

## **Integrated Growth Management Strategy (IGMS) – Public and Stakeholder Response Document**

Staff Response of Comments Received on the IGMS and Growth Concepts

### **Overview**

This document provides summaries of written submissions and staff responses on comments related to the IGMS and Growth Concepts.

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

The submissions are organized chronologically by date received.

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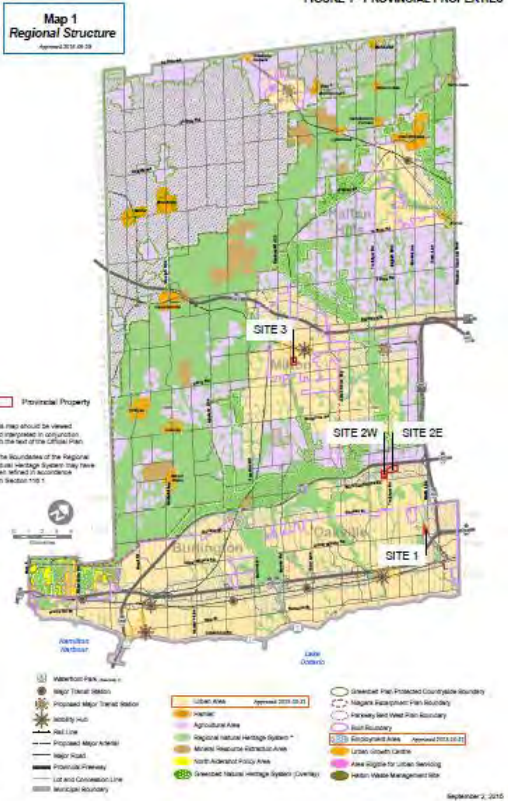
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		<p>heritage study for the entire property, which concludes that the Site 1 is suitable for development.</p> <p>IO has identified that Site 1 could be developed for residential uses similar to the neighbouring residential community to the west and would be a logical extension of this neighbourhood.</p> <p>Additionally, the Joshua Creek Valley system provides a natural and logical division between the residential community to the west and the employment area to the east. Although it is identified as Employment Area on the Region of Halton Official Plan, we believe Site 1 is not well suited for employment use. Our reasons are as follows:</p> <ul style="list-style-type: none"> <li>• It is separated from other employment areas by the Joshua Creek Valley to the east and north, and to the south by Upper Middle Road. The Upper Middle Road corridor and the Joshua Creek Valley provide physical separation of the subject land from employment areas.</li> <li>• Site 1 is separated from employment land to the south by Upper Middle Road East which provides separation distance from this employment area. It is noted that the land on the south side of Upper Middle Road are designated “Business Commercial” and “Business Employment” in the Town’s OP.</li> <li>• Site 1 is triangular in shape and also contains a stormwater management facility (which is not owned by the Province). The Site constraints may limit large scale employment uses on this property.</li> </ul> <p>As such, given the Site’s location and that the land is not considered by the Town to be part of its vacant employment land supply, and because Site 1 is not included in the Town’s mapping of employment areas, IO requests that this site be removed from the “Employment Area” designation from the Halton OP.</p> <p>Through the Town’s Official Plan Review process, a conversion request was submitted on behalf of IO to the Town. The Request was supported by the Town; however, it was indicated that this request would require coordination with Halton Region to remove the Employment overlay on Site through its Official Plan Review process (October 16, 2017 Oakville Staff Report).</p> <p>Site 2 – Trafalgar Corridor Land</p> <p>Site 2 is comprised of Provincially owned properties on the east (Site 2 E) and west (Site 2W) sides of Trafalgar Road, north of Burnhamthorpe Road, designated as “Employment</p>	<p>order to align with the Town’s Urban Structure.</p> <p>In this context, Regional staff have recommended the area identified as Site 1 in the letter (referred to as ‘The Parkway’ and referenced as ‘O-04’ and ‘O-12’ in the conversion request inventory), be advanced through the Preferred Growth Concept Regional Official Plan Amendment.</p> <p>Detailed information on how this area was assessed as part of the Region’s review of employment conversion requests is provided in Appendix B of the Preferred Growth Concept Report and Appendix C.2 to the Growth Concepts Discussion Paper.</p>

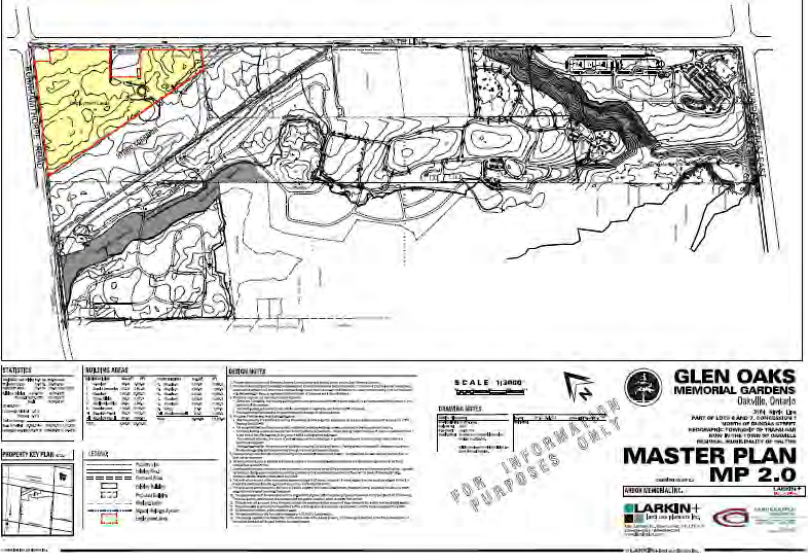
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		<p>District” and “Trafalgar Urban Core Area 1” in the North Oakville East Secondary Plan (“NOESP”) (see attached map). The western parcel is approximately 20.5 ha, and the eastern parcel 14.3 ha (together referred to as the “Site 2”). IO agrees with maintaining the “Employment Area” designation on the eastern portion of the Site 2 E eastern parcel.</p> <p>We note that the Region of Halton Official Plan does not designate “Trafalgar Urban Core Area 1” lands as “Employment Areas”. However, it appears that the Town considers this designation as part of its Employment Areas.</p> <p>IO is not seeking to remove the permitted employment uses (i.e. office) on the portions of Site 2E and 2W within the Trafalgar Urban Core Area 1 designation. Instead, IO is seeking to add residential permissions to create a mixed use node with a greater diversity of uses and vibrancy than the current policies provide.</p> <p>IO has had previous discussions and made submissions to the Town with respect to adding residential permissions to the Trafalgar Urban Core 1 land. The Town has indicated that consideration of this request would be looked at through the future North Oakville Secondary Plan Review process to assess the mix of uses required to support the Trafalgar Urban Core Area.</p> <p>Therefore, IO continues to support the exclusion of the Trafalgar Urban Core Area 1 land from Halton Region’s Employment Area overlay.</p> <p>Site 3 – E.C. Drury Campus, Milton</p> <p>Site 3 is the E.C. Drury Campus for the Deaf and Trillium School, located at 255 Ontario Street South in Milton (Figure 6). Site 3 is approximately 24.5 hectares (63 acres). Site 3 is located in the central, developed area of the Town of Milton, in proximity to the Main Street East, the downtown core and to the Milton GO station. Ontario Street is a Multi-Purpose Arterial Road that is well served by local and regional public transit.</p> <p>Site 3 is designated “Urban Area” on Map 1: Regional Structure in the Halton OP (Figure 7). The land to the north of Site 3 is designated “Urban Growth Centre”, which is one of the Intensification Areas identified in the Regional OP.</p> <p>The Milton Official Plan identifies Site 3 as Institutional Area (Figure 8 (Milton OPA 31)) and along an Intensification Corridor located between two Intensification Areas in the Milton Official Plan.</p>	<p><b><u>Site 2 and 3</u></b></p> <p>Comments pertaining to Site 2 (Trafalgar Corridor Land) and Site 3 (E.C. Drury Campus, Milton) are noted.</p> <p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. In particular, the Preferred Growth Concept directs a significant amount of growth to strategic growth areas, including areas around GO stations and on planned higher order transit corridors, such as the Trafalgar Corridor in Oakville, and more generally to the Delineated Built-Up Area. In this way, the comments relating to these sites have been considered and are reflected in the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>Site 3 is immediately south of the Regional Ontario Street Property, which was subject to a Master Plan exercise that recommended a mix of uses to be established in a more intense design than what currently exists on the property.</p> <p>In consideration of the aforementioned Master Plan exercise and the possibility that some, or all of Site 3, could be redeveloped in the future (dependent on program needs), IO requests that Halton Region consider the redevelopment and intensification potential of Site 3 in its MCR and OP Review processes.</p> <p>We will continue to monitor your ongoing MCR and OP Review Process, and we would like our comments to be considered as part of the background review stages. If you have any questions, or wish to discuss these Sites in further detail, please do not hesitate to contact Michael Coakley at Infrastructure Ontario or I.</p> <p>Yours truly,</p> <p>GSP Group Inc.</p> <p>Eric Saulesleja, MCIP, RPP  Senior Associate  / Figures Attached  c.c. Owen McCabe – Halton Planning  Brook Marshall – Halton Planning  Michael Coakley – Infrastructure Ontario  Lindsey Gerrish – Infrastructure</p>	

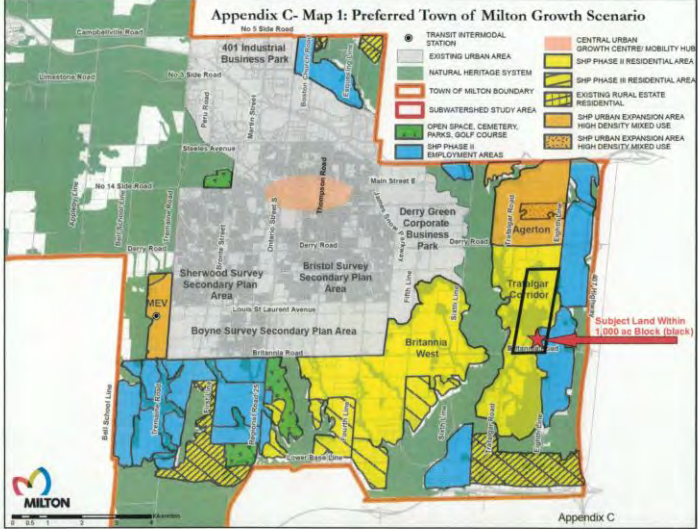
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		<p style="text-align: center;"><b>FIGURE 1 - PROVINCIAL PROPERTIES</b></p>  <p>Note: The submission also included individual maps of each property. These were redacted for the purposes of this chart.</p>	
2.	<p>Matt Bagnall on behalf of Arbor Memorial</p> <p>E-mail dated October 3, 2018</p>	<p>Dear Sir,</p> <p>Please find attached a letter concerning the Region's Official Plan review and my client's lands at 3164 Ninth Line, Oakville (Glen Oaks Memorial Gardens).</p> <p>If you could confirm this has been received, that would be greatly appreciated.</p> <p>Regards, Matt</p>	

No.	Source	Submission	Response
		<p>ATTACHED LETTER</p> <p>We represent Arbor Memorial Inc. (AMI) on planning matters affecting their properties in the Greater Toronto Area, including their property at Glen Oaks Memorial Gardens, Oakville. We have been following the Halton Regional Official Plan Review (HROPR) and, at this time, wish to make a submission to the Region in regards to a portion of Glen Oaks Memorial Gardens that is identified for employment uses.</p> <p>Currently, a portion of the Glen Oaks Memorial Garden Cemetery is identified as "Employment Area" overlay on Map 1 of the Halton Region Official Plan (HROP). As part of the HROPR, please accept our request for the removal of the 'Employment Area' overlay from the Glen Oaks property at the south west corner of the Burnhamthorpe Road and Ninth Line intersection (see enclosed Master Plan). Glen Oaks currently comprises a number of established and future/expanding burial gardens, related buildings (funeral home, mausoleum, and administrative offices) and natural heritage areas. In addition, the property includes vacant land abutting the aforementioned roads and a utility corridor, these lands being identified as the 'Employment Area' overlay, as well as 'Employment Area' designation in Appendix 7.3 of the North Oakville East Secondary Plan 'Master Plan'. This vacant land within the cemetery property represents a much-needed burial garden expansion area required for the future growth of the cemetery, which would enable Glen Oaks Memorial Gardens to continue to meet the memorialization needs of Halton Region.</p> <p>Given the difficulty of securing lands for new cemeteries in the Greater Toronto Area, it is imperative that existing cemetery lands be retained for this important use. Accordingly, it is the intention of LARKIN+, on behalf of AMI, to pursue a re-designation of these lands, initially through the removal of the Region's 'Employment Area' overlay through the ROPR process, and subsequently through the Town's OP review process, as appropriate, to designate the lands 'Cemetery Area'.</p> <p>Please find enclosed a signed letter from AMI authorizing LARKIN+ Land Use Planners to act on their behalf in this regard, as well as a 'Glen Oaks Master Plan' identifying the employment area on the property. I have registered online to be added to the HROPR notification list and I look forward to being updated on the progress of the HROPR and further opportunities to input into the process at both a Regional and local level.</p> <p>Sincerely,</p> <p>LARKIN+</p>	<p>Based on a review of the submission, Regional staff's initial assessment of the request (identified as 'O-18 – 3164 Ninth Line in the conversion request inventory) concluded that further analysis was required. This finding was summarized in Appendix C.2 to the Growth Concepts Discussion Paper.</p> <p>Further analysis of the request was undertaken as summarized in Appendix B to the Preferred Growth Concept Report. The conclusion of this analysis was that the lands should remain identified within the Regional Employment Area based on the lack of demonstration of the need for the conversion and its impact on the Region's supply of employment lands, among other things.</p>



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3.	<p>Terrence Glover on behalf of Eighth Line Apple Orchard</p> <p>E-mail dated October 9, 2018</p>	<p>Dear Mrs. Hogan:</p> <p>As you are aware Urban in Mind Planning, Land Development &amp; CPTED Consultants along with CB Land Management Inc., have been retained by the owner to provide professional planning and municipal servicing opinion regarding the logical inclusion of the Eighth Line Apple Orchard Inc. lands (Subject Lands) into the Town of Milton's preferred growth scenario recommendation to the Regional Municipality of Halton.</p> <p>This submission letter provides our opinion on planning matters and is supported by a separate municipal servicing opinion letter provided by CBLM under separate cover.</p> <p>In addition to our review of ROPA 38 and the Sustainable Halton Master Water, Wastewater, Transportation Plan, we have reviewed Milton Staff Report ES-016-18, from the recent September 24, 2018 Council Meeting, and are generally supportive of the attached "Appendix C-Map 1: Preferred Town of Milton Growth Scenario Plan". The location of the subject property is identified on the attached map by a red arrow.</p> <p>Notwithstanding that this most recent plan is thoughtful in its approach to meeting Milton's current and future growth needs, we continue to recommend that the urban zoning/uses</p>	<p>In terms of the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy, the subject lands were initially adjacent to, but not within, the areas identified as potential locations for urban expansion lands. The Land Needs Assessment identifies the amount of land required and the appropriate location to accommodate growth to 2051. Based on the results of the Land Needs Assessment and further technical analysis, the subject lands are proposed to be included in the Preferred Growth Concept as Community Area.</p>

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		<p>of the subject property should be considered in the same light as the rest of the 1, 000 acre block.</p> <p>As depicted on the attached map, the subject lands are located on the north side of Britannia Road and the west side of Eighth Line. These major roadways provide a physical separation/barrier between the subject lands and the currently proposed South Halton Plan (SHP) Phase 2 Employment Lands which support the logical inclusion of the subject lands into the 1000 acre land assembly. To this end, the subject lands have more physical commonalities with the lands to the north and west than they do with the lands to the south and east of the site.</p> <p>In reviewing the most recent plan, it is clear that the subject property has been included in this preferred growth scenario because it makes logical sense to do so. The pending 6-lane Britannia Road redevelopment abutting the property, the pending servicing infrastructure that will surround the area of the property, the location of the existing Hwy 407 interchange, the expansion of Go Transit, the calculated land area needed for anticipated growth, and the inherent support for the Trafalgar Corridor Secondary Plan have all have been evaluated to conclude that the subject lands should be included in the Town's preferred growth scenario.</p> <p>In conclusion, we generally support this preferred growth scenario in principle, but continue to recommend that the planning of the subject lands be integrated with the associated 1, 000 acre block, rather than be associated with future employment land~ separated by major roadways.</p> <p>Sincerely,</p> <p>Terrance Glover. RPP, cpr Principal Urban in Mind, Planning, Land Development &amp; CPTED Consultants</p>	

No.	Source	Submission	Response
		 <p data-bbox="1234 386 1255 776" style="writing-mode: vertical-rl; transform: rotate(180deg);">Milton's Preferred Growth Scenario plan from the ES-016-18</p>	
4.	<p data-bbox="289 971 428 1073">Colin Chung on behalf of Remington Group</p> <p data-bbox="289 1105 428 1159">E-mail dated May 3, 2019</p>	<p data-bbox="457 971 1402 1133">Glen Schnarr &amp; Associates Inc. (GSAI) attended the Council Workshop and Presentation on April 10, 2019 presenting Regional Growth Scenarios to 2041 and we would like to provide comments on the Growth Scenarios presented. GSAI represents The Remington Group, owner of approximately 281 hectares (695 acres) of land in the Town of Milton, immediately adjacent to the existing Milton Urban Area (see Aerial Context Plan enclosed). Our client is desirous of the inclusion of their land into the 2041 Urban Area.</p> <p data-bbox="457 1166 1402 1403">Our client's lands include 100 hectares (248 acres) of the Greenbelt Plan area, the Sixteen Mile Creek valley system and related Regional Natural Heritage System, which is 36% of the total land area owned by our client. The inclusion of our client's lands into the Milton Urban Area will advance and secure Halton Region's vision and mandate for a complete, comprehensive and sustainable Natural Heritage System by enabling the extension of these natural features and systems into public ownership in the future for the Town and the Region. In addition, our client's lands are a natural and logical continuation of current cost effective Master Planned Regional Services, servicing urban development south of Britannia Road to accommodate growth to the year 2041. We request that you</p>	<p data-bbox="1438 971 1892 1268">The majority of the subject lands were within the Primary Study Area – which is the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy – and based on the results of technical analysis, generally those lands within the Primary Study Area and outside of the Provincial Greenbelt Plan Area are proposed to be included in the Preferred Growth Concept.</p> <p data-bbox="1438 1300 1892 1403">Lands adjacent to Eighth Line are currently identified as Future Strategic Growth Area and are proposed to be included in the Preferred Growth Concept</p>

No.	Source	Submission	Response
		<p>consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the release of the discussion paper in May and to working with you on Halton Region's Growth Scenarios. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,  GLEN SCHNARR &amp; AS SOCIA TES INC</p>	<p>as Employment Area. Lands within the Primary Study Area and adjacent to Fifth Line, Lower Base Line, and Sixth Line north of Lower Base Line are proposed to be included in the Preferred Growth Concept as Community Area. Lands adjacent to Sixth Line south of Lower Base Line were not within the Primary Study Area, are partially within the Provincial Greenbelt Plan Area, and are not proposed to be included in the Preferred Growth Concept. Please see Preferred Growth Concept mapping for additional detail. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response																		
		<p>20:\Drawings\390-009\2019 05 May\Aerial_Context_May 3 19.dwg</p> <p><b>THE REMINGTON GROUP AERIAL CONTEXT PLAN</b></p> <p>SOUTH OF BRITANNIA ROAD, MIDTON REGIONAL MUNICIPALITY OF HALTON</p> <table border="1"> <tr> <td></td> <td>BRATTY LANDS</td> <td>8397.45 ha (20622 ac)</td> </tr> <tr> <td></td> <td>RESIDENTIAL NET DEVELOPABLE AREA</td> <td>4100.96 ha (101224 ac)</td> </tr> <tr> <td></td> <td>AREA WITHIN RNHS</td> <td>4800.42 ha (119114 ac)</td> </tr> <tr> <td></td> <td>REGIONAL NATURAL HERITAGE SYSTEM (RNHS)</td> <td>2100.00 ha (5200 ac)</td> </tr> <tr> <td></td> <td>DISTRICT MASTER PLANNED VIA FOR INFRASTRUCTURE</td> <td>1000.00 ha (2471 ac)</td> </tr> <tr> <td></td> <td>DISTRICT MASTER PLANNED MAINTENANCED INFRASTRUCTURE</td> <td>1000.00 ha (2471 ac)</td> </tr> </table> <p>GSAI Glen Schwarz &amp; Associates Inc.</p> <p>Scale: N.T.S. May 3, 2019</p>		BRATTY LANDS	8397.45 ha (20622 ac)		RESIDENTIAL NET DEVELOPABLE AREA	4100.96 ha (101224 ac)		AREA WITHIN RNHS	4800.42 ha (119114 ac)		REGIONAL NATURAL HERITAGE SYSTEM (RNHS)	2100.00 ha (5200 ac)		DISTRICT MASTER PLANNED VIA FOR INFRASTRUCTURE	1000.00 ha (2471 ac)		DISTRICT MASTER PLANNED MAINTENANCED INFRASTRUCTURE	1000.00 ha (2471 ac)	
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No.	Source	Submission	Response
		<p>The submission consists of two technical drawings, labeled P&amp;P #2 and P&amp;P #3. Each drawing includes an aerial view of the site with a red line indicating the sewer line alignment, a profile view showing the sewer's elevation and slope, and a legend with various symbols for infrastructure. The profile views show a 2400mm diameter concrete sewer with a slope of 0.13%. The drawings are for 'MILTON PHASE 4 - BRITANNIA WEST' and are intended for discussion purposes only.</p>	





No.	Source	Submission	Response
5.	<p>Natalie Deluca on behalf of Mattamy Homes</p> <p>E-mail dated January 3, 2020</p>	<p>Dear Mr. Benson. Please see attached letter and kindly confirm receipt. Thank you.</p> <p>Natalie Deluca Office Manager/Law Clerk to Scott Snider Turkstra Mazza Associates 15 Bold Street Hamilton, ON, L8P 1T3</p> <hr/> <p>ATTACHMENT</p> <p>Sent Via Email: Region of Halton Attn: Curt Benson, Director of Planning 1151 Bronte Road, Oakville Ontario L6M 3L1</p> <p>January 2, 2020</p> <p>Dear Mr. Benson:</p> <p>RE: Response to Integrated Growth Management Strategy Growth Scenarios Halton Region to 2041 Attachment #4 to LPS 41-19 Our File No. 13260</p> <p>1.0 Introduction: Need for Engagement</p> <p>I am writing to you on behalf of Mattamy Homes and associated companies. Our clients have had the opportunity to review in detail the report on Integrated Growth Management Strategy Growth Scenarios: Halton Region to 2041 (IGMS). We have noted that there has been no formal consultation process with the development industry on the IGMS by the Region to date. On behalf of Mattamy, we wish to state that we are interested in meeting with Regional staff to discuss the report and the feedback set out below. It is our opinion that meaningful engagement throughout the process will assist in all voices being heard and a more successful outcome for the IGMS process. There are a number of questions and concerns with the approach and recommendations within the report which are set out below.</p> <p>2.0 Growth Scenarios must be based on Approved Provincial Policy</p>	<p>Comments are acknowledged. Regional staff note that comments on the Integrated Growth Management Strategy have been addressed in material related to Regional Official Plan Amendment No. 48 (ROPA 48) and the Preferred Growth Concept Report. More details are also available in the Integrated Growth Management Strategy Policy Directions and will be in the future Regional Official Plan Amendment which is being proposed to implement the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>It is acknowledged that over the past months that there is a changing Provincial Policy context that will continue to evolve over the period of the IGMS process. One of the challenges will be to ensure that the IGMS study process is robust and fluid enough to address these policies changes. One of the changes that has occurred and is now in effect is the amended Growth Plan.</p> <p>Our clients support a growth scenario which is based on the current and in effect Growth Plan. Although we respect that the Region has been undertaking this study process over many months and the process started under the prior Growth Plan, new and in force policy must now be the basis for the Growth Scenarios. The previous Growth Plan which no longer has legal status as the basis for assessing Growth Scenarios is not appropriate.</p> <p>3.0 Growth Scenarios must encourage complete communities including all forms and types of housing</p> <p>The IGMS process envisions a significant change in built form and densities beyond that which the market currently or is anticipated to support. The report acknowledges the significant challenges and realistic possibility that desired housing form may not be aligned with market choices. It is essential that the IGMS plan and allow “complete” communities that fulfill all forms and tenures of households.</p> <p>We also note that the new draft PPS refers to the provision of a market-based range and mix of housing. It is likely this new PPS will be in force and effect prior to the amendment implementing the IGMS comes forward and should be considered as part of the next step of the study process and the scenarios revised and amended accordingly. We suggest that the Region should further assess the Growth Scenarios as the provision of market-based housing will result in the need for more grade related housing.</p> <p>The analysis is premised on the assumption that there will be a significant increase in apartment-built form and that two thirds of all apartment units in the 2030's will accommodate larger family households. The report notes that this will be achieved by empty nesters moving from their homes to apartments and young families will choose to move to apartments instead of ground related housing. This does not reflect a market-based range and mix of housing nor does it provide complete communities providing a full range and mix of housing forms. Although the trend to apartment housing as a higher mix of housing stock will likely grow, it is not prudent planning policy to base the long term growth strategy on a mix of housing that does not reasonably account for a market-based range and mix of housing. We would recommend that as part of the next step of the IGMS process that a market-based growth scenario be developed for part of the evaluation process.</p>	

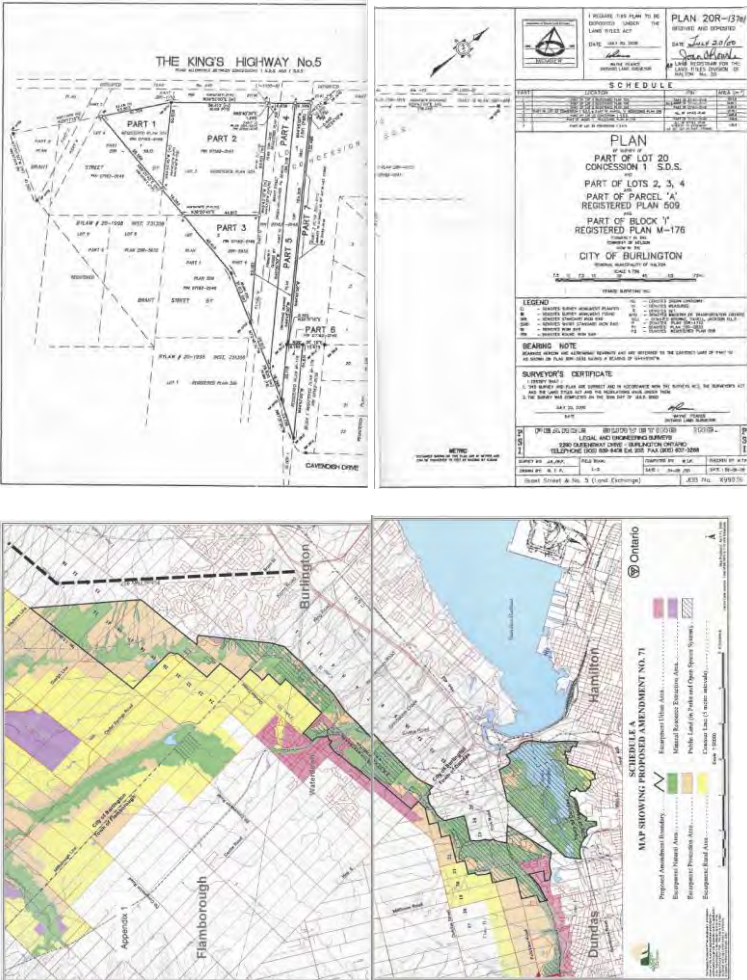


No.	Source	Submission	Response
		<p>8.0 Evaluation Criteria need to be re-evaluated to be less biased</p> <p>Appendix C to the Report sets out the Evaluation Framework for the scenarios. The objectives are sound. The Evaluation questions set out a framework for considering the impacts of the scenarios. Improvements could be made to these questions to broaden the matters for consideration.</p> <p>The measures proposed for each of the objectives appear to be prejudicial and structured to predetermine the selection of one specific scenario by the Region. The use of the terminology “ranks the highest” in the measures does not allow for relative ranking of competing priorities as it only identifies what will be ranked the highest. One example is within Theme 1 “The concept that locates new residential development close to existing or potential priority corridors and provide opportunities for multimodal access will be ranked the highest” The measure is not clear in its language as to whether it is all new residential or only a portion of new residential to be evaluated under this measure. The measure does not consider the range and mix of housing and community design found within emerging areas and other priorities for urban structure. When one goes to the measures for complete communities, the only two measures related to protection of the NHS and Agriculture and contiguous development patterns. Building complete communities is a much broader concept than just these two measures. The language of the measures proposed is insufficient for a growth management evaluation process and need significant reconsideration prior to proceeding.</p> <p>9.0 Summary</p> <p>A growth management strategy must take into account planning policy directives and community and stakeholders’ interests/views. Although the Region’s work to date has considered some of this input, the lack of engagement with community builders is concerning along with apparent disregard of market conditions and trends. All involved desire safe and complete communities servicing the needs of existing and future residents. More weight must be given to these considerations to ensure an appropriate outcome.</p> <p>We look forward to working with Region throughout this study process and further discussing the above points.</p> <p>Yours truly,</p> <p>Scott Snider</p>	

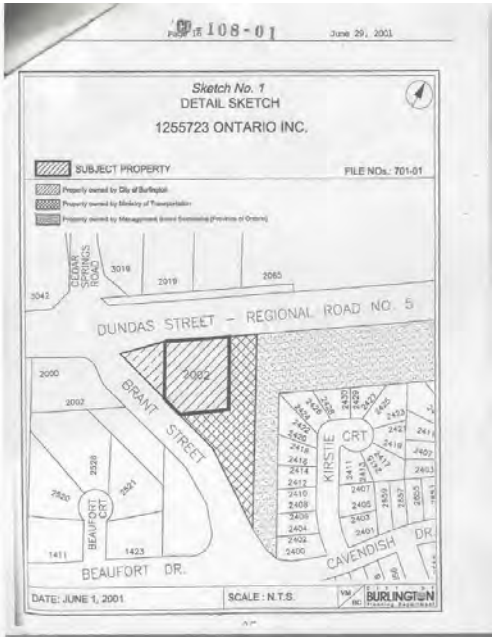
No.	Source	Submission	Response
6.	<p>Helen Vastis (2002 Dundas Street Burlington &amp; 0 Lower Base Line Milton)</p> <p>E-mail dated February 7, 2020</p>	<p><i>E-MAIL</i></p> <p>Hi Dan</p> <p>Further to our telephone conversation on December 19, 2019, I confirm that I have two properties for which I am requesting to amend the Regional Official Plan so that these properties can be brought into the urban boundary. The properties are as follows;</p> <p>1. 2002 Dundas Street, Burlington</p> <p>These lands are located at the south-east corner of Dundas Street and Brant Street in the City of Burlington.</p> <p>We have reviewed this matter with several consultants and our lawyer who advises that the property line which delineates which lands are inside the urban boundary and which lands are outside the urban boundary, should be running in the road (Dundas Street) and not in the middle of property. Our lawyer has advised us that this is a mapping error.</p> <p>We have approached the City of Burlington, Planning Department, and requested that they address this issue as there is a mapping scale issue. We were advised that the official plan was currently in the hands of the City of Burlington and this is the time to address this issue. The City of Burlington responded to us on November 21, 2019 and advised that the subject lands have been removed from the Parkway Belt Plan (see attachment) but in order for them to proceed with our request, the next step would be to amend the Regional Official Plan as it designates the property Agricultural Area. If this is done, then the City of Burlington would review our request to amend its Official Plan, but a discussion with the Region is required first. The City of Burlington provided us with your contact information.</p> <p>I have attached an email which includes a letter from the Ministry of Municipal Affairs dated May 17, 2016, that clearly states that our lands are no longer within the Parkway Belt West Plan or in the Minister's Zoning Order, O. Reg. 482/73. Both the Region and the City of Burlington were copied with this letter. Attached is also a reference plan of the area and an area sketch.</p> <p>For these reasons it is our lawyers opinion that the subject lands should be within the Regional urban boundary.</p> <p>I await to hear back from you on this matter and as to how we can proceed to correct the maps and include these lands within the Regional urban boundary. I also confirm your advice that once the subject lands are within the Regional urban boundary then they will</p>	<p><u>2002 Dundas Street, Burlington</u></p> <p>Comments are acknowledged and continue to be considered. Regional staff are still looking into this matter in more detail. Given the nature of the request, this matter will be addressed and confirmed as a part of the implementing Regional Official Plan Amendment (ROPA).</p>

No.	Source	Submission	Response
		<p>also be acknowledged by the local plan and therefore we will not need to do anything further with the City of Burlington.</p> <p>2. 0 Lower Base Line, Milton</p> <p>These lands are located on the south-west corner of Trafalgar Road and Lower Base Line in the Town of Milton. Attached is a location map. This area is currently zoned as Agricultural. We are requesting a boundary expansion in order to get the subject lands inside the settlement area.</p> <p>Just to give you a brief background - the subject lands are comprised of an assembly of various remnant parcels. The first parcel was purchased on April 19 2002 by 1255723 Ontario Inc. for \$20,000.00 - this was a remainder of the 77 acres to the east and was a result of a natural severance when Trafalgar road was constructed.</p> <p>The next parcel was purchased from Halton Region on March 30, 2006 for \$27,000 pursuant to an agreement of purchase and sale with 1255723 Ontario Inc. I have attached a copy of this agreement for your review.</p> <p>The third parcel was purchase on August 21, 2006 from the Town of Milton for \$36,000 - this was a closed road allowance. I have attached a copy of this agreement for your review.</p> <p>The subject lands are irregular in shape and they comprise an area of approximately 2.77 acres. They are currently vacant but they contain a gravel surface. These lands have never been farmed or used for agricultural purposes. Previously, the lands were used as the former right-of-way for Trafalgar Road. Following the reconstruction and realignment of Trafalgar Road, the Region of Halton and the Town of Milton declared these lands as surplus and sold them to us.</p>	<p><u>0 Lower Base Line, Milton</u></p> <p>Based on the technical analysis and the amount of new Employment Area determined to be needed through the Region's Land Needs Assessment to accommodate additional Employment Land Employment in Halton between 2031 and 2051, staff are recommending that the subject lands be included within the Preferred Growth Concept as Employment Area.</p>

No.	Source	Submission	Response
		<div data-bbox="470 272 919 829" data-label="Image"> </div> <p data-bbox="451 850 961 878">I await to hear further from you as to next steps,</p> <p data-bbox="451 906 602 933">Kind Regards</p> <p data-bbox="451 961 680 1015">Helen Vastis 1255723 Ontario Inc.</p> <hr data-bbox="451 1044 1413 1047"/> <p data-bbox="451 1075 638 1102"><b>ATTACHMENTS</b></p> <p data-bbox="451 1130 1388 1185"><b>Note:</b> An Attachment detailing correspondence with the Ministry of Municipal Affairs was redacted for the purposes of this chart.</p>	

No.	Source	Submission	Response
			



No.	Source	Submission	Response
			
7.	<p>Jennifer Staden on behalf of Fieldgate Developments re: 5593 Reg Road 25 &amp; 5419 Third Line</p> <p>E-mail dated March 25, 2020</p>	<p>Good morning Curt,</p> <p>I trust you are keeping healthy and well, all things considered. Please find attached a letter and corresponding Aerial Context Plan from Glen Schnarr &amp; Associates Inc., on behalf of our client Fieldgate Developments, with respect to the Regional Growth Scenarios that were presented at the April 10, 2019 workshop and further presented at the June 19, 2019 Council Meeting.</p> <p>We look forward to the opportunity to discuss the Growth Scenarios further with you.</p> <p>Regards</p> <hr/> <p>ATTACHED LETTER</p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) has been monitoring the Regional Official Plan review including the Regional Growth Scenarios to 2041 and we would like to provide</p>	

No.	Source	Submission	Response
		<p>comments on the Growth Scenarios previously presented. GSAI represents Fieldgate Developments, owner of approximately 65.74 hectares (162.45 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Aerial Context Plan enclosed). Our client is desirous of the inclusion of their land into the 2041 Urban Area.</p> <p>We feel that our client's lands are a natural and logical continuation of current cost effective Master Planned Regional Services, servicing urban development south of Britannia Road to accommodate growth to the year 2041. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>The Town of Milton has expressed interest to the Province to have our client's lands included in the Milton Urban Boundary for residential growth. Our client's lands were identified by the Town of Milton in a Staff Report on Amendment 1 to the Growth Plan (PD-011-19) as 'Open Space, Cemetery, Parks, Golf Course' and 'Whitebelt'. In a letter from Jill Hogan, Milton's Director of Planning, dated February 28, 2019 to Cordelia Clarke Julien (Assistant Deputy Minister) regarding the Town's comments on Amendment 1 to the Growth Plan, the Town requested that the Province permit a settlement boundary expansion in excess of 40 hectares, in advance of the Region's MCR, to facilitate the inclusion of all 'whitebelt' lands within the Milton Urban Boundary for future residential/mixed-use growth. The Town's interests were again reiterated in a letter to Premier Doug Ford dated February 13, 2019. Our request to have our client's lands included in the Milton Urban Boundary is therefore consistent with the Town's vision for future residential growth.</p> <p>We look forward to working with you on Halton Region's Growth Scenarios. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p> <p>Colin Chung, MCIP, RPP Partner</p>	<p>Based on the results of technical analysis, lands adjacent to Third Line, within the Primary Study Area (the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy) and outside of the Provincial Greenbelt Plan Area, are proposed to be included in the Preferred Growth Concept as Community Area.</p> <p>Based on the results of technical analysis, lands adjacent to Regional Road 25, within the Primary Study Area and outside of the Provincial Greenbelt Plan Area, are proposed to be included in the Preferred Growth Concept as Employment Area. The remaining portion of the parcel adjacent to Regional Road 25, within the Primary Study Area and outside the Provincial Greenbelt Area are proposed to be included in the Preferred Growth Concept as Community Area.</p>
8.	Mark Leger E-mail dated August 12, 2020	<p><b>From:</b> Mark Leger  <b>Sent:</b> Wednesday, August 12, 2020 4:28 PM  <b>To:</b> Benson, Curt  <b>Subject:</b> New Sub-Divisions Population Density Covid-19</p> <p>Mr Benson,</p>	

