and wastewater infrastructure from 2031-2051.

Table 16: Summary of Cost Assessment for W/WW Infrastructure to Service PGC

Period	2031-2041 (2021\$)	2041-2051 (2021\$)
Water		
WTP	\$94M - \$201M	\$107M - \$228M
Storage	\$35M - \$75M	\$52M - \$110M
Pumping	\$40M - \$85M	\$92M - \$196M
Linear	\$38M - \$81M	\$41M - \$89M
Wastewater		
WWTP	\$279M - \$598M	\$62M - \$132M
Pumping	\$67M - \$144M	\$79M - \$169M
Linear	\$67M - \$143M	\$132M - \$289M
Total Capital Cost	\$669M – \$1,326M	\$564M - \$1209M

Table 17: Summary of O&M Cost for W/WW Infrastructure to Service PGC

Period	2031-2041 (2021\$)	2041-2051 (2021\$)
Water	\$7M - \$16M	\$48M - \$102M
Wastewater	\$28M - \$60M	\$78M - \$168M
Total	\$35M - \$76M	\$126M - \$270M

4. Future Refinements

Due to the iterative nature of the IGMS process, including ongoing consultations between the Region and its local municipalities, the Preferred Growth Concept has undergone refinements since the water and wastewater assessment was conducted. These include adjustments to the estimates of the Concept's population and employment growth, especially in their distribution across local municipalities and policy areas.

A professional opinion has been provided as an addendum to the water and wastewater technical study (found in Appendix F), outlining impacts that the Preferred Growth Concept population and employment numbers changes may have on the assessment's findings.

It is important to note that the technical study findings are conceptual and define a snapshot in time. The recommendations made in this section will be confirmed through additional analysis undertaken for the final Council-endorsed Preferred Growth Concept and during the water and wastewater master plan update, which is scheduled to start in 2022.

B. Transportation Assessment

For the transportation assessment, the planned 2031 transportation system (roadways, transit) capacity was compared to the projected 2041 and 2051 growth requirements in order to identify the impact the Preferred Growth Concept could have on the planned transportation system. Similarly, the Preliminary Recommended Transit Priority Corridor Network from the Defining Major Transit Requirement Study in Halton (2019) was tested against the same 2041 and 2051 growth requirements to identify transit improvements required to accommodate the Preferred Growth Concept.

Based on the opportunities and constraints identified as part of the analysis, a future transportation servicing concept was developed that meets the requirements of the Preferred Growth Concept. Infrastructure cost estimates are based upon this servicing concept. It is important to note that this analysis is representative of a high-level transportation strategy to support the Draft Preferred Growth Concept. The strategy discussed herein is based on opportunities and constraints and is conceptual only. Further, the strategy and associated costs developed for the analysis of the Preferred Growth Concept are subject to refinement and more detailed planning through the Region's next Multi-Modal Transportation Master Plan to 2051.

For further detail regarding all aspects of this assessment, see Appendix G of this report.

5. Background Studies

A series of transportation-related studies inform the context for the assessment of the Preferred Growth Concept. These include:

- Transportation Master Plan (TMP) (2031) – The Road to Change (2011)
- Halton Region Active Transportation Master Plan (2015)
- Mobility Management Strategy for Halton (MMS) (2017)
- Defining Major Transit Requirements in Halton Region (DMTR) (2019)

6. Technical Analysis and System Impact

The analysis of the 2041 and 2051 transportation infrastructure needs for the draft Preferred Growth Concept was based on two assessments: transportation infrastructure and transit. Travel demand needs were assessed through the regional transportation network performance, at the screenline level, and the ability of the Regional transportation network to accommodate travel demand through that screenline. Deficient screenlines were reviewed in further detail to assess capacity improvement opportunities for Regional and local roads. For the transit analysis, the Transit Priority Corridors were analyzed by comparing passenger demand in the peak hour along the corridor to potential capacity of future service.

