

September 28, 2022

GSAI File: 1375-001

(Via Email – [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca))

Hon. Steven Clark

Ministry of Municipal Affairs and Housing

777 Bay Street, 17<sup>th</sup> Floor

Toronto, ON M5G 2E5

**RE: Halton Regional Official Plan Amendment No. 49  
Ms. Jo-Anne Vivian Snow and Mr. James Scott  
PT LT 5, CON 7 NNS, TOWN OF MILTON & PT LT 4, CON 7 NNS, TOWN OF MILTON**

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Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to Ms. Jo-Anne Vivian Snow and Mr. James Scott, the Owners of approximately 55.24 hectares (136.5 acres) of land in the Town of Milton (the 'Subject Lands'). The Subject Lands abut employment lands that were previously brought into the Region of Halton and Town of Milton 2031 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.

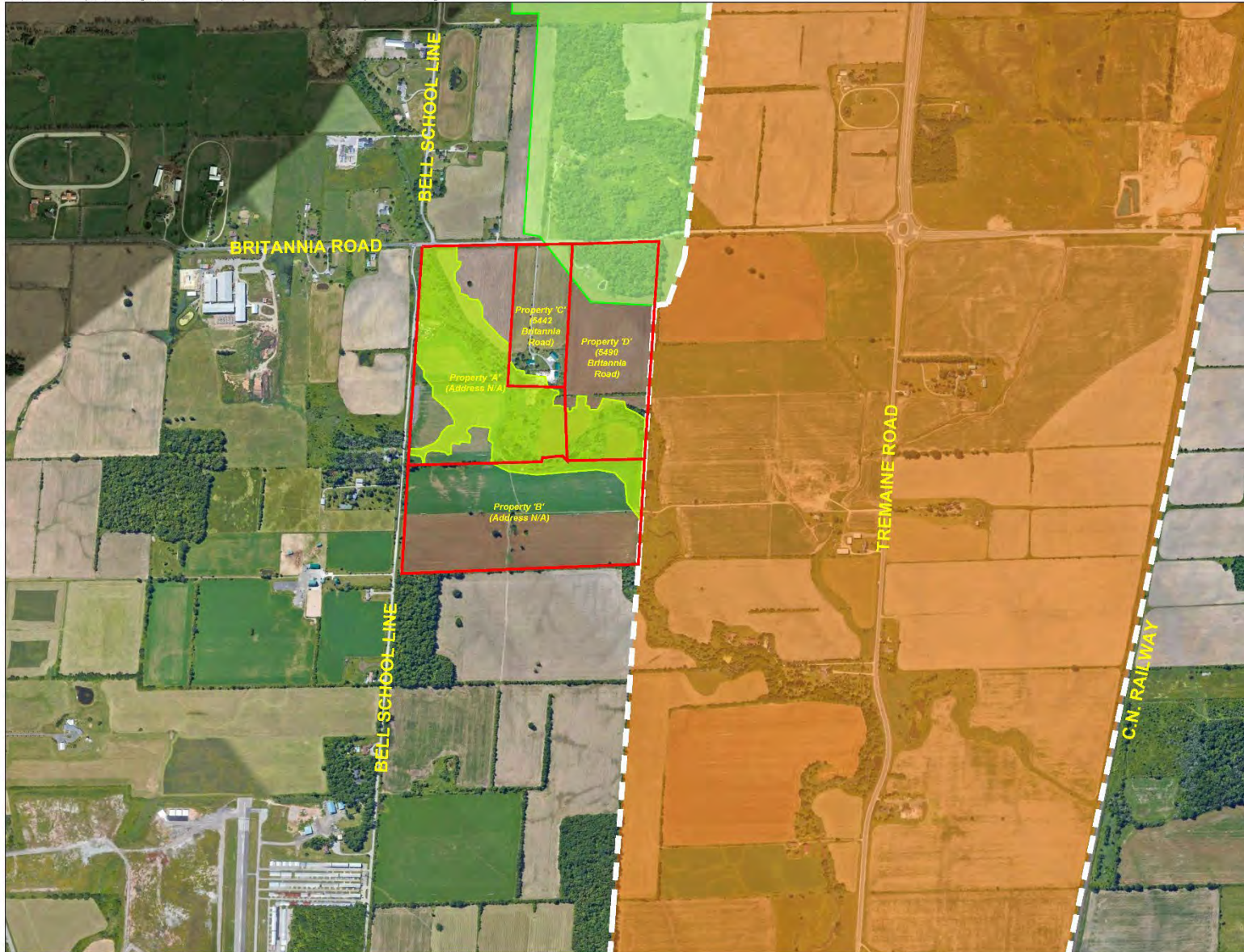
On behalf of the Owner and further to previous correspondences submitted to the Region dated April 14, 2021, July 15, 2021 and January 14, 2022, included as **Appendix I** to this Letter, we are pleased to provide this Letter to you in relation to the Environmental Registry of Ontario (ERO Number 019-5684 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.

The Subject Lands are located immediately adjacent to the existing Urban Area and the Subject Lands are identified by the Region of Halton as the Future Strategic Employment Area that are candidate Urban Area for additional employment growth. It is also immediately adjacent to a planned Milton Education Village Secondary Plan area on Tremaine Road in Milton. Based on this, the Subject Lands are an appropriate location for inclusion in an expanded Urban Area.










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## AERIAL CONTEXT PLAN

Jo-Anne Vivian Snow &  
5442 Britannia Road &  
5490 Britannia Road  
Town of Milton

### Legend

-  Property 'A' (Address N/A)  
±19.95ha (49.30ac)
-  Property 'B' (Address N/A)  
±20.43ha (50.48ac)
-  Property 'C' (5442 Britannia Road)  
±6.57ha (16.24ac)
-  Property 'D' (5490 Britannia Road)  
±14.86ha (36.72ac)
- TOTAL PROPERTY AREAS  
±61.81ha (152.74ac)**
-  Greenbelt Natural Heritage System (NHS)
-  Regional Natural Heritage System (NHS)
-  Urban Area  
(as per Region of Halton  
ROPA 38 Urban Boundary  
expansion)

### Notes:

- all measurements and areas are approximate only
- Regional Natural Heritage System limits as per Minister of Natural Resources and Forestry interactive mapping



Scale 1:10,000  
April 1, 2021

In our opinion, inclusion of the Subject Lands in an expanded Urban Area will enable a natural and logical extension of growth, will support Provincial growth targets, 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 residents and jobs 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 (see Milton Staff Report DS-006-22, dated January 17, 2022, attached as **Appendix II** to this Letter), it was the desire of Milton to expand the Urban Area to provide for additional lands to accommodate projected growth.

We are writing to request that you exercise your discretion under the *Planning Act* to modify Halton Regional Official Plan Amendment 49 to ensure that appropriate growth projected for the Region of Halton and the Town of 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.



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Colin Chung, MCIP, RPP  
Managing Partner

*Appendix I / Previous Comment Letters*





April 14, 2021

Refer To File: 1375-001

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 Official Plan Review Discussion Papers  
 Formal Response from Ms. Jo-Anne Vivian Snow and Mr. James Scott**

Glen Schnarr & Associates Inc. (GSAI) represents Ms. Jo-Anne Vivian Snow and Mr. James Scott, owners of approximately 55.24 hectares (136.50101 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Parcels ‘A’, ‘B’ and ‘D’ on the *Aerial Context Plan* enclosed). Our clients’ lands are designated “*Future Strategic Employment Area*” in the current Regional Official Plan. Our clients are desirous of the inclusion of their land into the 2051 Urban Area.

Our clients’ lands include land within the Regional Natural Heritage System, and the inclusion of our clients’ 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. We also feel that the inclusion of our clients’ 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 2051.

Region’s Discussion Papers (June 2020)

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 should be identified where Regional approval is not required;

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 www.gsai.ca



- The Region should consider Town of Milton's previously identified whitebelt lands for candidate settlement area boundary expansion;
- ROP policies for employment lands should permit a broad range of uses to promote complete communities (see further discussion below);
- 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.



### Urban Structure Discussion Paper (July 2020)

In reviewing the Regional Urban Structure Discussion Paper and more notably *Figure 30 – Potential Locations for new Employment Area DGA*, we note that our clients' above-noted lands are located within “*Remaining Future Strategic Employment Areas*”. As noted in the Urban Structure Discussion Paper, Future Strategic Employment Areas (FSEA) identified in the current ROP, are lands outside the current Settlement Areas, but strategically located with respect to major transportation facilities and existing Employment Areas. If additional lands are required to support employment growth in Halton, the FSEA ought to be treated as priority locations for accommodating this growth.

Furthermore, there are active employment land conversion requests that amount to approximately 1,030 net hectares (2545 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 (July 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 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.

### Integrated Growth Management Strategy- Growth Concepts Discussion Paper (February 2021)

Upon review of the IGMS Discussion Paper released in February 2021, and the proposed four concepts, we note that in all four concepts, our clients' lands are illustrated as “*Future Strategic Employment Area*” and not identified within any of the Potential New Employment Areas, despite the fact that these lands were identified as future Employment lands through the previous Halton Region MCR process (ROPA 38).

In the IGMS Growth Concepts Discussion Paper (February 2021), the Employment Area Land Needs Assessment demonstrates that the Region requires a range of 980 hectares to 1,220 hectares of developable land in order to meet the long- term needs of Schedule 3 of the Growth Plan to 2051. Specifically:



- Growth Concept 1 requires an additional 1,170 hectares of developable land;
- Growth Concept 2 requires an additional 1,100 hectares of developable land;
- Growth Concept 3 requires an additional 980 hectares of developable land; and,
- Growth Concept 4 requires an additional 1,220 hectares of developable land.

The Region should prioritize the existing Future Strategic Employment Areas to achieve 2051 targets to implement phasing effectively. As well, active employment conversion requests should continue to be considered with respect to the land budget as approximately 1,030 net hectares (2,545 net acres) of land could be removed from the Employment Areas, subject to the success of the conversion requests.