No.	Source	Submission	Response
		<p>I hope you and your Family are Safe/Well during this unprecedented time. As many Canadians I been watching various news casts regarding the Covid-19 Pandemic. There are a number of key factors that have helped spread the virus. One of the factors is high population density. Has Region given any consideration to changing the current density requirements for new sub-division in Halton (Halton Hills). I have spoken to other in my community (Halton Hills: Georgetown) and it is a concern. We as a community and Province are thinking differently than 6 months ago. Mapping our future community has changed as a result of the pandemic. I would appreciate your thoughts regarding my concerns raised above. I was given your contact information from the office of Mayor Bonnette.</p> <p>Mark Leger President Larry Ella &amp; Associates Insurance Brokers Limited</p>	<p>In April 2021, Regional Council provided additional direction to staff to make available the following information, to form part of the public engagement program: a White Paper on “Planning for Change: An Analysis of COVID-19’s Acceleration of Economic Trends in Halton Region.” A copy of the paper is available online here: <a href="https://www.halton.ca/getmedia/1ff022ba-3eb3-4424-a3a1-3b36ed623156/LPS-white-paper-on-planning-for-change.aspx">https://www.halton.ca/getmedia/1ff022ba-3eb3-4424-a3a1-3b36ed623156/LPS-white-paper-on-planning-for-change.aspx</a>.</p> <p>The paper discusses the changing nature of the economy and employment, and implications for Halton Region, including approaches to address these impacts. The impacts of the COVID-19 pandemic are also considered as part of the Preferred Growth Concept Report and its Land Needs Assessment. The Integrated Growth Management Strategy continues to support complete communities that are planned at appropriate and transit-supportive densities.</p>
9.	<p>Ruth Victor on behalf of 263 Burnhamthorpe Road W</p> <p>E-mail dated August 18, 2020</p>	<p>We have had the opportunity to review the Halton Region Official Plan Review Integrated Growth Management Strategy Regional Urban Structure Discussion Paper dated June 2020. Specifically we have reviewed Appendix E – Employment Area Conversion Requests Inventory and Mapping.</p> <p>We note that the employment lands conversion request for 263 Burnhamthorpe Road West made previously to the Town of Oakville as part of their municipal Comprehensive Review is not included on your inventory and mapping. For this reason, we are formally requesting that the employment land conversion of 263 Burnhamthorpe Road, Oakville be considered by the Region as part of the IGMS Regional Official Plan Review process.</p> <p>To assist, we are attaching copies of the submissions made to the Town of Oakville on this matter as they apply to this request as well.</p> <p>Please let me know if you require any additional information.</p>	<p>Based on a review of the submission, Regional staff’s initial assessment of the request (identified as ‘O-19 – 263 Burnhamthorpe Road West’ in the conversion request inventory) concluded that the request did not meet the Region’s conversion principles as set out in the Regional Urban Structure Discussion Paper. This finding was summarized in Appendix C.2 to the Growth Concepts Discussion Paper.</p> <p>A final review of the request was undertaken as summarized in Appendix B to the Preferred Growth Concept Report. The conclusion of this analysis confirmed</p>

No.	Source	Submission	Response
		<p>Yours truly,</p> <p>Ruth Victor</p>	<p>the recommendation that the lands remain identified within the Regional Employment Area based on the lack of demonstration of the need for the conversion, the potential to undermine the viability of the surrounding employment areas, and the lack of local municipal support, among other things.</p>
10.	<p>Brandon Petter on behalf of T.L.M.T.T Ontario Ltd.</p> <p>E-mail dated August 21, 2020</p>	<p>Dear Mr. Longo,</p> <p>RE: North Oakville – Employment Area Conversion Review (Town of Oakville, Ontario)</p> <p>urbanMetrics inc. is pleased to submit this Employment Area Conversion Review in support of the re-designation of a portion of Part of Lot 8, Concession 2 N.D.S located north of Burnhamthorpe Road in the North Oakville Secondary Plan Area from “Employment Area” to “Transitional Area”. This review represents the initial phase of the Employment Area Conversion process, which would ultimately require the completion of a more extensive Employment Area Conversion Study in support of your application.</p> <p>This initial phase will in a general sense address the suitability of these lands as a mixed-use area- compared to their current designation which permits more traditional employment uses-based on current market trends in Oakville, and the locational characteristics of the property. More importantly, in this first phase we have addressed how the proposed conversion meets the conversion criteria contained in the Growth Plan, and the current in-force Region of Halton and Oakville Official Plans.</p> <p>We do note that the Region is currently developing specific conversion criteria that are expected to be released in mid-summer. Once these criteria are available, we will address these criteria through an addendum to this initial review. Based on the analysis contained in this report, it is our professional opinion that re-designation of the subject site is appropriate in light of its relationship to adjacent land uses, the locational and access characteristics of the property, and current market trends, in terms of the type of businesses that are being attracted to Oakville. Also, the proposed conversion meets the Provincial, Regional, and Town of Oakville conversion criteria.</p> <p>It has been a pleasure conducting this study on behalf of T.L.M.P.T Ontario Ltd and we look forward to discussing our results.</p> <p>Yours truly,</p> <p>Douglas R. Annand, CMC, PLE</p>	<p>Based on a review of the submission, Regional staff’s initial assessment of the request (identified as ‘O-15’ in the conversion request inventory and considered comprehensively with the adjacent ‘O-21’, together referred to as ‘Burnhamthorpe Road East) concluded that the request did not meet the Region’s conversion principles as set out in the Regional Urban Structure Discussion Paper. This finding was summarized in Appendix C.2 to the Growth Concepts Discussion Paper.</p> <p>Further analysis of the request was undertaken as summarized in Appendix B to the Preferred Growth Concept Report. This included the review of additional supplemental materials addressing Regional staff’s initial analysis. The conclusion of this analysis confirmed the recommendation that the lands remain identified within the Regional Employment Area based on the lack of demonstration of the need for the conversion and the location of the lands as part of a broader contiguous employment area in proximity to goods movement facilities.</p>


No.	Source	Submission	Response
		<p>Partner</p> <hr/> <p><b>Note:</b> The above text is the cover letter of a 58 page submission. Subsequent pages of the submission included a detailed background report on the employment conversion request, including site context, economic trends, and an overview of the land use planning framework.</p>	
11.	<p>David Faye on behalf of Star Oak</p> <p>E-mail dated August 24, 2020</p>	<p>Hi, Owen,</p> <p>I am following up as a result of our conversation on August 14, 2020 regarding Star Oak Developments Limited's ("Star Oak") request for approval of an employment land conversion with respect to an employment block located at Sixth Line and Loyalist Trail in Oakville.</p> <p>This request was made in 2015 to the Town of Oakville (see attached KLM Planning Partners letter to the Town of Oakville dated September 8, 2015). The Town has forwarded this request to the Region of Halton for consideration during the Region of Halton's Municipal Comprehensive Review currently underway. We understand that Town of Oakville staff have advised the Region that the Town supports Star Oak's conversion request.</p> <p>Phase 1 of the Star Oak draft plan of subdivision 24T-13002 is now registered as Plan 20M-1221. The Block in question is Block 154 which comprises 3.128 acres. The Town of Oakville has contracted with Star Oak to purchase the westerly 1.507 acres of Block 154 for a new fire station. This transaction is scheduled to close in 2020. The remainder of Block 154 is 1.621 acres in size.</p> <p>Star Oak wishes to continue with the employment land conversion request for Block 154. Please advise if any further information is required from Star Oak Developments in support of the conversion land request.</p> <p>Regards, David Faye</p> <hr/> <p>ATTACHED LETTER</p> <p>Mr. Wedderburn:</p>	<p>Based on a review of the submission, Regional staff's initial assessment of the request (identified as 'O-17 – Sixth Line / Burnhamthorpe' in the conversion request inventory) concluded that the request met the Region's conversion principles as set out in the Regional Urban Structure Discussion Paper and that it should be implemented as part of the Preferred Growth Concept. This finding was summarized in Appendix C.2 to the Growth Concepts Discussion Paper.</p> <p>Subsequently, <a href="#">Report No. LPS60-21</a> identified a submission from the Halton District School Board which highlighted the role of subject lands as an optimal secondary school location following the evaluation of three potential sites. Given the public interest in providing and advancing community facilities in the North East Oakville Secondary Plan area and the lack of impact to the overall land supply, this conversion was recommended as part of Regional Official Plan Amendment No 48. It was adopted by Regional Council and subsequently approved by the Minister of Municipal Affairs and Housing.</p> <p>More information on the assessment of this employment conversion request is</p>



No.	Source	Submission	Response
		<p>A larger future employment parcel is located on the west side of Sixth Line. Due to the configuration of the subject lands, it is appropriately suited for the requested non-employment uses.</p> <p>c) Is the site located outside or on the fringe of an employment area?</p> <p>The subject lands are part of a small isolated pocket of employment area bisected by Sixth Line and surrounded by the Natural Heritage Systems and Transitional Area lands. These employment lands on the east side of Sixth Line, where the subject lands are located are further constrained by the location of the Region of Halton Reservoir (see attached figure). Given this configuration of natural features and land uses, the subject lands are effectively on the fringe of a small isolated pocket of employment area.</p> <p>d) Will the conversion create incompatibilities with adjacent land uses?</p> <p>No, the proposed conversion will not create incompatibilities with adjacent land uses. As described above, the subject lands are bounded by the Natural Heritage System, Region of Halton Reservoir and future residential uses immediately to the south of Street '2' and on lands west of Sixth Line, north of Burnamthorpe Road. The requested conversion to permit medium/high density residential and complementary retail and service establishment uses would provide for compatible uses to the adjacent lands, offering varied housing forms and opportunity for retail and service uses that serve the immediate area.</p> <p>e) Do site constraints (i.e. size, configuration, topography) limit market choice?</p> <p>Yes, the subject lands are constrained in configuration and size as described above. These factors severely limit the market choice available to the subject lands for the full range of employment uses contemplated by the Employment District Designation, especially when larger, unconstrained, future development parcels would be readily available in the immediate vicinity when the proposed draft plan of subdivision is registered. The size and configuration of the subject lands make it more suitable for non-employment uses.</p> <p>f) Will the conversion support other planning policy objectives (i.e. access to public transit, complete communities)?</p> <p>The lands are strategically located within the community, adjacent to a planned transit route, major pedestrian roadway and trail network. The requested conversion to non-employment uses would achieve the planning objectives for the provision of a variety of housing densities, unit types and tenures throughout the neighbourhoods, which contributes to transit-supportive and walkable, complete communities.</p>	

No.	Source	Submission	Response
		<p>On behalf of our client, we request that staff take into consideration as part of the ongoing Municipal Comprehensive Review, the inclusion of the subject lands for conversion to permit medium/high density residential uses and a range of complementary retail and service establishment uses. The provision of these uses in proximity to a planned transit route, and natural heritage, residential and employment lands would achieve provincial and municipal objectives for transit supportive developments and creation of complete communities.</p> <p>We look forward to working collaboratively with the Town during the public consultation phase of the Official Plan Review. Should you have any questions, please do not hesitate to call.</p> <p>Yours very truly,</p> <p>KLM Planning Partners Inc.</p> <p>James M. Kennedy, MCIP, RPP</p> <div data-bbox="499 857 1220 1377" style="text-align: center;"> <p><b>FIGURE 1 - NORTH OAKVILLE EAST SECONDARY PLAN</b></p> <p><b>FIGURE NOE 2 Land Use Plan</b></p> <p>February 2004</p> </div>	



No.	Source	Submission	Response
		<p style="text-align: center;">Figure 2 - Proposed Draft Plan of Subdivision</p> 	
12.	Kelly Martel on behalf of	Good Morning Mr. Tovey,	Based on a review of the submission, Regional staff's initial assessment of the



No.	Source	Submission	Response
	<p>800 Burloak Drive</p> <p>E-mail dated August 24, 2020</p>	<p>On behalf of our client, Emshih Developments, please find attached comments on the Urban Structure Discussion Paper as well as additional input and information in relation to the employment conversion request for 800 Burloak Drive in the City of Burlington. If you could please advise that you are in receipt of this submission and it will form part of the public record on this matter and be used as input to the conversion request, it would be much appreciated.</p> <p>Thanks, Kelly</p> <hr/> <p>ATTACHED LETTER</p> <p>MHBC is retained by Emshih Developments Inc. with respect to their landholdings municipally addressed as 800 Burloak Drive in the City of Burlington (the Subject Lands). The Subject Lands are approximately 1.7 hectares in size and are located on the west side of Burloak Drive, west of the rail line, and are adjacent to Sherwood Forest Park. The Subject Lands are currently vacant and undeveloped (Figure 1).</p> <p>Background</p> <p>The Subject Lands are currently designated General Employment, in accordance with Schedule B of the City of Burlington Official Plan (Figure 2) and are further identified within the Region of Halton's Employment Area on Map 1- Regional Structure of the Official Plan (Figure 3). The conversion of these lands was supported by the City through their employment land review exercise and the New Official Plan project (see Appendix 1). They were not identified by the Region as lands to be added to the PSEZ and were not identified by the Province as part of a PSEZ in the first draft mapping.</p> <p>However, the lands were added to the PSEZ in the second draft of the PSEZ mapping as a result of comments submitted by the City following their report on the PSEZ mapping (Report PB-18-19, February 27, 2019) We have previously provided comments to the Province, Region and City with respect to these lands and have met with Regional staff in July of 2018 to discuss the Region's process for employment conversions; and, with City staff in April of 2020 to discuss the provision of City support for the removal of the lands from the PSEZ. It is our understanding a comment letter to the Province requesting removal from the PSEZ was submitted by the City on May 19, 2020 (see Appendix 2).</p> <p>We have reviewed the Discussion Paper prepared by the Region as part of the Regional Official Plan Review Process (ROPR) and are pleased to see that our previous</p>	<p>request (identified as 'B-11 – 800 Burloak' in the conversion request inventory) concluded that the request met the Region's conversion principles as set out in the Regional Urban Structure Discussion Paper. This finding was summarized in Appendix C.2 to the Growth Concepts Discussion Paper.</p> <p>This conversion was advanced as part of Regional Official Plan Amendment No. 48. It was adopted by Regional Council and subsequently approved by the Minister of Municipal Affairs and Housing.</p> <p>More information on how this conversion meets the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>

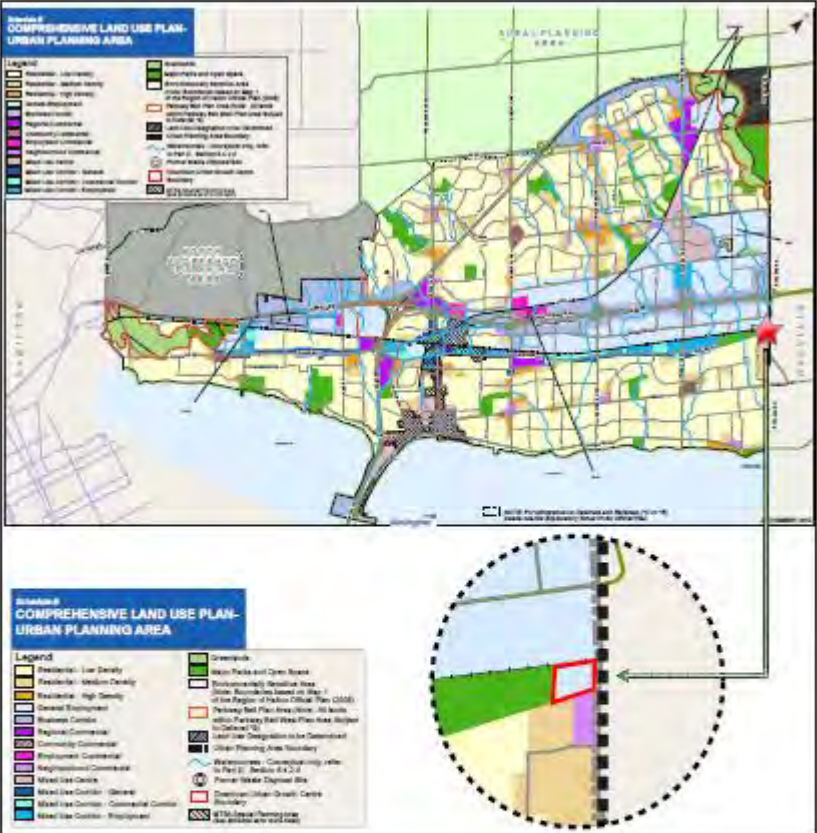
No.	Source	Submission	Response										
		<p>submissions have been acknowledged by the Region and that 800 Burloak Drive is included on the Region's list of conversion requests to review.</p> <p>Conversion Criteria Assessment</p> <p>Since the time of our original submission, the Region, through the Urban Structure Discussion Paper, has provided a list of criteria under which the conversion requests will be assessed. We are writing this letter to supplement our previous submissions on this matter and to provide an analysis and rationale for the justified conversion of these lands to assist the Region. The two tables below provide justification and rationale for the conversion request in relation to the existing conversion criteria set out in the ROP, through Section 77.4(4), as well as the new criteria set out in Appendix 3 of the Discussion Paper.</p> <p>1. Conversion Criteria- Section 77.4(4) ROP</p> <table border="1" data-bbox="453 695 1388 1416"> <thead> <tr> <th colspan="2" data-bbox="453 695 1388 748"><b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b></th> </tr> <tr> <th data-bbox="453 751 919 781"><b>Criteria</b></th> <th data-bbox="924 751 1388 781"><b>Rationale/Justification</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="453 784 919 1110">There is a need for the conversion</td> <td data-bbox="924 784 1388 1110">The conversion would facilitate redevelopment of the site to a use that is more in keeping with the surrounding land uses (park, recreation, and residential). The location of these uses in close proximity to the site make development for employment uses difficult due to proximity/ sensitive land use issues. The use of these lands would be better served by applying a land use designation that is more compatible with the surrounding uses.</td> </tr> <tr> <td data-bbox="453 1114 919 1247">The lands are not required for employment purposes over the long term</td> <td data-bbox="924 1114 1388 1247">As noted by Dillon and the City in their review and reports, due to the small parcel size and location of the lands, they are not required for employment purposes over the long term.</td> </tr> <tr> <td data-bbox="453 1250 919 1416">The conversion will not compromise the Region's or Local Municipality's ability to meet the employment forecast in Table 1 and Table 2a</td> <td data-bbox="924 1250 1388 1416">The subject parcel is relatively small and isolated from the employment lands to the north by the rail corridor. Its conversion will not have a significant detrimental effect on the overall employment land inventory.</td> </tr> </tbody> </table>	<b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b>		<b>Criteria</b>	<b>Rationale/Justification</b>	There is a need for the conversion	The conversion would facilitate redevelopment of the site to a use that is more in keeping with the surrounding land uses (park, recreation, and residential). The location of these uses in close proximity to the site make development for employment uses difficult due to proximity/ sensitive land use issues. The use of these lands would be better served by applying a land use designation that is more compatible with the surrounding uses.	The lands are not required for employment purposes over the long term	As noted by Dillon and the City in their review and reports, due to the small parcel size and location of the lands, they are not required for employment purposes over the long term.	The conversion will not compromise the Region's or Local Municipality's ability to meet the employment forecast in Table 1 and Table 2a	The subject parcel is relatively small and isolated from the employment lands to the north by the rail corridor. Its conversion will not have a significant detrimental effect on the overall employment land inventory.	<p>Comments are acknowledged. Please see response provided above.</p>
<b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b>													
<b>Criteria</b>	<b>Rationale/Justification</b>												
There is a need for the conversion	The conversion would facilitate redevelopment of the site to a use that is more in keeping with the surrounding land uses (park, recreation, and residential). The location of these uses in close proximity to the site make development for employment uses difficult due to proximity/ sensitive land use issues. The use of these lands would be better served by applying a land use designation that is more compatible with the surrounding uses.												
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No.	Source	Submission		Response
		The conversion will not adversely affect the overall viability of the Employment Area, and achievement of the intensification and density targets of Table 2 and other policies of this Plan	The subject parcel is relatively small and isolated from the employment lands to the north by the rail corridor. Its conversion will not have a significant detrimental effect on the overall viability of the Employment Area and will not impact the intensification and density targets of Table 2 and other policies of the Regional Plan.	Comments are acknowledged. Please see response provided above.
	There is existing or planned infrastructure to accommodate the proposed conversion	The property is within the built up area where services and infrastructure to accommodate the conversion are available.		
	Cross-jurisdictional issues have been considered	There are no cross-jurisdictional issues of note for this property.		
	All Regional policies and requirements, financial or otherwise, have been met	This criteria is satisfied.		
	2. Conversion Request Evaluation Criteria- Discussion Paper & Appendix			
	<b>Table 2: Assessment of Proposal in relation to Conversion Request Evaluation Criteria Per Appendix 3 of the Urban Structure Discussion Paper</b>			
	<b>Subject</b>	<b>Principle</b>	<b>Rationale/Justification</b>	
	Employment Land Supply	Current Context	The site is currently vacant, surrounded by a mix of employment and non-employment uses.	
		Future Potential	The City of Burlington, through their work on the New Official Plan, has recommend conversion of the lands and removal from the Employment Overlay with the future designation to be "Mixed Use Intensification Area/ Local Centre".	
		Strategic Parcel Supply	The proposed conversion would not adversely impact the supply of parcels adjacent to or near major goods movement facilities as the existing context currently includes a mix of employment and non-employment uses.	

No.	Source	Submission			Response
			Land Budget Implications	Due to the relatively small parcel size, the proposed conversion would not impact the supply and ability to achieve the employment forecast	
		Demonstrated Need	Strategic Location	The proposed conversion is located within the built up area, but is not within an identified MTSA or strategic growth area. It is located adjacent to a large community recreation facility, including outdoor recreation area, which hinders development on the site due to compatibility/ sensitive land use issues.	
			Strategic Location	The proposed conversion would allow for more appropriate development of the site given the surrounding context.	
			Specific Conditions and Constraints	The development of the lands for employment uses are constrained as a result of proximity to sensitive land uses (residential and recreation/ open space)	
		Employment Area Viability	Locational Impacts	The conversion would not negatively impact the surrounding employment area which is located on the other side of the railway line.	
			Compatibility	The proposed conversion would allow for a more compatible land use with the adjacent residential and recreational/ open space land uses.	
			Continued Function and Expansion	As noted above, the conversion would not hinder the continued function and expansion of the surrounding employment areas on the opposite side of the railway.	
		General Considerations	Cross-Jurisdictional	There are no cross-jurisdictional issues of note for this property.	
			Supporting Infrastructure	The property is within the built up area where services and infrastructure to accommodate the conversion are available	
			Other Regional Requirements	There are no other Regional policies or requirements that would be impacted by the proposed conversion.	
			Local Support	There is local support for the conversion.	

No.	Source	Submission	Response
		<p>We trust the above information will be helpful to the Region in their assessment of the requests and we thank the Region for providing opportunity to comment. If there is anything further you may require in relation to this request, please do not hesitate to contact us.</p> <p>Yours Truly,</p> <p>MHBC  Dana Anderson, FCIP, RPP Kelly Martel, MCIP, RPP  Partner Associate</p>	

No.	Source	Submission	Response
		 <p data-bbox="1066 1101 1276 1117">Data Source: First Base Satellite Aerial Photo 2019</p> <p data-bbox="464 1122 653 1208"><b>Figure 1</b> <b>Location and Surrounding Uses</b></p> <p data-bbox="464 1295 653 1344">800 Burloak Drive Burlington, Ontario</p> <p data-bbox="688 1127 751 1143"><b>LEGEND</b></p> <ul data-bbox="688 1154 1276 1219" style="list-style-type: none"> <li>Subject Lands</li> <li>Burloak Dr</li> <li>Railway</li> <li>Harvester and Wyecroft Rd</li> <li>Queen Elizabeth Way (QEW)</li> </ul> <p data-bbox="688 1256 800 1273">DATE: February 10, 2020</p> <p data-bbox="848 1256 911 1273">SCALE: N.T.S.</p> <p data-bbox="947 1252 1024 1344">North</p> <p data-bbox="1031 1252 1276 1344">  <b>PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE</b>  <small>445 BRANT STREET, SUITE 200, BRANTFORD, ONT. N6A 1B6      P: 519-751-1234   F: 519-751-1235   WWW.MHBC.COM</small> </p>	

No.	Source	Submission	Response
		 <p><b>Figure 2</b>  <b>Burlington Official Plan- Schedule B</b></p> <p>800 Burloak Drive  Burlington, Ontario</p> <p><b>LEGEND</b>  <span style="border: 1px solid red; display: inline-block; width: 10px; height: 10px;"></span> Subject Lands</p> <p>DATE: February 18, 2020      SCALE: 1:1</p> <p><b>MHBC</b> PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE  480 BROAD AVENUE, SUITE 200, SUDBURY, ONTARIO N3B 1Y9  (705) 525-1111   WWW.MHBC.COM</p>	



No.	Source	Submission	Response						
13.	<p>Kelly Martel on behalf of 901 Guelph Line (Emshih Developments Inc.)</p> <p>E-mail dated August 24, 2020</p>	<p>MHBC is retained by Emshih Developments Inc. with respect to their landholdings municipally addressed as 901 Guelph Line in the City of Burlington (the Subject Lands). The Subject Lands are located at the southeast corner of the intersection of Guelph Line and Harvester Road and back onto the CN rail line (see Figure 1 attached). The Subject Lands are approximately 6.4 ha in area. The lands are currently occupied by a single storey, vacant industrial warehouse and temporary offices. The Subject lands are currently designated as employment in both the City of Burlington Official Plan and in the Region of Halton's Official Plan. As part of the City of Burlington's Municipal Comprehensive Review and Official Plan Review process, the owner prepared a comprehensive master plan and redevelopment proposal for the site with supporting materials (related to traffic, servicing, sustainability, and affordable housing). These materials were submitted as part of a formal request for conversion through the City's Municipal Comprehensive Review in 2013. The master plan developed for the Subject Lands evolved from the past mixed use policy designation for the site (as part of the Midtown area) and through a visioning workshop held with the Burlington Economic Development Corporation, Burlington Green, Council members and City staff.</p> <p>We have previously made comment to the Province, Region and City with respect to these lands and have met with Regional staff to discuss the conversion request numerous times. In addition to the request to convert the lands to permit a mixed use development through their removal from the City and Regional Employment Area overlay and the PSEZ, this request involves the inclusion of the Subject Lands within the Burlington GO MTSA Boundary (see Appendix 1, attached) and the identification of the site as a Special Policy area to permit the site redevelopment subject to criteria (See Appendix 2 attached). Process (ROPR) and are pleased that our previous submissions have been acknowledged by the Region and that 901 Guelph Line is included on the Region's list of conversion requests to review.</p> <p>Since the time of our original submission, the Region, through the Urban Structure Discussion Paper, has provided a set of criteria under which the conversion requests will be assessed. We are writing this letter to supplement our previous submissions on this matter and to provide our analysis and rationale for the justified conversion of these lands to assist the Region. The two tables below provide justification and rationale for the conversion request in relation to the existing conversion criteria set out in the ROP, through Section 77.4(4), as well as those new criteria set out in Appendix 3 of the Discussion Paper.</p> <p>Conversion Criteria- Section 77.4(4) ROP</p> <table border="1" data-bbox="457 1325 1388 1409"> <thead> <tr> <th colspan="2" data-bbox="457 1325 1388 1377"><b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b></th> </tr> <tr> <th data-bbox="457 1377 751 1409"><b>Criteria</b></th> <th data-bbox="751 1377 1388 1409"><b>Rationale/Justification</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="457 1409 751 1414"></td> <td data-bbox="751 1409 1388 1414"></td> </tr> </tbody> </table>	<b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b>		<b>Criteria</b>	<b>Rationale/Justification</b>			<p>Based on a review of the submission, Regional staff's initial assessment of the request (identified as 'B-17 – 901 Guelph Line' in the conversion request inventory) concluded that the request did not meet the Region's conversion principles as set out in the Regional Urban Structure Discussion Paper. This finding was summarized in Appendix C.2 to the Growth Concepts Discussion Paper.</p> <p>A final review of the request was undertaken as summarized in Appendix B to the Preferred Growth Concept Report. The conclusion of this analysis confirmed the recommendation that the lands remain identified within the Regional Employment Area based on the lack of demonstration of the need for the conversion and the potential to undermine the viability of the surrounding employment areas, among other things.</p>
<b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b>									
<b>Criteria</b>	<b>Rationale/Justification</b>								

No.	Source	Submission		Response
		<p>There is a need for the conversion</p>	<p>Conversion required on subject site to:</p> <ul style="list-style-type: none"> <li>• Site context and restrictions (MTO constraints for access for certain employment uses</li> <li>• Non-employment uses are needed to mitigate MTO issues concerning traffic related to office only development (compatibility with Provincial ministry requirements)</li> <li>• To facilitate development of the lands as a mixed-use complete community which provides residential, retail and employment uses on a single site (redevelopment potential)</li> <li>• Provides an opportunity to yield higher employment densities than would otherwise be achievable on the site with the existing use (6 jobs/ hectare) , through comprehensive site redevelopment in a mixed use form (~60 jobs/ha)</li> </ul>	
		<p>The lands are not required for employment purposes over the long term</p>	<ul style="list-style-type: none"> <li>• Change in principle of use would permit the City to ensure adequate employment is provided on site, above what is provided with the current use. This will be done through site specific performance based targets which include a minimum number of jobs to be required on-site</li> </ul>	
		<p>The conversion will not compromise the Region's or Local Municipality's ability to meet the employment forecast in Table 1 and Table 2a</p>	<ul style="list-style-type: none"> <li>• Redevelopment would contribute to achieving target forecast; maintaining status quo would not</li> <li>• The site does not yield a high employment density in its current form (6 jobs/ ha)</li> <li>• The site, as currently developed, is not considered to have a significant impact on short-term and long-term needs as it would not be feasibly utilized for its current built function given the location and land values</li> </ul>	
		<p>The conversion will not adversely affect the overall viability of the Employment Area, and achievement of the intensification and density targets of Table 2 and other policies of this Plan</p>	<ul style="list-style-type: none"> <li>• Proposal for redevelopment would introduce residential uses to the site</li> <li>• Hood paper and packaging is located in proximity to the site, however is identified as a Class 1 industrial use (not "heavy industrial"). Further, a 20 metre buffer is maintained between this use and the subject lands</li> <li>• Cogent Power is located in proximity to the site and is a Class 2 industrial use. It is located outside of the D6 Buffer Zone and meets compatibility standards</li> <li>• The areas directly west of the site are existing residential- low and medium density zoning</li> <li>• Laurentian Drive, Roseland Creek and a stormwater management pond located along eastern edge of site and act as a buffer from</li> </ul>	


No.	Source	Submission		Response	
			adjacent uses • Redevelopment would contribute to achieving target; maintaining status quo would not	Comments are acknowledged. Please see response provided above.	
		There is existing or planned infrastructure to accommodate the proposed conversion	• Subject site is located within the built boundary and currently serviced A preliminary servicing report has been prepared for the site, and provided through the original submission request, which confirms serviceability of the lands		
		Cross-jurisdictional issues have been considered	• The site is located within the City of Burlington and is currently within the Region's Employment Area overlay. Requests for consideration for removal/ conversion have been made to both the City and Region		
		All Regional policies and requirements, financial or otherwise, have been met	The proposed redevelopment will advance Regional policies for achieving appropriate and compatible intensification and contribute to much needed affordable housing supply and seniors housing		
Conversion Request Evaluation Criteria- Discussion Paper & Appendix					
<b>Table 2: Assessment of Proposal in relation to Conversion Request Evaluation Criteria Per Appendix 3 of the Urban Structure Discussion Paper</b>					
<b>Principle</b>		<b>Rationale/Justification</b>			
Current Context	There are no existing non-employment uses located on the site; however, redevelopment potential for pure employment uses is limited by MTO restrictions. As such, the site is limited to the current use which yields 6 jobs/ ha whereas conversion to provide for a mixture of uses on the site as part of a comprehensive redevelopment would yield ~60 jobs/ ha, thereby contributing in a more meaningful way to provision of jobs. The continuation of the current use given its age and construction is not feasible.				
Future Potential	The continuation of the historical use given the site's age and construction is not feasible. Upgrading of the site for				

No.	Source	Submission	Response
		<p>continued employment use is also not feasible given the location and market value. As noted above, conversion of the lands would provide an opportunity for a comprehensive mixed use development that would yield ~60 jobs/ ha whereas the current use yields 6 jobs/ ha. The conversion and mixed use redevelopment would better contribute to accommodating employment growth and meeting growth management targets to the 2041 horizon than maintaining the lands as employment</p> <p>Strategic Parcel Supply</p> <ul style="list-style-type: none"> <li>• Hood paper and packaging is located in proximity to the site, however is identified as a Class 1 industrial use (not “heavy industrial”). Further, a 20 metre buffer is maintained between this use and the subject lands and would not adversely impact the adjacent use</li> <li>• Cogent Power is located in proximity to the site and is a Class 2 industrial use. It is located outside of the D6 Buffer Zone and meets compatibility standards</li> <li>• The areas directly west of the site are existing residential-low and medium density zoning</li> <li>• Laurentian Drive, Roseland Creek and a stormwater management pond located along eastern edge of site and act as a buffer from adjacent uses</li> <li>• While the site is a larger size parcel it does not represent a strategic parcel for employment use or re-use given the MTO restrictions</li> </ul> <p>Land Budget Implications</p> <p>The site is 6.4 hectares (15.8 acres) and is already developed (i.e. it is not a vacant site). Conversion of the site would not have an overall adverse impact on the supply of employment lands and the ability of the Region and local municipalities to meet employment forecast and intensification and density targets in the context of planning to 2041 due to the nature of the site already being developed and the inability for re-use. In fact, 5 conversion would assist the Region and City in meeting its employment objectives as well as other city-building initiatives adopted by Council through their Strategic Plan.</p> <p>Strategic Location</p> <p>The proposed site is located in close proximity to the Burlington GO Station and in the past a request has been</p>	

No.	Source	Submission		Response
			made to the City for the site be added to the Burlington GO MTSA Boundary and for the conversion to be considered under this lens. The Region, in their role, has the ability to delineate MTSA boundaries. We believe the Region should consider including this site within the MTSA boundary for the reasons set out in our past submissions	
		Strategic Opportunity	The conversion will benefit the area and the community by providing an opportunity for the site to redevelop as a mixed use, complete community in an area with good access to public transit and other services. In particular, it will provide for an increased number of jobs per hectare than what currently exists today; will provide for a greater live work play function on the site and in the area, allowing people to live in close proximity to their employers; will contribute to sustainability initiatives through the design of the area; and will provide a variety of housing options to cater to a wide range of demographics including affordable housing and housing for seniors. The proposal for site redevelopment will signal a gateway to the community, and assist in achieving the City's vision for this area as a gateway.	
		Specific Conditions and Constraints	As noted previously, there are considerable constraints to developing the property solely for employment uses, namely the MTO restrictions related to traffic and office-only uses. The MTO constraints justify consideration of mixed use on the site to satisfy concerns. Additionally, the site context and MTO restrictions prohibit access for certain employment uses.	
		Locational Impacts	<ul style="list-style-type: none"> <li>• Laurentian Drive, Roseland Creek and a stormwater management pond located along eastern edge of site and act as a buffer from adjacent uses</li> <li>• Extension/ modification of MTSA boundary to include site would provide a logical boundary (refer to maps attached)</li> </ul>	
		Compatibility	<ul style="list-style-type: none"> <li>• Hood paper and packaging is located in proximity to the site, however is identified as a Class 1 industrial use (not "heavy industrial"). Further, a 20 metre buffer is maintained between this use and the subject lands and would not adversely impact the adjacent use</li> <li>• Cogent Power is located in proximity to the site and is a Class 2 industrial use. It is located outside of the D6 Buffer Zone and meets compatibility standards</li> </ul>	