The potential transportation system improvements are summarized below:

- In south Halton, an increase in transit service (enhanced frequencies and larger vehicles) along Dundas Street is a possible solution to address identified deficiencies.
- In addition to transit improvements, Ford Drive would need to be widened to six lanes between Royal Windsor Road and the QEW by 2041. Ninth Line would also need to be widened to six lanes between the QEW and Dundas Street by 2051.
- In mid-Halton, all the roadways that make up these screenlines are already at six lanes in cross-section and have been identified as a Priority Bus Corridor by 2041 based on the DMTR Study. Because of the existing six lane cross-section, the deficiencies must rely on a transit solution or operational improvements, for example a reversible lane.
- Downtown Milton requires capacity improvements by 2051. Within the ability of the Region or Milton, there are no reasonable options to address the potential

transportation demand. System performance could be improved to some degree, primarily through operational improvements and enhanced transit.

The above improvements are conceptual and will be subject to further enhancement and refinement through the upcoming Multi-Modal Transportation Master Plan to 2051. Assessing the transportation system performance at each planning horizon finds that even with the inclusion of the above listed potential recommendations, the regional transportation system will mature by 2041 and that primarily high-order transit services, need to be primary considerations beyond this timeline.

7. Transportation Servicing Costs

A preliminary high-level cost analysis was completed for each of the potential road infrastructure and transit improvements required to service growth to 2051. The preliminary high-level cost methodology is consistent with the previous master planning cost estimating approach. Given the similarity of growth forecasts for each of the concept, there is little variation on the cost requirements to service the growth between the growth concepts. All concepts show similar fiscal outcomes that are within a 1% difference as noted in Appendix F to the Growth Concepts Discussion Paper.

Table 12 presents a summary of preliminary high-level cost analysis for road improvements suggested by 2051, as outlined in the previous section, to service the Preferred Growth Concept.

Table 18: Summary of Increase in Road Capital Costs to Service Preferred Growth Concept

Potential Solution*	Preliminary High-Level Cost** (2031 to 2051) (2021\$)
Ford Dr – Royal Windsor Dr to QEW (widen to 6 lanes)	\$32.3M to \$68.3M
Ninth Line – QEW to Dundas (widen to 6 lanes)	\$17.6M to \$37.8M
Derry Rd – Highway 407 to Trafalgar Rd (Reversible Lane)	\$9.24M to \$19.8M
Derry Rd – Trafalgar Rd to RR25 (Reversible Lane)	\$21.2M to \$45.5M

**Subject to undertaking of transportation master plan and Class Environmental Assessment process*

***Reflects total incremental costs for the 2031 to 2051 period*

Table 13 presents the preliminary high-level costing for the transit component of the transportation system.

It is important to note the preliminary high-level costs presented below are from 2031 to 2051 and are in addition to the 2031 cost estimate recommendations from the DMTR Study. As presented in the DMTR Study, the Transit Priority Corridor Networks includes \$261M (2016\$) in new transit infrastructure by 2031, In addition to infrastructure costs, transit fleet requirements in the range of \$117M (2016\$) have also been allocated by 2031 and approximately \$39M (2016\$), per year, to cover Operations and Maintenance (O&M) costs to 2031. These 2016 costs were adjusted to current values. The table below represent the incremental costs to the regional capital and operating programs.

Table 19: Summary of Increase in Transit Costs to Service Preferred Growth Concept

Preferred Growth Concept*	2031 to 2051** (2021\$)
Capital	\$127M to \$272M
O&M	\$21.7M to \$46.5M

**Costs include the recommendations per the DMTR Study in addition to the recommendations suggested in this analysis*

***Reflects total incremental costs for the 2031 to 2051 period*

8. Future Refinements

Due to the iterative nature of the IGMS process, including ongoing consultations between the Region and its local municipalities, the Preferred Growth Concept has undergone refinements since the transportation assessment was conducted. These include adjustments to the estimates of the Concept’s population and employment growth, especially in their distribution across local municipalities and policy areas.

It is important to note that the technical study findings are conceptual only and define a snapshot in time based on opportunities and constraints. The recommendations made in this section will be confirmed through final assessments undertaken in concert with the implementation of the Preferred Growth Concept through Regional Official Plan Amendment No. 49. A professional opinion has been provided as an addendum to the transportation technical study (found in Appendix G), outlining impacts that the Preferred Growth Concept population and employment numbers changes may have on the assessment’s findings.