### Conclusion

For the reasons noted above, it is our opinion that all of Milton's whitebelt lands should be included into the 2051 Urban Area for employment purposes (as previously endorsed by Milton Council), to assist the Region in meeting 2051 employment targets. Furthermore, during the Region's previous MCR process (ROPA 38), the Region designated the Tremaine corridor as Employment lands, and our clients' lands are contiguous to this area and are a logical expansion for employment growth along Tremaine Road.

We look forward to meeting with the Region to discuss this further. 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**





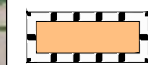
# AERIAL CONTEXT PLAN

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5442 Britannia Road &  
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Town of Milton

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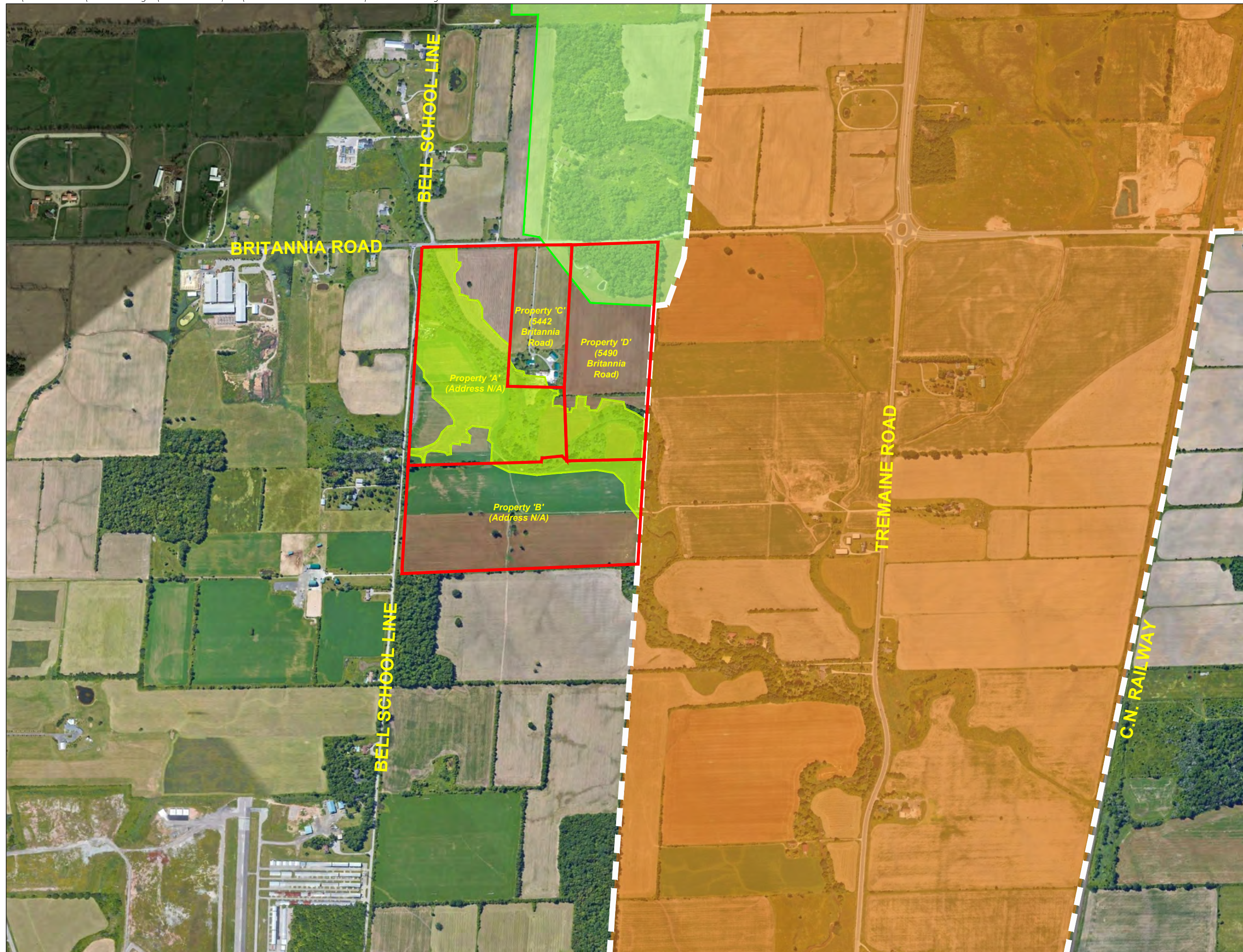
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Scale 1:10,000  
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**Halton Region Discussion Paper Questions - GSAI Responses**  
**April 14, 2021**

Question #	Halton Region Discussion Paper Question	GSAI Response
<b>Regional Urban Structure – Technical Questions</b>		
9	<b>Are there any other factors that should be considered when assessing Employment Area conversion requests in Halton Region?</b>	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	<b>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?</b>	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	<b>How can the Regional Official Plan support employment growth and economic activity in Halton Region?</b>	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	<b>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?</b>	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	<b>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?</b>	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**  
**April 14, 2021**

14	<p><b>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?</b></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><b>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?</b></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"> <li>- 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?</li> <li>- Why do Regional staff think 60+ people and jobs per hectare is better planning?</li> <li>- Has a sensitivity analysis been undertaken to justify a density greater than 50 persons &amp; jobs/hectare and to determine if it will meet current and future market demand conditions over the next 30 years?</li> </ul> <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><b>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?</b></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**  
**April 14, 2021**

<b>Regional Urban Structure – General Questions</b>		
1	<b>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</b>	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	<b>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?</b>	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	<b>How can the Regional Official Plan support employment growth and economic activity in Halton Region?</b>	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	<b>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?</b>	<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**  
**April 14, 2021**

7	<b>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?</b>	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	<b>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?</b>	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.
<b>Rural and Agricultural System - Technical Questions</b>		
1	<b>Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?</b>	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	<b>Are there any additional pros and cons that could be identified for any of the options?</b>	Please see response on preferred mapping option below.
3	<b>Do you have a preferred mapping option? If so, why?</b>	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	<b>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?</b>	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**  
**April 14, 2021**

5	<p><b>What additional conditions or restrictions should be required for any agriculture- related uses?</b></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><b>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?</b></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><b>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?</b></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><b>What additional conditions or restrictions should be required for any on-farm diversified uses?</b></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><b>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?</b></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**  
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11	<b>Should the requirements for an Agricultural Impact Assessment be included in any other new or existing Regional Official Plan policies?</b>	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	<b>Should special needs housing be permitted outside of urban areas and under what conditions?</b>	We concur with the Town of Milton's comments, special needs housing should be expressly permitted in urban and rural areas.
<b>Rural and Agricultural System – General Questions</b>		
1	<b>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?</b>	The Region should consider the needs of farm operations to protect farm viability, while balancing potential impacts on surrounding operations.
<b>Natural Heritage - Technical Questions</b>		
1	<b>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?</b>	<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**  
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2	<p><b>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?</b></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><b>To ease the implementation of buffers and vegetation protection zones, should the Region include more detailed policies describing minimum standards?</b></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><b>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?</b></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><b>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?</b></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**  
**April 14, 2021**

6	<p><b>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?</b></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><b>Should the Regional Official Plan incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?</b></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><b>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?</b></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><b>How can Halton Region best support the protection and enhancement of significant woodlands through land use policy?</b></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>
<b>Natural Heritage – General Questions</b>		
2	<p><b>Are there other policies or actions Halton can include in the Regional Official Plan Review to protect and enhance the Natural Heritage System?</b></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**  
**April 14, 2021**

<b>Climate Change – Technical Questions</b>		
1	<p><b>Have you felt the impacts of climate change on your community? What impacts are of most concern to you in the next 20 years?</b></p>	<p>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.</p>
2	<p><b>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?</b></p>	<p>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.</p>
3	<p><b>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?</b></p> <p><b>In your opinion, are we growing in the right direction?</b></p>	<p>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.</p>





July 15, 2021

Refer To File: 1375-001

Halton Region  
 1151 Bronte Road  
 Oakville, ON  
 L6M 3L1

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

**Re: Staff Report LPS18-21 – Regional Official Plan Review  
 Integrated Growth Management Strategy - Growth Concepts  
 Discussion Paper  
Formal Response from Ms. Jo-Anne Vivian Snow and Mr. James Scott**

Glen Schnarr & Associates Inc. (GSAI) represents Ms. Jo-Anne Vivian Snow and Mr. James Scott, owners of approximately 55.24 hectares (136.50101 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Parcels ‘A’, ‘B’ and ‘D’ on the *Aerial Context Plan* enclosed). Our clients’ lands are designated “*Future Strategic Employment Area*” in the current Regional Official Plan. As previously noted in correspondence to the Region dated April 14, 2021, our clients are desirous of the inclusion of their land into the 2051 Urban Area.

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.

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- 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.