No.	Source	Submission	Response												
		<table border="1"> <tr> <td data-bbox="455 254 709 337"></td> <td data-bbox="714 254 1388 337"> <ul style="list-style-type: none"> <li>The areas directly west of the site are existing residential-low and medium density zoning. Site redevelopment for mixed use would be compatible</li> </ul> </td> </tr> <tr> <td data-bbox="455 341 709 394">Continued Function and Expansion</td> <td data-bbox="714 341 1388 394">There are no plans or intentions to expand the existing use on site given its age</td> </tr> <tr> <td data-bbox="455 397 709 586">Cross- Jurisdictional</td> <td data-bbox="714 397 1388 586">The site is within the City of Burlington and on the Region's Employment Area Overlay. The requested conversion should be considered within both the context of the City as well as the broader regional context and the impacts of the conversion evaluated under that lens- what the conversion and redevelopment can provide in terms of regional employment and housing</td> </tr> <tr> <td data-bbox="455 589 709 727">Supporting Infrastructure</td> <td data-bbox="714 589 1388 727"> <ul style="list-style-type: none"> <li>Subject site is located within urban built boundary</li> <li>A preliminary servicing report has been prepared for the site, and provided through the original submission request, which confirms serviceability of the lands</li> </ul> </td> </tr> <tr> <td data-bbox="455 730 709 868">Other Regional Requirements</td> <td data-bbox="714 730 1388 868">The Region's Discussion Paper notes the importance of considering the changing nature of employment in urban areas and the subject site is a prime example of an opportunity to increase employment with the integration of a mix of uses in proximity to the Burlington GO MTSA</td> </tr> <tr> <td data-bbox="455 872 709 976">Local Support</td> <td data-bbox="714 872 1388 976">We have made presentations to Council and staff numerous times about the unique opportunity this conversion would provide to optimize the use of the site, however staff and Council support have not been obtained to date</td> </tr> </table> <p data-bbox="455 1003 1388 1198">Our opinion continues to be that the Subject Lands should not be designated as employment lands in the future planning in the City of Burlington Official Plan or the Region's Official Plan. The Subject Lands should be considered for conversion to a mixed use land use designation (that includes employment in jobs greater than what exists today) and inclusion within the Burlington GO MTSA, through both the Region's OPR process as well as through a modification to the City's Official Plan for all of the reasons set out in our past correspondence and herein.</p> <p data-bbox="455 1226 1388 1279">In summary, the Subject Lands are appropriate for conversion and redevelopment for a mixed use community as they:</p> <ul data-bbox="455 1307 1388 1386" style="list-style-type: none"> <li>Do not have a high concentration of existing employment;</li> <li>Will not have a high economic impact through removal as they do not play an economic or strategic role within the City or the Region;</li> </ul>		<ul style="list-style-type: none"> <li>The areas directly west of the site are existing residential-low and medium density zoning. Site redevelopment for mixed use would be compatible</li> </ul>	Continued Function and Expansion	There are no plans or intentions to expand the existing use on site given its age	Cross- Jurisdictional	The site is within the City of Burlington and on the Region's Employment Area Overlay. The requested conversion should be considered within both the context of the City as well as the broader regional context and the impacts of the conversion evaluated under that lens- what the conversion and redevelopment can provide in terms of regional employment and housing	Supporting Infrastructure	<ul style="list-style-type: none"> <li>Subject site is located within urban built boundary</li> <li>A preliminary servicing report has been prepared for the site, and provided through the original submission request, which confirms serviceability of the lands</li> </ul>	Other Regional Requirements	The Region's Discussion Paper notes the importance of considering the changing nature of employment in urban areas and the subject site is a prime example of an opportunity to increase employment with the integration of a mix of uses in proximity to the Burlington GO MTSA	Local Support	We have made presentations to Council and staff numerous times about the unique opportunity this conversion would provide to optimize the use of the site, however staff and Council support have not been obtained to date	
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		<ul style="list-style-type: none"> <li>• Are within close proximity to the Burlington GO Station which is an identified Major Transit Station Area providing higher order transit;</li> <li>• Have limitations for additional office development given current traffic patterns associated with the highway interchange (as the Ministry of Transportation has advised);</li> <li>• Are fully serviced and underutilized;</li> <li>• Do not share a common border with an employment zone or site due to the natural separation by the creek;</li> <li>• Will provide for a comprehensive new mixed use, gateway development that provides residential, commercial and employment uses;</li> <li>• Can provide for a complete community with a higher ratio of jobs than the existing warehouse building;</li> <li>• Provide for an opportunity for a new master planned site based on sustainable design principles and climate resiliency as fully supported by Burlington Green;</li> <li>• Offer an immediate opportunity to provide affordable housing, housing and services for seniors which is in urgent need in the City; and,</li> <li>• Offer an immediate opportunity to provide affordable housing and employment opportunities for young households to live and work in Burlington.</li> </ul> <p>Sincerely,</p> <p>MHBC  Dana Anderson, FCIP, RPP Kelly Martel, MCIP, RPP  Partner Associate</p>	

No.	Source	Submission	Response
		 <p><b>Figure 1- Location Map</b> 901 Guelph Line Burlington, Ontario</p> <p><b>LEGEND</b> [Red Rectangle] Subject Lands</p> <p>DATE: December 15, 2016    SCALE: NOT TO SCALE</p> <p><b>MHBC</b> PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE WE BRING IDEAS, ARTS, AND INNOVATION TO LIFE. WE ARE BOLD. WE ARE LOCAL. WE ARE HERE TO STAY. WWW.MHBCA.COM</p>	



No.	Source	Submission	Response
14.	<p>Graham Hendren on behalf of Westerkirk Capital Inc.</p> <p>E-mail dated August 24, 2020</p>	<p>Hello,</p> <p>On behalf of our client, Westerkirk Capital Inc., we are pleased to submit this employment conversion request for the lands at the northeast quadrant of Neyagawa Blvd. and Burnhamthorpe Rd. W. Please find attached our letter outlining the conversion request and assessment.</p> <p>If you have any questions please do not hesitate to ask.</p> <p>Thank you</p> <hr/> <p>ATTACHED LETTER</p> <p>MacNaughton Hermsen Britton and Clarkson (“MHBC”) are retained by Westerkirk Capital Inc., the owners of the land located at the northeast quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the “Subject Lands”). The Subject Lands are approximately 18.8 hectares in size (see Figure 1). We understand the Region recently released an Integrated Growth Management Strategy Urban Structure Discussion Paper dated June 2020, which was prepared as part of Regional Official Plan Review Process (ROPR). The Discussion Paper addresses planning for growth in the Region, Settlement Areas Community Areas and Employment Areas. The Paper provides an overview on the Region’s employment area policies and identifies requests for the conversion of employment lands submitted through local Official Plan reviews.</p> <p>The Discussion Paper sets out additional criteria for employment conversion requests and establishes a deadline of August 31st for additional submissions to be made for consideration by the Region through its ROPR process related to existing or new conversion requests. The following letter outlines the current physical and policy context for the Subject Lands and the recent conversion request made through the Town of Oakville Official Plan Review process for the lands. The letter also provides a justification for the employment land conversion request and includes an assessment of the Regional criteria as set out in the Discussion Paper.</p> <p><b>Location</b></p> <p>As noted and shown on Figure 1, the Subject Lands are located at the northeast quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville. The Subject Lands are situated immediately south of the Highway 407 corridor and are bound by existing agricultural uses to the east. Of the total land area for the Subject Lands,</p>	<p>Regional staff have recommended this employment conversion (337, 353 Burnhamthorpe Road West, O-02) be advanced through the Preferred Growth Concept Regional Official Plan Amendment.</p> <p>More information on the assessment of this employment conversion request is provided in Appendix B to the Preferred Growth Concept Report.</p>

No.	Source	Submission	Response
		<p>18.80 ha, approximately 5.7 ha are located within the Neyagawa Urban Core with the balance (13.1 ha) designated Employment District and Transitway. Approximately 3.3 ha are being requested for conversion to be consolidated for development with the lands designated as Neyagawa Urban Core to the west (see Figure 2).</p> <p><b>Existing and Surrounding Land Uses</b></p> <p>The Subject Lands are currently vacant and were previously used for agricultural purposes. The surrounding existing and planned land uses are as follows: North: Highway 407 (Employment District and Transitway) South: Agricultural uses and residential uses (General Urban Area/Neyagawa Urban Core) East: Agricultural and rural residential uses (Employment District) West: Agricultural uses (Neyagawa Urban Core) The Subject Lands about the planned 407 Transitway. A station at Neyagawa Boulevard is proposed to be located west of the Subject Lands.</p> <p><b>Policy Context</b></p> <p>The Subject Lands are currently designated Urban Area in the Region’s Official Plan with a portion of the lands located within the Employment Area overlay on Map 1- Regional Structure of the Official Plan. The Subject Lands are designated Neyagawa Urban Core and Employment District in the North Oakville East Secondary Plan. A portion of the lands are also identified as a Stormwater Management Facility on the North Oakville East Master Plan (see Figure 2). The Subject Lands are not located within the Provincially Significant Employment Zones as provided through the A Place to Grow 2019. A previous request for conversion for the Subject Lands was submitted to the Town of Oakville as part of their Commercial and Employment Review which resulted in Official Plan Amendment 26 (“OPA 26”).</p> <p>The conversion request is listed as Request #8 under Appendix F of the Town’s recommendation report dated March 22, 2018. The request was recommended for further study by the Town at that time since, as part of the Town’s Urban Structure Review (another study that formed part of the Official Plan Review), the lands were identified as part of the ‘Node for Further Study’ at Neyagawa Blvd. and Burnhamthorpe Road West through Official Plan Amendment No. 15. The lands were to be further considered through the North Oakville Secondary Plans Review.</p> <p>A review of the North Oakville Secondary Plans was initiated in May 2017. This study was a component of the ongoing Official Plan Review by the Town. Official Plan Amendment 321 (“OPA 321”) to the North Oakville East Secondary Plan (By-law 2018-074) was adopted on June 11, 2018. Halton Region approved OPA 231 with modifications on September 21, 2018. OPA 231 was further modified by the Local Planning Appeal Tribunal and came in-effect as of July 3, 2019. We understand employment conversions</p>	<p>Comments are acknowledged. Please see response provided above.</p>

No.	Source	Submission	Response												
		<p>were not considered or implemented through OPA 321 but are now being considered through the Region's ROPR process to be further implemented, if approved, through Oakville's conformity update. This request focuses on removing an additional portion of the Subject Lands (approximately 3.3 ha) from the Region's Employment Area overlay. Specifically, the lands to be converted would have the effect of extending the Neyagawa Urban Core Designation across the Burnhamthorpe Road West frontage to the eastern boundary of the Subject Lands (Figure 2). The area proposed to be converted conversion include the planned stormwater management facility. The estimated area of the facility is approximately 1.0 hectare resulting in a net employment land conversion of only 2.3 hectares. The balance of the lands to the north along the Highway 407 corridor would remain Employment District and within the Region's Employment Area overlay.</p> <p><b>Conversion Criteria Assessment</b></p> <p>The following three tables below provide justification and rationale for the conversion request for the 3.3 ha of land as shown on Figure 2 in relation to the existing conversion criteria set out in provincial policy (PPS, 2020 and the Growth Plan, 2019), the ROP, through Section 77.4(4), as well as the new criteria set out in Appendix 3 of the Discussion Paper.</p> <p><b>Conversion Criteria – Provincial Conversion Criteria</b></p> <table border="1" data-bbox="457 857 1388 1412"> <thead> <tr> <th colspan="3" data-bbox="464 862 1381 938"><b>Table 1: Assessment of Conversion Request against Provincial Conversion Criteria per the PPS and Growth Plan, 2019</b></th> </tr> <tr> <th data-bbox="464 943 627 971"><b>Criteria</b></th> <th colspan="2" data-bbox="627 943 1381 971"><b>Rationale/ Justification</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="464 976 627 1219">PPS 2020</td> <td data-bbox="627 976 827 1219">There is an identified need for the conversion and the land is not required for employment purposes over the long term</td> <td data-bbox="827 976 1381 1219">Justification for the identified need for the conversion is provided in Table 2.</td> </tr> <tr> <td data-bbox="464 1224 627 1408"></td> <td data-bbox="627 1224 827 1408">The proposed uses would not adversely affect the overall viability of the</td> <td data-bbox="827 1224 1381 1408">The lands can retain employment functions through their integration into the Urban Core area. They are not required to be protected for long term employment purposes given their size and the current supply of other employment lands to the north and east. The subject parcel is relatively small and isolated from the employment lands to</td> </tr> </tbody> </table>	<b>Table 1: Assessment of Conversion Request against Provincial Conversion Criteria per the PPS and Growth Plan, 2019</b>			<b>Criteria</b>	<b>Rationale/ Justification</b>		PPS 2020	There is an identified need for the conversion and the land is not required for employment purposes over the long term	Justification for the identified need for the conversion is provided in Table 2.		The proposed uses would not adversely affect the overall viability of the	The lands can retain employment functions through their integration into the Urban Core area. They are not required to be protected for long term employment purposes given their size and the current supply of other employment lands to the north and east. The subject parcel is relatively small and isolated from the employment lands to	<p>Comments are acknowledged. Please see response provided above.</p>
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No.	Source	Submission		Response
			employment area	the north and will not adversely affect the overall viability of the remaining employment area.
			Existing or planned infrastructure and public service facilities are available to accommodate the proposed uses	The property is within an area where future services and infrastructure will be available to accommodate the conversion.
		Growth Plan, 2019	There is a need for the conversion.	Justification for the identified need for the conversion is provided in Table 2.
			The lands are not required over the horizon of this Plan for the employment purposes for which they are designated;	The lands are not required to be protected for long term employment purposes given their size and the current supply of employment lands to the north and east.
			The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan	The portion of the Subject Lands requested for conversion are relatively small and isolated from the employment lands to the north. The conversion will not compromise the Region's or the Town's ability to meet the employment forecasts.
			The proposed uses would not adversely	Given its small size and location, proposed uses on the subject parcel would not adversely affect the overall employment area. The lands can retain

No.	Source	Submission		Response						
			affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan;	employment functions that will support the achievement of the Growth Plan's minimum density targets.	Comments are acknowledged. Please see response provided above.					
			There are existing or planned infrastructure and public service facilities to accommodate the proposed uses.	The property is within an area where future services and infrastructure will be available to accommodate the conversion.						
2. Conversion Criteria - Section 77.4(4) ROP										
<table border="1"> <thead> <tr> <th colspan="2" data-bbox="459 1005 1381 1057"><b>Table 2: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b></th> </tr> <tr> <th data-bbox="459 1060 921 1084"><b>Criteria</b></th> <th data-bbox="926 1060 1381 1084"><b>Rationale/ Justification</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="459 1088 921 1409">There is a need for the conversion</td> <td data-bbox="926 1088 1381 1409">The conversion would facilitate the comprehensive development of the site under the Neyagawa Urban Core designation. To isolate the lands adjacent to the proposed Stormwater Management Pond solely for employment uses is contrary to the objectives for the Neyagawa Urban Core and the North Oakville East Secondary Plan. The lands are part of a Node that serves an important function to support the transitway with mixed use, compact</td> </tr> </tbody> </table>						<b>Table 2: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b>		<b>Criteria</b>	<b>Rationale/ Justification</b>	There is a need for the conversion
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No.	Source	Submission		Response
			urban development. The Regional and local policy framework supports the need for conversion. The conversion of the lands will also ensure more integrated and compatible land uses while still providing for employment opportunities through the mixed use Node and on the balance of the employment lands to the north.	
		The lands are not required for employment purposes over the long term	The lands can retain employment functions through their integration into the Urban Core area. They are not required to be protected for long term employment purposes given their size and the current supply of employment lands to the north and east.	
		The conversion will not compromise the Region's or Local Municipality's ability to meet the employment forecast in Table 1 and Table 2a	The portion of the Subject Lands requested for conversion are relatively small and isolated from the employment lands to the north. The conversion will not compromise the Region's or the Town's ability to meet the employment forecasts.	
		The conversion will not adversely affect the overall viability of the Employment Area, and achievement of the intensification and density targets of Table 2 and other policies of this Plan	The subject parcel is relatively small and isolated from the employment lands to the north and will not adversely affect the overall viability of the employment area and will not impact the intensification and density targets of Table 2 and other policies of the Regional Plan.	
		There is existing or planned infrastructure to accommodate the proposed conversion	The property is within an area where future services and infrastructure will be available to accommodate the conversion.	
		Cross-jurisdictional issues have been considered	There are no cross-jurisdictional issues of note for this property.	
		All Regional policies and requirements, financial or otherwise, have been met	This criteria is satisfied. The integration of the Burnhamthorpe frontage into the Neyagawa Urban Core also advances the function of the Neyagawa/ Burnhamthorpe Node as identified by the Town and supported by the Region.	

No.	Source	Submission	Response													
		<p>3. Conversion Request Evaluation Criteria - Discussion Paper &amp; Appendix</p> <table border="1" data-bbox="457 365 1388 1209"> <thead> <tr> <th colspan="3" data-bbox="464 370 1381 451"><b>Table 3: Assessment of Proposal in relation to Conversion Request Evaluation Criteria Per Appendix 3 of the Urban Structure Discussion Paper</b></th> </tr> <tr> <th data-bbox="464 454 667 479"><b>Subject</b></th> <th data-bbox="672 454 934 479"><b>Principle</b></th> <th data-bbox="938 454 1381 479"><b>Rationale/ Justification</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="464 482 667 1205" rowspan="3">Employment Land Supply</td> <td data-bbox="672 482 934 722">Current Context</td> <td data-bbox="938 482 1381 722">The site is currently vacant, surrounded by planned urban core land uses with the exception of future employment uses further east. The proposed stormwater management pond dissects the employment lands creating a remnant employment parcel along the Burnhamthorpe Road frontage.</td> </tr> <tr> <td data-bbox="672 725 934 966">Future Potential</td> <td data-bbox="938 725 1381 966">The future potential of the lands is best suited as part of the comprehensive development of the balance of the lands within the same ownership within the Neyagawa Urban Core for mixed use.</td> </tr> <tr> <td data-bbox="672 969 934 1205">Strategic Parcel Supply</td> <td data-bbox="938 969 1381 1205">The proposed conversion would not adversely impact the supply of parcels adjacent to or near major goods movement facilities as the existing context currently includes planned employment uses that are retained along the 407 frontage.</td> </tr> </tbody> </table>	<b>Table 3: Assessment of Proposal in relation to Conversion Request Evaluation Criteria Per Appendix 3 of the Urban Structure Discussion Paper</b>			<b>Subject</b>	<b>Principle</b>	<b>Rationale/ Justification</b>	Employment Land Supply	Current Context	The site is currently vacant, surrounded by planned urban core land uses with the exception of future employment uses further east. The proposed stormwater management pond dissects the employment lands creating a remnant employment parcel along the Burnhamthorpe Road frontage.	Future Potential	The future potential of the lands is best suited as part of the comprehensive development of the balance of the lands within the same ownership within the Neyagawa Urban Core for mixed use.	Strategic Parcel Supply	The proposed conversion would not adversely impact the supply of parcels adjacent to or near major goods movement facilities as the existing context currently includes planned employment uses that are retained along the 407 frontage.	<p>Comments are acknowledged. Please see response provided above.</p>
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No.	Source	Submission			Response
			Land Budget Implications	Due to the relatively small parcel size, the proposed conversion would not impact the supply and ability to achieve the employment forecast. Further, the planned stormwater management facility occupies approximately 1.0 hectares of the currently designated Employment District limiting the land budget implications of the proposed conversion.	
		Demonstrated Need	Strategic Location	The proposed conversion lands are adjacent to the Urban Core designated lands to the west and bound by the stormwater management pond to the north. The Burnhamthorpe Road frontage provides for the strategic connection to the westerly lands and can best serve the nodal mixed use function for the area.	
			Strategic Opportunity	The proposed conversion would allow for more appropriate development of the site given the surrounding context.	



No.	Source	Submission			Response
			Specific Conditions and Constraints	The development of the lands for employment uses is constrained as a result of their isolation between the northern employment lands and the stormwater management pond. The location of the proposed stormwater management facility isolates the employment lands to the south with frontage along Burnhamthorpe Road West and would limit result in parcel sizes that are not marketable for a range of employment uses.	
		Employment Area Viability	Locational Impacts	The conversion would not negatively impact the employment area to the east.	
			Compatibility	The proposed conversion would allow for a more compatible land uses to be integrated and comprehensively developed with the balance of the lands to the west.	
			Continued Function and Expansion	As noted above, the conversion would not hinder the continued function and expansion of the planned employment areas to the north and east.	
		General Considerations	Cross- Jurisdictional	There are no cross-jurisdictional issues of note for this property.	
			Supporting Infrastructure	The property is within an area where services and infrastructure to accommodate the conversion will be provided.	
			Other Regional Requirements	There are no other Regional policies or requirements that would be impacted by the proposed conversion.	
			Local Support	There is local support for the development of the Node with mixed uses and the integration of the whole Subject Lands as part of this Node is generally supported through the Town of Oakville's OPA 15.	

No.	Source	Submission	Response
		<p>We trust the above information will be used by the Region in their assessment of the request and we thank the Region for providing opportunity to comment. If there is anything further you may require in relation to this request, please do not hesitate to contact us.</p> <p>Sincerely,</p> <p>MHBC Dana Anderson, MA, FCIP, RPP Partner Cc: Curt Benson, Region of Halton Diane Childs, Town of Oakville</p>	
15.	<p>Graham Hendren on behalf of Fieldgate Commercial Properties</p> <p>E-mail dated August 28, 2020</p>	<p>Hello,</p> <p>On behalf of our client, Fieldgate Commercial Properties, we are pleased to submit the attached employment conversion requests for the lands at the northwest quadrant of Neyagawa Blvd. &amp; Burnhamthorpe Rd. W and at Dundas Street West north of Postmaster Drive.</p> <p>If you have any questions please do not hesitate to ask.</p> <p>Thank you, Graham</p> <hr/> <p>ATTACHED LETTER</p> <p>MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) are retained by Fieldgate Commercial Properties in relation to their interest and the interest of the current registered owner, Dorham Holdings Inc., in the lands located at the northwest quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (hereinafter the “Subject Lands”). The Subject Lands occupy an area of approximately 11.3 hectares. The Subject Lands are legally described as Part of Lot 20, Concession 2 North of Dundas Street, Part 1, 20R9368 Lying West of Part 1, PE200 Except Part 4, 20R13713 &amp; Parts 1 &amp; 2 HR1104980 and Part 1, 20R20812.</p> <p>We understand the Region recently released an Integrated Growth Management Strategy Urban Structure Discussion Paper dated June 2020, which was prepared as part of</p>	<p>Regional staff have recommended this employment conversion (Burnhamthorpe /Neyagawa NW Quadrant, O-22) be advanced through the Preferred Growth Concept Regional Official Plan Amendment.</p> <p>Request O-22 was initially identified as requiring further analysis and was tested in the Growth Concepts.</p> <p>To consider the Neyagawa Urban Core comprehensively the request was combined with requests O-02.</p> <p>The final assessment has recommended this employment conversion be advanced through the Preferred Growth Concept Regional Official Plan Amendment.</p> <p>More information on how this conversion meets the principles of the Region’s employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>

No.	Source	Submission	Response
		<p>Regional Official Plan Review Process (ROPR). The Discussion Paper addresses planning for growth in the Region, Settlement Areas Community Areas and Employment Areas. The Paper provides an overview on the Region’s employment area policies and identifies requests for the conversion of employment lands submitted through local Official Plan reviews.</p> <p>The Discussion Paper sets out additional criteria for employment conversion requests and establishes a deadline of August 31st for additional submissions to be made for consideration by the Region through its ROPR process related to existing or new conversion requests. The employment conversion request contained herein focuses on introducing commercial uses on the Subject Lands. Commercial uses are commonly found in employment areas. As outlined in the Paper, the ROP provides limited direction on how ancillary and supportive land uses should be planned for within employment areas. Given the evolving nature of employment and employment areas, greater flexibility is needed to allow for supportive land uses in these areas.</p> <p>The Town of Oakville adopted Official Plan Amendment 26 (“OPA 26”) in April 2018 to update the employment, commercial and mixed use designations in the Livable Oakville Plan. The Town’s Employment and Commercial Review estimates that approximately 20% of the Town’s commercial space is developed within employment areas and assumes this trend will continue. 1 Approximately half of employment growth in employment areas to 2041 is anticipated to be from the commercial sector.2 The review also notes that there is a projected shortfall of approximately 83,612 square metres of commercial lands to 2041. When examining the context in North Oakville and accounting for the recommendations and evaluation contained in the Review, there is a projected commercial shortfall of 17,049 square metres. If 20% of the future demand for commercial space were accommodated within employment areas, this would significantly reduce the projected shortfall.</p> <p>The following letter outlines the current physical and policy context for the Subject Lands and the recent conversion request made through the Town of Oakville Official Plan Review process for the lands. The letter also provides a justification for the employment land conversion request for commercial uses per Section 77.4(4) of the ROP and includes an assessment of the additional Regional criteria as set out in the Discussion Paper.</p> <p><b>SITE CONTEXT</b></p> <p>As shown on Figure 1, the Subject Lands are located at the northwest quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville. The Subject Lands are approximately 11.3 hectares in size and are bound by the Highway 407 corridor to the north, Neyagawa Boulevard to the east, Burnhamthorpe Road West and 501 Burnhamthorpe Road West to the south, and Fourth Line to the west. The entirety of</p>	

No.	Source	Submission	Response
		<p>the Subject Lands are proposed to be redesignated to support a broader mix of commercial uses. The Subject Lands are currently vacant and are surrounded by a mix of existing rural residential and agricultural land uses, natural heritage areas to the west, and institutional and residential uses. More specifically, the Subject Lands are surrounded by the following land uses:</p> <p>NORTH: The Subject Lands abut open space and Highway 407 to the north. A transit stop along the 407 Transitway is planned immediately north of the Subject Lands. The lands north of the 407 Transitway are part of the Parkway Belt West Plan.</p> <p>EAST: The Subject Lands abut Neyagawa Boulevard to the east. Further east are vacant lands designated as Employment District and the Neyagawa Urban Core.</p> <p>SOUTH: The Subject Lands abut a single detached dwelling on the north side of Burnhamthorpe Road West (501 Burnhamthorpe Road West). King's Christian Collegiate, a private high school, is located south of Burnhamthorpe Road West. An outdoor soccer facility is located to the east of the campus. Low rise residential uses are also located further south.</p> <p>WEST: The Subject Lands abut Fourth Line to the west. Further west exist a mix of rural residential dwellings and agricultural uses. These dwellings are situated along Fourth Line and are spaced out considerably. Further west is a large natural area that comprises part of the Region's natural heritage system.</p> <p><b>POLICY CONTEXT</b></p> <p>As illustrated on Halton Region Official Plan Map 1, the Subject Lands are currently designated 'Urban Area' on Map 1 – Regional Structure of the in-force ROP and are located within the 'Employment Area' overlay. The Employment Area overlay designation permits a range of employment uses. The Subject Lands are designated Employment District and Transitway in the North Oakville East Secondary Plan (see Figure 2). A future stormwater management facility (location to be determined) is also identified on the site. The Subject Lands are not located within the Provincially Significant Employment Zones as provided through the A Place to Grow, 2019. The majority of the Subject Lands are designated as Employment District with the northern portion designated at Transitway under the North Oakville East Secondary Plan. Employment Districts refer to land designed to accommodate development of predominantly employment generating uses including a wide range of industrial and office development. Limited retail and service commercial uses designed to serve the businesses and employees are permitted within the Employment Districts.</p>	

No.	Source	Submission	Response						
		<p>As part of the Town's Urban Structure Review, another study that formed part of the Official Plan Review, the lands were identified as part of a 'Node for Further Study' at Neyagawa Boulevard and Burnhamthorpe Road West through Official Plan Amendment No. 15 ("OPA 15"). The request was recommended for further study based on the previous OPA 15 Node and the further review through the North Oakville East Secondary Plans Study. A previous request for conversion for the Subject Lands was submitted on behalf of Dorham Holdings Inc., the current owner of the Subject Lands, to the Town of Oakville as part of their Commercial and Employment Review which resulted in OPA 26. The conversion request is listed as Request #12 under Appendix F of the Town's recommendation report dated March 22, 2018.</p> <p>A review of the North Oakville Secondary Plans was initiated in May 2017. This study was a component of the ongoing Official Plan Review by the Town. Official Plan Amendment 321 ("OPA 321") to the North Oakville East Secondary Plan (By-law 2018-074) was adopted on June 11, 2018. Halton Region approved OPA 231 with modifications on September 21, 2018. OPA 231 was further modified by the Local Planning Appeal Tribunal and came in-effect as of July 3, 2019. We understand employment conversions were not considered or implemented through OPA 321 but are now being considered through the Region's ROPR process to be further implemented, if approved, through Oakville's conformity update. This request focuses on removing the Subject Lands from the Region's Employment Area overlay and redesignating them to permit needed commercial uses under a commercial land use designation or as part of the Neyagawa Urban Core designation.</p> <p><b>CONVERSION CRITERIA ASSESSMENT</b></p> <p>The following two tables below provide justification and rationale for the conversion request as shown on Figure 2 in relation to the existing conversion criteria set out in provincial policy, the ROP, through Section 77.4(4), as well as the new criteria set out in Appendix 3 of the Discussion Paper.</p> <p>1. Conversion Criteria - Section 77.4(4) ROP</p> <table border="1" data-bbox="453 1159 1388 1243"> <thead> <tr> <th colspan="2" data-bbox="453 1159 1388 1214"><b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b></th> </tr> <tr> <th data-bbox="453 1214 743 1243"><b>Criteria</b></th> <th data-bbox="743 1214 1388 1243"><b>Rationale/Justification</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="453 1243 743 1252"></td> <td data-bbox="743 1243 1388 1252"></td> </tr> </tbody> </table>	<b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b>		<b>Criteria</b>	<b>Rationale/Justification</b>			<p>Comments are acknowledged. Please see response provided above.</p>
<b>Table 1: Assessment of Conversion Request against ROP Conversion Criteria per Section 77.4(4)</b>									
<b>Criteria</b>	<b>Rationale/Justification</b>								


No.	Source	Submission		Response
		There is a need for the conversion	The conversion would facilitate the comprehensive development for needed commercial uses. To isolate the lands at the northwest quadrant of Neyagawa Blvd and Burnhamthorpe Rd W solely for employment uses given the current context is contrary to the objectives for the Node established in OPA 15 and the North Oakville East Secondary Plan. The lands are within a Node that serves an important function to support the transitway with mixed use, compact urban development. The Regional and local policy framework supports the need for conversion to ensure appropriate commercial uses. The conversion of the lands will also ensure more integrated and compatible land uses while still providing for employment opportunities.	
		The lands are not required for employment purposes over the long term	The lands can retain employment functions through their commercial use. They are not required to be protected for long term employment purposes given their size and the current supply of pure employment lands to the east and west along the 407 corridor.	
		The conversion will not compromise the Region's or Local Municipality's ability to meet the employment forecast in Table 1 and Table 2a	The portion of the Subject Lands requested for conversion are relatively small (11.3 ha). The conversion will not compromise the Region's or the Town's ability to meet their employment forecasts.	
		The conversion will not adversely affect the overall viability of the Employment Area, and achievement of the intensification and density targets of Table 2 and other policies of this Plan	The subject parcel is the only quadrant of the Neyagawa Blvd and Burnhamthorpe Rd W not designated as an Urban Core Area. It is relatively small and isolated from the employment lands to the east and will not adversely affect the overall viability of the employment area and will not impact the intensification and density targets of Table 2 and other policies of the Regional Plan.	
		There is existing or planned infrastructure to accommodate the proposed conversion	The property is within an area where future services and infrastructure will be available to accommodate the conversion.	


































No.	Source	Submission		Response
		Cross-jurisdictional issues have been considered	There are no cross-jurisdictional issues of note for this property.	
		All Regional policies and requirements, financial or otherwise, have been met	This criteria is satisfied.	
		2. Conversion Request Evaluation Criteria - Discussion Paper & Appendix		
		<b>Table 2: Assessment of Proposal in relation to Conversion Request Evaluation Criteria Per Appendix D of the Urban Structure Discussion Paper</b>		
		<b>Subject</b>	<b>Principle</b>	<b>Rationale/Justification</b>
		Employment Land Supply	Current Context	The site is currently vacant, surrounded by planned urban core land uses with the exception of future employment uses further west.
			Future Potential	The future potential of the lands is best suited for commercial uses given its size, access and location. The subject lands are located at a strategic location within the Town of Oakville. A planned Transitway stop is proposed immediately adjacent to the Subject Lands at Neyagawa Boulevard and Highway 407. The 407 Transitway is a planned bus rapid transit line (BRT) that will run adjacent to Highway 407 between Brant Street in Burlington to Hurontario Street in Mississauga. The planned 2041 hourly morning peak ridership at the planned Neyagawa station is 2000 (eastward) and 600 (westward) riders. This planned transit stop represents significant future potential for the subject lands to support a greater range of opportunities for land uses. The subject lands have great potential to support increased densities and jobs through commercial land uses.

No.	Source	Submission			Response
			Strategic Parcel Supply	The proposed conversion would not adversely impact the supply of parcels adjacent to or near major goods movement facilities as the existing context currently includes planned employment uses that are retained west of Fourth Line which also have direct exposure to the highway corridor.	
			Land Budget Implications	Due to the relatively small parcel size, the proposed conversion would not impact the supply and ability to achieve the employment forecast.	
		Demonstrated Need	Strategic Location	The proposed conversion of the lands to expand commercial uses within the Urban Core Node can better serve the nodal mixed use function for the area.	
			Strategic Opportunity	The proposed conversion would allow for more appropriate development of the site given the market need for commercial uses. The Subject Lands are uniquely positioned within close proximity to a planned 407 transitway station immediately north of the lands. The planned transitway provides strategic opportunity to support increased employment opportunities that are supported by transit.	
			Specific Conditions and Constraints	The development of the lands for employment uses is constrained as a result of their isolation from other employment areas located further east along the 407 corridor.	
		Employment Area Viability	Locational Impacts	The conversion would not negatively impact the remaining employment area to the west.	
			Compatibility	The proposed conversion would allow for a more compatible land uses to be integrated and comprehensively developed with the broader Urban Core Node.	