Further as noted, the strategy, recommendations and associated costs developed for the analysis of the Preferred Growth Concept are subject to refinement and detailed planning through confirmation of the final Council-endorsed Preferred Growth Concept and the Region’s next Multi-Modal Transportation Master Plan update.

C. Fiscal Impact Analysis

The fiscal impact of growth is of utmost importance to the Region and the IGMS process. The planning policy regime in Ontario requires that planning for development occurs in a way that promotes the financial well-being of local governments.

As part of the IGMS Preferred Growth Concept Report, a fiscal impact analysis of the Preferred Growth Concept has been undertaken. The analysis is used to assess the long-term financial implications to the Region and local municipalities of providing services and infrastructure to 2051, including the infrastructural upgrades suggested in both the water and wastewater assessment and the transportation assessment outlined above. The recommendations made in this section will be confirmed through final assessments undertaken in concert with the amendment implementing the Preferred Growth Concept. A professional opinion has been provided as an addendum to the Fiscal Impact Assessment (found in Appendix H), outlining impacts that the Preferred Growth Concept population and employment numbers changes may have on the findings.

A number of key overarching assumptions, including those related to net operating costs, growth related capital costs, and asset management are used across the analysis of all four local municipalities and the Region. For detailed information related to these assumptions and the assessment more generally, see Appendix H.

1. Tax Revenue Assumptions

Although there is an inherent cost of growth based on rules set out in the DCA, it is assumed Region and local municipal up-front costs for growth related infrastructure is to be fully funded from development charges. However, operating costs and future replacement of these assets will need to be funded largely from tax revenues. In this analysis, tax revenues are a direct function of assessment growth. As the Region and local area municipalities continue to grow, it is expected that the assessment base will also grow to 2051.

Table 14 below sets out the assessment per unit assumptions. It is important to note that the assessment remains the same throughout the forecast period and thus assumes a similar style of building types to 2051 (e.g. the size and number of rooms within an apartment building).

Table 20: Average Weighted Assessment per Residential Unit

Residential	Burlington	Oakville	Halton Hills	Milton
Singles/Semis (Low Density)	\$740,000	\$1,210,000	\$730,000	\$590,000
Multiples (Medium Density)	\$450,000	\$560,000	\$450,000	\$400,000
Apartments (High Density)	\$380,000	\$460,000	\$300,000	\$300,000

The non-residential forecast is based on an average assessed value per square metre of building space. Table 15 outlines the average assessment parameters for each non-residential category.

Table 21: Average Weighted Assessment per Square Metre (Non-Residential)

Non-Residential	Burlington	Oakville	Halton Hills	Milton
Major Office	\$4,240	\$4,240	\$2,560	\$2,560
Employment Land	\$3,180	\$3,180	\$1,590	\$1,590
Population- Related	\$4,240	\$4,240	\$2,650	\$2,650

2. Fiscal Observations of the Preferred Growth Concept

The table below illustrates the percentage impact to property taxes over the planning horizon. Average annual tax increases from 2021-2051 provide a measure of the net fiscal impact from growth associated with the development forecast under the PGC. The differences in tax impacts across municipalities can largely be attributed to the PGC development forecast and differences in the average assessment values across municipalities.

The financial analysis included in the technical study is intended as an order of magnitude analysis to quantify the effects of the PGC. Once the PGC is approved, master plans and related analysis will need to be undertaken to validate fiscal impact assumptions and further refine costs.

Table 22: Estimated Average Annual Tax Increases 2021-2051

Municipality	PGC
Burlington	4.16%
Oakville	3.16%
Milton	3.68%
Halton Hills	3.44%
Halton Region (No Transit)	2.33%
Halton Region (With Transit)	2.89%

Finally, the analysis considers scenarios both with and without a regional transit service. If the Region were to undertake the costs of providing a region-wide transit service at a regional level, this results in an additional tax impact of about half a percent, per year. Furthermore, recognizing that Halton Hills does not currently operate a localized transit system like other local municipalities, the Town expects to implement a transit system in the future. Based on a high-level analysis as part of the Fiscal Impact Analysis, the implementation of a local transit system resulted in an estimated upwards tax pressure for Halton Hills ranging from an additional 0.3% to 0.5% over the period.