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

Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**


**Colin Chung, MCIP, RPP**  
**Partner**



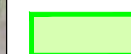


# AERIAL CONTEXT PLAN

Jo-Anne Vivian Snow &  
5442 Britannia Road &  
5490 Britannia Road  
Town of Milton

## Legend

-  Property 'A' (Address N/A)  
±19.95ha (49.30ac)
- Property 'B' (Address N/A)  
±20.43ha (50.48ac)
- Property 'C' (5442 Britannia Road)  
±6.57ha (16.24ac)
- Property 'D' (5490 Britannia Road)  
±14.86ha (36.72ac)

**TOTAL PROPERTY AREAS**  
**±61.81ha (152.74ac)**

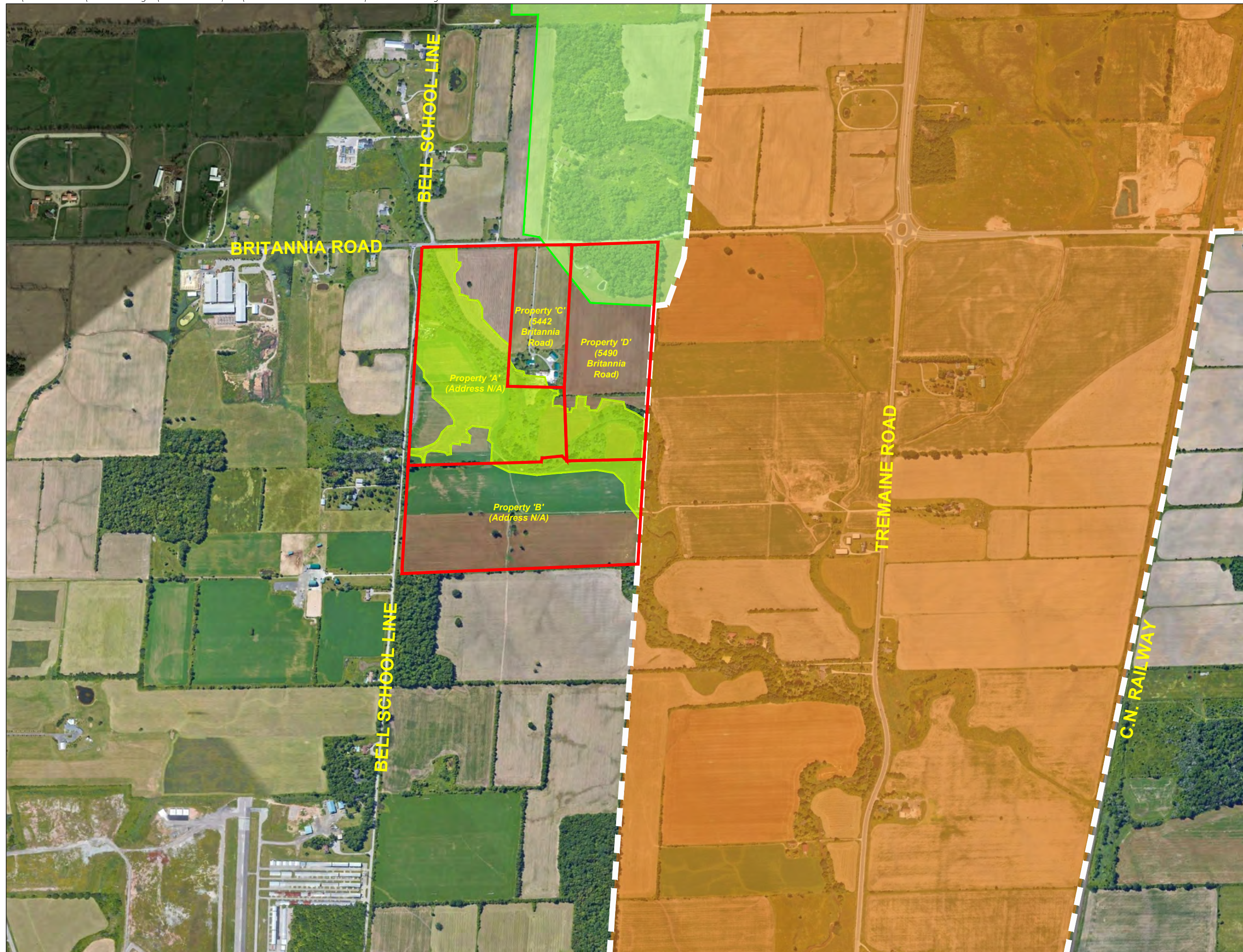
-  Greenbelt Natural Heritage System (NHS)
-  Regional Natural Heritage System (NHS)
-  Urban Area  
(as per Region of Halton  
ROPA 38 Urban Boundary  
expansion)

## Notes:

- all measurements and areas are approximate only
- Regional Natural Heritage System limits as per Minister of Natural Resources and Forestry interactive mapping



Scale 1:10,000  
April 1, 2021







# The Corporation of the Town of Milton

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Report To: Council

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From: Barbara Koopmans, Commissioner, Development Services

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Date: June 21, 2021

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Report No: DS-055-21

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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.

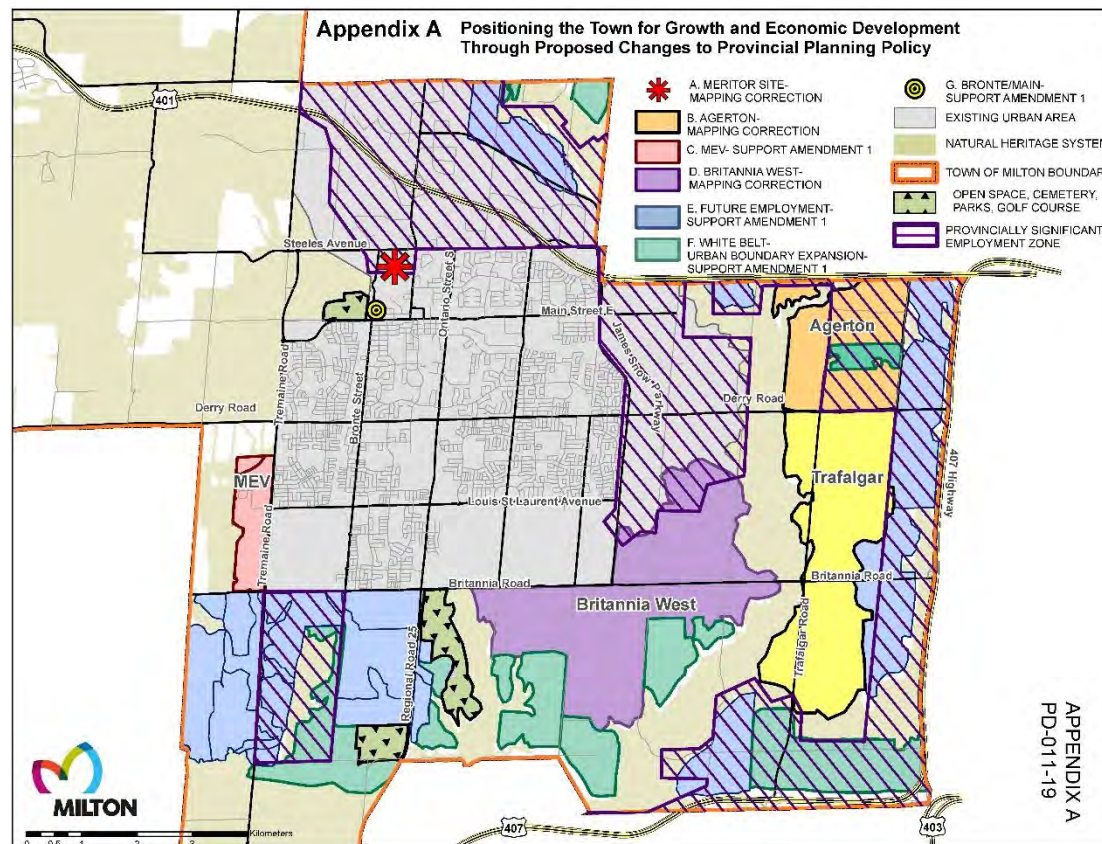
Appendix B illustrates the proposed Settlement Area Boundary Expansion and associated redesignation of Milton's whitebelt lands as Community Area and Employment Area. The proposed designations reflect the Town's Council adopted 2051 Vision (shown in Figure

## Discussion

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

## Discussion

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).

## Discussion

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.*

## Discussion

*“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



## Discussion

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.***

## Discussion

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

## Discussion

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

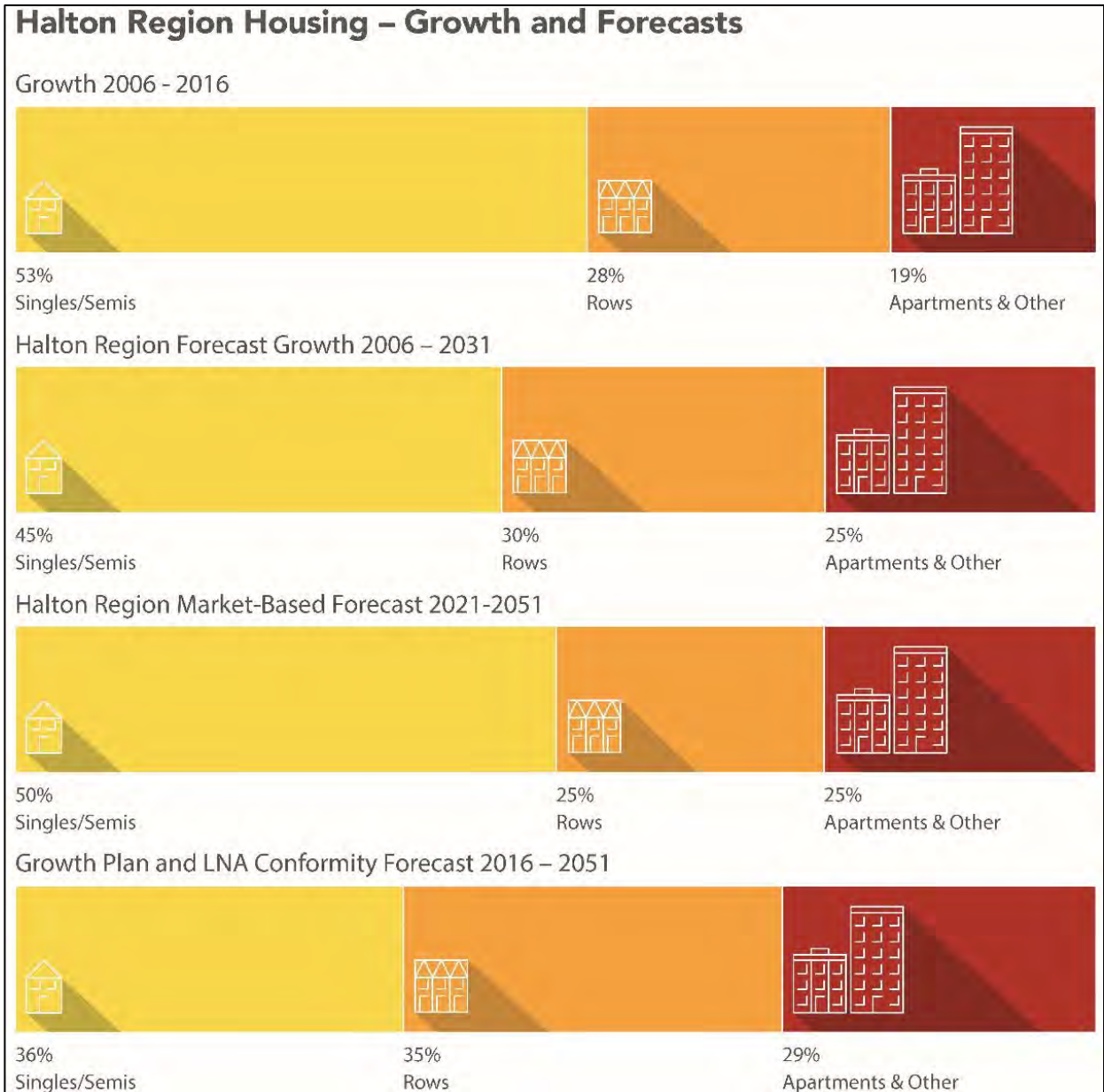
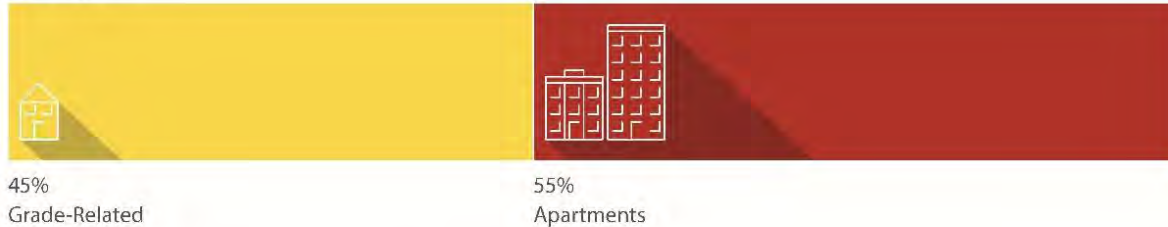