No.	Source	Submission			Response
			Continued Function and Expansion	As noted above, the conversion would not hinder the continued function and expansion of the planned employment areas to the west which remain vacant.	
		General Considerations	Cross-Jurisdictional	There are no cross-jurisdictional issues of note for this property.	
			Supporting Infrastructure	The property is within an area where services and infrastructure to accommodate the conversion will be provided.	
			Other Regional Requirements	There are no other Regional policies or requirements that would be impacted by the proposed conversion.	
			Local Support	There is local support for the development of the Node with mixed uses and the integration of the whole Subject Lands as part of this Node is generally supported through the Town of Oakville's OPA 15.	
		<p>Our opinion continues to be that the Subject Lands should not be designated for pure employment lands in the future planning in the North Oakville East Secondary Plan or the Region's Official Plan. The Subject Lands should be considered for conversion to commercial uses (that includes employment in jobs greater than what exists today) through both the Region's OPR process as well as through a modification to the Town's Official Plan for all of the reasons set out herein.</p>			
		<p>Yours truly,  MHBC  Dana Anderson, MA, FCIP, RPP  Partner  cc: Curt Benson, Region of Halton  Diane Childs, Town of Oakville</p>			

No.	Source	Submission	Response
		 <p><b>Figure 1</b> Location Map</p> <p>VuMap Aerial Imagery</p> <p>Northwest Quadrant of Niagara Falls Blvd. &amp; Burnhamthorpe Rd. W., Town of Oakville</p> <p><b>LEGEND</b>  <span style="border: 2px solid red; display: inline-block; width: 15px; height: 10px; vertical-align: middle;"></span> Subject Lands</p> <p>DATE: August 16, 2020    SCALE: Not to Scale</p> <p><b>MHBC</b> PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE  <small>200 WESTERN AVENUE, SUITE 100, OAKVILLE, ONTARIO L6M 1R7    P: 905.846.1111 ext. 1   www.mhbc.ca</small></p>	

No.	Source	Submission	Response																											
		 <p data-bbox="1108 1105 1283 1122">Data Source: North Oakville East Master Plan</p> <p data-bbox="478 1127 661 1198"><b>Figure 2</b> Proposed Employment Conversion</p> <p data-bbox="478 1224 661 1247">North Oakville East Master Plan</p> <p data-bbox="478 1263 661 1312">Northwest Quadrant of Noyagawa Blvd. &amp; Burnhamthorpe Rd. W., Town of Oakville</p> <table border="1" data-bbox="682 1127 1283 1247"> <thead> <tr> <th colspan="3">LEGEND</th> </tr> </thead> <tbody> <tr> <td></td> <td>Subject Lands</td> <td></td> <td>Elementary School</td> <td></td> <td>Natural Heritage System Area</td> </tr> <tr> <td></td> <td>Noyagawa Urban Core</td> <td></td> <td>Neighbourhood Centre Area</td> <td></td> <td>Regional Employment Overlay (Map 1)</td> </tr> <tr> <td></td> <td>Employment District</td> <td></td> <td>Stormwater Management Facility</td> <td></td> <td></td> </tr> <tr> <td></td> <td>General Urban Area</td> <td></td> <td>Transitway</td> <td></td> <td></td> </tr> </tbody> </table> <p data-bbox="682 1263 793 1279">DATE: August 18, 2020</p> <p data-bbox="821 1263 919 1279">SCALE: Not to Scale</p> <p data-bbox="955 1263 1039 1344"></p> <p data-bbox="1039 1263 1283 1344">  <b>PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE</b>  <small>1000 WILLOW ROAD, SUITE 100, OAKVILLE, ON L6K 3G7      (905) 231-1811   www.mhbc.com</small> </p>	LEGEND				Subject Lands		Elementary School		Natural Heritage System Area		Noyagawa Urban Core		Neighbourhood Centre Area		Regional Employment Overlay (Map 1)		Employment District		Stormwater Management Facility				General Urban Area		Transitway			
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No.	Source	Submission	Response
16.	<p>Constance Ratelle on behalf of fifth Line Farming Limited (Mattamy)</p> <p>E-mail dated August 31, 2020</p>	<p>Good afternoon,</p> <p>I am attaching an employment conversion request on behalf of Fifth Line Farming Limited for a 4.6 hectare property east of Fifth Line, north of Britannia Road, in Milton.</p> <p>Please feel free to give me a call at _____ if you require any further information.</p> <p>Thanks,</p> <p>Constance</p> <hr/> <p>ATTACHED LETTER</p> <p>Dear Mr. Benson,</p> <p>I am writing on behalf of Fifth Line Farming Limited (Mattamy) in response to the IGMS Regional Urban Structure Discussion Paper released in June 2020. We understand the Region is currently evaluating requests to convert lands within the Employment Area. This letter serves as our request for consideration of a conversion on a site in Milton, currently under an Employment Area overlay in the Regional Official Plan. We have reviewed the conversion principles outlined in the discussion paper and believe the site to be an appropriate candidate for conversion due to its limited size and irregular shape on the periphery of the employment area. Mattamy owns land in Milton's Phase 4, on the east side of Fifth Line, north of Britannia Road. Their property is divided by a Natural Heritage System channel running north-south which serves as the boundary between the Town's Derry Green Corporate Business Park and the Britannia East/West Secondary Plan areas (Figure 1). It is located adjacent to Fifth Line (future 35m-wide minor arterial) and is anticipated to accommodate an extension of Louis St. Laurent Avenue.</p> <p>The property is designated Urban Area in the Regional Official Plan, and the west portion of the land is subject to the Employment Area overlay (Figure 2). The east portion of Mattamy's property, across the Natural Heritage System, is not subject to the same overlay. The west portion of the property is designated Business Park Area on the Town of Milton Official Plan (Figure 3) and falls within Milton's Derry Green Corporate Business Park Secondary Plan Area (Figure 4). The east portion is part of the Sustainable Halton Lands/Future Urban Expansion Area and will be included in the future Britannia East/West Secondary Plan area and intended for residential development. In the Derry Green Corporate Business Park Secondary Plan, the Business Park Area designation permits a range of light industrial and office uses but prohibits institutional uses. This Business Park area owned by Mattamy is approximately 4.6 hectares in size. Mattamy has been</p>	<p>Regional staff have recommended retaining these subject lands (Fifth Line Farm, M-09) within the Regional Employment Area.</p> <p>More information on how this conversion does not meet the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>

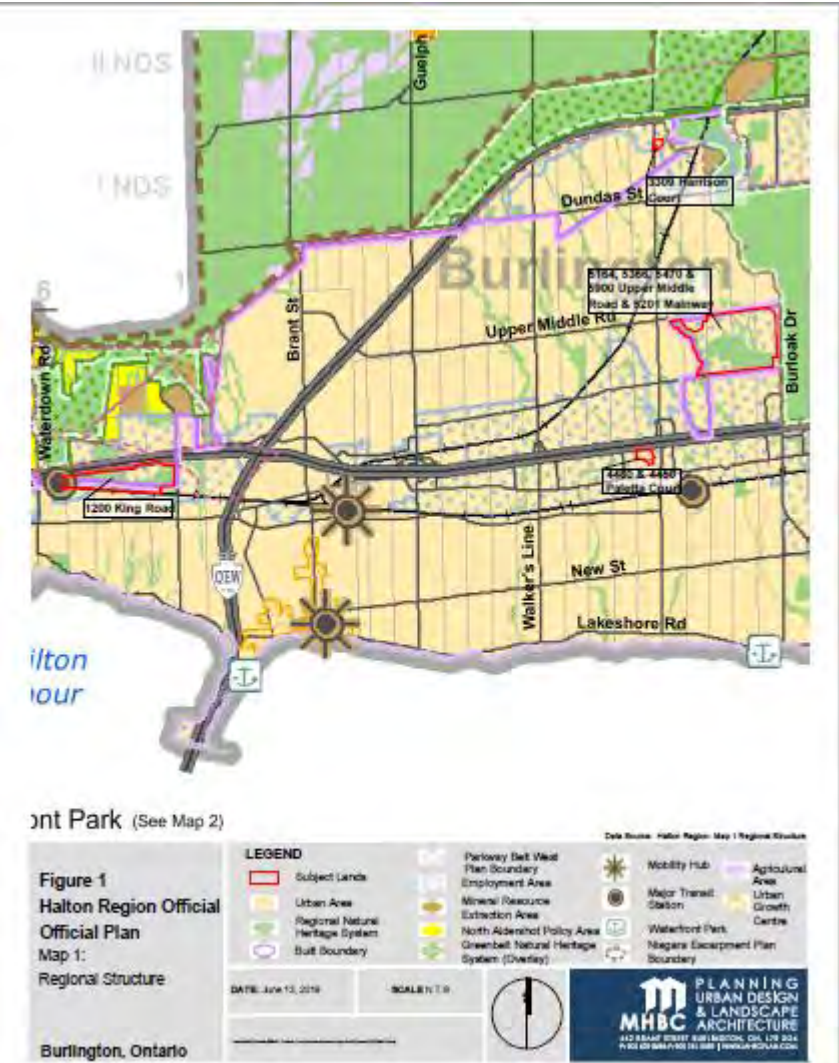
No.	Source	Submission	Response
		<p>approached by the Muslim Association of Milton to purchase land for a new place of worship. A place of worship is not currently permitted in this location as it is intended for employment. However, the subject site would be an appropriate location for a place of worship as the site is on the periphery of the employment area and is separated from the rest of Derry Green by an arterial road (Fifth Line). A preliminary land use concept is appended as Figure 5.</p> <p>Approximately 2.5 ha of area would remain to be developed for commercial or other transitional uses on this site. East of the site, on the other side of the Natural Heritage System but proposed to be connected via Louis St. Laurent, is intended for residential development through the future Britannia East/West Secondary Plan process. We feel Fifth Line would serve as an appropriate alternative boundary for the Employment Area overlay, and a logical division between dedicated employment uses on the balance of the employment area and alternative uses adjacent to, and potentially more compatible with, the Natural Heritage System. Below is a response to each of the four principles outlined in the Integrated Growth Management Strategy Discussion Paper (June 2020): Employment Land Supply</p> <p>With a conversion to allow for non-employment uses, the subject site would be suited to accommodate institutional and commercial uses with various employment opportunities to serve surrounding residents. The proposed development would not impact movement of goods as it is located on the periphery of the employment area, separated from the balance of the area by an arterial road. The proposal applies to a relatively small area (4.6 hectares) and would not have an adverse impact on the supply of employment lands in the Region. Demonstrated Need The subject site is located within the Region's Urban Area, outside of the Built Boundary, and is subject to the Employment Area overlay (Figure 2 – Regional Structure). However, it is not located with a Strategic Growth Area or other identified node or corridor. The subject site is constrained by Fifth Line (to be widened to 35 metres) and the Natural Heritage System, and is anticipated to be bisected by the extension of Louis St. Laurent Avenue. The developable area will be split into two smaller blocks, approximately sized 3.36ha and 0.64ha. Due to the limited size and irregular shape, the site is less suitable for employment uses and requires flexibility in its permitted uses to develop efficiently. Non-employment uses such as a place of worship will provide some population-related jobs and will optimize use of infrastructure by locating on an arterial road and making efficient use of an irregular site. Institutional and commercial uses will support the use of transit service on Fifth Line.</p> <p>Employment Area Viability</p> <p>The subject site is located on the periphery of the employment area (southeasternmost edge) and the proposed conversion, if approved, would result in an employment area</p>	

No.	Source	Submission	Response
		<p>boundary that is logical and regular (Fifth Line) and does not undermine the continued viability of adjacent lands. The proposal would not impact any existing land uses and would be compatible with future employment and non-employment uses in the area.</p> <p>General Considerations  Services and infrastructure are planned for this area and will be appropriate to support the proposed non-employment uses. The proposal has been discussed with Town of Milton planning staff, as a local Official Plan amendment and Zoning By-law amendment would be required following a conversion of the land from employment to implement the proposal. We believe the proposal is consistent with the above conversion principles and propose that the Employment Area overlay be removed from the area east of Fifth Line, in order to allow for flexibility in the uses on the periphery of the employment area. The subject site is small in scale (4.6 hectares) and is an appropriate location for non-employment uses to transition to the future neighbourhood to the east without disrupting the character of the rest of the employment area.</p> <p>Alternatively, we propose that consideration be given to permitting the place of worship use on the property, in accordance with ROP Section 77.4 b): 77.4 It is the policy of the Region to: (1) Prohibit residential and other non-employment uses including major retail uses in the Employment Areas except: [...] b) for institutional uses identified in a Local Official Plan, as a result of a detailed study that sets limits and criteria on such uses based on the following principles: [i] the use is of small scale and such uses collectively within an Employment Area shall not change the character of that Employment Area; [ii] the location and design of the use meet the Land Use Compatibility Guidelines under Section 143(10) of this Plan; [iii] the use is located at the periphery of the Employment Area; and [iv] such uses do not collectively displace employment from the Employment Area to result in a shortfall in Employment Areas to meet the Local Municipality's employment forecast in Table 1 and Table 2a.</p> <p>The proposal meets the above criteria as the proposed place of worship use is small in scale, approximately 1.4 hectares (3.5 acres), and its limited size and location at the periphery, separated from rest of the employment area by an arterial road, will not impact the overall character of the employment area. The proposed location is appropriate for land use compatibility as it sites the place of worship away from potential future industrial uses, on an irregular site backing onto the Natural Heritage System. There are no existing industrial uses in the area to cause compatibility issues, nor is a residential use being proposed here that would limit future industrial uses.</p> <p>We look forward to discussing this proposal further and collaborating with Regional staff on a strategy for this development. Please feel free to contact me at <a href="mailto:constance@korsiak.com">constance@korsiak.com</a> with any questions you may have.</p>	




No.	Source	Submission	Response
		<p>This letter contains employment conversion requests for the following lands owned by Penta:</p> <ul style="list-style-type: none"> <li>• 1200 King Road (Tab 1);</li> <li>• 3309 Harrison Court (Tab 2);</li> <li>• 4450 &amp; 4480 Paletta Court (Tab 3); and,</li> <li>• 5164, 5366, 5470, 5900 Upper Middle Road &amp; 5201 Mainway (Tab 4).</li> </ul> <p>The aforementioned lands are identified on the Region's Urban Structure (Halton Region Official Plan Map 1) on Figure 1. Factual information regarding the aforementioned lands, including the physical and policy context and a summary of previous conversion requests and submissions is contained in Table 1. Copies of previous submissions made for the lands are attached as appendices to this letter, specifically this includes our submissions on the Adopted Burlington Official Plan, dated April 23, 2018 (Appendix A), the Aldershot GO and Appleby GO Mobility Hubs, dated July 18, 2018 (Appendix B), and the proposed Amendment 1 to the Growth Plan and Provincially Significant Employment Zone mapping, dated February 28, 2019 (Appendix C).</p> <p>Each request outlines the current physical and policy context of the property as well as a review of the recent conversion requests made through the City of Burlington's Official Plan Review process. Each request includes justification for the employment land conversion per Section 77.4(4) of the ROP and includes an assessment of the additional Regional criteria as set out in the Discussion Paper. It is our opinion that the aforementioned lands should not be designated solely for employment uses. The lands should be considered for conversion to non-employment uses through both the Region's OPR process as well as through a modification to the City's Official Plan for all of the reasons set out in each assessment and request. The conversion requests will allow the lands to support employment through commercial and other employment supportive uses and will assist the Region and City in achieving planned population and employment growth and meeting intensification and density targets. The conversion requests also assist in creating complete communities by increasing the range of permitted uses located close to existing and planned neighbourhoods.</p> <p>We trust the information contained herein is sufficient to assess the conversion requests. Should you have any questions or require additional information, please do not hesitate to contact us.</p> <p>Yours truly,</p> <p>MHBC Gerry Tchisler, M.Pl., MCIP, RPP Dana Anderson, MA, FCIP, RPP Associate Partner</p>	<p>After further analysis, the conversion requests related to the western portions of 1150/1200 King Road, were not supported.</p> <p>More information on how these conversions do not meet the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>



No.	Source	Submission	Response
		<p>cc: Curt Benson, Region of Halton Dave Pitblado, Penta</p>  <p>Figure 1 Halton Region Official Official Plan Map 1: Regional Structure</p> <p>Burlington, Ontario</p> <p>DATE: June 13, 2016      SCALE: 1:0</p> <p>PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE MHC 412 BRAD STREET, SUITE 200, ONTARIO, ON L2R 2S4 PH: 905.847.9030 FAX: 905.847.9031 WWW.MHCPLAN.COM</p>	

No.	Source	Submission	Response
		<p>Note: An additional 92 pages of information – including an overview of the physical context, policy context, and previous history of the conversion request locations – was included with this submission but redacted for the purposes of this chart.</p>	
18.	<p>Ian Graham on behalf of 1265 Burnhamthorpe Road East</p> <p>E-mail dated September 11, 2020</p>	<p>Dear Mr. Tovey,</p> <p>R.E. Millward + Associates Ltd. is submitting this letter on behalf of the owners (Marko &amp; Mica Mesic) of a property known municipally as 1265 Burnhamthorpe Road East (the “subject site”) in the North Oakville East Secondary Plan area in the Town of Oakville. The subject site is 2.02 hectares (4.99 acres) in area with 91.4 meters (300 feet) of frontage along the north side of Burnhamthorpe Road East. The subject site is identified as being within the delineated “Urban Area” and is designated as an Employment Area on Map 1 – Regional Structure. The subject site is also located within a Provincially Significant Employment Zone as delineated by “A Place to Grow: Growth Plan for the Greater Golden Horseshoe 2020”. We understand that as part of the Regional Official Plan Review, Halton Region is currently accepting requests for Employment Areas to be removed from the Regional Employment Area Overlay on Map 1 – Regional Structure.</p> <p>Requests in the Vicinity</p> <p>It has come to our attention that an Employment Area Conversion Request has been submitted for the property surrounding the subject site, described as Part of Lot 8, Concession 2 N.D.S1 (the “adjacent property”). UrbanSolutions submitted the request on behalf of the landowner, T.L.M.T.T. Ontario Ltd. for the portion of lands fronting on Burnhamthorpe Road East to redesignate the lands from Employment Area to Transitional Area. Refer to the letter and supporting application materials provided by UrbanSolutions pertaining to the adjacent property, dated August 21, 2020. The adjacent property is 35.59 hectares (87.94 acres) in size and surrounds the subject site to the east, west, and north. Please see to Figure 1 at the end of this letter for the proximal location of the adjacent property to the subject site. Please be advised that the issuance of this letter demonstrates that the owners of the subject site intends to file an Employment Area Conversion Request with the Region of Halton for 1265 Burnhamthorpe Road East in the Town of Oakville. Respecting Halton Region’s August 31, 2020 deadline for conversion requests, this letter serves as notice of intent to file an application that responds to the evaluation criteria set out in Section 4.3.2.1 of the Integrated Growth Management Strategy Regional Urban Structure Discussion Paper (dated June 2020).</p> <p>Rationale for the Conversion Request</p> <p>R.E. Millward + Associates Ltd. acknowledges the important role that employment lands play in the local, regional, and provincial economy. Protecting and preserving Employment</p>	<p>Based on a review of the submission, Regional staff’s initial assessment of the request (identified as ‘O-21’ in the conversion request inventory and considered comprehensively with the adjacent ‘O-15’, together referred to as ‘Burnhamthorpe Road East) concluded that the request did not meet the Region’s conversion principles as set out in the Regional Urban Structure Discussion Paper. This finding was summarized in Appendix C.2 to the Growth Concepts Discussion Paper.</p> <p>Further analysis of the request was undertaken as summarized in Appendix B to the Preferred Growth Concept Report. This included the review of additional supplemental materials addressing Regional staff’s initial analysis. The conclusion of this analysis confirmed the recommendation that the lands remain identified within the Regional Employment Area based on the lack of demonstration of the need for the conversion and the location of the lands as part of a broader contiguous employment area in proximity to goods movement facilities.</p>

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		<p>Areas was a key theme explored in the Regional Integrated Growth Management Strategy Urban Structure Discussion Paper, identifying the need to provide lands for businesses and economic activities such as manufacturing, warehousing, offices and other associated uses. However, should a redesignation be granted for the adjacent property, the subject site would be a remaining 'pocket' of Employment Areas, with lands to the east and west being Transitional Area. This would present a potential land use conflict between the subject site and adjacent property, given the divergence in use permissions between Employment Areas and Transitional Areas. The application to convert the lands from Employment Area to Transitional Area for the subject site is intended to be consistent with the application for surrounding lands. Additionally, the Transitional Area designation is appropriate for the subject site as it extends the existing Transitional Area from the west, along Burnhamthorpe Road East.</p> <p>The Transitional Area designation acts as a buffer between the approved residential developments to the south of Burnhamthorpe Road East and the designated Employment Area to the north of the subject site. Given the existing and planned land uses in the surrounding area, a redesignation from Employment Area to Transitional Area does not compromise the viability or future potential of the designated Employment Area to the north. Further, the Growth Plan principle of locating Employment Areas near major good movement facilities and corridors would be withheld, as the subject site has frontage on Burnhamthorpe Road East and does not create implications for lands in close proximity to Highways 407 and 403, or William Halton Parkway. This will be explored in greater detail in the supplemental planning materials to be provided to Halton Region at a later date.</p> <p>We will provide the fulsome background information to the Region of Halton in a timely manner. We appreciate your consideration and look forward to working with Halton Region. Please do not hesitate to contact the undersigned should you have any questions or comments.</p> <p>Sincerely,</p> <p>Ian A.R. Graham, MCIP, RPP  Director  1200 Bay Street, Suite 1101  Toronto, ON M5R 2A5  t. 416 304 0457 ex 22  c.  ian@remillward.com  cc. Councillor Natalia Lishchyna, Ward 6, Town Councillor  Councillor Tom Adams, Ward 6, Regional Councillor  Orlan Mesic, on behalf of Marko and Mica Mesic  Owen McCabe, Halton Region</p>	

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		<p>Robert Millward, R.E. Millward + Associates Ltd.  Natasha Petzold, R.E. Millward + Associates Ltd.  Matt Johnston, Urban Solutions  Brandon Petter, Urban Solutions</p> <p><b>Figure 1   Subject Site and Adjacent Property with Active Conversion Request</b></p>  <p><b>Legend</b></p> <ul style="list-style-type: none"> <li><span style="border: 1px dashed black; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> 1265 Burnhamthorpe Rd E (Subject Site)</li> <li><span style="background-color: orange; display: inline-block; width: 15px; height: 10px; margin-right: 5px;"></span> Approximate Location of Conversion Request (Adjacent Property)</li> </ul>	
19.	<p>Jacob Kaven on behalf of Team Honda 4061420 Canada Inc.</p> <p>E-mail dated September 24, 2020</p>	<p>Good Afternoon Curt,</p> <p>I hope you and your family are well and staying safe!</p> <p>Please find attached our Employment Conversion Request letter for 170 Steeles Avenue East in Milton. It is our understanding that Town staff will be forwarding a letter outlining support for our request.</p> <p>Please do not hesitate to contact me should you have any questions or require further information.</p> <p>Regards,</p>	<p>Regional staff have recommended this employment conversion (Meritor Lands, M-10) be advanced through the Regional Official Plan Amendment No. 48.</p> <p>More information on how this conversion meets the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>


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		<p>Jacob</p> <hr/> <p>ATTACHED LETTER</p> <p>Mr. Benson, We are writing on behalf 4061420 Canada Inc. (Team Honda Powerhouse of Milton) in response to the IGMS Regional Urban Structure Discussion Paper released in June 2020. This letter serves as our request to remove the Employment Area overlay in the Regional Official Plan to enable mixed use redevelopment. We have reviewed the conversion principles outlined in the discussion paper and believe the site to be an appropriate candidate due to the surrounding land use context, the contemplated uses on the adjacent 'Meritor' property and the site's limited size and location on the periphery of the employment area. We have been in discussion with Town staff about the desire to remove the Region's Employment Area overlay to facilitate mixed use development. This is consistent with the Town's request to convert the abutting Meritor property, formally endorsed by Milton Council in February 2019. It is our understanding that Town staff will be forwarding a letter outlining support for our request.</p> <p>SITE CONTEXT</p> <p>As shown on Figure 1, the site is located at the southwest corner of Steeles Avenue East and Martin Street and is currently occupied by the Team Honda Powerhouse of Milton auto dealership. The lands are bound by: • North: Steeles Avenue East, beyond which are employment and commercial uses • East: Detached dwellings and Martin Street • South &amp; West: The Meritor property (150 Steeles Ave E) currently occupied by a goods movement distribution centre (Moonstone Transport) and Sixteen Mile Creek</p> <p>HALTON REGION OFFICIAL PLAN</p> <p>Map 1 Regional Structure (Figure 2) designates the lands Urban Area with an Employment Area overlay. The Region is currently evaluating requests to convert lands within the Employment Area as part of the ongoing Regional Official Plan Review.</p> <p>TOWN OF MILTON OFFICIAL PLAN – OPA 31</p> <p>As shown on Figure 3 - Schedule B, Urban Area Land Use Plan, the property is designated 'Business Park Area'. Section 3.7.1.10 states that the conversion of lands within Employment Areas to non-employment uses, shall be prohibited unless approved through a Municipal Comprehensive Review. The property is designated 'Business Park Area' and 'Business Commercial Area' on Schedule C.2.B - Milton 401 Industrial/Business Park Secondary Plan Land Use Plan (Figure 4) and further identified as a 'Special Study</p>	<p>Comments are acknowledged. Please see response provided above.</p>

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		<p>Area' (overlay designation). Section C.2.5.12 states that "the lands in this Special Study Area, with the exception of the Natural Heritage Area, have been identified as an Intensification Area on Schedule K" (Figure 5).</p> <p>Intensification Areas are defined as lands identified within the Urban Area that are to be the focus for accommodating intensification. Consideration of the introduction of any non-employment uses shall require the completion of a municipal comprehensive review and amendment to this Plan.</p> <p><b>PROVINCIALY SIGNIFICANT EMPLOYMENT ZONES</b></p> <p>In January 2019, the Province proposed Amendment 1 to the Growth Plan for Greater Golden Horseshoe 2019, including the identification of 29 'Provincially Significant Employment Zones'. Provincially Significant Employment Zones' are defined as areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. Provincially significant employment zones can consist of employment areas as well as mixed-use areas that contain a significant number of jobs. Amendment 1 was subsequently approved and took effect on August 28, 2020. During the comment period for Amendment 1, Milton Staff Report PD-011-19 (Appendix A), dated February 11, 2019, recommended that Council express broad support in-principle to the proposed Amendment, but requested that the Minister undertake a mapping correction to remove the Meritor property from the proposed Provincially Significant Employment Zone to facilitate mixed-use development.</p> <p>Resolution 078-19 was carried by Council. The June 2020 IGMS Discussion Paper acknowledged the Town's request to the Province. Figure 20 of the Discussion Paper (Figure 6) shows that the Meritor property has been removed from the Provincially Significant Employment Zones map. Additionally, the Region has acknowledged the employment conversion request made by the Town by way of staff report Milton Staff Report PD-011-19 170 Steeles Avenue East is identified as a Provincially Significant Employment Zone on Figure 20 of the IGMS Discussion Paper (Figure 6). However, Section 5.2.2.3 of the amended Growth Plan states that the Province may review and update provincially significant employment zones in response to a municipal request. Further, Section 2.2.5.9 of the Growth Plan prescribes that conversion of lands within employment areas to non-employment uses may be permitted only through a municipal comprehensive review. The ongoing Regional Official Plan review satisfies this requirement.</p> <p><b>REGIONAL OFFICIAL PLAN REVIEW (IGMS) – EMPLOYMENT CONVERSION</b></p> <p>The Growth Plan and Regional Official Plan prescribe criteria that must be met in order to facilitate the conversion of employment areas. To assist with applying the conversion</p>	

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		<p>policies in the Growth Plan and ROP, a set of evaluation criteria have been developed and are discussed in the Integrated Growth Management Strategy (IGMS) discussion paper (June 2020).</p> <p>Four general Principles have been developed and are accompanied by detailed considerations to assist with the consideration of conversion requests, including:</p> <ul style="list-style-type: none"> <li>• Employment Lands Supply;</li> <li>• Demonstrated Need;</li> <li>• Employment Area Viability; and</li> <li>• General Considerations.</li> </ul> <p>Below are responses to each of the four principles. Employment Lands Supply The supply of land required for employment purposes to the 2041 planning horizon and the ability to achieve Regional employment targets will not be adversely affected by the proposed conversion. The proposal applies to a small area (approximately 2.5 hectares) and would not have a material impact on the overall supply of the employment lands and the ability to achieve Regional employment targets. Demonstrated Need There is a demonstrated need for the proposed conversion on the basis that it would enable a strategic opportunity for growth that supports the Regional Urban Structure and/or Local Urban Structure, or, on the basis that there are specific existing conditions or constraints associated with the subject lands that reduce or limit the opportunity for employment uses.</p> <p>The proposed conversion provides opportunity to enable development supportive of population targets within the build boundary, supporting the desired local urban structure. The Growth Plan prescribes a minimum of 50 per cent of all residential development occurring annually within Halton Region be within the Delineated Built-up Area. The majority of the existing employment uses in the area are north of Steeles Avenue East. As there are existing residential uses to the east, the Meritor Site to the west and south (proposed conversion M-03), Steeles Avenue East is the logical Employment Area boundary. Employment Area Viability The overall viability of an employment area will not be adversely affected by the proposed conversion.</p> <p>Given the intended development of the Meritor property with mixed uses, Steeles Avenue will form the southern boundary of the Employment Area that is logical and does not undermine the continued viability of adjacent lands within the Employment Area. The proposed conversion would not impact any existing land uses and would be compatible with surrounding uses (existing and future). General Consideration The proposed conversion does not compromise any other relevant Regional or Local objective, policy or requirement, financial or otherwise, and can be supported by existing or planned infrastructure and public service facilities. The lands are adequately served by existing municipal infrastructure. Any future development applications would be subject to the</p>	

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		<p>review of supporting studies demonstrating adequate servicing/transportation capacity and recommended improvements if necessary.</p> <p>Town staff have expressed support for the proposed conversion. We are not aware of any cross-jurisdictional issues. We believe the proposal is consistent with the above conversion principles and request that the Employment Area overlay be removed from the property to permit the development of mixed uses compatible and complementary of adjacent existing/future uses. CONCLUSION The proposed land use conversion meets the above criteria as the site is small (approximately 2.5 hectares) and located at the periphery of the Employment Area. Being separated from rest of the Employment Area by a major arterial road (Steeles Ave E), the conversion will not impact the overall viability of the Employment Area. The proposed conversion to a mixed use designation is compatible and complementary to the adjacent existing and future uses, providing opportunities to enable development supportive of population targets within the built boundary.</p> <p>Please feel free to contact me directly at <a href="mailto:jacob@korsiak.com">jacob@korsiak.com</a> should you have any questions or require further information.</p> <p>Sincerely yours,</p> <p>KORSIAK URBAN PLANNING</p> <p>Jacob Kaven, MES, RPP Encl. Copy: Barb Koopmans, Commissioner – Planning and Development Jill Hogan, Director - Planning Policy and Urban Design Mike Vernooy, Neatt Communities</p>	



No.	Source	Submission	Response
			
20.	Melinda MacRory on behalf of 3515-3545 Rebecca Street Burloak Market	<p>Hi Owen,</p> <p>Please find attached our Employment Conversion Request letter for the properties located at 3515-3545 Rebecca Street in the Town of Oakville.</p> <p>Should you have any questions or require additional information, please do not hesitate to contact us.</p> <p>If you could kindly confirm receipt it would be greatly appreciated.</p>	<p>Regional staff have recommended retaining these subject lands (3515-3545 Rebecca Street, O-23) within the Regional Employment Area.</p> <p>More information on how this conversion does not meet the principles of the Region's employment conversion assessment criteria is available in</p>

No.	Source	Submission	Response
	<p>Place Partnership</p> <p>E-mail dated October 7, 2020</p>	<p>Best</p> <hr/> <p>ATTACHED LETTER</p> <p>Needs image to text</p> <p>MacNaughton Hensen Britton Clarkson Planning Limited (“MHBC”) are currently retained by Burloak Market Place Partnership with respect to their lands located at 3515-3545 Rebecca Street in the Town of Oakville (the ‘Subject Lands’).n</p> <p>The Region recently released an Integrated Growth Management Strategy Urban Structure Discussion Paper dated June 2020, which was prepared as part of the Regional Official Plan Review Process (ROPR). The discussion Paper addresses planning for growth in the Region, Settlement Areas, Community Areas and Employment Areas. The Paper provides an overview of the Region’s employment area policies and identifies requests for the conversion of employment lands submitted through local Official Plan reviews. The Discussion Paper sets out additional criteria for employment conversion requests and establishes a deadline of August 31<sup>st</sup> for additional submissions to be made for consideration by the Region through its ROPR process related to existing or new conversion requests. Staff have advised that submissions are still being accepted after this deadline.</p> <p>This letter outlines an employment conversion request for the Subject Lands in order to facilitate the development of non-employment uses, including commercial and residential uses, to allow for a greater mix of uses on the Subject Lands. The request outlines the current physical and policy context of the property as well as a review of the recent conversion requests made through the Town of Oakville’s Official Plan Review process. The request also provides justification for the employment land conversion per provincial policies and Section 77.4(4) of the Regional Official Plan (‘ROP’), and includes an assessment of the additional Regional criteria as set out in the Discussion Paper.</p> <p>PHYSICAL CONTEXT</p> <p>Existing Conditions</p> <p>As illustrated on Figure 1, the Subject Lands are located at the northeast corner of Burloak Drive and Rebecca Street in the Town of Oakville. With Burloak Drive representing the border between the Town of Oakville and the City of Burlington, the Subject Lands represent a gateway site to the Town of Oakville. The property is</p>	<p>Appendix B of the Preferred Growth Concept Report.</p>

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		<p>rectangular in shape with an area of approximately 3.16 hectares (7.81 acres), with frontage of approximately 183 metres on Burloak Drive and 163 metres on Rebecca Street. The Subject Lands are currently vacant.</p> <p>Adjacent Uses</p> <p>The site is surrounded by the following uses</p> <p>North: Place of worship (Harvest Bible Chapel).  East: Woodlot; Automobile service station (Shell).  South: Low density residential  West: Nursing home (Burloak Long Term Care); Low density residential; Public open space (Fothergill Woods Park).</p> <p>Transportation</p> <p>The Subject Lands are located approximately 1.9km south of the Queen Elizabeth Way, and approximately 3.5km from the Appleby GO Station. Oakville Transit Route 14A serves the Subject Lands on Burloak Drive, and provides service to the Appleby and Oakville GO Station. Oakville Transit Route 14 is located east of the Subject Lands along Great Lakes Boulevard and also provides service to the Appleby and Oakville GO Station. Both Rebecca Street and Burloak Drive are identified on the Town's Active Transportation Plan as Multi-Use Trail Routes.</p> <p>POLICY CONTEXT</p> <p>Provincially Significant Employment Zones</p> <p>A request was made to the Province on February 28, 2019 to remove the Subject Lands from the Provincially Significant Employment Zone (PSEZ) and the letter as Appendix A. The request explained that property is neither designated nor zoned for the types of employment uses which are the intended focus of the PSEZ. As of December 2019, the Subject Lands were removed from the PSEZ identified as 'Halton-19'.</p> <p>Halton Region Official Plan</p> <p>As shown on Figure 2, the following designations apply to the Subject Lands under the ROP:</p> <ul style="list-style-type: none"> <li>• Urban Area (Map 1, Urban Structure); and,</li> <li>• Employment Area (Map 1, Urban Structure).</li> </ul>	

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		<p>Town of Oakville Official Plan</p> <p>As shown on Figure 3, the following designations from the Town of Oakville Official Plan apply to the Subject Lands:</p> <ul style="list-style-type: none"> <li>• Employment Areas (Schedule A1, Urban Structure); and,</li> <li>• Business Commercial with a Site-Specific Exception (Schedule F South West Land Use).</li> </ul> <p>Employment areas are intended to provide industrial, business and office activities, which will be the major source of employment opportunities in the Town. The employment areas permit a wide range of business and economic activities and are defined by four specific Employment land use designations: Office Employment, Business Employment, Industrial and Business Commercial. The Employment land use designations provide for compatible uses in appropriate locations with a variety of form, scale, and intensity of development. The Business Commercial designation is to provide service commercial uses for the surrounding employment areas and for the travelling public</p> <p>Town of Oakville Official Plan Review</p> <p>The Town of Oakville completed an Employment and Commercial land review in 2018, resulting in OPA 26, adopted by Town Council on April 16, 2018. At this time, a previous employment conversion request was submitted by MHBC on November 6, 2017 to re-designated the lands as Community Commercial instead of Employment Commercial. The request was considered by Town staff as part of the OP 26 process in Appendix F to the corresponding staff report dated March 22, 2018; however, Town recommended an alternative request to realign the existing Business Commercial designation to be aligned with the property boundaries of the Subject Lands.</p> <p>A copy of the MHBC employment conversion request letter dated November 6, 2017 is attached in Appendix B. A copy of the Town's assessment of the previous conversion request for the Subject Lands under Appendix F to the staff report dated March 22, 2019 is attached in Appendix C.</p> <p>Town of Oakville Zoning By-Law 2014-014</p> <p>The Subject Lands are zoned Business Commercial (E4) with site-specific permission E-15 under Zoning By-law 2014-014.</p> <p>The Business Commercial (E4) zone with site-specific permission E-15 allows for the following permitted uses:</p>	

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21.	<p>Draga Barbir and Associates on behalf of 2220243 Ontario Inc.</p> <p>E-mail dated October 15, 2020</p>	<p>Re: 8283 Esquesing Line, Milton Regional Official Plan Review</p> <p>Request for Urban Area Boundary Expansion</p> <p>I am the land use planning consultant retained by Noor Teyyab, the owner of a parcel of land legally described as Part Lot 3, Concession 5, Town of Milton (the “Subject Lands”), known municipally as 8283 Esquesing Line. With respect to the Regional Official Plan Review regarding expansion of the urban area boundary, I am submitting this letter to request that the entire parcel of land be included within the urban area.</p> <p>A Special Council Meeting is scheduled for November 18, 2020. A formal written submission will follow.</p> <p>So far, we have reviewed some of the materials available on-line. As a result of this brief review of the materials, we conclude that the Subject Lands in their entirety should be within the urban area boundary.</p> <p>Property description:</p> <p>The Subject Lands are located on the east side of Esquesing Line, north of James Snow Parkway. The lands have an area of approximately 12 acres, with a frontage of approximately 500 feet along Esquesing Line and a depth of approximately 1100 feet.</p> <p>Current Land Use Designations:</p> <ol style="list-style-type: none"> <li>1. In the Regional Official Plan on Map 5 (Regional Phasing), the subject property is shown as “Urban Area with Regional Phasing between 2021 and 2031”.</li> <li>2. The subject property is designated in the Town of Milton Official Plan as “Agricultural Area” and “Greenland Area” (Schedule A – Land Use Plan).</li> <li>3. In the Town of Milton Phasing Plan, the subject property is in Phase 4 Lands – “Urban Expansion Area” – 2021 onwards.</li> </ol> <p>Current Zoning:</p>	<p>These lands were considered for potential settlement boundary expansion as a result of acknowledgement / commitments made in Minutes of Settlement for appeals to Regional Official Plan Amendment No. 38. The subject lands are currently designated as Urban Area, Regional Natural Heritage System and Agricultural Area and are partially within the Provincial Greenbelt Plan Area. Those lands within the Provincial Greenbelt Plan Area are not eligible for inclusion in the Urban Area under Provincial Legislation. Based on the results of technical analysis, staff are recommending that the lands designated Urban Area remain unchanged and that lands within the Regional Natural Heritage System and Agricultural Area not be included within the Preferred Growth Concept.</p>

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		<p>In the Town of Milton Zoning By-Law 144-2003, approximately 90% of the subject property is zoned “A1 – Agricultural”, and the remaining portion (approximately 10%), located at the back of the property, is zoned “GA – Greenlands”.</p> <p>We submit that the entire parcel should be included within the urban area boundary.</p> <p>Regards,</p> <p>Draga Barbir, B.Sc. B.Arch. MCIP RPP</p>	
22.	<p>David Pitblado on behalf of Penta Properties Inc.</p> <p>E-mail dated October 30, 2020</p>	<p>Dear Mr Benson:</p> <p>Re: Regional Official Plan Review – Burlington’s Urban Growth Centre</p> <p>With respect to Burlington’s Urban Growth Centre, we understand the City of Burlington is seeking to remove this designation from the downtown core as part of this Official Plan Review process, and place it over the lands around the Burlington GO Station. Respectfully, we feel there is a better opportunity that the City and Region may be overlooking.</p> <p>The lands around the Burlington GO Station are already developed or planned for development in the near term, meaning the prospect of future longer term growth over the next 30 years is very limited. If there is little ability to accommodate future growth in the Burlington GO Station area, development pressures downtown will inevitably continue.</p> <p>Given the recent Amendment 1 to the Growth Plan whereby the Province changed the planning horizon to 2051, we feel there is better opportunity to plan for future growth in areas that can actually accommodate that future growth with reduced conflicts with existing residents. Instead of one Urban Growth Centre effectively in name only we propose two actual Urban Growth Centres with real long term potential, around the Aldershot GO and Appleby GO Stations.</p> <p>Aldershot GO Station directly abuts a large amount of vacant land at 1200 King Road with extensive possibilities for future growth with convenient public transit and highway access, in an area with minimal negative impacts to existing residents. Unlike the Burlington GO Station area, this area is practically a clean slate of potential. There is no need to slowly chip away at changing the existing built up area of Aldershot when these vacant lands can easily accommodate the required growth.</p> <p>Similarly, Appleby GO Station is surrounded by vacant and dated employment lands ripe for re-development into a vibrant mixed-use community that could accommodate greater numbers of jobs and residents with easy public transit and highway access in an area with</p>	<p>Regional Official Plan Amendment (ROPA) No. 48, which was approved with minimal changes by the Minister of Municipal Affairs and Housing on November 10, 2021. ROPA 48 delineates the Appleby GO and Aldershot GO as MTSAs, and refines and/or adjusts the boundaries of the Urban Growth Centres, including Burlington.</p> <p>The Regional Urban Structure is a key foundation to the Region’s Integrated Growth Management Strategy. The Burlington Urban Growth Centre and Major Transit Station Area are strategic growth areas that are planned for greater population and job growth and higher rates of development than other areas in the City and Region.</p> <p>The area around the Burlington GO Station is well suited to accommodate an adjusted Urban Growth Centre boundary that focuses on greater density as it is well serviced by dedicated rail transit with frequent service on the Lakeshore West GO rail line. This GO rail line is considered</p>