Details on sensitivity testing for both regional transit and changes in high density unit sizes, and more detailed observations of the estimated average annual tax increase are included in Appendix H.

3. Future Refinements

Due to the iterative nature of the IGMS process, including ongoing consultations between the Region and its local municipalities, the Preferred Growth Concept has undergone refinements since the fiscal impact assessment was conducted. These include adjustments to the estimates of the Concept’s population and employment growth, especially in their distribution across local municipalities and policy areas.

A professional opinion has been provided as an addendum to the fiscal impact analysis (found in Appendix H), outlining impacts that the Preferred Growth Concept population and employment numbers changes and the associated Regional infrastructure needs may have on the assessment’s findings.

It is important to note that the technical assessments in this report are conceptual and define a snapshot in time. A detailed analysis will be undertaken once planning estimates and refinements to the infrastructure assessments are revised for the final Council-endorsed Preferred Growth Concept.



8. Next Steps

To implement the IGMS Preferred Growth Concept, as well as the applicable IGMS policy directions, if endorsed by Council at a future meeting, it will be recommended that staff be directed to prepare a draft Regional Official Plan Amendment (ROPA). This ROPA would build upon the Regional Urban Structure implemented through ROPA No. 48, approved by the Province in November 2021, as the second phase of the Region's Official Plan Review to achieve conformity with Provincial Plans, including the Growth Plan to the 2051 planning horizon. Final technical assessments, based upon a final Council-endorsed Preferred Growth Concept, and the public and agency input on the implementing Draft Regional Official Plan Amendment, will be provided to support Regional Council's deliberation, together with Regional staff's recommendation report.

Key changes to the Regional Official Plan which would be included in the Draft ROPA include:

- updates to population and employment forecasts, intensification and density targets, and Regional development phasing, to implement the IGMS Preferred Growth Concept to the 2051 planning horizon;
- delineation of a Regional Urban Boundary and related policy updates to provide policy direction for any future expansions to the Regional Urban Boundary, in accordance with the Growth Plan;
- identification of Regional Intensification Corridors as strategic growth areas that are part of the Regional Urban Structure, augmenting the policies pertaining to the Regional Urban Structure contained in ROPA 48;
- updates to the policy framework for Regional Nodes on the basis of the Minister's decision on ROPA 48 and further consultation with the Local Municipalities, including the identification and/or delineation and minimum density target setting for certain existing and additional Primary Regional Nodes, beyond those contained in ROPA No. 48, in the Dundas Street and Trafalgar Road corridors in North Oakville;
- an update of the Employment Area boundaries and policy framework;
- an update to the existing land use compatibility policy framework for consistency with the PPS, 2020, in relation to the interface of employment uses and residential and other sensitive land uses;

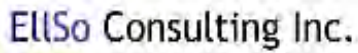
Regional Official Plan Review

- to update to Regional Official Plan mapping to implement the Integrated Growth Management Strategy Preferred Growth Concept.

There is a Provincial requirement for Regional Council to adopt a Regional Official Plan Amendment addressing Growth Plan conformity by July 1, 2022. The consideration of the Preferred Growth Concept will be take place at a future meeting. A recommendation will be brought forward and Regional Council's decision will form the foundation of Halton's Integrated Growth Management Strategy.

Acronyms

BUA	Built-Up Area
DGA	Designated Greenfield Area
FSEA	Future Strategic Employment Area
GHG	Greenhouse Gases
HUSP	Halton Urban Structure Plan
IGMS	Integrated Growth Management Strategy
MCR	Municipal Comprehensive Review
MTSA	Major Transit Station Area
ROPA	Regional Official Plan Amendment
ROPR	Regional Official Plan Review
SGA	Strategic Growth Areas
UGC	Urban Growth Centre



Regional Official Plan Review