Figure 3: Halton Region IGMS Growth Concept Forecasts

## 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



## Discussion

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

## Discussion

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:*



## Discussion

- 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;



## Discussion

- 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

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

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 <sup>1</sup>	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 <sup>2</sup>	7,455	14,317	6,862
Net Undercount Rate <sup>3</sup>	4.25%	4.25%	
<b>Total Population</b>	<b>572,778</b>	<b>1,100,000<sup>4</sup></b>	<b>527,222</b>

Sources:

<sup>1</sup>Statistics Canada, 2016 Census Profile.

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

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

<sup>4</sup>A 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:

<sup>1</sup>Statistics Canada, 2016 Census Profile.

<sup>2</sup>Hemson 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 <sup>1</sup>	3.52	2.67	1.58	

Household Population Growth	235,787	177,248	85,083	498,118
Non-Household Population Rate <sup>2</sup>	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 <sup>3</sup>	4.25%	4.25%	4.25%	4.25%
<b>Total Population</b>	<b>249,600</b>	<b>187,632</b>	<b>90,067</b>	<b>527,299</b>

Sources:

<sup>1</sup>Region of Halton 2017 Development Charges Background Study, December 2016.

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

<sup>3</sup>Statistics 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%
<b>Total Distribution</b>	<b>66,985</b>	<b>66,385</b>	<b>53,850</b>	<b>187,220</b>
<b>Built-Up Area Unit Demand</b>	<b>4,520</b>	<b>36,160</b>	<b>49,720</b>	<b>90,401</b>
<b>DGA Unit Demand</b>	<b>61,529</b>	<b>30,225</b>	<b>4,130</b>	<b>95,883</b>
<b>Rural Area Unit Demand</b>	<b>936</b>	<b>0</b>	<b>0</b>	<b>936</b>
<b>DGA Unit Mix (%)</b>	<b>64%</b>	<b>32%</b>	<b>4%</b>	<b>100%</b>

## 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
<b>Total Halton Region</b>	<b>12,146</b>	<b>12,202</b>	<b>9,855</b>	<b>34,203</b>

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
<b>Total Halton Region</b>	<b>18,309</b>	<b>19,939</b>	<b>10,313</b>	<b>48,560</b>

## 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
<b>Total Existing DGA Supply</b>	<b>30,455</b>	<b>32,141</b>	<b>20,167</b>	<b>82,763</b>
<b>DGA Unit Demand</b>	<b>61,529</b>	<b>30,225</b>	<b>4,130</b>	<b>95,883</b>
<b>New DGA Unit Requirement</b>	<b>31,074</b>	<b>0</b>	<b>0</b>	<b>31,074</b>
<b>New DGA Unit Mix</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>	<b>100%</b>

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	
<b>Land Requirement (ha.)</b>	<b>2,220</b>	<b>0</b>	<b>-</b>	<b>2,220</b>

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

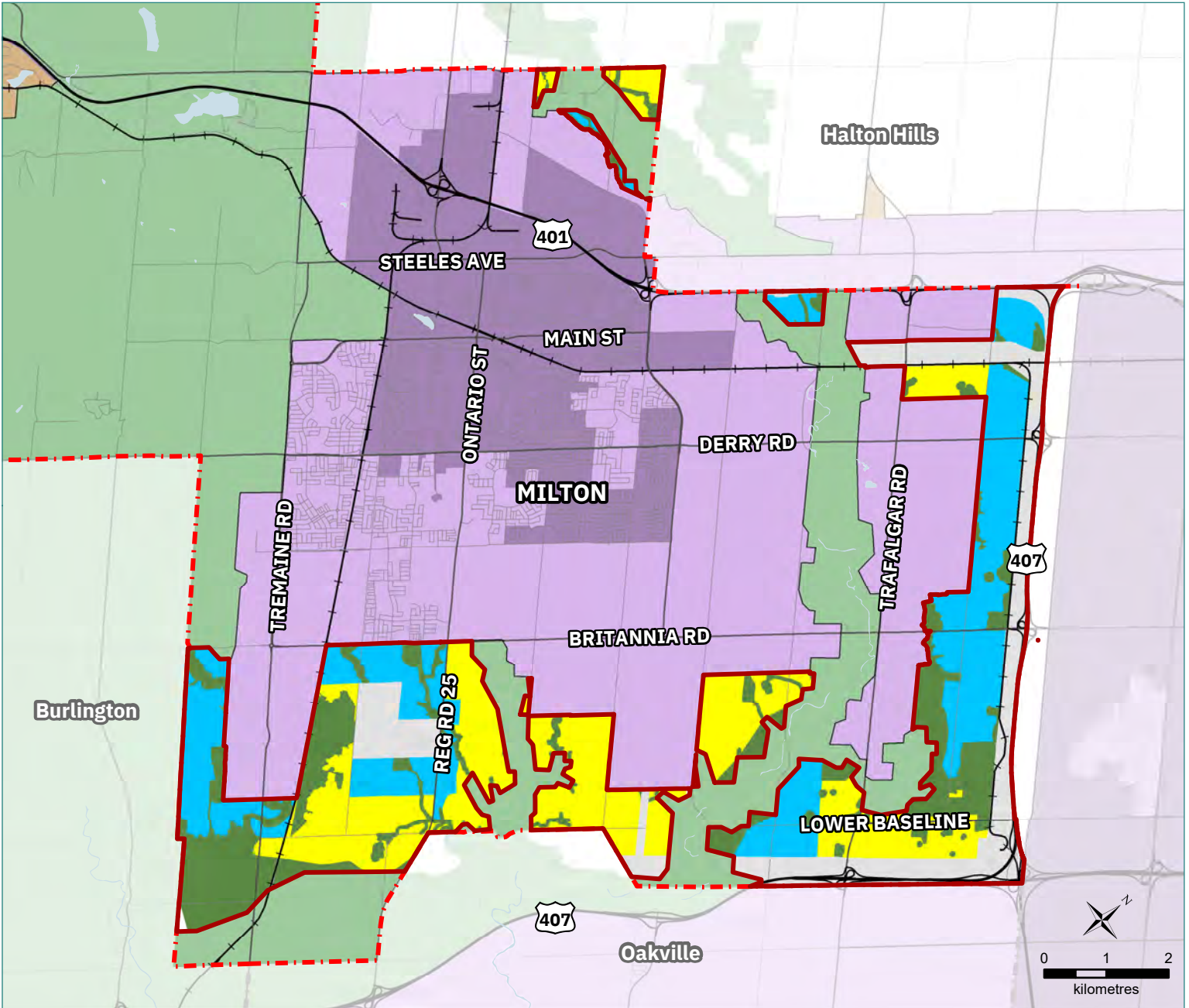
Once the Community Area land need requirement is calculated, it is important to ensure that the DGA achieves the density target of 50 residents and jobs per hectare set out in the Growth Plan. This is calculated by estimating the full population and employment of the DGA and dividing it by its gross 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
<b>Total DGA</b>	<b>7,980</b>	<b>475,643</b>	<b>59.6</b>

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         | Whitebelt               |
| Greenbelt Plan Area        | New Community Area      |
| Built-Up Area              | New Employment Area     |
| Designated Greenfield 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



# The Corporation of the Town of Milton

APPENDIX C  
DS-055-21

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Report To: Council

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From: Barbara Koopmans, Commissioner, Development Services

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Date: May 3, 2021

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Report No: DS-028-21

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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:

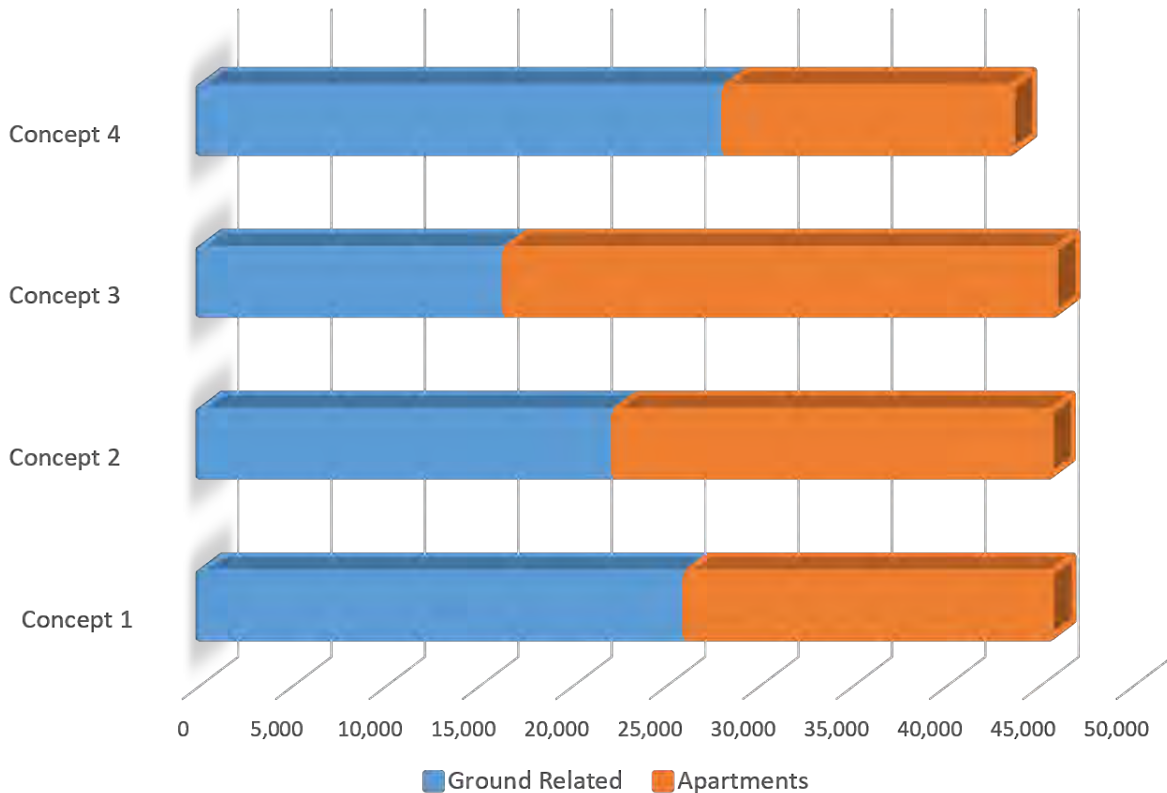
- Theme 1: Regional Urban System and Local Urban Structure
- Theme 2: Infrastructure and Financing
- Theme 3: Agriculture, Environment and Climate Change
- Theme 4: Growth the Economy and Moving People and Goods

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?

<b>Where is growth proposed in Milton 2021-2051?</b>				
	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
<b>Total</b>	<b>65,200</b>	<b>65,100</b>	<b>65,400</b>	<b>63,100</b>

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

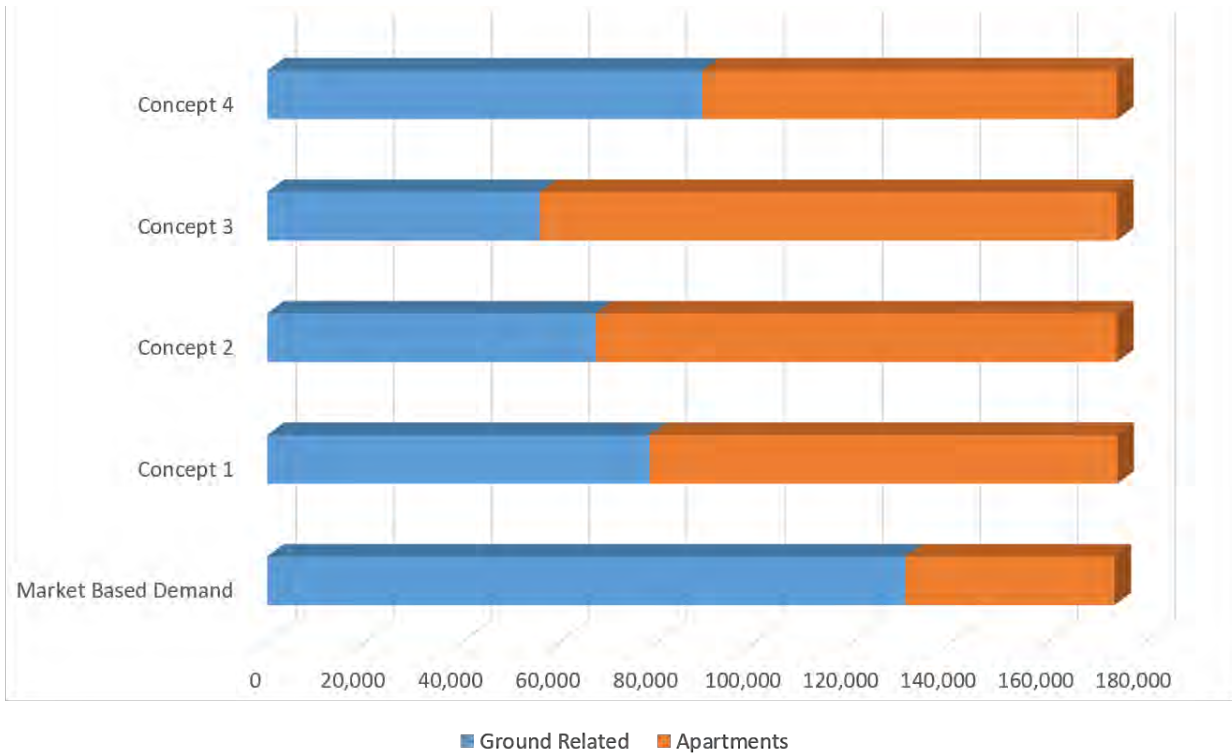
The Growth Concepts have been formulated using the province’s updated Land Needs Assessment Methodology (LNA). Along with the policies of the 2019 Growth Plan, Halton is required to use the methodology to assess the quantity of land required to accommodate forecasted growth. A key consideration in the 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”.<sup>1</sup>

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					



<sup>1</sup> 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



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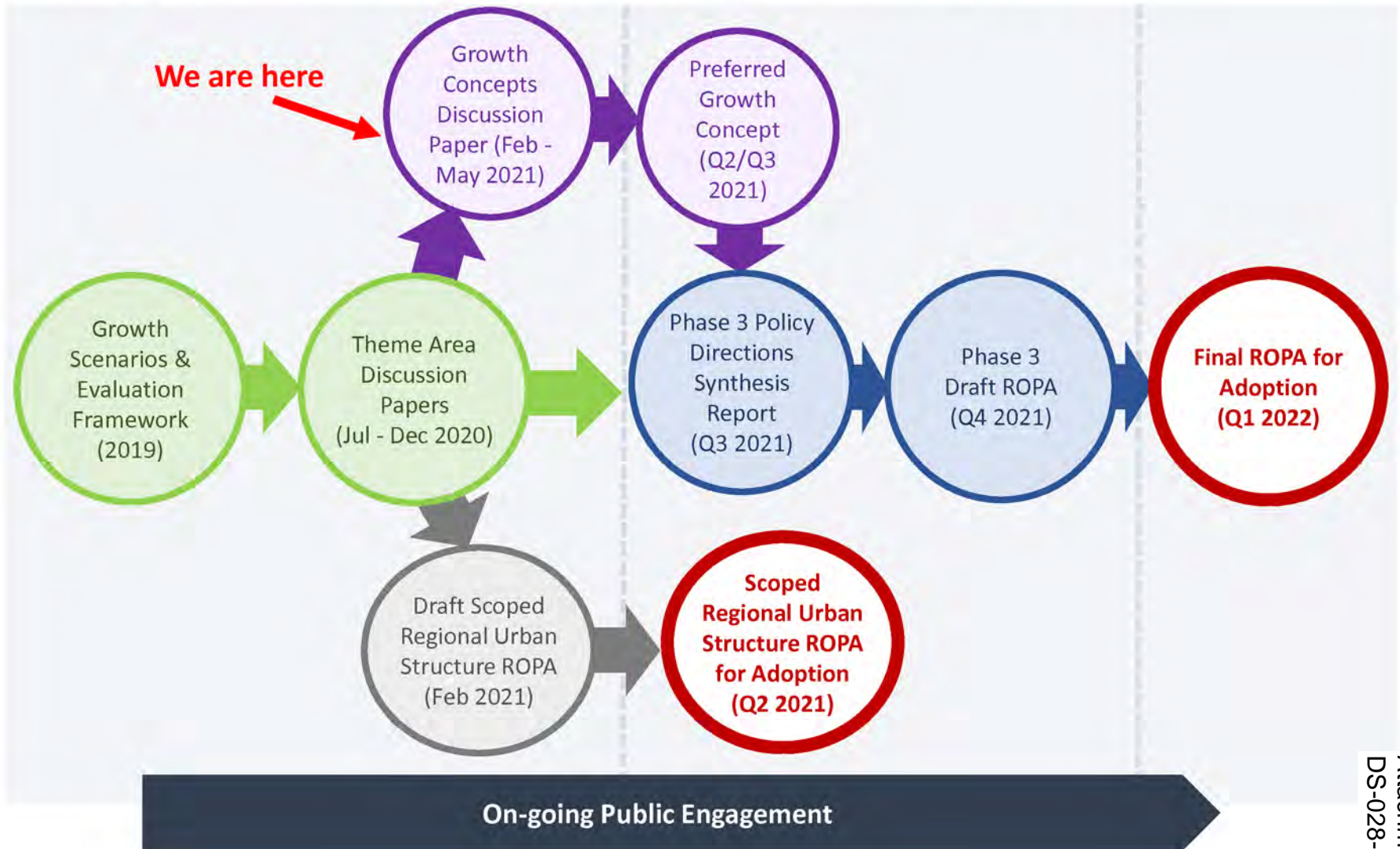
For questions, please contact: Jill Hogan, MCIP, RPP