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		<p>minimal negative impact to existing residents If the City is keen on diverting density and traffic away from downtown and protecting the small town feel, then these two areas would seem like a natural fit to accommodate the densities Burlington must accommodate by 2051. It could be a win-win scenario for Burlington.</p> <p>We appreciate your consideration of these comments.</p> <p>Yours truly, Penta Properties Inc.</p> <p>Dave Pitblado Director, Real Estate Development</p>	<p>higher order transit based on the definition in the Growth Plan, 2019.</p>
23.	<p>Scott Snider on behalf of Penta Properties Inc.</p> <p>E-mail dated October 30, 2020</p>	<p>Dear Mr. Benson,</p> <p>Re: Regional Official Plan Review (ROPR) Discussion Papers Comments on Behalf of Penta Properties Inc. and Paletta International Corporation Our File No. 13143</p> <p>We are counsel to Penta Properties Inc. and Paletta International Corporation (collectively “Penta”). Penta has extensive land holdings in the Region of Halton, both in settlement areas (particularly, the City of Burlington) and in the rural/agricultural area. These submissions relate to the five Discussion Papers released for public comment.</p> <p><b><u>North Aldershot</u></b></p> <p>Penta is by far the largest landowner within the Central Sector of North Aldershot. Penta owns some 106 hectares (ha) (263 acres) of land <u>that has been designated, zoned and subject to draft plan approvals for development on full services for over twenty (20) years.</u> The lands are referred to as “Eagle Heights”.</p> <p>Eagle Heights has also been the subject of further land use approvals intended to implement and refine those existing approvals. The City has indicated its support, in principle, for the refined development applications.</p> <p>Furthermore, since the approval of the official plan amendment, zoning and plans of subdivision in 1996, Penta has undertaken extensive work across virtually every discipline to implement those approvals. This has included extensive additional study and engineering work. In February of this year, Penta received its approval from the Ministry of</p>	<p><b><u>North Aldershot</u></b></p> <p>Commentary in this response will not be provided on the site specific development application matters currently being deliberated through litigation as that is a separate process.</p> <p>The review undertaken as part of the Integrated Growth Management Strategy concluded that urban expansion within the North Aldershot Policy Area as a whole is not supportable given the overriding policy considerations of the Growth Plan, 2019. This conclusion was based on considerations such as significant and</p>

No.	Source	Submission	Response
		<p>Natural Resources and Forestry under the <i>Niagara Escarpment Plan</i> to allow servicing and municipal infrastructure in the area. The projects required for the development of the lands are included in the City and Region's Capital Budgets and Forecasts.</p> <p>In short, Eagle Heights has long been intended for residential development on full municipal services. Yet these existing approvals and the extensive work is not appropriately addressed in the Region's Discussion Paper. This is a fatal flaw in that work to date.</p> <p>We are attaching two (2) papers that address North Aldershot in considerable detail:</p> <p>i) A planning and engineering submission of Metropolitan Consulting Inc., dated October 27, 2020; and</p> <p>ii) A <i>Technical Response Paper</i> authored by Tom Hilditch, dated October 28, 2020, which addresses the natural heritage issues relevant to North Aldershot.</p> <p>While the current applications to refine the existing approvals were appealed to LPAT for non-decisions, there is simply no reason that Penta, the City and the Region cannot work more cooperatively to complete the work necessary to bring the long-standing development approvals to fruition as set out in Metropolitan's submission. We have been waiting nearly two (2) years for comments from the Region and City on revised reports that we hope satisfy earlier comments from various agencies. We urge the Region to expedite the delivery of comments and to meet with representatives of Penta to at least refine and narrow any outstanding issues. The current grid lock serves no one.</p> <p><b><u>Natural Heritage</u></b></p> <p>The Region's approach to its natural heritage affects virtually every property owned by Penta in the Region. The Discussion Paper deals with natural heritage conservation and management at a very high level. To address these issues, Penta engaged Tom Hilditch who completed a <i>Technical Response Paper</i> which is attached to this submission. Mr. Hilditch is a renowned ecologist with some forty (40) years of experience in a broad array of ecological issues. This has included several appointments to provincial committees, including his work as the Chair of the Species at Risk Program Advisory Committee for many years.</p> <p>Mr. Hilditch's review raises a number of fundamental issues with the Region's proposed approach to the management and conservation of its natural heritage. Clearly, these matters require careful attention and we look forward to Regional Staff engaging directly with Mr. Hilditch to explore them. We are confident that the Region's approach will be</p>	<p>sensitive natural heritage features and functions; the challenge of optimizing major infrastructure investment to service very limited and dispersed pockets of developable land; and, the challenge of achieving a complete community through more compact urban form and a complete range and mix of housing. It should be noted that existing, historical development approvals will be taken into consideration in the North Aldershot Policy Area.</p> <p><b><u>Natural Heritage</u></b></p> <p>Thank you for the submission of the Technical Response Paper prepared by Mr. Hilditch. The submission included statements related to the author's professional opinion on natural heritage planning as well as general comments. The paper provided an opinion on natural heritage planning in general, or commentary on an alternative philosophy to natural heritage planning that should occur within Halton Region. It is important to note that the fundamental principles, goals and objectives of Halton's Natural</p>



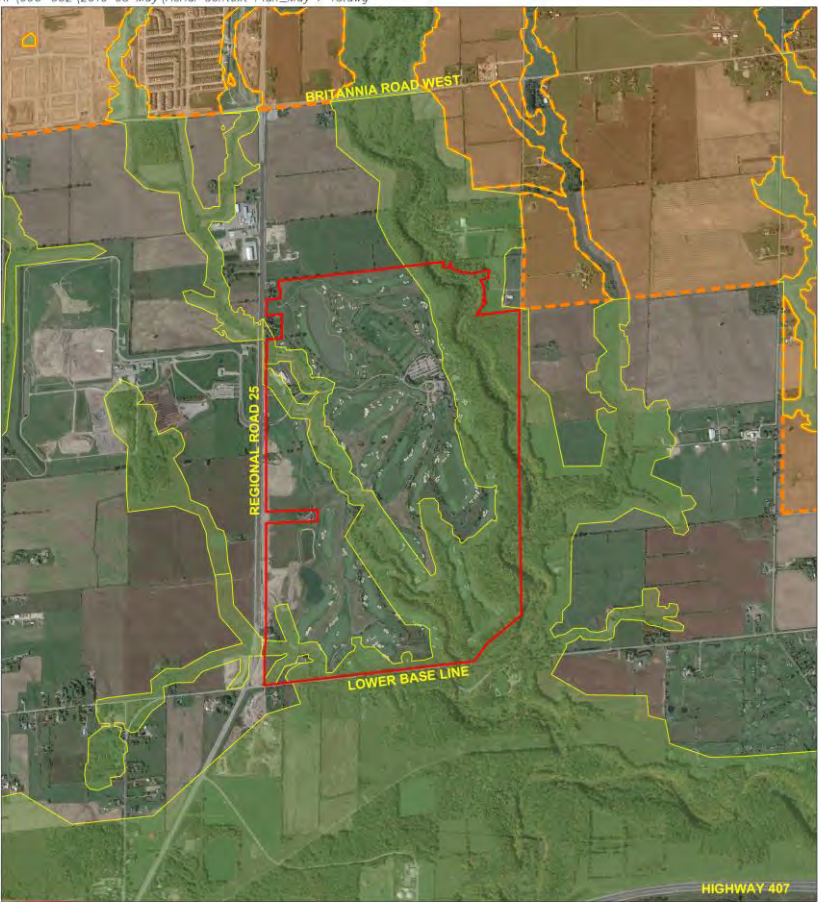











No.	Source	Submission	Response
		<p>improved through such an exchange. Certainly, this should not be limited to simply receiving and considering Mr. Hilditch's <i>Technical Response Paper</i>.</p> <p><b><u>Integrated Growth Management Strategy/Climate Change</u></b></p> <p>As Staff recognize, none of the Discussion Papers incorporate the significant implications of Amendment No. 1 to the <i>Growth Plan</i>. While Penta appreciates Staff's commitment to address Amendment No. 1 in the next stage of the Integrated Growth Management Strategy ("IGMS"), it is essential that the extended planning horizon and updated Land Needs Assessment methodology be fully reflected in whatever official plan policies emerge from the ongoing Official Plan review. Given the long timelines associated with development approvals, the Official Plan framework necessary to support the population and employment targets to 2051 should be in place as soon as possible. The Region's Official Plan should establish the necessary urban structure now to achieve the targets to 2051.</p> <p>Recognizing that the Growth Management Strategy Discussion Paper is, therefore, essentially an interim report, Penta does have a number of specific comments:</p> <p>1. <u>Major transit station area ("MTSA") proposed boundary delineation (Appendix B) – Aldershot Go Station.</u> The proposed MTSA boundary in this area excludes Penta's property at 1200 King Road. 1200 King Road has been part of the City's Mobility Hub for many years and planning for these lands has advanced. 1200 King Road is the only fully vacant property in this area and, as such, the property with the best potential to provide the anticipated mixed use/complete community development envisioned within MTSAs. 1200 King Road should be included within the Aldershot Go Station MTSA.</p> <p>2. <u>MTSA proposed boundary delineation- Appleby Go Station.</u> The proposed delineation in this area includes 4480 Paletta Court which is owned by Penta; however, it excludes the abutting property at 4450 Paletta Court which is also owned by Penta. The two (2) properties are under the same ownership and should be planned as an integrated unit to fulfill the planned function of the MTSA at this Go Station.</p> <p>3. <u>Appendix E: Employment Area Conversion Request Inventory and Mapping.</u> This Appendix purports to catalogue the employment conversion requests received by the Region to date. However, the inventory is clearly incomplete, at least insofar as Penta is concerned. Attached is a letter to the Region's Manager of Policy Planning from MHBC dated August 31, 2020. This material sets out the employment conversion requests from Penta, many of which are not included in Appendix E. The absence of the properties from this Appendix is troubling and should be corrected.</p>	<p>Heritage System is not being reviewed as part of the ROPR. Natural heritage has a central place within the planning vision for Halton as described in the ROP. Within this vision, two concepts feature prominently. The first is "sustainable development", in which protecting the natural environment is a vital factor. The second is "landscape permanence", which recognizes that although the Region will urbanize and change, certain landscapes must be preserved permanently. Halton's NHS is built on the goal to provide a high degree of confidence that the biological diversity and ecological function of the Region of Halton will be preserved and enhanced for future generations that consists of key features, substantial core areas that are connect by function ecological linkages that enhance long-term ecological integrity. Although the main principles for Halton's NHS are not being revised, we recognize that there may be merit to provide some further clarification with regards to definitions and identification of key features and components. Policy Direction NH-7 recommends that a guideline is prepared that builds on the existing Regional Official Plan policy framework, Sustainable Halton 3.02 report and the definitions for linkages, buffers and enhancements areas to key features. It will provide further direction on the identification of these components, outline approaches that can be used to satisfy the relevant policies and used to support restoration and enhancement within the Regional Natural Heritage System that can be achieved through development proposals. Furthermore, Policy Direction NH-8 recommends that the Regional Planning staff identify</p>

No.	Source	Submission	Response
		<p><b><u>Rural and Agricultural System</u></b></p> <p>While Penta/Paletta is known as a land development company; in fact, Paletta International Corporation has a large and active agri-services division committed to farming in the Region of Halton and elsewhere. Paletta’s interest in farming is long-standing.</p> <p>The Summary of this Discussion Paper notes that the Region is reviewing agricultural policies to “preserve agricultural land and support farming”. Paletta is very concerned that the proposed directions will, in fact, undermine farming in the Region.</p> <p>These concerns are directed particularly to the implications of the Natural Heritage System, including buffers and vegetated protection zones. Paletta’s experience is that these NHS policies frustrate normal farm practices making the pursuit of agriculture more and more difficult. Over time, NHS buffers mature into heavily vegetated areas and become the new starting points for additional buffers: “buffers on buffers”.</p> <p>In Paletta’s view, normal farm practices must be prioritized and protected throughout the agricultural area. This was an issue through the approval of ROPA 38 and remains a fundamental concern for Paletta in the current Regional OP review.</p> <p><b><u>Conclusion</u></b></p> <p>In Penta’s view, the Region has an opportunity to provide constructive direction to facilitate vibrant, mixed use communities and a viable farming sector. Penta’s hope is that the Region will engage constructively with stakeholders to achieve real results that advance provincial policy. Penta would welcome the opportunity to discuss these issues in detail with staff as the Region’s OP Review proceeds.</p> <p>We respectfully request notice of all future meetings, reports and consultation activities related to the ROPR. Please provide notice directly to this firm and to Penta c/o Dave Pitblado (dpitblado@paletta.ca).</p> <p>Thank you.</p> <p>Yours truly,</p> <p>Scott Snider</p> <p>Note: The submission included a 158 page attachment which provides detailed responses and technical analysis. This attachment was redacted for the purposed of this chart.</p>	<p>opportunities to address the quality of a woodland through potential updates to the definitions of significant woodland and woodland within the Regional Official Plan. Further, explore opportunities to provide direction within the Regional Official Plan for enhancement and restoration of woodlands that have been impacted by invasive non-native species and/or have experienced severe disturbance due extreme weather events and the impact of forest pathogens. There will be opportunities to engage with Regional staff on these matters through the Stage 3 Phase 3 ROPA.</p> <p>It is also important to note that the Cootes to Escarpment EcoPark System is not a Region-led initiative; as a municipal agency within an interest in natural heritage protection, Halton Region makes up one of ten organizations that are part of the collaborative to support the establishment of the EcoPark through a memorandum of understanding. There have been no suggestions or recommendations to impose additional restrictions on private lands as a result of the EcoPark.</p> <p><b><u>Integrated Growth Management Strategy</u></b></p> <p>The Integrated Growth Management Strategy, focuses on accommodating population and employment growth to 2051. The Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>

No.	Source	Submission	Response
			<p>Regional Official Plan Amendment (ROPA) No. 48 was approved by the Minister of Municipal Affairs and Housing on November 10, 2021 with few modification. ROPA 48 delineates MTSAs in accordance with the Growth Plan, including Aldershot GO MTSA. Geographically, 1200 King Road is far outside of the approved Aldershot GO MTSA 4450 Paletta Court is located outside of the approved Appleby GO MTSA and 4480 Paletta Court is within the approved MTSA and is within the Regional Employment Area.</p> <p>Additional details on Employment Conversions is available in Appendix B of the Preferred Growth Concept Report.</p> <p><u>Rural and Agricultural System</u></p> <p>Comments related to agriculture and natural heritage will be addressed through the Rural and Agricultural System and Natural Heritage System components of the Regional Official Plan Review.</p> <p>To note, the Region formed an Agricultural Working Group as part of the consultation process. Potential options to explore during Phase 3 of the Regional Official Plan and to support the Rural and Agricultural System were identified and brought to the Halton Agricultural Advisory Committee and the Natural Heritage Advisory Committee for further discussion.</p>
24.	Jennifer Staden on behalf of Clublink	Glen Schnarr & Associates Inc. (GSAI) represents ClubLink Corporation ULC, owner of RattleSnake Point Golf Club, approximately 277 hectares (683 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Aerial Context Plan enclosed). In the Regional Urban Structure Discussion Paper and more notably on Figure 29 –	Based on the results of technical analysis, lands within the Primary Study Area and outside of the Provincial Greenbelt Plan Area are proposed to be included in the

No.	Source	Submission	Response
	E-mail dated October 30, 2020	<p>Potential Locations for new Community Area DGA, we note that our client's above-noted lands are located within potential location "1".</p> <p>Our client's lands are located on Highway 25, which is designated as a Higher Order Transit Corridor in the existing Regional Official Plan, and which could therefore support future urban uses on our client's lands. Existing water and sewer services are also available along Highway 25. Furthermore, our client's lands have previously been endorsed by Town of Milton Council as the desirable property for Milton Urban Boundary expansion for employment and residential/mixed-use growth as per Staff Report PD-011-19 and previous correspondence between the Town of Milton and Premiere Doug Ford dated February 2019. Our request to have our client's lands included in the Milton Urban Boundary is therefore consistent with the Region's identified potential locations for urban area expansion as well as the Town of Milton's vision for future employment and residential growth.</p> <p>We feel that our client's lands can be serviced cost-effectively and efficiently utilizing the existing and planned infrastructure that currently serves the planned communities north of Britannia Road in Milton. The addition of these lands within the Milton Urban Boundary will also contribute towards Milton achieving the 50/50 (jobs/population) split as previously set out and contribute to the development of complete communities. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p> <p>_____ Colin Chung, MCIP, RPP Partner</p>	<p>Preferred Growth Concept. Lands along the majority of the frontage to Regional Road 25 are proposed to be included within the Employment Area while the majority of the remaining lands within the Primary Study Area and outside of the Provincial Greenbelt Plan Area are proposed to be Community Area.</p>

No.	Source	Submission	Response
		cc: Gary Carr, Regional Chair Members of Regional Council Graham Milne, Regional Clerk Barb Koopmans, Town of Milton Jill Hogan, Town of Milton	

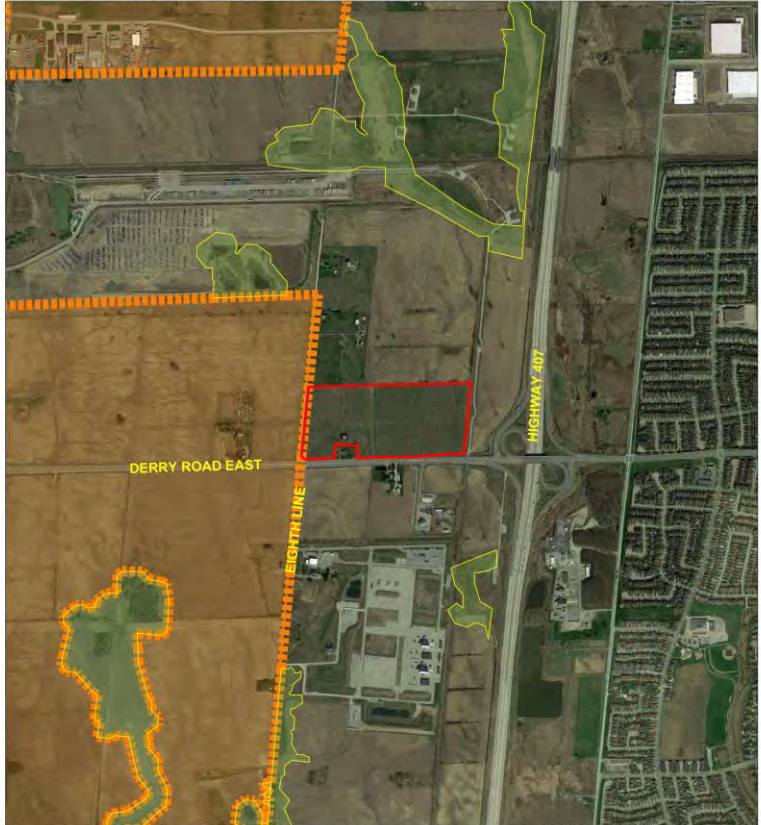
No.	Source	Submission	Response															
		<p>K:\990-002\2019 05 May\Aerial Context Plan_May 7 13.dwg</p>  <p><b>RATTLESNAKE POINT GOLF CLUB AERIAL CONTEXT PLAN</b></p> <p>TOWN OF MILTON REGIONAL MUNICIPALITY OF HALTON</p> <table border="0"> <tr> <td></td> <td>Subject Property - Area:</td> <td>±276.53 ha (683.32 ac)</td> </tr> <tr> <td></td> <td>Residential Net Developable Area (NDA):</td> <td>±158.67 ha (392.08 ac)</td> </tr> <tr> <td></td> <td>Area Within NHS:</td> <td>±117.86 ha (291.24 ac)</td> </tr> <tr> <td></td> <td colspan="2">REGIONAL NATURAL HERITAGE SYSTEM (NHS)</td> </tr> <tr> <td></td> <td colspan="2">EXISTING URBAN AREA</td> </tr> </table> <p> <b>GSAI</b> Glen Schnarr &amp; Associates Inc.</p> <p> Scale NTS May 7, 2019</p>		Subject Property - Area:	±276.53 ha (683.32 ac)		Residential Net Developable Area (NDA):	±158.67 ha (392.08 ac)		Area Within NHS:	±117.86 ha (291.24 ac)		REGIONAL NATURAL HERITAGE SYSTEM (NHS)			EXISTING URBAN AREA		
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	EXISTING URBAN AREA																	

No.	Source	Submission	Response
25.	<p>Jennifer Staden on behalf of Kaneff Properties</p> <p>E-mail dated October 30, 2020</p>	<p>Good afternoon Curt, Chair Carr and Members of Regional Council,</p> <p>We are pleased to provide you with formal comments from Kaneff Properties Limited regarding the Region's Official Plan Review (Municipal Comprehensive Review) currently underway and specifically the Discussion Papers (released July 2020). Please find the comments attached.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>Thank you</p> <hr/> <p>ATTACHED LETTER</p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Kaneff Properties Limited, owner of approximately 19 hectares (47 acres) of land in the Town of Milton, just outside of the existing Milton Urban Area (see Aerial Context Plan enclosed). Our client's lands are designated "Future Strategic Employment Area" in the current Regional Official Plan and are within Provincially Significant Employment Zone 18 (Halton, Peel). In the Regional Urban Structure Discussion Paper and more notably Figure 30 – Potential Locations for new Employment Area DGA, we note that our client's above-noted lands are located within "700 ha of new designation".</p> <p>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:</p> <ul style="list-style-type: none"> <li>• With respect to employment conversions, timing for build-out should be considered (likely beyond 2051 horizon) and strategic locations for employment land conversion should be identified where Regional approval is not required;</li> <li>• The Region should consider Town of Milton's previously identified whitebelt lands for candidate settlement area boundary expansion;</li> <li>• 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;</li> </ul>	<p><u>Integrated Growth Management Strategy</u> Subject lands are currently identified as Future Strategic Employment Area. Based on the results of technical analysis are proposed to be included in the Preferred Growth Concept as Employment Area.</p> <p><u>Natural Heritage</u> Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• ROP policies for employment lands should permit a broad range of uses to promote complete communities;</li> </ul> <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> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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,</li> <li>• 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.</li> </ul> <p>Please see appended Comment Matrix prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 for further detail.</p>	<p>required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p> <p><u>Climate Change</u></p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and</p>



No.	Source	Submission	Response
		<p>We feel that our client's lands can be serviced cost-effectively and efficiently utilizing the existing and planned infrastructure that currently serves the planned communities north of Britannia Road in Milton. The lands are physically suitable and conveniently located close to existing and planned 400 series highways and our request to have our client's lands included in the Milton Urban Boundary is consistent with the Provincially recognized Employment Areas and the Region's identified potential locations for urban area expansion for employment uses. The addition of these lands within the Milton Urban Boundary will also contribute towards Milton achieving the 50/50 (jobs/population) split as previously set out and contribute to the development of complete and walkable communities. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p> <hr/> <p>Colin Chung, MCIP, RPP Partner cc: Gary Carr, Regional Chair Members of Regional Council Graham Milne, Regional Clerk Barb Koopmans, Town of Milton Jill Hogan, Town of Milton</p>	<p>and Council's emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p>

No.	Source	Submission	Response						
		<p data-bbox="472 259 871 276">x:\Drawings\001-042\2019 05 May\Aerial Context Map_May 6 19.dwg</p>  <p data-bbox="472 1104 745 1144"><b>KANEFF PROPERTIES LIMITED AERIAL CONTEXT PLAN</b></p> <p data-bbox="472 1161 661 1185">DERRY &amp; HIGHWAY 407, MILTON REGIONAL MUNICIPALITY OF HALTON</p> <ul data-bbox="766 1112 1050 1177" style="list-style-type: none"> <li><span style="border: 1px solid red; display: inline-block; width: 10px; height: 10px; margin-right: 5px;"></span> Subject Property - Area: ±18.90 ha (46.70 ac)</li> <li><span style="border: 1px solid green; display: inline-block; width: 10px; height: 10px; margin-right: 5px;"></span> REGIONAL NATURAL HERITAGE SYSTEM (RNHS)</li> <li><span style="border: 1px dashed orange; display: inline-block; width: 10px; height: 10px; margin-right: 5px;"></span> EXISTING URBAN AREA</li> </ul> <p data-bbox="1176 1112 1228 1177">Scale 1:15,000 April 30, 2019</p> <p data-bbox="1081 1209 1228 1258"><b>GSAI</b> Glen Schmarr &amp; Associates Inc.</p> <p data-bbox="451 1274 1312 1307">Halton Region Discussion Paper Questions – GSAI Responses October 30, 2020</p> <table border="1" data-bbox="451 1323 1386 1388"> <thead> <tr> <th data-bbox="451 1323 766 1388">Question #</th> <th data-bbox="766 1323 1081 1388">Halton Region Discussion Paper Question</th> <th data-bbox="1081 1323 1386 1388">GSAI Response</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Question #	Halton Region Discussion Paper Question	GSAI Response				<p data-bbox="1428 1274 1890 1380">Comments are acknowledged. Please see a detailed response provided above. Additional responses to public and stakeholder submissions as a part of the</p>
Question #	Halton Region Discussion Paper Question	GSAI Response							

No.	Source	Submission		Response
		Regional Urban Structure – Technical Questions		ROPR can also be found in the Policy Directions Submission-Response charts.
9	Are there any other factors that should be considered when assessing Employment Area conversion requests in Halton Region?	We concur with the Town of Milton's comments. Locational context is key in identifying strategic locations for employment areas and should be considered. The Region should consider including a policy that sets out criteria for where the local municipalities can decide on employment conversions and those that require Regional approval, since some conversion requests may have Regional implications. As such, the Region should not be the approval authority for all employment conversions.		
10	Are there any areas within Halton Region that should be considered as a candidate for addition to an Employment Area in the Regional Official Plan?	We concur with the Town of Milton's comments that Employment Areas previously identified by the Town should be included into the Settlement Area boundary. Furthermore, as stated by Town of Milton staff in Staff Report PD-011-19, all whitebelt lands identified by the Town should be added to the Settlement Area Boundary. Furthermore, lands within Provincially Significant Employment Zones and within the Region's Future Strategic Employment Areas should be prioritized to be added		

No.	Source	Submission		Response	
		11	How can the Regional Official Plan support employment growth and economic activity in Halton Region?	<p>to the urban area for employment purposes.</p> <p>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.</p>	
		12	What type of direction should the Regional Official Plan provide regarding planning for uses that are ancillary to or supportive of the primary employment uses in employment areas? Is there a need to provide different policy direction or approaches in different Employment Areas, based on the existing or planned employment context?	<p>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</p>	

No.	Source	Submission		Response	
				<p>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>	
		13	<p>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</p>	<p>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</p>	

No.	Source	Submission		Response	
			<p>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?</p>	<p>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.</p>	
		14	<p>Are there other factors, besides those required by the Growth Plan, Regional Official Plan or Integrated Growth Management Strategy Evaluation Framework that Halton Region should consider when evaluating the appropriate location for potential settlement area expansions?</p>	<p>The Region should consider areas previously identified by the local area municipalities as priority areas for settlement area expansion areas, such as Town of Milton's Staff Report PD-011-19. Urban Expansion should be contiguous to existing urban areas where the Region and local municipality have already made commitments and planning for municipal services and community services and amenities.</p>	
		15	<p>What factors are important for the Region to consider in setting a minimum Designated Greenfield Area density target for Halton Region as whole, and for each of the Local Municipalities? Should the Region use a higher minimum Designated Greenfield Area density target than the 50 residents and jobs per hectare target in the Growth Plan?</p>	<p>A deviation away from the splits identified in the Hemson work (i.e. more apartments) will be a deviation from market-based supply and would require significant justification, which we have not seen to date. We concur with the Town of Milton that the density target should not be arbitrarily increased without significant justification from both</p>	

No.	Source	Submission		Response
			<p>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. 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. 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: - 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</p>	

No.	Source	Submission			Response
				<p>Region? - Why do Regional staff think 60+ people and jobs per hectare is better planning?  - Has a sensitivity analysis been undertaken to justify a density greater than 50 persons &amp; jobs/hectare and to determine if it will meet current and future market demand conditions over the next 30 years? 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>	<p>Comments are acknowledged. Please see a detailed response provided above. Additional responses to public and stakeholder submissions as a part of the ROPR can also be found in the Policy Directions Submission-Response charts.</p>
16			<p>Are there any additional considerations or trends that Halton Region should review in terms of the Regional Urban Structure component of the Regional Official Plan Review?</p>	<p>It is our understanding that the Region will be updating their Land Needs Assessment as part of the next steps in the Official Plan Review. Ensuring that the information being fed into the LNA is accurate is critical.</p>	
		<p>Regional Urban Structure – General Questions</p>			
1			<p>Which areas of the community, such as Major Transit Station Areas, Urban Growth Centres, corridors and other</p>	<p>The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with</p>	



No.	Source	Submission		Response	
			<p>potential strategic growth areas, should be the primary focus for new houses and apartments? Why</p>	<p>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.</p>	
		2	<p>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?</p>	<p>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.</p>	
		5	<p>How can the Regional Official Plan support employment growth and economic activity in Halton Region?</p>	<p>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</p>	

No.	Source	Submission		Response	
		6	<p>Halton's Employment Areas are protected for employment uses such as manufacturing, warehousing, and offices. How should the Region balance protecting these Employment Areas with potential conversions to allow residential uses or a broader mix of uses?</p>	<p>and spend leisure time, in the same area.</p> <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. 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</p>	

No.	Source	Submission		Response	
				<p>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>	
		7	<p>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?</p>	<p>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.</p>	

No.	Source	Submission		Response	
		8	Having appropriate separation distances between employment uses and sensitive land uses (residential, etc.) is important for ensuring land use compatibility. What should be considered when determining an appropriate separation distance?	Issues of compatibility between employment lands and new sensitive land uses are already addressed in Provincial and Regional land use compatibility guidelines. Duplication could lead to confusion.	Comments are acknowledged. Please see a detailed response provided above. Additional responses to public and stakeholder submissions as a part of the ROPR can also be found in the Policy Directions Submission-Response charts.
Rural and Agricultural System – Technical Questions					
		1	Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?	We concur with the Town of Milton comments that a separate and unique land use designation should be used for Prime Agricultural Areas, as required by Provincial policy and especially that a separate and unique Rural land use designation should be applied to non-prime agricultural areas for clarity, transparency, and ease of use.	
		2	Are there any additional pros and cons that could be identified for any of the options?	Please see response on preferred mapping option below.	
		3	Do you have a preferred mapping option? If so, why?	We believe that the mapping options presented are not clear and should not be treated as mutually exclusive options. We believe that the mapping should have prime agriculture as a designation (as required by Provincial policy) and that Natural Heritage	

No.	Source	Submission		Response
		4	Should the ROP permit the agriculture-related uses as outlined in the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas in its entirety?	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. 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.
		5	What additional conditions or restrictions should be required for any agriculture- related uses?	We agree with the Town of Milton comments that additional restrictions for agriculture related uses Region-wide would be inappropriate. Caseby-case analysis should be considered especially where farm building development and expansion is required to accommodate the agriculture related use.
		6	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	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.

No.	Source	Submission		Response
			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?	
		7	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?	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.
		8	What additional conditions or restrictions should be required for any on-farm diversified uses?	We agree with the Town of Milton that further restrictions to on-farm diversified uses should be restricted to the local municipalities.
		10	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?	We agree with the Town of Milton that the current AIA policies in the ROP are sufficient.
		11	Should the requirements for an Agricultural Impact Assessment be included in any other new or existing Regional Official Plan policies?	We concur with the Town of Milton that requirements set out in Provincial Policy with respect to renewable energy projects, may not

No.	Source	Submission			Response
				need to be duplicated in municipal policies.	
		12	Should special needs housing be permitted outside of urban areas and under what conditions?	We concur with the Town of Milton's comments, special needs housing should be expressly permitted in urban and rural areas.	
		1	Should Halton adopt a flexible approach in allowing agriculture-related uses and on-farm diversified use businesses in the agricultural area to support the economic vitality of farms and farmers?	The Region should consider the needs of farm operations to protect farm viability, while balancing potential impacts on surrounding operations.	
		Natural Heritage Discussion Paper			
		1	As required by the Growth Plan, the new Natural Heritage System for the Growth Plan mapping and policies must be incorporated into the Regional Official Plan. Based on options outlined in the Natural Heritage Discussion paper, what is the best approach in incorporating the Natural Heritage System for the Growth Plan into the Regional Official Plan?	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. ROP policies need to acknowledge that there is insufficient, current information available at the Regional-scale to make final decisions on boundaries,	
					<p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system</p>

No.	Source	Submission		Response
			<p>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>	<p>based approach to natural heritage features and functions intended to achieve the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p>
		2	<p>Regional Natural Heritage System policies were last updated through Regional Official Plan Amendment 38. Are the current goals and objectives for the Regional Natural Heritage System policies still relevant/appropriate? How the can Regional Official Plan be revised further to address these goals and objectives?</p>	<p>NHS features should be delineated separate from linkages/buffers. It is not clear why the Region would consolidate centres for biodiversity, linkages, buffers, and enhancement areas into the overall RHS. Instead, perhaps the Region should establish a clear set of guidelines and criteria for when and how linkages, buffer widths and enhancement areas are needed and there perhaps separate guidelines/criteria for each of those elements.</p>
		3	<p>To ease the implementation of buffers and vegetation protection zones, should the Region include more detailed</p>	<p>"Buffers" and "vegetation protection zone" should not be used interchangeably as they are differentiated in Provincial policy. The</p> <p>A systems-based approach has been used to identify and protect the Region's NHS. The goal of the Halton's NHS is to provide a high degree of confidence that the biological diversity and ecological functions of the Region of Halton will be preserved and enhanced for future generations, through the creation of a Natural Heritage System consisting of key features and substantial core areas connected by multiple linkages that enhance long-term ecological integrity. To provide clarification on the mapping of key features and components of the system, Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System</p>



No.	Source	Submission		Response
			<p>policies describing minimum standards?</p> <p>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>	<p>designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Policy Direction NH-7 recommends that a guideline is prepared that builds on the existing Regional Official Plan policy framework and the definitions for linkages, buffers and enhancements areas to key features. It will provide further direction on the identification of these components, outline approaches that can be used to satisfy the relevant policies and used to support restoration and enhancement within the Regional Natural Heritage System that can be achieved through development proposals.</p> <p>Policy Direction NH-8 recommends that the Regional Official Plan addresses the quality of a woodland in recognize the impacts of invasive species on the determination of the significance of woodlands. Through Stage 3 of Phase 3 of the ROPR, Regional Planning staff will identify opportunities to address the quality of a woodland through potential updates to the definitions of significant woodland and woodland within the Regional Official Plan. Further, explore opportunities to provide direction within the Regional Official Plan for enhancement and restoration of woodlands that have been impacted by invasive non-native species and/or have experienced severe disturbance due extreme weather events and the impact of forest pathogens.</p>
4		<p>Given the policy direction provided by the Provincial Policy Statement and Provincial plans, how should policy and mapping address the relationship between natural heritage protection and agriculture outside of the Urban Area or the Natural Heritage System?</p>	<p>We believe that a comprehensive approach is needed for significant woodlands and that they should be assessed on a site-by-site basis. This would ensure groups of dead trees or invasive species are not incorrectly identified as significant. Furthermore, we think that the Region should also consider studies completed locally as part of Secondary Plans and other projects when identifying these woodlands.</p>	
5		<p>The Greenbelt Plan 2017 and Growth Plan 2019 require municipalities to identify Water Resource Systems in Official Plans. Based on the two (2) options provided in the Natural Heritage</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</p>	

No.	Source	Submission		Response
			Discussion Paper, how should the Water Resource System be incorporated into the ROP?	<p>Maps 1 and 1G of the ROP have been refined as part of this ROPR to better reflect the policies that define the NHS. The draft 2019 RNHS also utilized updated base data information available from the Province and conservation authorities to assemble the RNHS. Using updated base layers ensures that NHS mapping in the ROP reflects the most current data available and thus the maps are as accurate as possible. In addition to the base layers updates, a review of the NHS mapping was undertaken to recognize planning decisions and updated information since ROPA 38 and this includes OMB decisions, approved planning applications, special Council Permits and staff refinements based on in-field observations. The final step in the RNHS mapping update process was a Quality Assurance/Quality Control (QA/QC) evaluation of the draft 2019 RNHS. The purpose of this exercise was to complete a visual inspection of the draft 2019 RNHS to confirm that a consistent approach to the mapping in accordance with the Regional Official Plan, identify mapping errors. Therefore, the Regional NHS mapping was subject to a rigorous technical process to ensure accuracy at a Regional-scale. As noted above, refinements to Halton's NHS may occur through subsequent Planning Approval processes under the Planning Act. We acknowledge the support for Policy 116.1 to remain in the ROP.</p> <p>Acknowledged comments with regards to Parks. Permitted uses in Prime Agricultural Area and Natural Heritage System are not being revised as part of the ROPR, except</p>
6	Preserving natural heritage remains a key component of Halton's planning vision. Should Halton Region develop a Natural Heritage Strategy and what should be included in such a strategy?	<p>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> <p>There is an existing policy in the ROP that speaks to how the RNHS mapping gets updated. Policy 116.1 states: "116.1 The boundaries of the Regional Natural Heritage System may be refined, with additions, deletions and/or boundary adjustments, through: a) a Sub-watershed Study accepted by the Region and undertaken in the context of an Area-Specific Plan; b) an individual Environmental Impact Assessment accepted by the Region, as required by this Plan; or c) similar studies based on terms of reference accepted by the Region. 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</p>		