Phone: Ext. 2304

<b>Attachments</b>
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



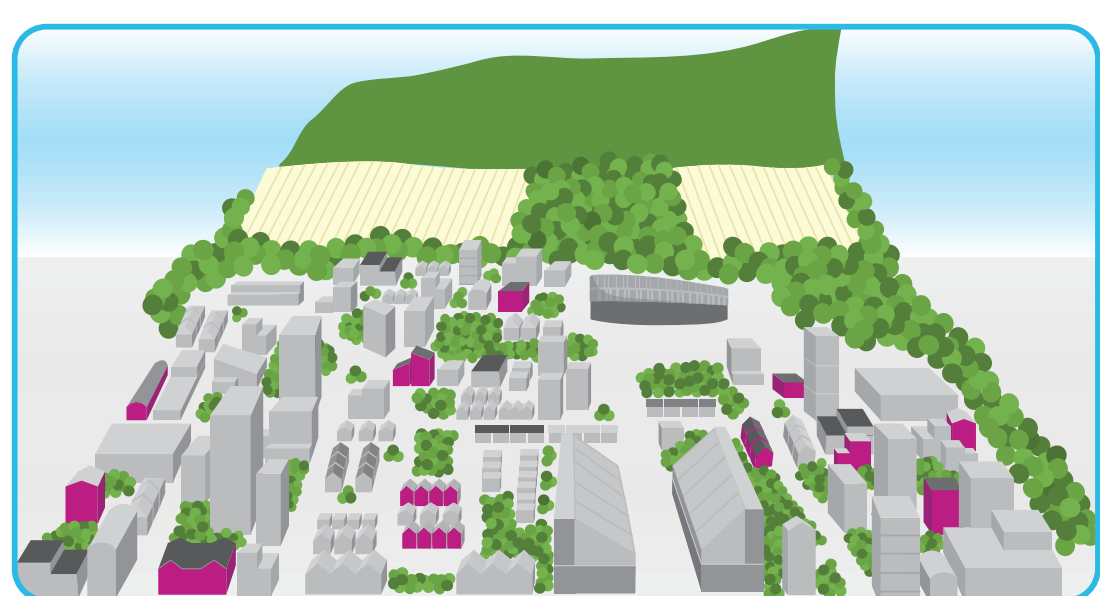
HISTORIC DOWNTOWN MILTON



CIVIC PRECINCT



STABLE NEIGHBOURHOODS



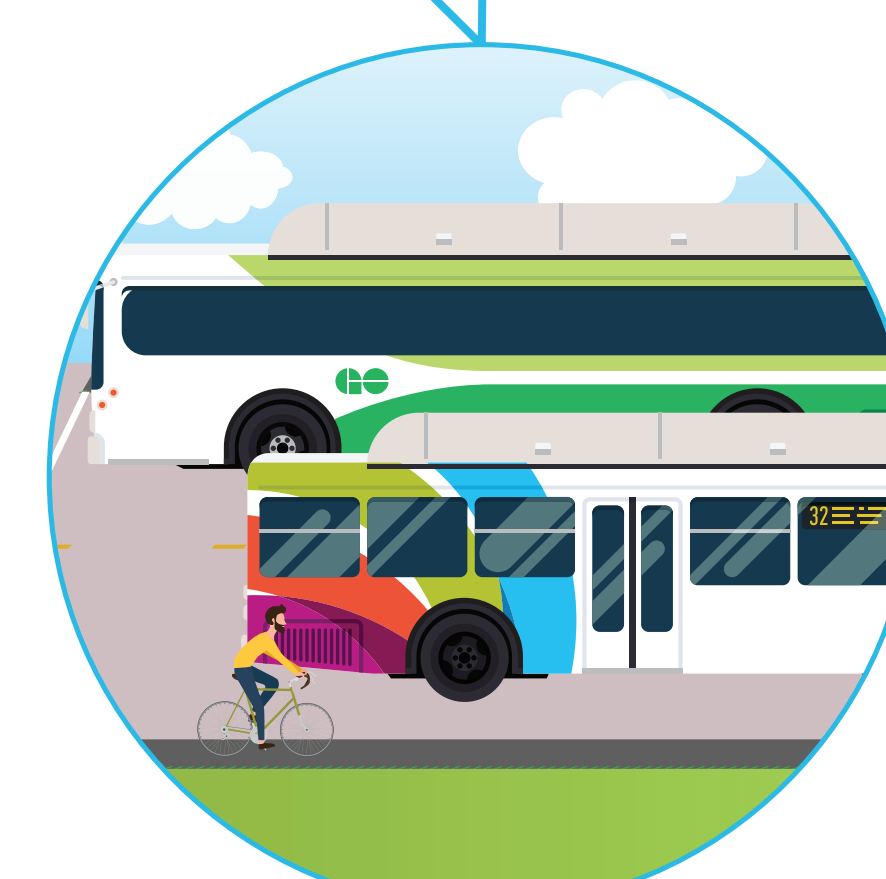
MILTON EDUCATION VILLAGE



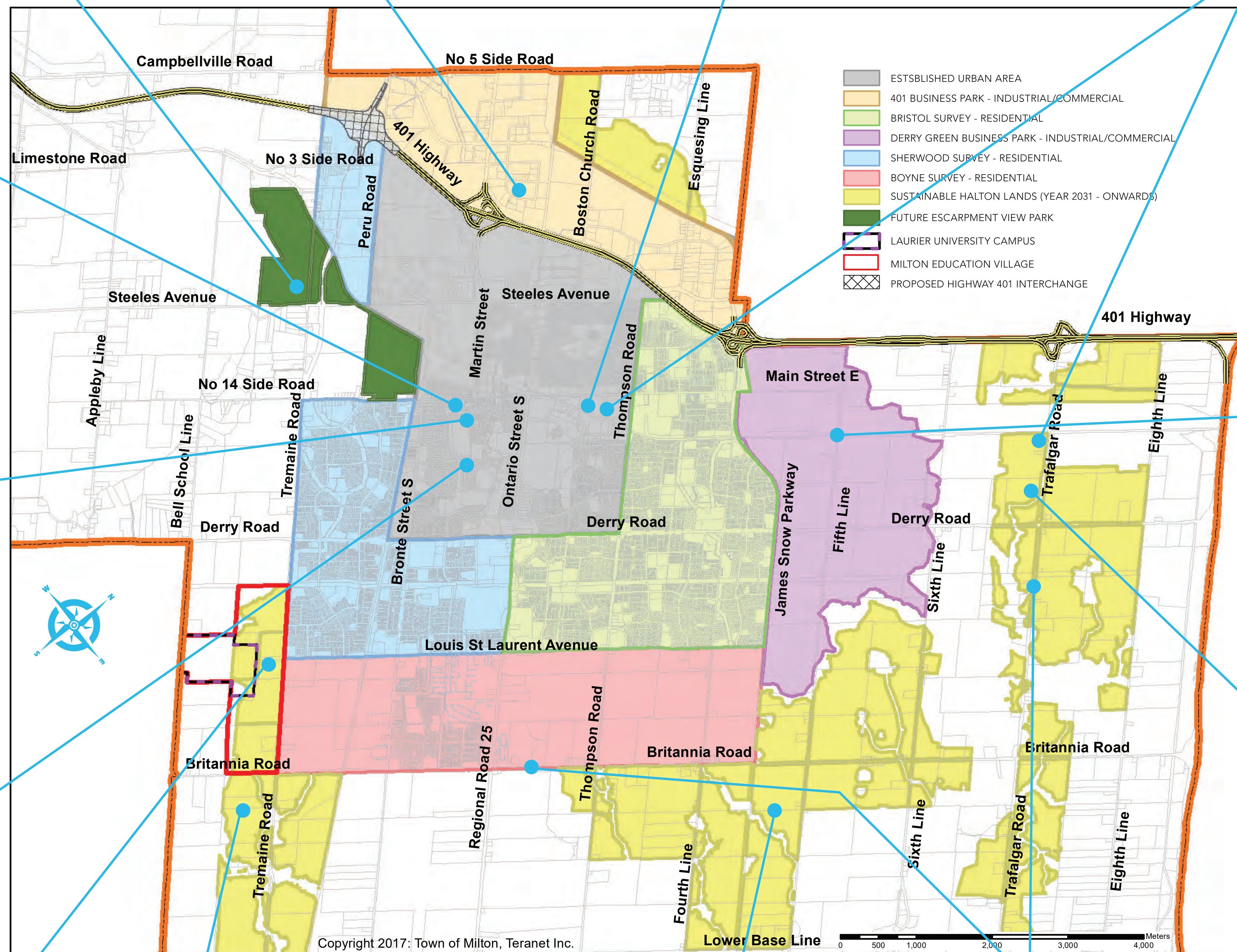
COMPLIMENTARY MEV EMPLOYMENT LANDS



SUSTAINABLE HALTON - 2031



HIGHER ORDER TRANSIT CORRIDOR



DERRY GREEN BUSINESS PARK



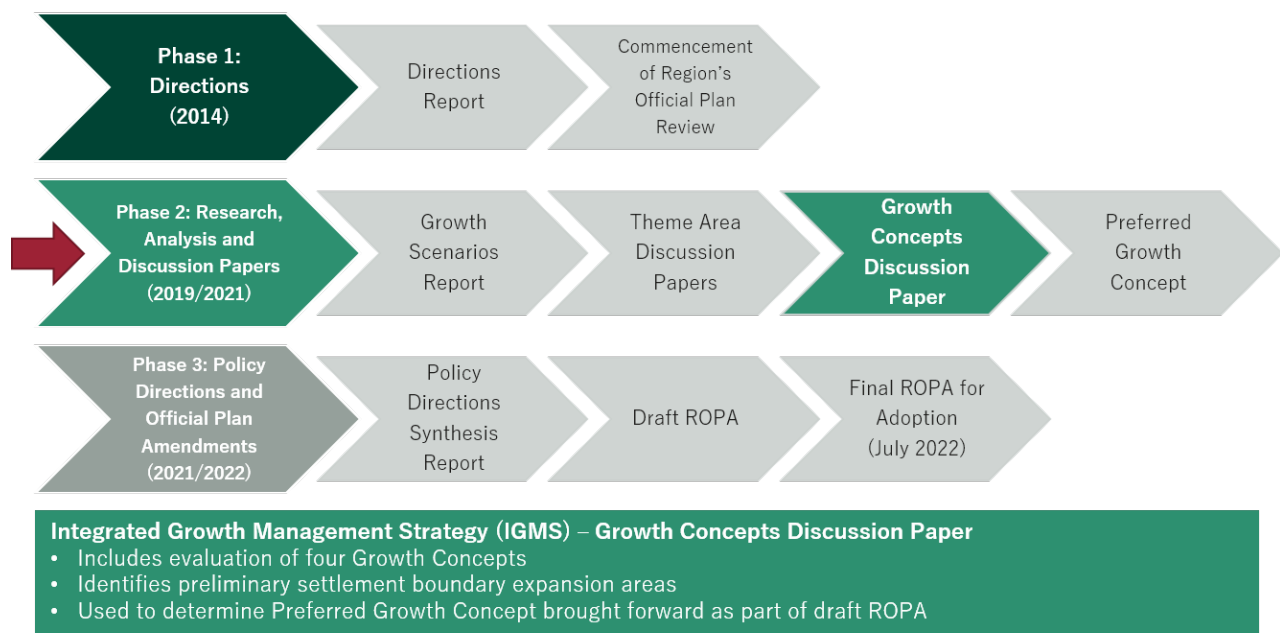
TRAFALGAR CORRIDOR





# Executive Summary

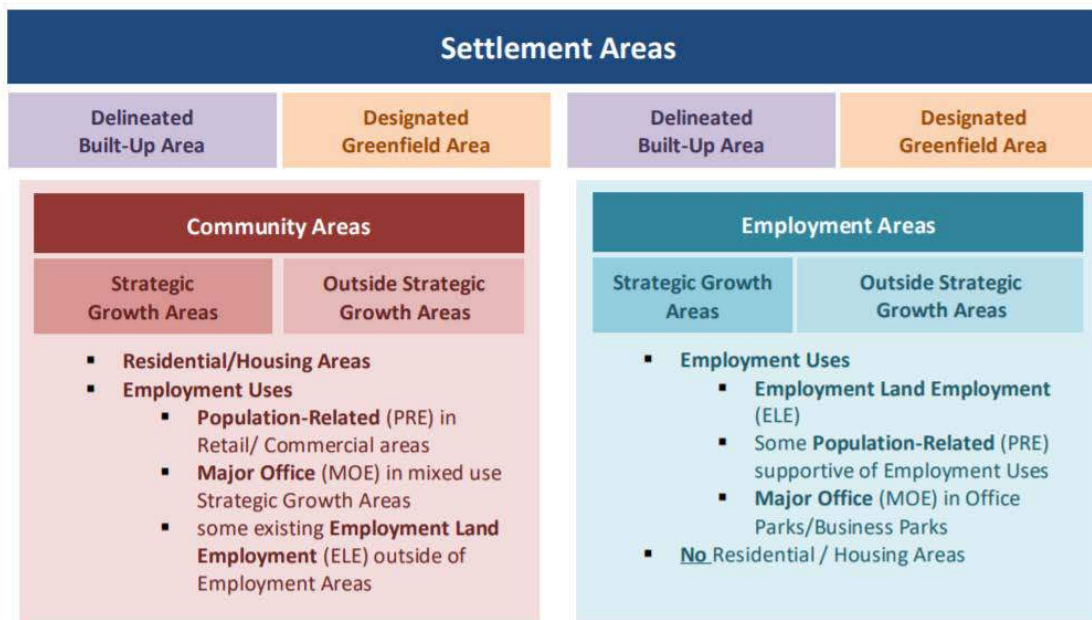
The Growth Concepts Discussion Paper is a critical component of the the Integrated Growth Management Strategy (IGMS), which is a key element of Halton’s Official Plan Review. The Paper describes the basis for and the evaluation of four Growth Concepts, elements of which will be used to develop the Preferred 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"> <li>• 50% densification to 2031 then 60% densification* to 2051</li> <li>• Lower share of employment growth in Employment Areas relative to Concept 4</li> </ul>	<ul style="list-style-type: none"> <li>• One-half the amount of new community DGA of Concept 1</li> <li>• 70% densification* (2031-51)</li> <li>• Share of employment growth in Employment Areas midway between Concepts 1 and 3</li> </ul>	<ul style="list-style-type: none"> <li>• Build out of existing DGA only</li> <li>• About 80% densification* (2031-51)</li> <li>• Least share of employment growth in Employment Areas</li> </ul>	<ul style="list-style-type: none"> <li>• 50% intensification in BUA (2021-51)</li> <li>• Greatest share of employment growth in Employment Areas</li> </ul>

**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

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Report To: Council

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From: Barbara Koopmans, Commissioner, Development Services

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Date: May 3, 2021

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Report No: DS-039-21

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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
- tCO<sub>2</sub>e = 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 tCO<sub>2</sub>e
- 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

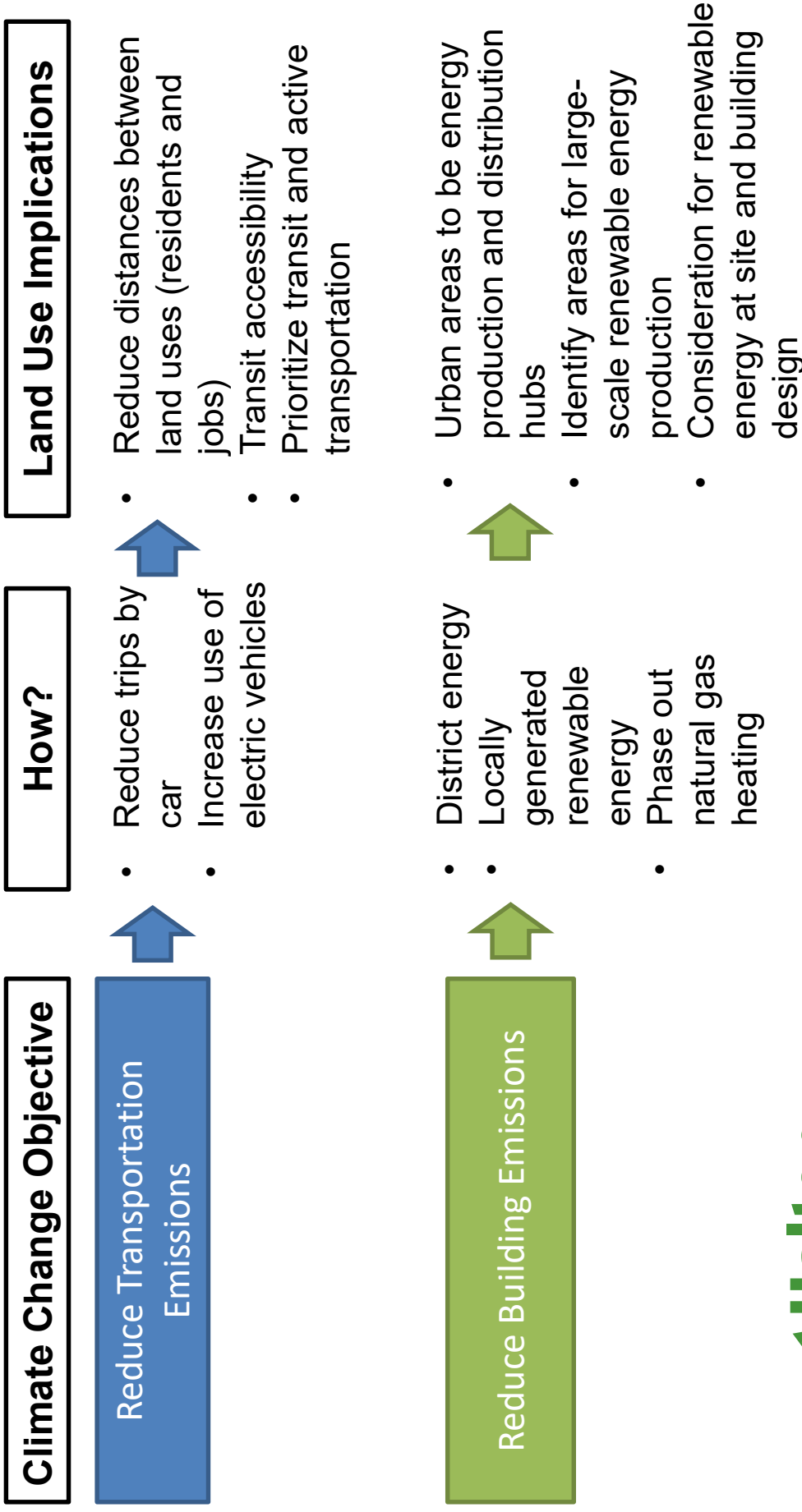
Concepts, ranked lowest to highest emissions	New residential building emissions	New commercial building emissions	New PUV transportation emissions	New other transportation emissions	New industrial emissions	New waste emissions	New water emissions
<b>Concept 3A</b>	764,947	343,526	944,240	555,016	179,716	138,753	6,335
<b>Concept 2</b>	775,278	343,526	971,809	555,016	179,716	138,753	6,335
<b>Concept 1</b>	784,663	343,526	992,505	555,016	179,716	138,753	6,335
<b>Concept 4</b>	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
<b>Concept 3A</b>	<b>2,932,532</b>	-	<b>6.08</b>
<b>Concept 2</b>	<b>2,970,433</b>	+1.3%	<b>6.16</b>
<b>Concept 1</b>	<b>3,000,513</b>	+2.3%	<b>6.23</b>
<b>Concept 4</b>	<b>3,032,208</b>	+3.3%	<b>6.29</b>

- 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: 1375-001

Halton Region  
1151 Bronte Road  
Oakville, ON L6M 3L1

**Attn:** Curt Benson  
Director of Planning Services

**RE:** Halton Regional Official Plan Review  
Draft Preferred Growth Scenario  
Ms. Jo-Anne Vivian Snow and Mr. James Scott

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Dear Mr. Benson,

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants to Ms. Jo-Anne Vivian Snow and Mr. James Scott, the Owners of approximately 55.24 hectares (136.5 acres) of lands in the Town of Milton (the 'Subject Lands'). On behalf of the Owners, 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 south of Britannia Road, east of Bell School Line (see enclosed Aerial Context Map). The Subject Lands consist of Regional Natural Heritage System ('NHS') lands and are adjacent to lands that were brought into the Town of Milton Urban Area as part of the previous Sustainable Halton Regional Official Plan Review process. Furthermore, the Site is subject to a 'Future Strategic Employment Area' policy overlay by the in-effect Halton Regional Official Plan and is in proximity to planned employment-related development along the Tremaine Road corridor as well as the Milton Education Village Secondary Plan area.