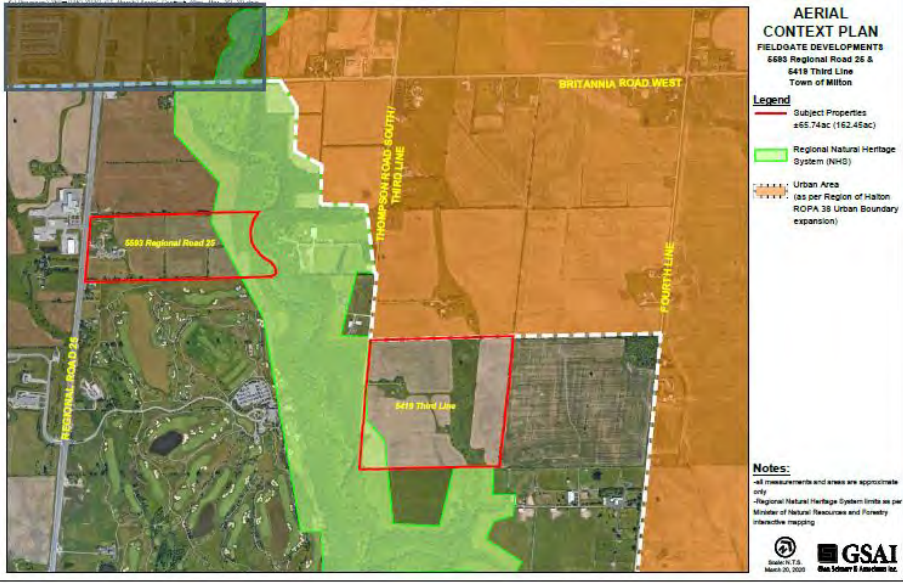
No.	Source	Submission		Response
			showing such refinements and incorporate them as part of the Region's statutory review of its Official Plan." We support this policy and believe this policy objective should be maintained.	<p>in accordance with on-farmed diversified uses and exploring opportunities for expansions for agricultural buildings in the RNHS.</p> <p>Acknowledged. Policy Direction NH-5 recommends that a new "Natural Hazards" section of the Regional Official Plan introduce natural hazards policies that are consistent with the Provincial Policy Statement, 2020, and Provincial Plans, and direct the Local Municipalities to include policies and mapping within their official plans and zoning by-laws to prohibit and restrict development within natural hazard lands and be required to consult and be in conformity with Conservation Authority policies.</p> <p>Acknowledged. Response provided above.</p>
		7	Should the Regional Official Plan incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?	
		9	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?	
		10	How can Halton Region best support the protection and enhancement of significant woodlands through land use policy?	
Natural Heritage – General Questions				
		2	Are there other policies or actions Halton can include in the Regional Official Plan Review to protect	
			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.	
			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.	
			As previously noted, the quality of woodland should be considered. Dead trees and invasive species should not be lumped in with woodlots of significance.	
			We would like to add that NHS in the settlement areas should be excluded. Policies should differentiate between	

No.	Source	Submission			Response
			and enhance the Natural Heritage System?	different Provincial Plan areas, not just adopt a blanket, most restrictive approach.	Comments are acknowledged. Please see a detailed response provided above. Additional responses to public and stakeholder submissions as a part of the ROPR can also be found in the Policy Directions Submission-Response charts.
		Climate Change – Technical Questions			
		1	Have you felt the impacts of climate change on your community? What impacts are of most concern to you in the next 20 years?	We believe that putting more density in the built boundary and greenfields is not the best or only way to curve climate change and minimize green house emissions. Is the Region exploring other strategies such as the importance of conservation, reuse and recycle? Or perhaps providing more electric charging stations to promote electric vehicle usage? Land use planning is not the solution to climate change. We encourage Regional staff to diversify their strategies rather than wager all solutions to planning.	
		2	How do you think the Regional Official Plan can help Halton respond to climate change? What mitigation and adaptation actions would you like to see embedded in the Regional Official Plan?	The Region should focus on programs over policies in curving climate change. Has the Region weighed the benefits to setting programs over policies in curving climate change? Why does Regional staff feel that ROP policy is the way to go in dealing with climate change? Is the Region prepared to provide financial and planning incentives for the industry to implement energy conserving	

No.	Source	Submission			Response
				measures to development such as solar heating/cooling, electric vehicle charging stations, active transportation facilities, etc.	
		3	Halton's population is forecast to grow to one million people and accommodate 470,000 jobs by 2041. What do you think about policies to plan for climate change through more compact urban form and complete communities? In your opinion, are we growing in the right direction?	We agree with the Town of Milton that a more compact urban form should not be at the expense of meeting community wellness, health and active living for all ages, and these factors need to be considered when assessing if intensification can be supported within the built boundary.	
26.	<p>Jennifer Staden on behalf of Fieldgate Developments re: 5593 Reg Road 25 &amp; 5419 Third Line</p> <p>E-mail dated October 30, 2020</p>	<p>Good afternoon Curt, Chair Carr and Members of Regional Council,</p> <p>We are pleased to provide you with formal comments from Fieldgate Developments regarding the Region's Official Plan Review (Municipal Comprehensive Review) currently underway and specifically the Discussion Papers (released July 2020). Please find the comments attached.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>Thank you</p> <hr/> <p>ATTACHED LETTER</p>			<p>Comments are acknowledged. For more details on a response regarding</p>

No.	Source	Submission	Response
		<p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Fieldgate Developments, owner of approximately 65.74 hectares (162.45 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Aerial Context Plan enclosed). In the Regional Urban Structure Discussion Paper and more notably on Figure 29 – Potential Locations for new Community Area DGA, we note that our client’s above-noted lands are located within potential locations “1” and “2”.</p> <p>Furthermore, our client’s lands have previously been endorsed by Town of Milton Council as the desirable property for Milton Urban Boundary expansion for residential/mixed-use growth as per Staff Report PD-011-19 and previous correspondence between the Town of Milton and Premiere Doug Ford dated February 2019 (see attached). Our request to have our client’s lands included in the Milton Urban Boundary is therefore consistent with the Region’s identified potential locations for urban area expansion as well as the Town of Milton’s vision for future employment and residential growth.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• With respect to employment conversions, timing for build-out should be considered (likely beyond 2051 horizon) and strategic locations for employment land conversion should be identified where Regional approval is not required;</li> <li>• The Region should consider Town of Milton’s previously identified whitebelt lands for candidate settlement area boundary expansion;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> </ul>	<p>commentary on urban expansion, please see response to March 25, 2020 in Row 7 above.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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,</li> <li>• 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.</li> </ul> <p>Please see appended Comment Matrix prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 for further detail.</p> <p>We feel that our client's lands can be serviced cost-effectively and efficiently utilizing the existing and planned infrastructure that currently serves the planned communities north of Britannia Road in Milton. The addition of these lands within the Milton Urban Boundary will also contribute towards Milton achieving the 50/50 (jobs/population) split as previously set out and contribute to the development of complete communities. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p>	<p><u>Natural Heritage</u></p> <p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field</p>

No.	Source	Submission	Response						
		<p>We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p> <hr/> <p>Colin Chung, MCIP, RPP Partner cc: Gary Carr, Regional Chair Members of Regional Council Graham Milne, Regional Clerk Barb Koopmans, Town of Milton Jill Hogan, Town of Milton</p>  <table border="1" data-bbox="457 1300 1388 1388"> <tr> <td data-bbox="457 1300 611 1360">Question #</td> <td data-bbox="611 1300 1024 1360">Halton Region Discussion Paper Question</td> <td data-bbox="1024 1300 1388 1360">GSAI Response</td> </tr> <tr> <td colspan="3" data-bbox="457 1360 1388 1388">Regional Urban Structure – Technical Questions</td> </tr> </table>	Question #	Halton Region Discussion Paper Question	GSAI Response	Regional Urban Structure – Technical Questions			<p>studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p> <p><u>Climate Change</u></p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and and Council's emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p>
Question #	Halton Region Discussion Paper Question	GSAI Response							
Regional Urban Structure – Technical Questions									



No.	Source	Submission		Response	
		1	How can the Regional Official Plan further support the development of Urban Growth Centres?	We concur with the Town of Milton's response that the Region should consider adjusting the limits of Urban Growth Centres to only include areas to develop within the horizon of the Plan and that work should be completed with the lower-tier municipalities. Furthermore we agree with the Town of Milton that the Region should acknowledge that a large portion of the Urban Growth Centre is located within Floodplain.	
		2	Should the Region consider the use of Inclusionary Zoning in Protected Major Transit Station Areas to facilitate the provision of affordable housing?	We do not believe inclusionary zoning should be considered in MTSA's. We should allow the market to dictate the location and details to affordable housing. Policy should not dictate affordable housing but instead provide criteria and a framework for the market to accommodate affordable housing.	
		3	Should the Region consider the use of the Protected Major Transit Station Areas tool under the Planning Act, to protect the Major Transit Station Areas policies in the Regional Official Plan and local official plans from appeal? If so, should all Major Transit Station Areas be considered or only those Major Transit Station Areas on Priority Transit Corridors?	We agree with the Town of Milton's comments that this approach is too restrictive and local contexts need to be considered. The Region should work with lower-tier municipalities to establish the appropriate limits and density targets.	
		4	From the draft boundaries identified in Appendix B and the Major Transit Station Area boundary delineation methodology outlined, do you have any comments on the proposed	In our opinion the MTSA boundaries should not be established in the Regional Official Plan. The Regional Official Plan should guide local	

No.	Source	Submission		Response	
			boundaries? Is there anything else that should be considered when delineating the Major Transit Station Areas?	municipalities by way of policy criteria in how MTSAs should be identified in the lower-tier Official Plans.	Comments are acknowledged. Please see a detailed response provided above. Additional responses to public and stakeholder submissions as a part of the ROPR can also be found in the Policy Directions Submission-Response charts.
		5	How important are Major Transit Station Areas as a component of Halton's Regional Urban Structure? What is your vision for these important transportation nodes?	In our opinion MTSA's should be the key locations for intensification in the built boundary and the Regional Official Plan policies should require priority for development in MTSA's while continuing to support intensification opportunities elsewhere in the built boundary. The key operative planning framework is ensuring appropriate development in MTSA's and other built boundary areas that support the Provincial growth objectives. Local municipalities should have the jurisdiction to plan for MTSA's, rather than the Region. The Region should not be involved in detailed land use planning, but should instead provide guidance to the lower-tiers.	
		6	Building on the 2041 Preliminary Recommended Network from the Determining Major Transit Requirement, should corridors be identified as Strategic Growth Areas in the Regional Official Plan? If so, should a specific minimum density target be assigned to them?	We agree with the Town of Milton's comments. Blanket densities should not be applied across the entire corridor but rather in strategic locations.	
		7	Should the Regional Official Plan identify additional multi-purpose and minor arterial roads in the Regional Urban Structure, not for the purposes of directing growth, but to support a higher order Regional transit network?	We agree with the Town of Milton's comments. Additional multi-purpose and minor arterial roads should be identified at the local level through technical studies, rather than identified by the Region.	

No.	Source	Submission		Response	
		8	<p>Are there any other nodes in Halton that should be identified within the Regional Official Plan from a growth or mobility perspective (i.e. on Map 1)? If so, what should the function of these nodes be and should a density target or unit yield be assigned in the Regional Official Plan?</p>	<p>We agree with the Town of Milton's comments. Aside from the growth nodes identified by the Province, the Region should allow the local municipalities to plan their own communities, rather than get involved with detailed land use planning.</p>	
		14	<p>Are there other factors, besides those required by the Growth Plan, Regional Official Plan or Integrated Growth Management Strategy Evaluation Framework that Halton Region should consider when evaluating the appropriate location for potential settlement area expansions?</p>	<p>The Region should consider areas previously identified by the local area municipalities as priority areas for settlement area expansion areas, such as Town of Milton's Staff Report PD-011-19. Urban Expansion should be contiguous to existing urban areas where the Region and local municipality have already made commitments and planning for municipal services and community services and amenities.</p>	
		15	<p>What factors are important for the Region to consider in setting a minimum Designated Greenfield Area density target for Halton Region as whole, and for each of the Local Municipalities? Should the Region use a higher minimum Designated Greenfield Area density target than the 50 residents and jobs per hectare target in the Growth Plan?</p>	<p>A deviation away from the splits identified in the Hemson work (i.e. more apartments) will be a deviation from market-based supply and would require significant justification, which we have not seen to date. We concur with the Town of Milton that the density target should not be arbitrarily increased without significant justification from both demographic and market perspectives. The Region should ensure there is a mix of housing and that the density can meet market-based supply, rather than policy-based objectives. Has the Region</p>	

No.	Source	Submission		Response
			<p>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. The minimum greenfield density should offer choices for a mix of housing types. This is a 30 year plan and 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: - Why do Regional staff think that 50 people and jobs per hectare, that the Growth Plan established as a minimum, is not appropriate for Halton Region? - Why do Regional staff think 60+ people and jobs per hectare is better planning? - Has a sensitivity analysis been undertaken to justify a density greater than 50 persons &amp; jobs/hectare and to determine if it will meet current and future market demand conditions over the next 30 years? If higher density is preferred only to result in less urban land being required and to curb urban sprawl, this justification is policy-driven and insufficient to</p>	

No.	Source	Submission		Response	
			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.		
		16	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?	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. Furthermore, Regional staff need to ascertain new trends due to COVID-19 and wide-spread working from home conditions, since more people are desiring ground related housing to be self isolated and have more room to work from home. This trend is continuing and you can now see impacts to the Toronto condominium and office market.	
<b>Regional Urban Structure – General Questions</b>					
		1	Which areas of the community, such as Major Transit Station Areas, Urban Growth Centres, corridors and other potential strategic growth areas, should be the primary focus for new houses and apartments? Why	The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with the Growth Plan 2020's minimum intensification target. This ratio puts less stress on existing residents and community services while providing a greater range of housing mix and types to meet market demands now and in the future.	Comments are acknowledged. Please see a response provided above.

No.	Source	Submission		Response	
		2	As the Region plans to accommodate new growth, should it focus on intensification of existing built up areas or on expansion into agricultural and natural areas? What is an appropriate balance?	The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with the Growth Plan 2020's minimum intensification target. This ratio puts less stress on existing residents and community services while providing a greater range of housing mix and types to meet market demands now and in the future.	Comments are acknowledged. Please see a detailed response provided above. Additional responses to public and stakeholder submissions as a part of the ROPR can also be found in the Policy Directions Submission-Response charts.
		3	How can the Regional Official Plan support a variety of mobility options to ensure integration of transportation and land use planning in growth areas?	The Region could support mobility options by prioritizing funding and seeking financial support from the Provincial and the Federal government. The Regional Official Plan policy is not the right mechanism.	
		4	Are there opportunities for the Regional Official Plan to strengthen policies for ensuring adequate parks and open spaces near growth areas?	Parks and open spaces should be left to the local municipalities to plan. This is not ideal for Regional Official Plan policy.	
		<b>Rural and Agricultural Systems – Technical Questions</b>			
		1	Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?	We concur with the Town of Milton comments that a separate and unique land use designation should be used for Prime Agricultural Areas, as required by Provincial policy and especially that a separate and unique Rural land use designation should be applied to non-prime agricultural areas for clarity, transparency, and ease of use.	
		2	Are there any additional pros and cons that could be identified for any of the options?	Please see response on preferred mapping option below.	

No.	Source	Submission		Response	
		3	Do you have a preferred mapping option? If so, why?	We believe that the mapping options presented are not clear and should not be treated as mutually exclusive options. We believe that the mapping should have prime agriculture as a designation (as required by Provincial policy) and that Natural Heritage System should be an overlay (similar to Mapping Option 1). However we also believe it is important to have a Rural Agriculture designation (as shown in Mapping Option 4), and not just designate all agricultural lands as "prime", regardless of soil quality/class.	
		4	Should the ROP permit the agriculture-related uses as outlined in the Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas in its entirety?	We agree with the Town of Milton comments that all agriculture-related uses should be permitted in all prime agricultural areas. The PPS allows for broader uses in prime agricultural areas and the ROP should reflect this.	
		5	What additional conditions or restrictions should be required for any agriculture- related uses?	We agree with the Town of Milton comments that additional restrictions for agriculture related uses Region-wide would be inappropriate. Caseby- case analysis should be considered especially where farm building development and expansion is required to accommodate the agriculturerelated use.	
		6	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.	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	

No.	Source	Submission		Response
			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?	municipalities to identify size requirements.
		7	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?	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.
		8	What additional conditions or restrictions should be required for any on-farm diversified uses?	We agree with the Town of Milton that further restrictions to on-farm diversified uses should be restricted to the local municipalities.
		10	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?	We agree with the Town of Milton that the current AIA policies in the ROP are sufficient.
		11	Should the requirements for an Agricultural Impact Assessment be included in any other new or existing Regional Official Plan policies?	We concur with the Town of Milton that requirements set out in Provincial Policy with respect to renewable energy projects, may not need to be duplicated in municipal policies.
		12	Should special needs housing be permitted outside of urban areas and under what conditions?	We concur with the Town of Milton's comments, special needs housing should be expressly permitted in urban and rural areas.
<b>Rural and Agricultural – General Questions</b>				
		1	Should Halton adopt a flexible approach in allowing agriculture-related uses and on-farm diversified use businesses in the agricultural	The Region should consider the needs of farm operations to protect farm viability, while



No.	Source	Submission		Response
			<p>area to support the economic vitality of farms and farmers?</p> <p>balancing potential impacts on surrounding operations.</p>	<p>Comments are acknowledged. Please see a detailed response provided above.</p>
		<p><b>Natural Heritage – Technical Questions</b></p>		
		<p>1</p> <p>As required by the Growth Plan, the new Natural Heritage System for the Growth Plan mapping and policies must be incorporated into the Regional Official Plan. Based on options outlined in the Natural Heritage Discussion paper, what is the best approach in incorporating the Natural Heritage System for the Growth Plan into the Regional Official Plan?</p>	<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. 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 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>	
		<p>2</p> <p>Regional Natural Heritage System policies were last updated through Regional Official Plan Amendment 38. Are the current goals and objectives for the Regional Natural Heritage System policies still relevant/appropriate? How the can</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</p>	

No.	Source	Submission		Response	
			Regional Official Plan be revised further to address these goals and objectives?	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.	
		3	To ease the implementation of buffers and vegetation protection zones, should the Region include more detailed policies describing minimum standards?	"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.	
		4	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?	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	

No.	Source	Submission		Response	
				projects when identifying these woodlands.	
		5	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?	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.	
		6	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?	There is an existing policy in the ROP that speaks to how the RNHS mapping gets updated. Policy 116.1 states: "116.1 The boundaries of the Regional Natural Heritage System may be refined, with additions, deletions and/or boundary adjustments, through: a) a Sub-watershed Study accepted by the Region and undertaken in the context of an Area-Specific Plan; b) an individual Environmental Impact Assessment accepted by the Region, as required by this Plan; or c) similar studies based on terms of reference accepted by the Region. 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	

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			showing such refinements and incorporate them as part of the Region's statutory review of its Official Plan." We support this policy and believe this policy objective should be maintained	Comments are acknowledged. Please see above for a detailed response. Additional responses to public and stakeholder submissions can also be found in the Policy Directions Submission-Response charts.
		7	Should the Regional Official Plan incorporate objectives and policies to support/recognize the Cootes to Escarpment EcoPark System?	
		9	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?	
		10	How can Halton Region best support the protection and enhancement of significant woodlands through land use policy?	
<b>Natural Heritage – General Questions</b>				
		2	Are there other policies or actions Halton can include in the Regional Official Plan Review to protect and enhance the Natural Heritage System?	
<b>Climate Change – Technical Questions</b>				
		1	Have you felt the impacts of climate change on your community? What impacts are of most concern to you in the next 20 years?	

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














No.	Source	Submission	Response
27.	<p>Jennifer Staden on behalf of Dave Walia, 236919, and 2661297 Ontario Inc. re: 8955 Boston Church Road, 8283 and 8369 Esquesing Road</p> <p>E-mail dated October 30, 2020</p>	<p>Good afternoon Curt, Chair Carr and Members of Regional Council,</p> <p>We are pleased to provide you with formal comments from Mr. Dave Walia, 236919 Ontario Inc. and 2661297 Ontario Inc., regarding the Region's Official Plan Review (Municipal Comprehensive Review) currently underway and specifically the Discussion Papers (released July 2020). Please find the comments attached.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>Thank you</p> <hr/> <p>ATTACHED LETTER</p> <p>8283 Esquesing Line &amp; 8329 Esquesing Line</p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Mr. Dave Walia &amp; 236919 Ontario Inc., owners of approximately 4 hectares (10 acres) of land, and represents 15 hectares (38 acres) of land on the east side of Esquesing Line, north of James Snow Parkway in the Town of Milton (see Aerial Context Plan 1 enclosed). These lands are municipally addressed as 8283 Esquesing Line &amp; 8329 Esquesing Line. As a result of the previous Regional Official Plan process (Sustainable Halton ROPA 38 process), 3 hectares (8 acres) of land our client represents were brought into the Milton Urban Area for employment development. However, 0.63 hectares (1.56 acres) of their land were left outside of the Urban Area on the basis that the Region's employment land budget, calculated to accommodate the 2031 employment growth, was determined by the Region to be fulfilled. The lands are adjacent to existing Employment Area as per the current Regional Official Plan, and are partially within Provincially Significant Employment Zone 18 (Halton, Peel).</p> <p>In the Regional Urban Structure Discussion Paper and more notably Appendix C: Proposed Technical Revisions to Halton's Employment Areas, we note that our client's lands are impacted by the Region's proposed revision ID: "R-M01" which proposes to align the Employment Area boundary with the natural water feature (please refer to previous correspondence submitted to the Region dated September 10, 2020).</p> <p>8955 Boston Church Road</p>	<p>Subject lands were considered for potential settlement boundary expansion as a result of the acknowledgement / commitments made in Minutes of Settlement for appeals to Regional Official Plan Amendment No. 38. The subject lands are currently designated as Urban Area, Regional Natural Heritage System and Agricultural Area and are partially within the Provincial Greenbelt Plan Area. Those lands within the Provincial Greenbelt Plan Area are not eligible for inclusion in the Urban Area under Provincial Legislation. Based on the results of technical analysis, staff are recommending that the lands designated Urban Area remain unchanged and that lands within the Regional Natural Heritage System and Agricultural Area not be included within the Preferred Growth Concept.</p>

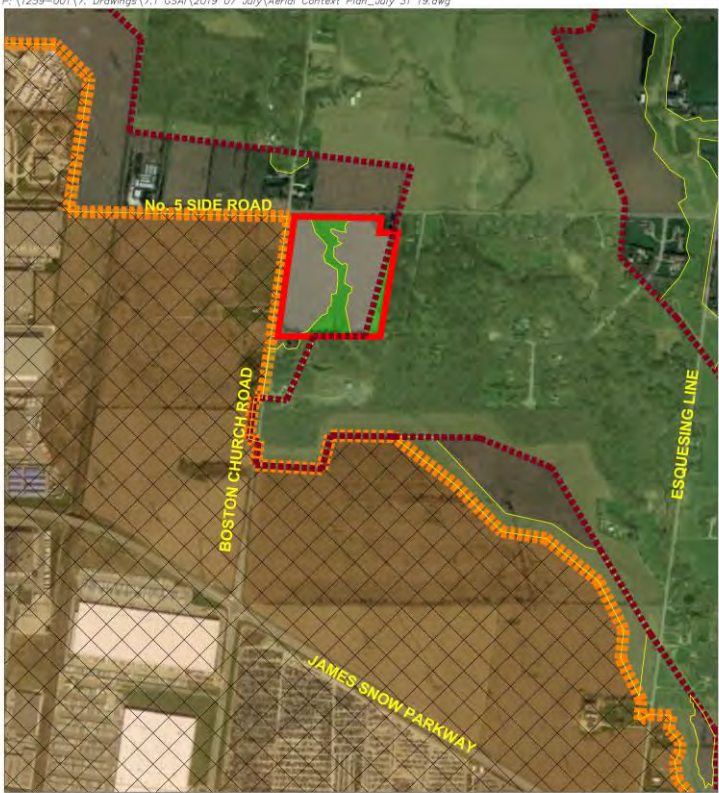
No.	Source	Submission	Response
		<p>GSAI also represents 2661297 Ontario Inc. owner of approximately 12 hectares (30 acres) of land on the southeast corner of Number 5 Side Road and Boston Church Road in the Town of Milton (see Aerial Context Plan 2 enclosed). This property is municipality addressed as 8955 Boston Church Road. In reviewing the Regional Urban Structure Discussion Paper and more notably Figure 30 – Potential Locations for new Employment Area DGA, we note that our client’s abovenoted lands are located within “Remaining Future Strategic Employment Areas”. Our client’s lands are part of the Milton North Business Park Tertiary Plan and are adjacent to the urban lands that were brought into the Built Boundary for employment purposes through the previous Regional Official Plan process (Sustainable Halton ROPA 38).</p> <p>Review of Discussion Papers</p> <p>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:</p> <ul style="list-style-type: none"> <li>• With respect to employment conversions, timing for build-out should be considered (likely beyond 2051 horizon) and strategic locations for employment land conversion should be identified where Regional approval is not required;</li> <li>• The Region should consider Town of Milton’s previously identified whitebelt lands for candidate settlement area boundary expansion;</li> <li>• 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;</li> <li>• ROP policies for employment lands should permit a broad range of uses to promote complete communities;</li> <li>• 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;</li> <li>• 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;</li> </ul>	<p>Majority of subject lands were within Primary Study Area and are currently identified as Future Strategic Employment Area. Based on the results of technical analysis, lands within the Primary Study Area and outside of the Provincial Greenbelt Plan Area are proposed to be included in the Preferred Growth Concept as Employment Area.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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,</li> <li>• 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.</li> </ul> <p>Please see appended Comment Matrix prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 for further detail.</p> <p>We feel that our clients' lands can be serviced cost-effectively and efficiently as they are an extension of existing employment land. Our request to have our client's lands included in the Milton Urban Boundary is consistent with the Provincially recognized Employment Areas (PSEZs). The addition of these lands within the Milton Urban Boundary meets the Region's criteria for a minor and technical employment boundary revision to ensure the Urban Boundary is clear and logical. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the</p>	<p><u>Natural Heritage</u></p> <p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be</p>



No.	Source	Submission	Response
		<p>changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p> <p>Colin Chung, MCIP, RPP Partner</p> <p>cc: Gary Carr, Regional Chair Members of Regional Council Graham Milne, Regional Clerk Barb Koopmans, Town of Milton Jill Hogan, Town of Milton</p>	<p>available from associated detailed field studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p> <p><u>Climate Change</u></p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and and Council's emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p>

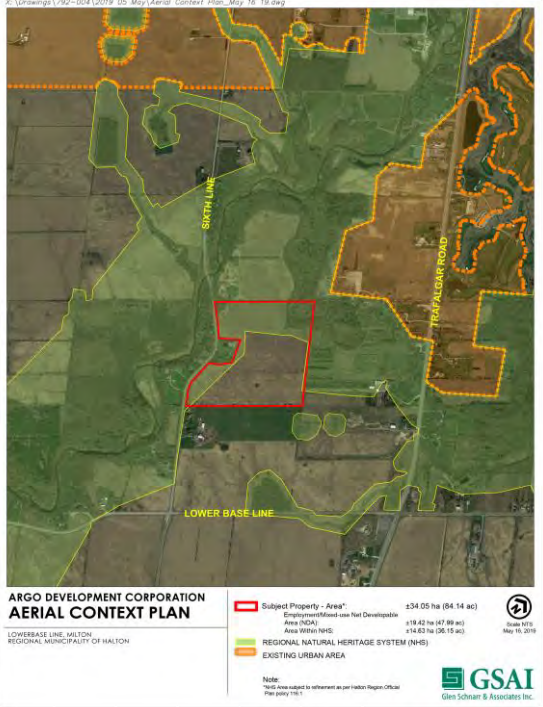
No.	Source	Submission	Response																								
		<p>P:\1254-001\7_Drawings\7.1_GSAI\2019_05_May\Aerial Context Plan_May 9 19.dwg</p>  <p><b>MR. DAVE WALIA 236919</b>  <b>ONTARIO INC.</b>  <b>AERIAL CONTEXT PLAN</b></p> <p>8283 &amp; 8329 ESQUESING LINE, MILTON  REGIONAL MUNICIPALITY OF HALTON</p> <table border="0"> <tr> <td></td> <td><b>Lands Client Represents:</b></td> <td>±15.25 ha (37.68 ac)</td> </tr> <tr> <td></td> <td>Employment/Mixed-use Net Developable Area (NDA):</td> <td>±3.05 ha (7.54 ac)</td> </tr> <tr> <td></td> <td>Agricultural Lands:</td> <td>±1.17 ha (2.89 ac)</td> </tr> <tr> <td></td> <td>Area Within NHS &amp; Greenbelt:</td> <td>±11.03 ha (27.26 ac)</td> </tr> <tr> <td></td> <td><b>Lands Client Owns:</b></td> <td>±4.04 ha (9.98 ac)</td> </tr> <tr> <td></td> <td>Employment/Mixed-use Net Developable Area (NDA):</td> <td>±1.05 ha (2.59 ac)</td> </tr> <tr> <td></td> <td>Agricultural Lands:</td> <td>±0.63 ha (1.56 ac)</td> </tr> <tr> <td></td> <td>Area Within NHS &amp; Greenbelt:</td> <td>±2.36 ha (5.83 ac)</td> </tr> </table> <p> REGIONAL NATURAL HERITAGE SYSTEM (NHS)   EXISTING URBAN AREA   EMPLOYMENT AREA   GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY</p> <p> Scale NTS  May 9, 2019</p> <p> <b>GSAI</b>  Glen Schnarr &amp; Associates Inc.</p>		<b>Lands Client Represents:</b>	±15.25 ha (37.68 ac)		Employment/Mixed-use Net Developable Area (NDA):	±3.05 ha (7.54 ac)		Agricultural Lands:	±1.17 ha (2.89 ac)		Area Within NHS & Greenbelt:	±11.03 ha (27.26 ac)		<b>Lands Client Owns:</b>	±4.04 ha (9.98 ac)		Employment/Mixed-use Net Developable Area (NDA):	±1.05 ha (2.59 ac)		Agricultural Lands:	±0.63 ha (1.56 ac)		Area Within NHS & Greenbelt:	±2.36 ha (5.83 ac)	
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No.	Source	Submission	Response
		<p>P:\1259-001\7_Drawings\7.1_GSAI\2019_07_July\Aerial_Context_Plan_July_31_19.dwg</p>  <p><b>2661297 ONTARIO INC.</b>  <b>AERIAL CONTEXT PLAN</b>        8995 BOSTON CHURCH ROAD, MILTON        REGIONAL MUNICIPALITY OF HALTON</p> <p><b>Legend:</b></p> <ul style="list-style-type: none"> <li>Subject Property - Area: ±12.20 ha (30.15 ac)        Employment/Mixed-use Net Developable Area (NDA): ±8.78 ha (21.70 ac)        Area Within NHS &amp; Greenbelt: ±3.42 ha (8.45 ac)</li> <li>REGIONAL NATURAL HERITAGE SYSTEM (NHS)</li> <li>EXISTING URBAN AREA</li> <li>EMPLOYMENT AREA</li> <li>GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY</li> </ul> <p><b>GSAI</b>        Glen Scharr &amp; Associates Inc.</p> <p>Scale: NTS        July 31, 2019</p> <p><b>Note:</b> Submission included additional tabular information on responses to the Discussion Paper Technical Questionnaires.</p>	

No.	Source	Submission	Response
28.	<p>Jennifer Staden on behalf of Argo</p> <p>E-mail dated October 30, 2020</p>	<p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Argo Development Corporation, owner of approximately 34 hectares (84 acres) of land in the Town of Milton, just outside of the existing Milton Urban Area (see Aerial Context Plan enclosed). Our client's lands are designated "Future Strategic Employment Area" in the current Regional Official Plan and are within Provincially Significant Employment Zone 18 (Halton, Peel). In the Regional Urban Structure Discussion Paper and more notably on Figure 30 – Potential Locations for new Employment Area DGA, we note that our client's above-noted lands are located within "Remaining Future Strategic Employment Areas".</p> <p>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:</p> <ul style="list-style-type: none"> <li>• With respect to employment conversions, timing for build-out should be considered (likely beyond 2051 horizon) and strategic locations for employment land conversion should be identified where Regional approval is not required;</li> <li>• The Region should consider Town of Milton's previously identified whitebelt lands for candidate settlement area boundary expansion;</li> <li>• 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;</li> <li>• ROP policies for employment lands should permit a broad range of uses to promote complete communities;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> </ul>	<p>For IGMS related response, please see response to July 15, 2021 submission provided further below in this chart.</p>

No.	Source	Submission	Response
		<p>Provincial minimum threshold. There are costs to both existing and future residents that need to be considered when contemplating intensification;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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,</li> <li>• 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.</li> </ul> <p>Please see appended Comment Matrix prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 for further detail.</p> <p>We feel that our client's lands can be serviced cost-effectively and efficiently utilizing the existing and planned infrastructure that currently serves the planned communities north of Britannia Road in Milton. The lands are physically suitable and conveniently located close to existing and planned 400 series highways and our request to have our client's lands included in the Milton Urban Boundary is consistent with the Provincially recognized Employment Areas and the Region's identified potential locations for urban area expansion for employment uses. The addition of these lands within the Milton Urban Boundary will also contribute towards Milton achieving the 50/50 (jobs/population) split as previously set out and contribute to the development of complete and walkable communities. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the</p>	<p><u>Natural Heritage</u></p> <p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field studies. Regional Official Plan policies allow for refinements to the Regional NHS</p>




No.	Source	Submission	Response
		<p>changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.</p> <p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p><b>GLEN SCHNARR &amp; ASSOCIATES INC.</b></p>  <p><b>ARGO DEVELOPMENT CORPORATION AERIAL CONTEXT PLAN</b></p> <p>LOWEBASE LINE, WILTON REGIONAL MUNICIPALITY OF HALTON</p> <p><b>Subject Property - Area*</b> ±34.05 ha (84.14 ac)</p> <p>Development/Retreat over Next Decade ±19.42 ha (47.89 ac)</p> <p>Area (NHA) ±14.82 ha (36.19 ac)</p> <p>Area (NHS) ±14.82 ha (36.19 ac)</p> <p>REGIONAL NATURAL HERITAGE SYSTEM (NHS)</p> <p>EXISTING URBAN AREA</p> <p>Note: *±0.00 Area subject to refinement as per Halton Region Office Plan (2020-176)</p> <p><b>GSAI</b> Glen Schnarr &amp; Associates Inc.</p>	<p>mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p> <p><u>Climate Change</u></p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and Council's emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p>

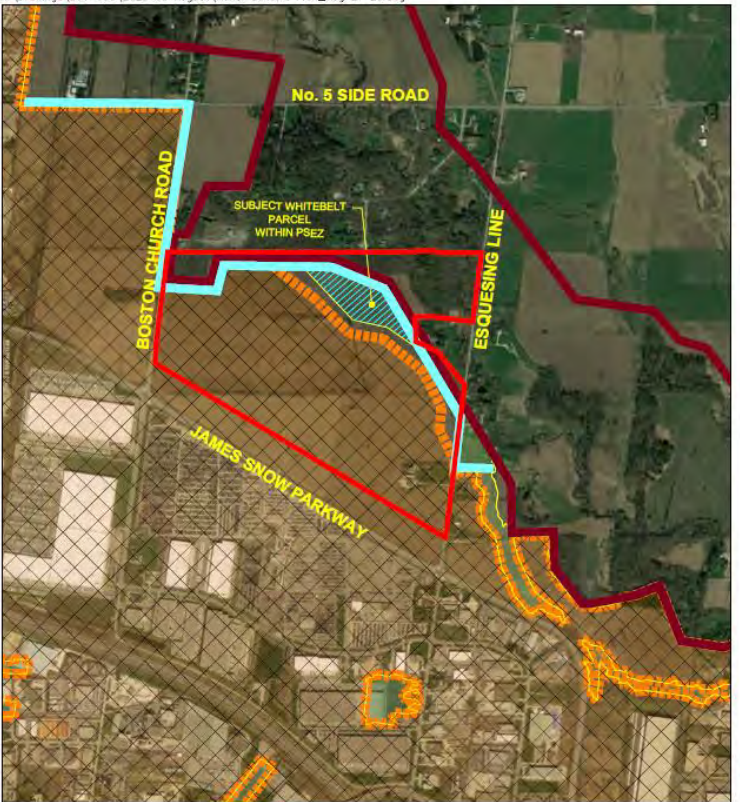
No.	Source	Submission	Response
29.	<p>Jennifer Staden on behalf of Orlando</p> <p>E-mail dated October 30, 2020</p>	<p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Orlando Corporation, owner of approximately 106 hectares (262 acres) of land in the Town of Milton (see Figure 1: Aerial Context Plan enclosed). Our client's lands, including this inadvertently excluded sliver of whitebelt land, are within Provincially Significant Employment Zone 18 (Halton, Peel) (see Figure 2: Provincial and Regional Planning Context enclosed). In the Regional Urban Structure Discussion Paper (June 2020) and more notably on Appendix C: Proposed Technical Revisions to Halton's Employment Areas, we note that our client's lands are impacted by the Region's proposed revision ID: "RM01" which, according to the Discussion Paper, proposes to align the Employment Area boundary with the natural water feature (please refer to previous correspondence submitted to the Region dated October 23, 2020).</p> <p>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:</p> <ul style="list-style-type: none"> <li>• With respect to employment conversions, timing for build-out should be considered (likely beyond 2051 horizon) and strategic locations for employment land conversion should be identified where Regional approval is not required;</li> <li>• The Region should consider Town of Milton's previously identified whitebelt lands for candidate settlement area boundary expansion;</li> <li>• 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;</li> <li>• ROP policies for employment lands should permit a broad range of uses to promote complete communities;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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.</li> </ul>	<p>For IGMS related response, please see response to July 15, 2021 submission below.</p>

No.	Source	Submission	Response
		<p>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;</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• 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;</li> <li>• 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,</li> <li>• 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.</li> </ul> <p>Please see appended Comment Matrix prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 for further detail.</p> <p>We feel that our client's lands can be serviced cost-effectively and efficiently as they are an extension of existing employment land (in fact on the same lot). Our request to have our client's lands included in the Milton Urban Boundary is consistent with the previous OMB Settlement Minutes as well as the Provincial PSEZ mapping for Employment Areas. The addition of these lands within the Milton Urban Boundary meets the Region's criteria for a minor and technical employment boundary revision to ensure the Urban Boundary is clear and logical. We request that you consider the inclusion of these lands as Urban Area and Employment Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology.</p>	<p><u>Natural Heritage</u></p> <p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field</p>



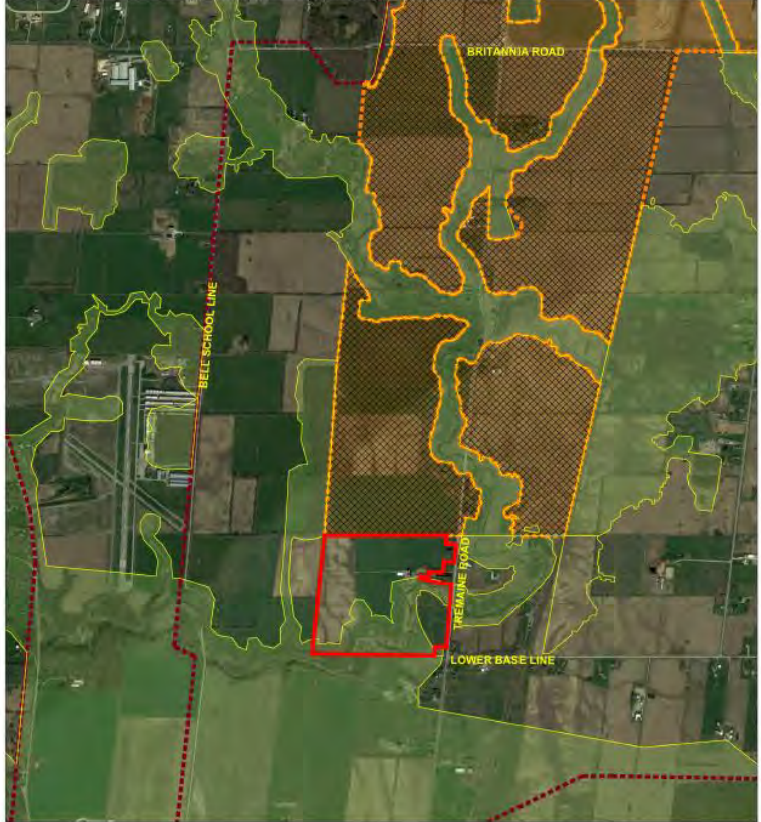
No.	Source	Submission	Response
		<p>By way of a copy to the Regional Clerk, we ask that our submission herein be circulated to the Regional Chair Carr and Members of Regional Council for the upcoming Special Council meeting on November 18, 2020.</p> <p>We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly, GLEN SCHNARR &amp; ASSOCIATES INC.</p>	<p>studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p> <p><u>Climate Change</u></p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and Council's emergency declaration.</p>

No.	Source	Submission	Response
		<p>X:\Drawings\314-006\2020 08 August\Aerial Context Plan_Aug 27 20.dwg</p>  <p><b>ORLANDO CORPORATION</b>  <b>FIGURE 1</b>  <b>AERIAL CONTEXT</b>      JAMES SNOW PARKWAY/BOSTON CHURCH ROAD,      TOWN OF MILTON,      REGIONAL MUNICIPALITY OF HALTON</p> <p> <span style="color: red;">▬</span> ORLANDO CORPORATION PROPERTY  <span style="color: orange;">- - -</span> EXISTING 2031 URBAN AREA BOUNDARY     </p> <p>Scale: N.T.S.      August 27, 2020</p> <p><b>GSAI</b>      Glen Schemm &amp; Associates Inc.</p>	

No.	Source	Submission	Response
		<p>X:\Drawings\314-006\2020_08_August\Aerial_Context_Plan_Aug_27_20.dwg</p>  <p><b>ORLANDO CORPORATION</b>  <b>FIGURE 2</b>  <b>PROVINCIAL AND REGIONAL PLANNING CONTEXT</b>      JAMES SNOW PARKWAY/BOSTON CHURCH ROAD,      TOWN OF MILTON      REGIONAL MUNICIPALITY OF HALTON</p> <ul style="list-style-type: none"> <li><span style="color: red;">—</span> ORLANDO CORPORATION PROPERTY: ±106.13ha (262.25ac)</li> <li><span style="color: cyan;">—</span> SUBJECT WHITEBELT PARCEL WITHIN PSEZ: ±6.82ha (16.85ac)</li> <li><span style="color: orange;">—</span> EXISTING 2031 URBAN AREA BOUNDARY</li> <li><span style="color: grey;">—</span> EXISTING 2031 EMPLOYMENT AREA</li> <li><span style="color: green;">—</span> GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY</li> <li><span style="color: blue;">—</span> PROVINCIAL SIGNIFICANT EMPLOYMENT ZONE</li> </ul> <p>Scale: 1:17.5      August 27, 2020</p> <p><b>GSAI</b>      Glen Schnarr &amp; Associates Inc.</p>	
30.	Jennifer Staden on behalf of Harold Patterson	<p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Mr. Harold Patterson, owner of approximately 39 hectares (97 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Aerial Context Plan enclosed). Our client's lands are designated "Future Strategic Employment Area" in the current Regional Official Plan and are adjacent to Provincially Significant Employment Zone 20 (Halton). In the Regional Urban Structure Discussion Paper and more notably on Figure 30 – Potential Locations</p>	<p><u>Integrated Growth Management Strategy</u></p> <p>Subject lands are currently identified as Future Strategic Employment Area. Based on the results of the technical analysis, staff are recommending that these lands</p>


No.	Source	Submission	Response
	E-mail dated October 30, 2020	<p>for new Employment Area DGA, we note that our client’s above-noted lands are located within “Remaining Future Strategic Employment Areas”.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The Region should consider Town of Milton’s previously identified whitebelt lands for candidate settlement area boundary expansion;</li> <li>• 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;</li> <li>• ROP policies for employment lands should permit a broad range of uses to promote complete communities;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> </ul>	<p>not be included within the Preferred Growth Concept. The lands are currently designated as Regional Natural Heritage System and Agricultural Area. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people. In addition, plans for enhanced freight rail infrastructure in the area have created uncertainty in regard to potential land uses and timing of future development in the area.</p> <p><u>Natural Heritage</u></p> <p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve the goal of long term protection and</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• 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;</li> <li>• 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,</li> <li>• 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.</li> </ul> <p>Please see appended Comment Matrix prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 for further detail.</p> <p>We feel that our client's lands can be serviced cost-effectively and efficiently utilizing the existing and planned infrastructure that currently serves the planned communities south of Britannia Road in Milton. The lands are physically suitable and conveniently located close to existing 400 series highways and our request to have our client's lands included in the Milton Urban Boundary is consistent with the Region's identified potential locations for urban area expansion for employment uses. The addition of these lands within the Milton Urban Boundary will also contribute towards Milton achieving the 50/50 (jobs/population) split as previously set out and will contribute to the development of complete and walkable communities. We request that you consider the inclusion of these lands as Urban Area to accommodate the Provincial growth target to 2041.</p> <p>We look forward to the next step in the MCR process, particularly the refinement of the preferred Growth Concepts. We anticipate the Region's background work will address the changes as per Growth Plan 2020 and the updated Land Needs Assessment Methodology. We look forward to continuing to work with staff on Halton Region's Official Plan Review. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p>	<p>enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p> <p><u>Climate Change</u></p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and Council's emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community greenhouse gas emission reductions</p>

No.	Source	Submission	Response															
		<p data-bbox="464 256 856 269">K:\Drawings\908-001\2019_05_May\Aerial_Context_Plan_May 9 19.dwg</p>  <p data-bbox="464 1097 730 1154"><b>MR. HAROLD PATTERSON C/O HAROLD, DIANE, SCOTT &amp; PENNY AERIAL CONTEXT PLAN</b></p> <p data-bbox="464 1170 646 1192">5130 TREMAINE ROAD, MILTON REGIONAL MUNICIPALITY OF HALTON</p> <table border="0" data-bbox="737 1105 1136 1243"> <tr> <td data-bbox="737 1105 772 1127">[Red outline]</td> <td data-bbox="779 1105 1136 1149">Subject Property - Area: Employment/Mixed-use Net Developable Area (NDA): 239.16 ha (96.82 ac) Area Within NHS &amp; Greenbelt: 125.72 ha (63.56 ac)</td> <td data-bbox="1171 1101 1220 1159">[North Arrow]</td> </tr> <tr> <td data-bbox="737 1166 772 1187">[Green outline]</td> <td data-bbox="779 1166 1024 1187">REGIONAL NATURAL HERITAGE SYSTEM (NHS)</td> <td data-bbox="1171 1149 1220 1159">Scale NTS</td> </tr> <tr> <td data-bbox="737 1187 772 1208">[Orange outline]</td> <td data-bbox="779 1187 905 1208">EXISTING URBAN AREA</td> <td data-bbox="1171 1159 1220 1180">May 9, 2019</td> </tr> <tr> <td data-bbox="737 1208 772 1229">[Blue hatched]</td> <td data-bbox="779 1208 884 1229">EMPLOYMENT AREA</td> <td></td> </tr> <tr> <td data-bbox="737 1229 772 1250">[Red dashed]</td> <td data-bbox="779 1229 1052 1250">GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY</td> <td></td> </tr> </table> <p data-bbox="1087 1203 1220 1252"><b>GSAI</b> Glen Schnarr &amp; Associates Inc.</p>	[Red outline]	Subject Property - Area: Employment/Mixed-use Net Developable Area (NDA): 239.16 ha (96.82 ac) Area Within NHS & Greenbelt: 125.72 ha (63.56 ac)	[North Arrow]	[Green outline]	REGIONAL NATURAL HERITAGE SYSTEM (NHS)	Scale NTS	[Orange outline]	EXISTING URBAN AREA	May 9, 2019	[Blue hatched]	EMPLOYMENT AREA		[Red dashed]	GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY		<p data-bbox="1434 256 1871 342">targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p>
[Red outline]	Subject Property - Area: Employment/Mixed-use Net Developable Area (NDA): 239.16 ha (96.82 ac) Area Within NHS & Greenbelt: 125.72 ha (63.56 ac)	[North Arrow]																
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[Blue hatched]	EMPLOYMENT AREA																	
[Red dashed]	GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY																	
31.	Nolan Moss on behalf of	<p data-bbox="449 1323 569 1349">Hi Steven,</p> <p data-bbox="449 1377 1331 1403">Attached please find our comment letter with regard to the IGMS discussion paper.</p>																



No.	Source	Submission	Response
	<p>SmartCentres</p> <p>E-mail dated October 30, 2020</p>	<p>Should you have any questions, please let me know and we look forward to discussing this further as the process advances.</p> <p>Thanks</p> <hr/> <p>ATTACHED LETTER</p> <p>October 30th, 2020 Halton Region Planning Services Legislative &amp; Planning Services 1151 Bronte Road Oakville ON L6M 3L1</p> <p>Re: Halton Region Official Plan Review Integrated Growth Management Strategy Regional Urban Structure Discussion Paper</p> <p>SmartCentres is the representative of the owner (Silgold Developments Inc. and Silgold II Developments Inc.) of the shopping centre identified in red in the aerial below (the “subject property”), located within the southwest quadrant of the intersection of Trafalgar Road and Dundas Street in the Town of Oakville. This letter is submitted to provide comments on the Halton Regional Official Plan Review, specifically the Integrated Growth Management Strategy Regional Urban Structure Discussion Paper.</p> <p>The Subject Property</p> <p>The subject property is approximately 52.16 acres in area, with frontage onto Dundas Street and Trafalgar Road.</p> <p>The subject property is almost entirely developed as a commercial shopping centre containing a Walmart and Real Canadian Superstore, and many other retail and commercial uses that serve the day-to-day needs of the surrounding community.</p> <p>This site is located in the Uptown Core, a growth area identified in the Town of Oakville Official Plan.</p>	<p>Comments on the Regional Urban Structure Discussion Paper have been noted and considered as part of the development of the Integrated Growth Management Strategy and Preferred Growth Concept.</p> <p>The proposed policy directions for the Integrated Growth Management focus on accommodating growth through intensification and “densification” which concentrates development to areas within the existing approved urban area, with the majority of growth directed to Strategic Growth Areas, such as Urban Growth Centres and Major Transit Station Areas.</p> <p>The Integrated Growth Management Strategy focuses on key planning objectives to ensure transit-supportive densities are achieved in communities. This includes strategic locations for growth in areas where access to existing and planned rapid transit can be maximized for the efficient movement of people and goods. More details on density targets is available in the <a href="#">Background Report</a> document prepared for the November 17, 2021 Regional Council meeting and the Preferred Growth Concept Report.</p>

No.	Source	Submission	Response
		 <p><b>Current Regional Policy</b></p> <p>The Halton Region Official Plan, Office Consolidation, June 19, 2018 identifies both Trafalgar Road and Dundas Street as Major Arterials with a Higher Order Transit Corridor designation, per Map 3. These roads are considered as intensification corridors under the current OP, and are intended to achieve greater densities in order to support the viability of existing and planned transportation infrastructure and services.</p> <p>In an effort to bring provincial and regional transportation planning efforts into alignment, the report entitled Defining Major Transit Requirements in Halton Region, dated March 26th, 2019, was prepared. Within this report is the Preliminary 2031 and 2041 Recommended Transit Priority Corridor Network. Dundas Street and Trafalgar Road are identified as BRT Corridors with Bus Only Lanes and Transit Signal Priority. The intersection of these two roads is identified as a Regional Transit Node.</p> <p><b>Regional Urban Structure Discussion Paper</b></p> <p>In keeping with the format of the discussion paper, please see the following comments in response to the relevant questions that are posed throughout the document.</p> <p><b>Discussion Question 1:</b> How can the Regional Official Plan further support appropriate growth and intensification in the Urban Growth Centres?</p> <p>The Regional Official Plan should support and encourage greater forms of intensification and development than currently contemplated, where appropriate, to ensure the efficient</p>	<p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>



No.	Source	Submission	Response
		<p>use of planned transit and service infrastructure, and to increase the overall housing mixture in the Region in order to address the ongoing and growing housing shortage.</p> <p><b>Discussion Question 6:</b> Building on the 2041 Preliminary Recommended Network from the Define Major Transit Requirements, should corridors be identified as Strategic Growth Areas in the Regional Official Plan? If so, should a specific minimum density target be assigned to them?</p> <p><b>Discussion Question 8:</b> Are there any other nodes in Halton that should be identified within the Regional Official Plan from a growth or mobility perspective (i.e. on Map 1)? If so, what should the function of these nodes be and should a density target or unit yield be assigned in the Regional Official Plan?</p> <p>While Map 1 or Map 3 of the current Regional Official Plan do not recognize the Uptown Core nor the Subject Property as a Mobility Hub, Major Transit Station Area or other form of intensification area, the findings of the Defining Major Transit Requirements (DMTR) report, would suggest that this area will become an important component of the larger, interconnected regional transit network. As part of the DMTR, a network of transit priority corridors was identified for the 2031 and 2041 planning horizons. The preliminary 2031 recommendations for the transit priority corridor network identified Trafalgar Road, between Steeles Avenue and Midtown Oakville GO to support HOV lanes and transit signal priority. It also identified this same corridor design for Dundas Street, between Bronte Road and the Halton/Peel boundary. The preliminary 2041 recommendations changed the portion of Trafalgar Road between Highway 407 and the Midtown Oakville GO, and the section of Dundas Street between Bronte Road and the Halton/Peel boundary to support Bus Rapid Transit. The subject property fronts onto these sections of the respective roads.</p> <p>The intersection of Trafalgar Road and Dundas Street is the only intersection of corridors that would support BRT with bus only lanes and transit signal priority, the greatest form of transit contemplated in the Preliminary 2041 Recommended Transit Priority Corridor Network. Both the 2031 and 2041 networks identify this intersection as a Regional Transit Node. Further, the Uptown Core would be the nearest transit node along the Trafalgar Road BRT line connecting to the Oakville GO Train Station which services the Lakeshore West GO line, one of the most used routes in the GTA network.</p> <p>Per the DMTR, the Region has allocated over \$1 billion in road improvement between 2018 and 2031, with an additional estimated cost of \$306 million to deliver the recommended preliminary 2031 and 2041 transit priority networks. Of the \$306 million, \$83.6 million appears to have been identified for the Trafalgar Road and Dundas Street corridor improvements.</p>	

No.	Source	Submission	Response
		<p>In order to ensure that this investment in the Regional transit network is optimized the Region should support the most efficient, compact, and greatest forms of intensification in the Uptown Core. In this regard, the Region should investigate establishing minimum density targets along corridors, focusing the greatest densities to nodal areas such as the Uptown Core.</p> <p>We reserve the right to comment further and appreciate the opportunity to contribute to the ongoing OP Review process. Should you have any questions regarding the foregoing or wish to discuss further, please contact the undersigned at nmoos@smartcentres.com.</p> <p>Sincerely,</p> <p>Nolan Moss, Development Manager SmartCentres</p>	
32.	<p>Argo/Newmark Developments Ltd.</p> <p>E-mail dated October 30, 2020</p>	<p><b>ATTACHMENT</b></p> <p>Dear Mr. Benson:</p> <p><b>Re: Submission by Argo Developments / Newmark Developments Ltd. 3069 Dundas Street West, Oakville Region of Halton Official Plan Review</b></p> <p>We act on behalf of Argo Developments and Newmark Developments (collectively, “Newmark”). Newmark owns lands known municipally as 3069 Dundas Street West in the Town of Oakville, which generally comprises the majority of the northwest quadrant of the intersection of Bronte Road and Dundas Street West, extending up to (and beyond) Highway 407 (the “Newmark Lands”).</p> <p>Newmark remains a site-specific appellant of OPA 289 (North Oakville West Secondary Plan), OPA 306 (Palermo Village North Urban Core Area) and ROPA 38 (Sustainable Halton). All of these appeals are currently adjourned <i>sine die</i> before the LPAT to allow Newmark to consult directly with the Town of Oakville regarding the development potential of the Newmark Lands.</p> <p>Further information pertaining to the Newmark Lands are available to the Region through the Town’s ongoing Palermo Village Growth Area Review. Our firm provided our client’s written submission respecting that Review. A copy of that submission, dated February 18, 2020, is attached for your convenience.</p> <p>With respect to the Regional Official Plan Review, we note that the Regional Urban Structure Discussion Paper speaks to the evaluation of potential Major Transit Station</p>	<p>Regional staff note that Regional Official Plan Amendment No. 48 (ROPA 48) was approved by the Minister of Municipal Affairs and Housing on November 10, 2021. ROPA 48 implements a Regional Urban Structure to establish a hierarchy of strategic growth areas which are nodes like Urban Growth Centers and Major Transit Station Areas, and corridors intended to be the focus of concentrating population and job growth.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>Areas (“MTSAs”). It is noted that MTSAs are to be directed toward strategic growth areas that offer connections to higher-order transit, including inter-regional transit.</p> <p>We also note that the Region is generally evaluating MTSAs almost exclusively along its GO Transit lines. With respect, there is nothing in the Province’s policies and directions concerning MTSAs specifying that these unique designations should be limited to areas that surround GO Transit stations.</p> <p>To this end, we submit that the Newmark Lands are uniquely situated to operate as an MTSA. In fact, the Town’s Urban Structure Map already identifies a “Proposed Regional Transit Node” at Palermo Village within the Newmark Lands. “Regional Transit Nodes” are defined to be key locations that integrate with the town-wide transportation system and provide a focus for transit-supportive development that facilitates first mile-last mile connections and solutions. Broadening this Transit Node designation to an MTSA would appropriately support future development on the Newmark Lands and ensure Provincial, Regional and Town investment in transit and transportation infrastructure along both Dundas Street West and Bronte Road is optimized.</p> <p>A review of the relevant definitions prescribed by the 2019 Growth Plan further supports consideration of the Newmark Lands for an MTSA designation:</p> <p><i>Major Transit Station Area:</i> The area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally are defined as the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.</p> <p>The majority of the Newmark Lands fits this definition pursuant to the Town’s Urban Structure and pursuant to the proposed mapping and policy under the Town’s Palermo Village Growth Area Review.</p> <p><i>Higher Order Transit:</i> Transit that generally operates in partially or completely dedicated rights-of-way, outside of mixed traffic, and therefore can achieve levels of speed and reliability greater than mixed-traffic transit. Higher order transit can include heavy rail (such as subways and inter-city rail), light rail, and buses in dedicated rights-of-way.</p> <p>The Newmark Lands are at the intersection of two Regional corridors proposed to be served by higher order transit (primarily bus rapid transit). The north portion of the Newmark Lands is also immediately proximate to the future 407 Transitway. In terms of transit options, the site will provide both speed and interchangeability for future transit users.</p>	

No.	Source	Submission	Response
		<p><i>Strategic Growth Areas:</i> Within settlement areas, nodes, corridors, and other areas that have been identified by municipalities or the Province to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form. Strategic growth areas include urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas.</p> <p>For the reasons identified in our submission on the Palermo Village Growth Area Review, the Newmark Lands exhibit all of the key hallmarks for a strategic growth area.</p> <p>Accordingly, we request that Regional Staff include Palermo Village generally, and the Newmark Lands specifically, as a candidate location for an MTSA designation.</p> <p><i>Regional Natural Heritage System</i></p> <p>In addition to the foregoing, the Newmark Lands exhibit little in the way of constraints to future urban development for low, medium and high-densities. As previously submitted by our client, there are no land forms, functions or features on the Newmark Lands that warrant inclusion or protection under the Regional NHS.</p> <p>On this point, staff should note that Policy 116.3 of the Region's Official Plan (ROPA 38) specifically reserves the delineation of the Regional NHS on land within the North Oakville West Secondary Plan Area to the determination of our client's ongoing appeal of OPA 289. We request that any Regional NHS mapping appropriately reflect the Region's policy text and not indicate the presence of Regional NHS on the Newmark Lands. Instead, the relevant map(s) should include a notation simply referring the reader to Policy 116.3.</p> <p>Please ensure our office is notified of any further opportunities to provide input to the current Regional Official Plan Review. Please also ensure the undersigned receives notice of any reports to Committee or Council concerning the Review.</p> <p>Yours truly,  AIRD &amp; BERLIS LLP  <b>Original signed by P.J. Harrington</b>  Patrick J. Harrington</p>	
33.	Scott Snider on behalf of	Please find the attached submissions on behalf of Mattamy Homes in respect of the ROPR Discussion Papers.	

No.	Source	Submission	Response
	<p>Mattamy Homes</p> <p>E-mail dated October 30, 2020</p>	<p>Scott Snider Turkstra Mazza Associates</p> <p>----- Via email</p> <p>Dear Mr. Benson,</p> <p><b>Re: Regional Official Plan Review (ROPR) Discussion Papers Comments on Behalf of Mattamy Homes Our File No. 13668</b></p> <p>We are counsel to Mattamy Homes and associated companies (“Mattamy”). Mattamy has extensive land holdings in the Region of Halton and a demonstrated track record of delivering high quality communities over many years.</p> <p>We are writing at this time to provide Mattamy’s submissions on the five Discussion Papers released for public comment as part of the Regional Official Plan Review (“ROPR”).</p> <p>In an effort to provide the most thoughtful and useful input at this stage in the ROPR, Mattamy engaged highly experienced experts to provide input which addresses both broad policy issues and technical matters. To that end, we are attaching the following:</p> <ol style="list-style-type: none"> <li>1. A submission of Ruth Victor &amp; Associates dated October 30, 2020. Ms. Victor is not only a member of the Canadian Institute of Planners but is also a member of the Royal Town Planning Institute in England. She has some thirty (30) years of professional planning experience. Ms. Victor is the former Manager of Development at the Region of Halton who, in that capacity, conducted the Region’s first major growth management exercise in the late 1980s. She does extensive work for both the private and public sectors.</li> <li>2. A <i>Technical Response Paper</i> authored by Tom Hilditch, dated October 28, 2020, which addresses natural heritage issues. Mr. Hilditch is a renowned ecologist with some forty (40) years of experience in a broad array of ecological issues. This has included several appointments to provincial committees, including his work as the Chair of the Species at Risk Program Advisory Committee for many years.</li> <li>3. A submission of urbanMetrics Inc. dated October 22, 2020 which addresses integrated growth management strategy issues. The author, Rowan Faludi, has over twenty-five (25) years’ experience in urban economic analysis consulting to both the public and private sectors.</li> </ol>	<p>Comments on the Regional Urban Structure Discussion Paper are acknowledged.</p> <p>Regional staff note that comments on the Integrated Growth Management Strategy have been addressed in material related to Regional Official Plan Amendment No. 48 (ROPA 48) and the Preferred Growth Concept Report. More details are also available in the Integrated Growth Management Strategy Policy Directions and will be in the future Regional Official Plan Amendment which is being proposed to implement the Preferred Growth Concept.</p> <p>Comments related to Natural Heritage are acknowledged and are addressed through a separate submission-response chart, presented in the Policy Directions Report.</p> <p>Comments related to Climate Change are acknowledged and have been factored into the policy directions for climate change in the Policy Directions Report for the Regional Official Plan Review.</p>

No.	Source	Submission	Response
		<p>4. A submission of Savanta Inc. dated October 29, 2020 which addresses natural heritage issues specific to Mattamy lands in south Georgetown, in the Town of Halton Hills.</p> <p>5. A submission from Turkstra Mazza Associates dated January 2, 2020 which was provided as earlier input into the Regions IGMS growth scenarios.</p> <p>Each of these detailed submissions provide important insights and input into the matters addressed in the Discussion Papers. While Mattamy is pleased to provide these submissions, we are of the view that they should be treated as an invitation for further, direct engagement with Mattamy and Mattamy's team of experts. Certainly, the Region's ongoing ROPR should not be limited to simply receiving and considering the submissions.</p> <p>The ROPR introduces an opportunity for the Region to provide constructive direction to facilitate vibrant, mixed use communities. This direction must reflect and implement provincial policy, including recent amendments to the Growth Plan. This opportunity will only be realized if the Region engages constructively with stakeholders. Mattamy would welcome the opportunity to discuss these issues in detail with staff as the ROPR continues.</p> <p>We respectfully request notice of all future meetings, reports and consultation activities related to the ROPR. Please provide notice directly to this firm and to Mattamy c/o Karen Ford (Karen.Ford@mattamycorp.com).</p> <p>Thank you. Yours truly, Scott Snider</p> <hr/> <p><b>ATTACHMENTS</b></p> <p><b>TAB 1</b></p> <p>October 30, 2020</p> <p>Regional Municipality of Halton Planning Services 1151 Bronte Road Oakville, Ontario L6M 3L1 Attention: Mr. Curt Benson, RPP, M CIP, Chief Planning Official</p> <p>Dear Sir:</p> <p>Re: Regional Official Plan Review Discussion Papers - Mattamy Homes Limited</p>	<p>Comments are acknowledged. Please see above for a detailed response. Additional responses to public and stakeholder submissions can also be found in the Policy Directions Submission-Response charts.</p>

No.	Source	Submission	Response
		<p>The following submission has been prepared on behalf of Mattamy Homes Limited and associated companies (Mattamy). The following is their response to the Discussion Papers issued for the Region of Halton IGMS process.</p> <p>Comments were previously provided by Mattamy on January 2, 2020 and a copy of those comments are attached to this submission. In addition, Mattamy has been extensively involved in other landowner group submissions on the Regional Official Plan review provided under separate cover and reserve our rights to rely on these submissions as part of the IGMS public consultation process.</p> <p>Regional Urban Structure Discussion Paper</p> <p>In the previous submission of January 2, 2020, Mattamy raised the concerns that there is a need for the IGMS study process to be robust and fluid enough to address the policy changes occurring at the Provincial level. Since that submission, there is a new Provincial Policy Statement and an amendment to the Provincial Places to Grow Plan. As stated previously, the new and in force Provincial policies must now be the basis for the IGMS process and the Growth Scenarios for Halton.</p> <p>The following points are the foundation for moving forward:</p> <ul style="list-style-type: none"> <li>• Any preferred growth scenario must be based upon the current and in effect Places to Grow Plan horizon to 2051 and the new Land Needs Methodology.</li> <li>• The PPS specifically refers to the provision of a market-based range and mix of housing. Market based range and mix of housing along with all other policies of the PPS is required to be considered as part of the IGMS process.</li> <li>• A realistic, defensible, implementable plan for growth is needed for Halton.</li> </ul> <p>The Urban Structure set out within the Discussion paper does not reflect the reality of a market-based range and mix of housing and proposes significant changes to built form and densities beyond that which the market currently or is anticipated to support. The IGMS process must ensure complete communities that fulfill all forms and tenures of housing while be consistent with and in conformity to approved planning policy. The significant emphasis on apartment built form for larger households will not result in more affordable housing for families.</p> <p>Attached to this letter is the analysis of the Urban Structure Discussion Paper by urbanMetrics Inc. dated October 22, 2020. This analysis sets out detailed responses to a number of questions posed within the Urban Structure Report.</p> <ul style="list-style-type: none"> <li>• The broad identification of corridors as strategic growth areas is not supported. The identification of growth areas must be done strategically. While additional density</li> </ul>	

No.	Source	Submission	Response
		<p>along corridors is appropriate, the Region must ensure that there is sufficient market demand for higher density housing along these corridors without compromising the designated growth areas within the Growth Plan and that the context of the approved and emerging secondary plans can integrate this additional density.</p> <ul style="list-style-type: none"> <li data-bbox="457 396 1409 695">• The broad identification of additional multi-purpose and minor arterial roads to support a higher order Regional transit network is not supported. Any additional corridors within the Regional Transit Network should be assessed and identified through a technical study such as a Transportation Master Plan. The primary way to support higher order transit along these roads is to allocate additional density. This raises the questions as to whether there is the market to accommodate further additional density without detracting from higher priority intensification areas, whether these roads can physically accommodate this increased density and whether the impacts to existing and planned low density neighbourhoods can be appropriately managed. This type of intensification, where appropriate, is best assessed and implemented through local planning processes.</li> <li data-bbox="457 727 1409 1271">• Regarding factors to be considered when evaluating the appropriate location for potential settlement expansions, it is noted that the criteria set out within the report omit any aspect of market consideration as required by the Places to Grow Plan and the PPS. The criteria set out by the Region are focused only on desired policy outcomes and not whether the growth strategy could be supported by market trends. Nor do they include consideration of potential adverse impacts on the regional economy, consumer housing decisions (e.g., choice) and housing affordability. There is very little discussion within the Paper regarding the economic impact of market manipulation and the need to plan for complete communities that appropriately balance all housing types and avoid the over designation of lands for apartment development. Apartment built form intrinsically may be a more affordable option for singles and couples but is a less affordable option for families and multigenerational households which require more living space. Other key questions are raised by the potential over designation of lands for apartment development such as the viability of the Region of Halton allocation program, and the impact to communities if the markets for apartments does not materialize. The long term implications of COVID - 19 on changing living arrangements as work from home, avoidance of common touch points or crowded confined spaces such as elevators and the desire for larger homes with outdoor amenity spaces are becoming the new reality for many and need to be considered as part of a long range planning process.</li> <li data-bbox="457 1304 1409 1406">• Regarding the minimum density in the designated greenfield area, it is noted that the Region as a whole will likely already exceed the density of 50 residents and jobs per hectare set out within the Places to Grow Plan and will likely exceed 60 residents and jobs per hectare when completed. Any considerations to exceed the Provincial</li> </ul>	



No.	Source	Submission	Response
		<p>requirements would be for local reasons and not to achieve Provincial targets. The Places to Grow Plan requires that the Region take a market based approach to housing and utilize this lens in determining the ultimate decision on minimum density. A market analysis as required by Provincial Policy must be undertaken by the Region.</p> <ul style="list-style-type: none"> <li>• In establishing a minimum Designated Greenfield Area (DGA) density target, the Region needs to be cognizant of the Provincial planning directive to accommodate a market -based mix of housing. The DGA should include a mix of housing types in order to provide a housing mix that meets market needs and focus higher density housing in intensification and planned strategic growth areas such as the strategic corridors and/or nodes.</li> <li>• With the new Growth Plan, the Region must start over and reconsider all of the Scenarios. It is our view that none of the current Scenarios originally proposed in the options report conform with the new policy context and revised population and employment forecasts. As part of the next step in the process, the Region must use the land Needs Assessment Methodology to determine its land needs and allocating future development to its area municipalities. Focusing solely on high density residential as a means of shifting housing choice and addressing other issues such as climate change is not a solution. Planning for high density in the right locations is good planning but it needs to be balanced with the reality of the market place, consumer choice and be financially viable for the Region. The Growth Plan requires that market must be recognized in planning for Growth.</li> </ul> <p>Additional issues identified within the Urban Structure Discussion Paper include:</p> <p>Whether the Region should consider the use of inclusionary zoning in MTSA to facilitate the provision of affordable housing, there is agreement that affordable housing is a need within communities. This should not be a blanket requirement that market housing provide affordable housing accommodation. Further the Region of Halton Allocation Program specifically makes affordable housing a significant challenge as early payment or additional payments are a cost that becomes embedded in the price of a home. This is the reality of the "growth pays for growth" policy of the Region and must be a variable that makes its way into discussion about affordable housing. Affordable housing strategies must be augmented with various government programs to build needed housing within communities, income support programs, rent support programs as well as incentives and a review of fees and charges to reduce the cost of providing housing to the rental and ownership markets.</p>	

No.	Source	Submission	Response
		<p>Regarding the identification of additional nodes from a growth or mobility perspective, this should only occur through a detailed urban structure study which has not occurred as part of this process and this work may be more appropriately completed at the local level.</p> <p>For the boundaries of the MTSA, these should be driven by the local level official plan and secondary plans processes. The development of these secondary plan policies is an extensive process which is focused on maximizing the potential for residents and jobs in these areas. Density targets should be reflective of local planning for these areas and it should be acknowledged in the growth projections that most of these areas will not build out by 2051.</p> <p>How the Regional Official Plan support s employment growth and economic activity, the Official Plan needs to recognize the significant changes that are occurring in the commercial sector stemming from the rapid rise in e-commerce and impacts of changing behaviours due to Covid-19, resulting in fundamental changes to the commercial hierarchy and the interrelationship between employment and commercial functions. The Regional Official Plan should provide flexibility with the Official Plan to allow businesses to respond in this changing environment.</p> <p>Natural Heritage Discussion Paper</p> <p>Attached to this submission is a Technical Response Paper prepared by Tom Hilditch. This paper undertakes an extensive review the Natural Heritage Discussion Paper and provides a fulsome assessment of the Region of Halton's Natural Heritage strategy and the directions and questions posed by the Region In that discussion paper. This paper sets out detailed discussion and responses to the Natural Heritage Discussion Paper. As set out within the conclusions section of the Paper:</p> <p>"There are many recommendations included in this Technical Response Paper, grouped according to key thematic areas, some of which correspond with the Region's standard questions in their Discussion Papers. A few of the more important recommendations follow:</p> <ul style="list-style-type: none"> <li>• Given that the substantial nature of the comments and questions raised in this Technical Response Paper, we recommend that we meet and invest the time required to review and discuss all elements presented In this document</li> <li>• The reliance upon a simplistic interpretation of the Precautionary Principle needs to be revised;</li> <li>• Areas where the Region's approach does not seem to be in alignment with current thinking, it needs discussion and adjustment (e.g., the need for different NHS approached in settlement versus rural/agricultural lands and the need to define offsetting rules to support efficient and sustainable community design); and</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response. Additional responses to public and stakeholder submissions can also be found in the Policy Directions Submission-Response charts.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• The Region's position that there is no "hard science" to defend specific mitigation measures (like buffer widths) requires discussion and modification.</li> <li>• Minutes of Settlement between the Regional Municipality of Halton and the Mattamy Development Corporation (2015) have not been completely considered in the Region's Discussion Paper. We request a meeting take place with the Region to carefully review the Natural Heritage Discussion Paper, and mapping layers to ensure that the Minutes of Settlement have been adhered to."</li> </ul> <p>In summary, the Technical Response paper stresses that it is necessary for the Region, prior to proceeding to the next stage In the IGMS process, to review the contemporary practices and literature regarding Natural Heritage Planning, identify options for moving forward that provide a degree of flexibility and innovation particularly within Urban Areas to achieve a more focused and practical approach.</p> <p>The primary issue is one of balance amongst a wide range of factors including sustainable, complete communities and preservation of natural features. As set out in Section 25 of the Regional Official Plan, "Planning decisions in Halton will be made based on a proper balance amount the following factors, protecting the natural environment, preserving Prime Agricultural Areas, enhancing its economic competitiveness and fostering a health equitable society. Towards this end, Regional Council subscribes to the following principles of sustainability: that natural resources are not being over-used; that waste generated does not accumulate over time; that the natural environment is not being degraded; and that this and future generations' capacity to meet their physical social and economic needs is not being compromised. The overall goal is to enhance the quality of life for all people of Halton, today and into the future". As further set out within the ROP, the fundamental value in land use planning is the principle of landscape permanence and the ROP identifies three components to its future landscape: settlement areas, a rural countryside and a natural heritage system. This fundamental value Is not about preserving and expanding the Natural Heritage System at the expense of considerations and priorities but about finding the right balance between urban, rural and natural heritage.</p> <p>To preserve the natural heritage system for the future, it requires an approach that has flexibility and innovation</p> <p>Also attached to this submission is a letter by Savanta dated October 29, 2020. Within this letter, concerns are set out regarding the errors in the proposed mapping of the Natural Heritage System for 14256 No 10 Sideroad in the Town of Halton Hills. It is Mattamy's request that the mapping be corrected as set out within that submission.</p> <p>Climate Change Discussion Paper</p>	