Given the above-noted location attributes, we request that you consider the Subject Lands for inclusion within the Town of Milton Urban Area to facilitate future employment-related development. In our opinion, inclusion of the Subject Lands is appropriate and supports good planning as the Subject Lands would facilitate a natural and logical extension of planned development, would support achievement of Provincial growth targets, would support

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www.gsai.ca



preservation of key natural heritage features and systems and would facilitate cost-efficient servicing. The Subject Lands would also enable a rounding out of lands that will not adversely impact the Land Needs Assessment efforts completed to date.

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

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

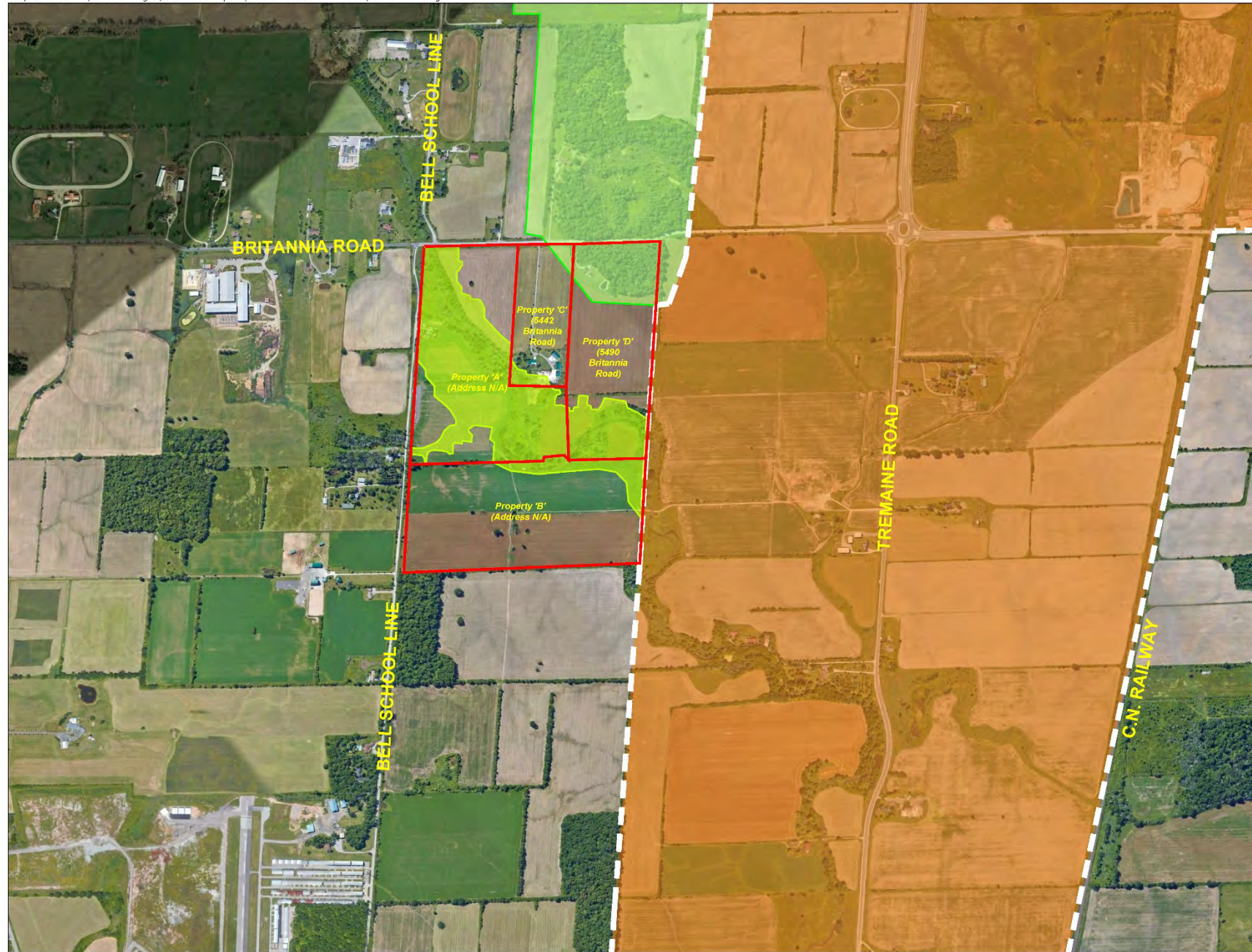
Yours very truly,

**GLEN SCHNARR & ASSOCIATES INC.**

Colin Chung, MCIP, RPP  
Partner

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





# AERIAL CONTEXT PLAN

Jo-Anne Vivian Snow &  
5442 Britannia Road &  
5490 Britannia Road  
Town of Milton

## Legend

- ▬ Property 'A' (Address N/A)  
±19.95ha (49.30ac)
  
- Property 'B' (Address N/A)  
±20.43ha (50.48ac)
  
- Property 'C' (5442 Britannia Road)  
±6.57ha (16.24ac)
  
- Property 'D' (5490 Britannia Road)  
±14.86ha (36.72ac)
  
- TOTAL PROPERTY AREAS  
±61.81ha (152.74ac)**
  
- Greenbelt Natural Heritage System (NHS)
  
- Regional Natural Heritage System (NHS)
  
- Urban Area  
(as per Region of Halton  
ROPA 38 Urban Boundary  
expansion)

## Notes:

- all measurements and areas are approximate only
- Regional Natural Heritage System limits as per Minister of Natural Resources and Forestry interactive mapping



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



# The Corporation of the Town of Milton

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Report To: Council

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From: Jill Hogan, Acting Commissioner, Development Services

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Date: January 17, 2022

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Report No: DS-006-22

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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
<b>Total NEW DGA</b>	<b>1,315 ha</b>	<b>1,365 ha</b>

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	
<b>Gross Area</b>	<b>1,760 ha</b>	<b>1,930 ha</b>	

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
<b>Total Developable Area</b>	<b>1,315</b>	<b>2,300</b>	<b>-985</b>
Non-Developable Area	445	1,680	
<b>Gross Area</b>	<b>1,760 ha</b>	<b>3,980 ha</b>	

**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.

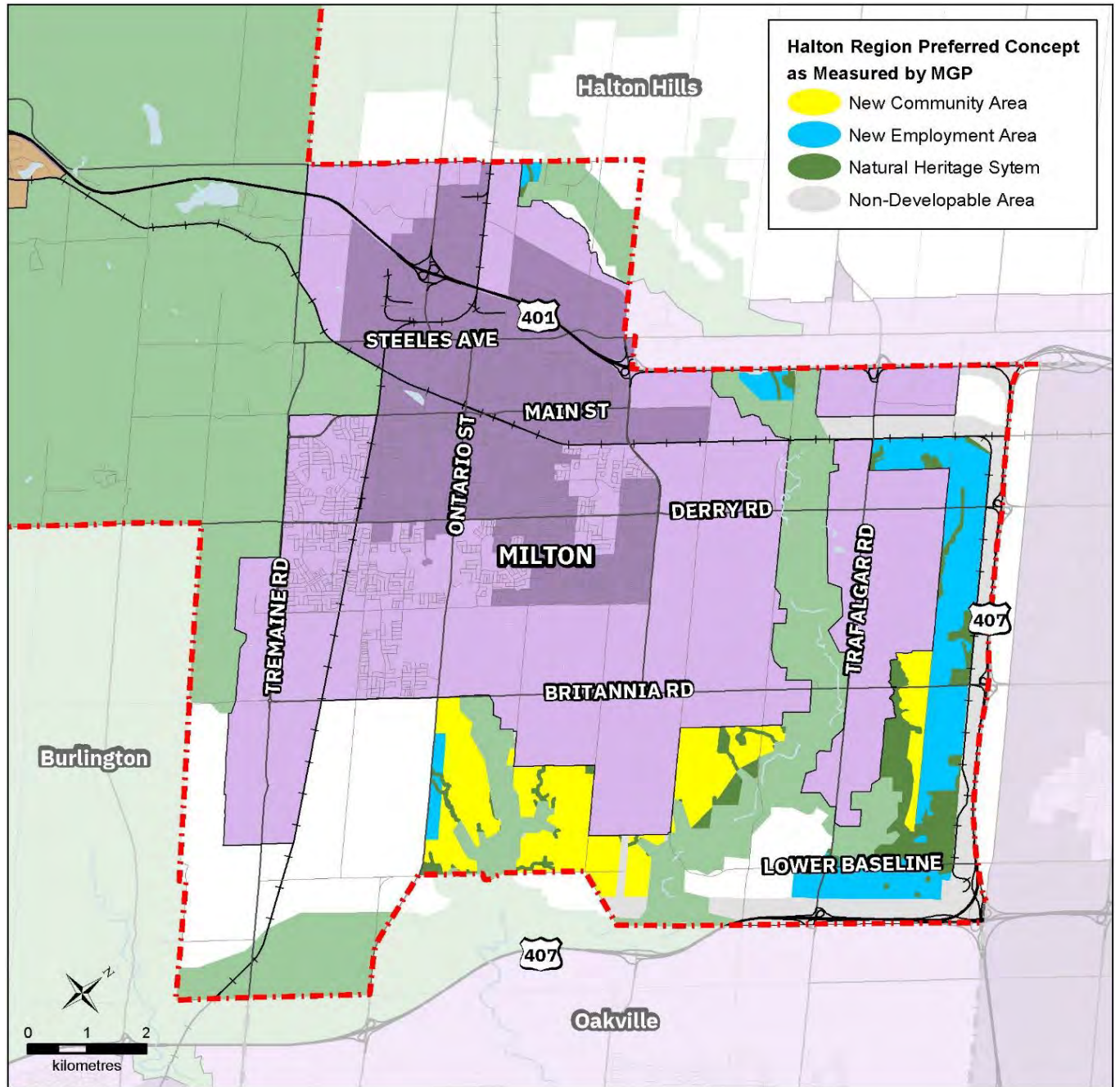


CAO Approval  
Andrew M. Siltala  
Chief Administrative Officer

### 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*