No.	Source	Submission	Response
		<p>Regarding the Climate Change Discussion Paper, there is not a one size fits all solution to the challenges of climate change. Building more apartment buildings is not the solution. Focus on Innovative building practices to reduce emissions over the long term and reduce waste in the building process should be priorities. The creation of walkable communities, that are transit supportive, is an important factor in reducing greenhouse gas emissions and should equally be a focus. This is best achieved at the local level through secondary planning processes. Discussion with landowners and the local municipality is essential to create realistic and Implement able targets, programs and initiatives.</p> <p>Mattamy looks forward to working with the Region throughout this study process. Should you have any questions or wish to discuss this submission further, please do not hesitate to contact me.</p> <p>Regards,</p> <p>Ruth Victor, MCIP, RPP, MRTPI</p> <p><b>TAB 2</b></p> <p>This attachment was a Technical Response Paper authored by Tom Hilditch, dated October 28, 2020, which addresses natural heritage issues. This paper was redacted for the purposes of this chart, as natural heritage related matters are being addressed through a separate submissions chart and the Natural Heritage theme of the Regional Official Plan Review.</p> <p><b>TAB 3</b>  October 22, 2020  Gary Gregoris  Senior Vice-President, Land Operations  Mattamy Homes Limited  433 Steeles Avenue East, Suite 110  Milton, Ontario  L9T 8Z4</p> <p>Dear Mr. Gregoris:</p> <p>RE: Response to Halton Region Urban Structure Discussion Paper</p> <p>You have asked urbanMetrics to provide commentary with regards to the Urban Structure Discussion paper released in June, 2020 as part of the Halton Region Integrated Growth Management Strategy (IGMS). In addition, we have also provided commentary on how</p>	<p>Comments are acknowledged. Please see above for a detailed response. Additional responses to public and stakeholder submissions can also be found in the Policy Directions Submission-Response charts.</p>

No.	Source	Submission	Response
		<p>the recent amendment to the Growth Plan finalized in August will impact the IGMS and the direction of the Urban Structure Discussion Paper.</p> <p><b>Recent Amendments to the Growth Plan means components of the Region’s IGMS must be re-visited.</b></p> <p>After proposing a number of changes to the Provincial Growth Plan in June and subsequently receiving public feedback, the Province announced the finalized version of the Amendment on August 28, 2020. Among the changes that will go into effect, several have direct implications on Halton’s IGMS, including:</p> <ul style="list-style-type: none"> <li>• Extending the Planning Horizon to 2051. The work to date including the Region’s Growth Scenarios report was based on projections only to 2041 as per the 2019 Growth Plan in effect at the time. The added time frame means that the Region will have to plan to accommodate more population and employment than it had previously considered.</li> <li>• Flexibility to Increase the Growth Plan Population and Employment Targets. The IGMS Scenarios Report prepared growth scenarios based on a fixed population. The amended Growth Plan now considers the population and employment forecasts as “minimums” rather than “targets”, which can be increased by the Region through a municipal comprehensive review.</li> <li>• Updated Population and Employment Projections. Schedule 3 of the Growth Plan now only includes population and employment forecasts to 2051. The IGMS work was based on the previous projections for 2031 and 2041 from the 2019 Growth Plan.</li> <li>• Updated Market Based Land Needs Methodology – The methodology used in the IGMS work tended to reflect desired policy outcomes with minimal emphasis on market demand and supply parameters, which is a required component of the updated methodology.</li> </ul> <p>It should be noted that there are no transition provisions provided in the Province’s Amendments to the Growth Plan and as such, the Halton Region MCR (like all other Regions MCR’s) is required to consider and conform to these changes. As such the Region is likely faced with having to reconsider and redo some of its previous IGMS work.</p> <p><b>Questions Posed by the IGMS Structure Report</b> The IGMS Structure Report poses some 15 questions to be addressed during the IGMS process. Some of the most relevant to Mattamy Homes given its various land holdings in the Region, include:</p> <p><b>Discussion Question 6: Building on the 2041 Preliminary Recommended Network from the Define Major Transit Requirements, should corridors be identified as</b></p>	<p>Questions and comments are acknowledged. Please see above for a</p>

No.	Source	Submission	Response
		<p><b>Strategic Growth Areas in the Regional Official Plan? If so, should a specific minimum density target be assigned to them?</b></p> <p>It is important to consider that the Growth Plan identifies Urban Growth Centres, Priority Transit Corridors and Major Transit Station Areas as the highest areas of intensification with the highest priority. The vast majority of corridors identified in the Halton Official Plan are not included in the Growth Plan. While this does not mean that Halton cannot plan for higher densities along its corridors, it does mean that if doing so, the Region must ensure that sufficient market for higher density housing exists so as not to impede the development of these higher priority areas.</p> <p>Many growing parts of the Region, such as North Oakville, do not contain any Urban Growth Centres, Higher Order Transit Corridors or Major Transit Station Areas, which are the highest priority intensification nodes with the highest density targets as per the Growth Plan. Considering corridors in these and other areas as Strategic Growth Areas, should be done with a full comprehension of the market for higher density uses in the Region and its various communities.</p> <p>Strategic Growth Areas along corridors should only be established after an understanding of (a) how they would impact the ability of higher order intensification areas to achieve their targeted densities; (b) whether there is sufficient market to support additional density along the corridors; (c) how additional density can physically be accommodated within the context of approved and emerging Secondary Plan Areas.</p> <p><b>Discussion Question 7: Should the Regional Official Plan identify additional multi-purpose and minor arterial roads in the Regional Urban Structure, not for the purposes of directing growth, but to support a higher order Regional transit network</b></p> <p>According to the Structure report, multi-purpose and Minor Arterial roads in the Region have the potential to be considered as part of the Regional Urban Structure as a focus for growth and intensification (depending on the urban context) or for long term protection to support a high-frequency transit function.</p> <p>Whether multi-purpose and/or Minor Arterial Roads should be so considered for additional growth is a question that would depend, in part, on the densities required to support higher order Regional transit in a particular area, as well as, the impact of this additional growth on the existing policies by the local municipalities. Furthermore, the permission or planning of additional density along Minor Arterial Roads which are typically situated within or in proximity to planned or established low rise stable neighbourhoods must be properly assessed. This juxtaposition of density and built form creates both real and</p>	<p>detailed response. Additional responses to public and stakeholder submissions can also be found in the Policy Directions Submission-Response charts.</p>

No.	Source	Submission	Response
		<p>perceived land use impacts. Finally, the implementation of additional development along Minor Arterial Roads often conflicts with other equally important planning objectives, such as: restrictions on direct access; over-sizing of lots; the requirement for rear lane or rear loaded housing forms; the need to accommodate on-street parking; transit stops and bus movements; traffic calming strategies; turning circles and road design; conflicts with sidewalks; multi-purpose pedestrian corridors and bike lanes.</p> <p>As an example of the impact of such a move on local policies, we would also note that in OPA 321, the Town of Oakville removed singles, semi-detached and duplex units from its definition of “Medium Density” development. Incorporating additional Medium Density development along Minor Arterial and multi-purpose roads would further constrain opportunities for these housing types, which are important in terms of accommodating housing choice and diversity.</p> <p>In summary, the question cannot be answered as posed. The only way to support transit along these corridors is through the direction of planning for growth. This approach to land planning has implications (some which are extremely negative) to place making and good community building principles.</p> <p><b>Discussion Question 14: Are there other factors, besides those required by the Growth Plan, Regional Official Plan or the Integrated Growth Management Strategy Evaluation Framework that Halton Region should consider when evaluating the appropriate location for potential Settlement Area expansions?</b></p> <p>As discussed above, the Growth Plan and the recent changes to it require a number of new considerations that were not anticipated or mandated: such as the change in the planning horizon; the new population and employment forecasts; the definition of the forecasts as being minimum thresholds not targets; and, that the housing market be examined as part of the growth management exercise and land budget methodology. To a large extent, the proposed scenarios and the Region’s Assessment Criteria shown on Figure 25 of the Structure Report to be used to evaluate the need for a Settlement Boundary expansion and where it should occur omits any aspect of market consideration. The criteria are focused entirely on desired policy outcomes and not on whether a growth strategy could be supported by market trends or what the potential adverse impacts would be on the regional economy, consumer residential housing decisions and housing affordability of adjusting the housing mix and supply in the Region.</p> <p>The current version of the Growth Plan requires that the “The GGH will have sufficient housing supply that reflects market demand and what is needed in local communities” and also indicates that “It is important to optimize the use of the existing urban land supply as well as the existing building and housing stock to avoid over-designating land for future</p>	

No.	Source	Submission	Response
		<p>urban development while also providing flexibility for local decision-makers to respond to housing need and market demand”.</p> <p>The Amendment to the Growth Plan also requires that municipalities use a revised methodology to determine their land needs:</p> <p><i>Recognizing that local needs are diverse, the proposed new Methodology aims to provide the key factors to be considered as municipalities plan to ensure that a sufficient and appropriate mix of 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 services that are needed to meet complete communities objectives to the horizon of the Plan...</i></p> <p><i>The proposed Methodology will provide more flexibility to municipalities. It will also be forward-looking and account for demographics, employment trends, market demand, and concerns related to housing affordability in the Greater Golden Horseshoe.</i></p> <p>In our opinion, the proposed changes to the Growth Plan reinforce the need of municipalities to consider market demand in their application of the population and employment forecasts and in the preparation of municipal comprehensive reviews. While the Halton Growth Scenario’s work does contain a number of paragraphs addressing market conditions, the Assessment criteria shown in Figure 25 of the Structure Report used to determine where expansion should occur contains no mention of market as a factor.</p> <p>The Scenarios report also acknowledges that the IGMS work is seeking to manipulate historic market trends rather than planning to accommodate them within the broader policy context:</p> <p><i>Planning for the GGH, including Halton, seeks to profoundly change these historical patterns, by introducing far more apartments into the broader housing market as well as within local market areas, including Halton. This planned shift in the range and mix of housing underlies much of the IGMS work and long-term growth planning in Halton.</i></p> <p>Very little discussion is contained in the IGMS work with regards to the economic impact of this market manipulation and the need to plan for complete communities that reflect the appropriate balance of housing types. Planning for a mix and range of housing forms in a variety of location to satisfy all facets of consumer choice and preference is a tenant of good public policy making and a requirement of all relevant and applicable legislation and planning policy. This has been reinforced in the August Growth Plan amendment which requires consideration of market demand. Essentially, in the statement above the Region through aspirational policy statement is ignoring the need to plan in the short and long</p>	<p>Comments are acknowledged.</p>



No.	Source	Submission	Response
		<p>term for housing and neighbourhoods that are both resilient and complete. Arguably, the Region's proposition is that traditional housing forms for families are less of a priority than other housing forms that cater to other segments of the community and marketplace.</p> <p>Of particular concern, is the potential to over-designate lands for apartment development, which is inherent in policies related to infill development, Urban Growth Centres, Major Transit Station Areas, Intensification Corridors, as well as, propositions in the Structure Report for minimum density targets along Corridors and to direct growth to multi-purpose and minor arterial roads. While the Growth Plan does contain specific density and intensification targets which must be met, the 2020 Growth Plan policies also require a balanced approach to the housing mix with a consideration of market needs to avoid overbuilding a particular housing type.</p> <p>It is important to recognize that there seems to be a common misconception that apartment units are universally more affordable than ground related housing. This, however, is only true when apartments are constructed at sizes much smaller than ground related units. This is because the cost to construct an apartment unit with surface parking is about 60% to 70% more on a square foot basis than a townhome or single detached house and the construction cost of an apartment with underground parking is approximately double the cost per square foot of a ground related unit. These cost differentials are directly reflected in the purchase prices of apartments and ground related units. Based on research conducted by urbanMetrics in November 2019, a new three-bedroom apartment in Oakville's Uptown Core of approximately 1,000 square feet was selling for an average of approximately \$940,000, compared to about \$800,000 for a much larger 1,800 square foot new townhome in a greenfield site in Milton.</p> <p>While apartment units may be a more affordable option for singles and couples for whom smaller housing space is manageable, apartments become decidedly less affordable for families with greater space needs.</p> <p>Key questions that need to be addressed in the IGMS work are:</p> <ul style="list-style-type: none"> <li>• To what extent does excessive apartment approvals limit the options available to home buyers, further reducing the affordability of ground related units and causing increased movement to the fringes of the urban area?</li> <li>• Are large amounts of high-rise apartment development a feasible alternative for ground related housing</li> <li>• What is the most appropriate balance between apartment development and ground related housing, recognizing both the policy goals of intensification and the economic impacts of constraining the supply of ground related housing?</li> <li>• How can market analysis best be accommodated within the IGMS framework going forward?</li> </ul>	

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• And finally, how is the Region's Allocation Program going to be considered. Will housing policies skewed towards apartments be economically viable? How will local municipalities and the Region afford to pay for infrastructure if the market for apartments does not materialise or take up is much slower due to oversupply? Finally, how is the basic land economics of high-rise developments (which are extremely capital intensive) being considered in a system that requires substantial front-end finance to meet the Region's principle that growth must pay for growth? If priority is given to high-rise developments over grade-related housing how will parkland and school sites be obtained?</li> </ul> <p>Furthermore, the long-term implications of COVID-19 on daily working and living patterns needs to be more fully assessed as part of the IGMS work. For example, COVID-19 has demonstrated that working from home is a viable option for a large portion of the office-based work force. To what extent will this workforce return to the previous 9-5, five-day a week pre- COVID model? And to what extent will families be willing to trade commuting time for larger home spaces from which to work, raise their children and undertake other household activities. There is already evidence that housing consumers are moving away from small apartments and gravitating to ground related units in suburban and exurban locations. While there is still a lot that is unknown with regards to the post-COVID world, it is not sufficient to simply assume that patterns of urbanisation will return to normal.</p> <p><b>Discussion Question 15: What factors are important for the Region to consider in setting a minimum Designated Greenfield Area (DGA) 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>Halton Region as a whole, and many of its new communities, will likely already exceed the Greenfield Area density of 50 residents and jobs per hectare as mandated in the Growth Plan and will also likely exceed 60 persons and jobs per hectare. If the Region chooses to plan to exceed the provincially mandated target or apply distinct density targets to individual municipalities, it will be for local reasons and not to achieve the Provincial targets.</p> <p>In our opinion, the criteria outlined on Figure 25 of the Structure report provide a good policy lens from which to assess where and how the Region should grow. However, the Growth Plan still requires that a market lens be applied to arrive at an ultimate decision. For example, the four scenarios under consideration in the Scenarios report provide for very different housing options which would appeal to different markets. The principal trade-offs between the four options relate to how many units to develop in new Greenfield Areas (mostly ground related); to be added to the existing Greenfield Areas (exclusively apartments); and to be developed within the Built Boundary (mostly apartments). A family</p>	

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		<p>that may be seeking a ground related unit in a new Greenfield Area in Milton, for example, would have a completely different set of housing needs than a person or family that may choose to live in an apartment along the Trafalgar Road Corridor or the Oakville Midtown Core. Without an understanding of the housing market, it would not be possible to arrive at a realistic allocation between very different areas and unit types.</p> <p>For this reason, we would strongly recommend that in assessing density targets and unit allocations, that the Region undertake a market analysis to inform its decisions.</p> <p><b>Conclusions</b>  In summary, the changes to the Growth Plan should require the Region to reconsider the Scenarios it originally proposed in its Scenarios report, as they no longer reflect the changes to the Growth Plan and the revised population and employment forecasts. It is also essential that the Region adopt a market focused methodology in determining its land needs and allocating future development to its area municipalities.</p> <p>The apparent aspirational policy statement noted above that the Region “seeks to profoundly change these historical patterns, by introducing far more apartments into the broader housing market as well as within local market areas,....” is troubling. This does not conform to the Growth Plan, which requires that the market must be recognized in planning for growth. High density residential being a panacea of community building needs to be re-evaluated. Planning for high density in the right location is good planning but formulating public policy that provides no balance within the realistic setting of the market place, consumer choice and the basic tenant of the Region’s financial foundations for growth is not.</p> <p>It was a pleasure to conduct this review on your behalf. If you have any questions, please do not hesitate to contact us.</p> <p>Yours truly,  urbanMetrics inc.</p> <p><b>TAB 4</b>  This attachment was a submission of Savanta Inc. dated October 29, 2020 which addresses natural heritage issues specific to Mattamy lands in south Georgetown, in the Town of Halton Hills. Information was redacted as natural heritage related matters are being addressed through a separate submissions chart Natural Heritage theme of the Regional Official Plan Review.</p> <p><b>TAB 5</b>  Sent Via Email:  Region of Halton</p>	<p>Comments are acknowledged. Please see above for a detailed response. Additional responses to public and stakeholder submissions can also be found in the Policy Directions Submission-Response charts.</p>

No.	Source	Submission	Response
		<p>Attn: Curt Benson, Director of Planning 1151 Bronte Road, Oakville Ontario L6M 3L1</p> <p>Dear Mr. Benson:</p> <p>RE: Response to Integrated Growth Management Strategy Growth Scenarios Halton Region to 2041 Attachment #4 to LPS 41-19 Our File No. 13260</p> <p>1.0 Introduction: Need for Engagement</p> <p>I am writing to you on behalf of Mattamy Homes and associated companies. Our clients have had the opportunity to review in detail the report on Integrated Growth Management Strategy Growth Scenarios: Halton Region to 2041 (IGMS). We have noted that there has been no formal consultation process with the development industry on the IGMS by the Region to date. On behalf of Mattamy, we wish to state that we are interested in meeting with Regional staff to discuss the report and the feedback set out below. It is our opinion that meaningful engagement throughout the process will assist in all voices being heard and a more successful outcome for the IGMS process. There are a number of questions and concerns with the approach and recommendations within the report which are set out below.</p> <p>2.0 Growth Scenarios must be based on Approved Provincial Policy</p> <p>It is acknowledged that over the past months that there is a changing Provincial Policy context that will continue to evolve over the period of the IGMS process. One of the challenges will be to ensure that the IGMS study process is robust and fluid enough to address these policies changes. One of the changes that has occurred and is now in effect is the amended Growth Plan.</p> <p>Our clients support a growth scenario which is based on the current and in effect Growth Plan. Although we respect that the Region has been undertaking this study process over many months and the process started under the prior Growth Plan, new and in force policy must now be the basis for the Growth Scenarios. The previous Growth Plan which no longer has legal status as the basis for assessing Growth Scenarios is not appropriate.</p> <p>3.0 Growth Scenarios must encourage complete communities including all forms and types of housing</p> <p>The IGMS process envisions a significant change in built form and densities beyond that which the market currently or is anticipated to support. The report acknowledges the</p>	

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		<p>significant challenges and realistic possibility that desired housing form may not be aligned with market choices. It is essential that the IGMS plan and allow “complete” communities that fulfill all forms and tenures of households.</p> <p>We also note that the new draft PPS refers to the provision of a market-based range and mix of housing. It is likely this new PPS will be in force and effect prior to the amendment implementing the IGMS comes forward and should be considered as part of the next step of the study process and the scenarios revised and amended accordingly. We suggest that the Region should further assess the Growth Scenarios as the provision of market-based housing will result in the need for more grade related housing.</p> <p>The analysis is premised on the assumption that there will be a significant increase in apartment-built form and that two thirds of all apartment units in the 2030’s will accommodate larger family households. The report notes that this will be achieved by empty nesters moving from their homes to apartments and young families will choose to move to apartments instead of ground related housing. This does not reflect a market-based range and mix of housing nor does it provide complete communities providing a full range and mix of housing forms. Although the trend to apartment housing as a higher mix of housing stock will likely grow, it is not prudent planning policy to base the long term growth strategy on a mix of housing that does not reasonably account for a market-based range and mix of housing. We would recommend that as part of the next step of the IGMS process that a market-based growth scenario be developed for part of the evaluation process.</p> <p>The IGMS report does indicate some of the challenges with the proposed growth strategies including the achievement of significant amounts of intensification. These include road, water and wastewater infrastructure deficiencies as well as parks, schools and other community uses. There needs to be a realistic assessment of the intensification areas as to their ability to accommodate growth proposed in the time frames anticipated and those assumptions factored into the IGMS process.</p> <p>4.0 Growth Scenario 4 B is preferred A realistic and managed plan for growth is needed for Halton. For these reasons Scenario 4 is preferred by our clients. The role of the MTSA’s is to support the evolving urban fabric, support public transportation and create important nodes for significant mixed use and intensification. This is best articulated in Scenario 4 B which incorporates these MTSA’s into the growth scenarios.</p> <p>5.0 Growth Number/Forecasts must be transparent</p> <p>Our clients have undertaken a detailed review of the background information provided by the local municipalities regarding the capacity of the existing Designated Greenfield Area</p>	

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		<p>(DGA) to accommodate the projected growth. The vast majority of the numbers used within the IGMS report were verified through other reports completed at the local level. Unfortunately, we were not able to find any background documents that set out the Town of Oakville numbers. We therefore request that the Region provide the information provided by the Town of Oakville to support these and other numbers used in this report.</p> <p>6.0 Re-evaluation of Growth Forecast to account for NHS adjustment</p> <p>We noted that the report states that for all scenarios, the Natural Heritage System and Greenbelt boundaries were maintained as currently mapped. It is noted that any proposed changes to the NHS resulting from the ongoing NHS review as part this process would result in the need to re-evaluate land supply and the potential land needs for urban expansions.</p> <p>7.0 Growth must pay for Growth</p> <p>Regarding the financial impact of the various scenarios we note that the report contains conflicting positions on this matter. Firstly, the report states that there are minimal differences in the financial impacts of the scenarios. The report then states that one of the challenges is the sequencing of development and the infrastructure requirements and investments. Financing of infrastructure is included in the criteria for evaluating the scenarios. We anticipate that each of the scenarios will have a differing order of magnitude regarding costing of the required infrastructure and would encourage the Region to assess and discuss this with the development community prior to proceeding with a preferred option.</p> <p>8.0 Evaluation Criteria need to be re-evaluated to be less biased</p> <p>Appendix C to the Report sets out the Evaluation Framework for the scenarios. The objectives are sound. The Evaluation questions set out a framework for considering the impacts of the scenarios. Improvements could be made to these questions to broaden the matters for consideration.</p> <p>The measures proposed for each of the objectives appear to be prejudicial and structured to predetermine the selection of one specific scenario by the Region. The use of the terminology "ranks the highest" in the measures does not allow for relative ranking of competing priorities as it only identifies what will be ranked the highest. One example is within Theme 1 "The concept that locates new residential development close to existing or potential priority corridors and provide opportunities for multimodal access will be ranked the highest" The measure is not clear in its language as to whether it is all new residential or only a portion of new residential to be evaluated under this measure. The measure does not consider the range and mix of housing and community design found within emerging areas and other priorities for urban structure. When one goes to the</p>	

No.	Source	Submission	Response
		<p>measures for complete communities, the only two measures related to protection of the NHS and Agriculture and contiguous development patterns. Building complete communities is a much broader concept than just these two measures. The language of the measures proposed is insufficient for a growth management evaluation process and need significant reconsideration prior to proceeding.</p> <p>9.0 Summary</p> <p>A growth management strategy must take into account planning policy directives and community and stakeholders' interests/views. Although the Region's work to date has considered some of this input, the lack of engagement with community builders is concerning along with apparent disregard of market conditions and trends. All involved desire safe and complete communities servicing the needs of existing and future residents. More weight must be given to these considerations to ensure an appropriate outcome.</p> <p>We look forward to working with Region throughout this study process and further discussing the above points.</p> <p>Yours truly, Scott Snider</p>	
34.	<p>Fiona Smaill</p> <p>E-mail dated November 8, 2020</p>	<p>Dear Halton Council,</p> <p>I have appreciated the opportunity to participate in the discussion around the Update to Halton's Official Plan, and am particularly interested in the focus on reviewing policies to preserve and protect the Natural Heritage of our communities.</p> <p>As a resident of North Aldershot I was particularly impressed with the presentation from your staff providing an excellent overview of the unique aspects of this area. They clearly set out how this Review of the Regional Official Plan both needed to ensure that the Official Plan remained aligned with provincial policies, but also reflected changes in our communities and the vision for the Region. The most important part of this, in my opinion, is recognizing the effect of climate change on our communities and the importance of protecting and maintaining our natural heritage.</p> <p>I am attaching a letter I sent to the Niagara Escarpment Commission, in response to an appeal to develop an area just north of the Hydro corridor in North Aldershot. This area has been identified as within your Natural Heritage boundaries and I was heartened to hear the discussion, including a comment by one of your senior staff saying that there was</p>	<p>The Regional Official Plan (ROP) permits a range of uses in the North Aldershot Policy Area. One of these is identified in ROP Section 138(14). The Regional Natural Heritage System (RNHS) is a land use designation within the Regional Official Plan that protects and enhances natural features and functions. RNHS Key features and components can be found in ROP Section 115.3 and 115.4.</p> <p>Lands located within the RNHS are subject to certain land use permissions and restrictions. For example, normal farm practices, existing uses and agricultural operations, single detached dwellings on existing lots, driveways and garages or pools could be permitted. Proposed development or site alteration in certain</p>

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		<p>no assurance that previous decisions about areas approved for development would honoured and landowners would be encouraged to become “stewards of the land”.</p> <p>In my letter I outline the unique aspects of this particular Natural Heritage area and argue strongly for not allowing development where it will have such a profound impact on our environment.</p> <p>Thank you for taking the time to review my comments. Please acknowledge my correspondence and let me know if I can provide any additional details. Sometimes it feels as though concerns such as mine go into a black box and our drowned out by the interests of the developers, but I am hopeful that your vision for the Region will endorse the importance of our unique natural heritage that is so special to Halton.</p> <p>Kind regards Fiona Smail and Peter Seary 33 Ireson Road Burlington, ON L7P 0T2</p> <hr/> <p>ATTACHMENT</p> <p>Dear Ms. Mott,</p> <p>As property owners of 33 Ireson Road, living here since 1989, we wish to express our very strong opposition to the proposed development in the unique and distinctive area that is north of the Hydro corridor and west of Waterdown Road in North Aldershot. My reasons are outlined as follows:</p> <p>When UNESCO named Ontario’s Niagara Escarpment a World Biosphere Reserve, it was in recognition of the need “to protect the most natural Escarpment features, valley lands, wetlands and related significant areas... with the goal of ensuring the Escarpment remains substantially as a natural environment for future generations” (my italics).</p> <p>Over the past 40 years, our local communities and governments have been strong advocates for policies that aim to protect and enhance the natural features of the Escarpment. The lands currently subject to the application for a development permit were initially contained within the ‘Escarpment Link’ of the Provincial 1978 Parkway Belt West Plan, and in 1990 were added to the Niagara Escarpment Planning Area. The Niagara Escarpment Plan Amendment 71 removed the lands from the Parkway Belt West Plan and designated these lands “Escarpment Natural Area and Escarpment Protection Area”. These “Escarpment Natural and Protection Areas” are essential because they are a visual and ecological buffer to the Escarpment.</p>	<p>features such as Significant Wetlands would not be permitted. Proposals for development or site alteration within the RNHS may require an Environmental Impact Assessment (EIA) to demonstrate that the proposal will result in no negative impacts to the RNHS.</p> <p>Proposals for development, including lands in the North Aldershot planning area, are carefully reviewed and considered in the context of all applicable municipal, Regional, Provincial, and agency policies, guidelines, regulations etc. For matters related to the Niagara Escarpment Plan (NEP) and development permit application review and approval process, please contact the Niagara Escarpment Commission (NEC).</p> <p>As a part of the ROPR, the North Aldershot Planning Area Discussion Paper is available online <a href="#">here</a>. Topics covered in the discussion paper, including natural heritage system considerations, will continue to be considered as we proceed with the ROPR.</p>



No.	Source	Submission	Response
		<p>I recall well the discussions around Amendment 71 to the Niagara Escarpment Plan starting as early as the 1990's (which more recent members of the community, council and Commission may not be as familiar with now 30 years on), and the important decision, given the plans for development in North Aldershot, to specifically include the area that is presently under planning appeal in the Niagara Escarpment Plan. By including this area, the importance of protecting this area to maintain and enhance the natural areas and character of the landscape of this part of the Escarpment was acknowledged and adopted.</p> <p>Permits for development for landowners whose properties are within the Niagara Escarpment Planning and Development area have in the past been approved subject to conditions that understand the unique area of North Aldershot. While recognizing that some limited development may be approved to provide for "reasonable enjoyment by the owners", the conditions of any development have been to ensure that the "escarpment environment shall be protected, restored and enhanced for the long term". The proposed planning application by Penta Properties Inc. to subdivide the lot into 9 single dwellings in question is entirely against both the spirit and principles of the development criteria established for the North Aldershot area, where original lots were NOT to be subdivided. This specifically includes the area in question (referenced as North Aldershot Central Sector SubArea 1) where the area above the power lines was included as an environmentally sensitive "buffer zone".</p> <p>Regrettably, the City of Burlington, in its adoption of Amendment No 197 to the City of Burlington Official Plan, provided "special provision" for development to occur in accordance with land use policies in the area identified as the North Aldershot Policy Area following a decision by the Ontario Municipal Board in 1996. In my opinion, these planning decisions were made during a "dark time" of our city politics, when transparency and openness were hard to find, when there was concern about how the OMB was conducting its hearings and making its decisions (indeed I know this first hand, because I attended the hearings held locally), and environmental considerations were only given lip service at best. More recently, some of the more responsible and considered developments in the City, including those around transport hubs, are now demonstrating a different vision, and in fact emphasizes that we must ensure the protection of our natural resources, the conservation of our land and planning that incorporates the natural environment for all to enjoy.</p> <p>Grindstone Creek and Smokey Hollow, that are adjacent to the area of the proposed development, have been identified as a Provincially Significant Earth Science Area of Natural and Scientific Interest (ANSI) and regionally the lands are identified as environmentally sensitive. It is irresponsible to allow any kind of development in close proximity to these areas. Widening Horning Road and extending the road to south of the</p>	

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		<p>Hydro corridor will cause significant disruption to the natural contours of the land, with the risk of erosion and sedimentation affecting the slopes and ravines and is inconsistent with the need to protect our environment. I cannot help but recall the prescient words of Joni Mitchell: “they paved paradise, put up a parking lot”. It is now well recognized that impervious surfaces (sealed roadways, driveways, etc.) significantly change water quality and quantity, carry pollutants loads downstream, and lead to increased flooding. Anyone who lives in the area and walks the natural contours knows no development can occur without significant disruption of the land, grading of lots, and cutting down of trees, and infrastructure development (water and wastewater systems) will impact the Escarpment environment. I quote from the Niagara Escarpment Plan: “the natural areas act to clean the air, provide drinking water, support recreational activities to benefit public health and quality of life and help and mitigate the effect of climate change .... These resources need to be protected over the long term”.</p> <p>In the North Aldershot Interagency Review, 1994, prepared for the Councils of the City of Burlington and Halton Region, the “paradox” of this area (neither urban nor rural) was recognized as its essential distinct character, and more than 25 years later it remains unchanged. Quoting from the Review: “the concentration of unique natural features such as the Niagara Escarpment, Grindstone Creek and the Sassafras Woods have had a profound formative effect on the area’s settlement pattern ... and rural characteristics [still] dominate the area ... the special character of North Aldershot should not be essentially changed.” While arguments might be made that this represented opinions from 30 years ago and over time opinions “drift” to where we have become resigned to more development, I would strongly argue that now, more than ever, we need to be very focused on protecting our environment.</p> <p>The criteria for development laid down in the Niagara Escarpment Plan clearly state that “the escarpment environment shall be protected, restored and enhanced for the long-term”. The development that is the subject of this application most clearly does NOT meet any reasonable expectation of a ‘broader landscape approach’ to protecting the environment and must be soundly rejected. As a resident of this area, in protesting most vehemently this application, I am reminded of a quote from the Interagency Report: “residents .... enjoy a home-based lifestyle centred on an appreciation of and stewardship of the natural setting” (my italics). The stewardship of this area is extremely important for today and the future. Strenuous and unceasing opposition to all attempts by Penta Properties Inc. to destroy this natural environment is required.</p> <p>I am very happy to discuss this further and can be reached by email or phone.</p> <p>Yours sincerely,</p> <p>Fiona Smail</p>	

No.	Source	Submission	Response
		<p>c.c. Kyle Plas, Burlington City Manager kyle.plas@burlington.ca  Kelvin Galbraith, Ward 1 City Councillor kevin.galbraith@burlington.ca  Marianne Meed Ward, Mayor, Marianne.MeedWard@burlington.ca</p>	
35.	<p>Barbara Varanelli</p> <p>E-mail dated November 11, 2020</p>	<p>TO WHOM IT CONCERN,</p> <p>Is the Regional Official Plan going to revisit allowing extension of sanitary sewers for residents who live on the Westside of Tremaine in Milton Heights when development occurs in the future?</p> <p>Thank you,  Barbara Varanelli</p>	<p>The area west of Tremaine Road is outside of Halton Region's Urban Area and the Regional Official Plan generally prohibits the extension of services outside the Urban Area. More information on this prohibition and limited exceptions to this prohibition are described in section 89 of the Regional Official Plan Regional Official Plan (pdf – p. 41-45) and in the Region's Urban Services Guidelines (pdf).</p> <p>An important part of the ROPR is determining how Halton will accommodate population and employment growth to the year 2051 such as through the potential expansion of the Urban Area. If it is determined that an expansion to the existing Urban Area is required to support new residents and jobs, there are certain areas that will be considered. These areas are identified on page 80 and 82 of the Regional Urban Structure Discussion paper available here.</p> <p>Provincial policies do not permit the Region to consider designating the lands west of Tremaine Road as part of the Urban Area because these lands are within the Niagara Escarpment and Greenbelt Plan areas (some areas in south Milton are outside of these areas and are identified for consideration for future employment growth). Despite this limitation, Regional staff welcomes you to provide a more detailed submission regarding your interest for consideration through the ROPR.</p>

No.	Source	Submission	Response
36.	Roy Pietila E-mail dated November 13, 2020	<p><b>November 13, 2020</b> VIA Email (Staff had a phone discussion the day prior)</p> <p>Steven,</p> <p>As we discussed yesterday, here are the reasons my wife and I would like the reclassification of our property from rural to urban.</p> <ol style="list-style-type: none"> <li>1. The farm is not large enough to be self sustaining. For instance, cattle need roughly one acre per head, and with 11 acres, the operation cannot be sized to be profitable. For the record, the farm housed beef cattle.</li> <li>2. There are too many dangers in the area to safely raise livestock due to the shrinking natural habitants of coyotes, wild dogs, racoons, skunks, opossums and weasels. These natural predators are being pushed south and into the ravines. Our property happens to back onto a ravine south of the development. Ten years ago we heard coyotes from time to time, now it's almost a daily occurrence. Ten years ago we never saw the coyotes, now it's a weekly occurrence. Ten years ago we never chased them, now this is a monthly occurrence. One year ago we decided to raise free range chickens. Over the past 16 months we purchased 36 chickens of which 8 are still alive, 26 were killed by coyotes, one by a bird of prey and one perished of natural causes.</li> <li>3. It is no longer safe to drive a tractor on the roads in the Milton area. There is too much traffic and a slow moving tractor causes unwarranted road rage in the form of verbal abuse or hand gestures. This will only get worse as we add more cars to the roads.</li> <li>4. Our property is land locked, therefore, further expansion is not possible. We live on the east side of Thompson Road and the west side is already designated urban (dividing line is in the middle of our road). Adjacent to the south is a bush / forest. Adjacent to the east is the ravine and then a golf course (Rattle Snake Point) and to the north is the Croatian soccer fields. Expanding the farm is impossible.</li> </ol> <p>In summary, keeping our property designated as rural does not make sense any longer. The property is not big enough to sustain a farm. Future expansion is impossible. Utilizing public roads with farm implements is not safe due to unwarranted abuse. Finally, keeping livestock safe is getting more difficult.</p>	<p>Subject lands are not identified to fall within the Preferred Growth Concept. The subject lands are currently designated as Urban Area, Regional Natural Heritage System and Agricultural Area and are partially within the Provincial Greenbelt Plan Area. Those lands within the Provincial Greenbelt Plan Area are not eligible for inclusion in the Urban Area under Provincial Legislation. Based on the results of technical analysis, staff are recommending that the lands designated Urban Area remain unchanged and that lands within the Regional Natural Heritage System and Agricultural Area not be included within the Preferred Growth Concept.</p> <p>In terms of agricultural related matters, to support the development of a Preferred Growth Concept, staff have been reaching out to our community to better understand how and where the community believes Halton should grow. The notification process was designed to reach as many residents and stakeholders as possible. Notification was provided by traditional media (newspapers) and postcards, as well as social media, email, and targeted cell phone ads. Staff provided email notifications to community associations and other community groups as widely as possible and local municipalities also assisted by forwarding notices to their stakeholder lists.</p>

No.	Source	Submission	Response
		<p>Regards, Roy</p>	<p>Notices directed readers to our project webpage (<a href="http://www.halton.ca/ropr">www.halton.ca/ropr</a>) to learn more and share their views. You can also review video and presentation materials used in our six Growth Concepts virtual Public Information Centres where residents had the opportunity to discuss the Growth Concepts, ask questions, and share their views.</p> <p>Additionally, Halton Region has been and will continue working directly with the Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area.</p>
37.	<p>Roger Funnell</p> <p>E-mail dated November 13, 2020</p>	<p>TO: REGIONAL MUNICIPALITY OF HALTON, SUBMISSION TO COUNCIL FOR NOVEMBER 18, 2020</p> <p>SUBJECT: ROPR 2020, NORTH ALDERSHOT PLANNING REVIEW - POINTS FOR DISCUSSION &amp; REVISIONS</p> <p>Please be advised that the ROPR 2020 North Aldershot Planning Review as presented by Meridian Planning and as prepared for the Region of Halton, appears to have significant errors, omissions of facts and contains suppositions of conclusions which are not supported by facts. We, as landowners in North Aldershot, hereby register our concern and opposition to ROPA 2020 North Aldershot Planning Review, as presented.</p> <p>We are identifying some of the issues to the Council of the Regional Municipality of Halton in the following Submission. Ideally this should be read alongside the Meridian Review,</p>	<p>Based on the results of the North Aldershot Policy Area Discussion Paper and technical analysis conducted for the Growth Concepts Discussion Paper under Appendix J, staff are recommending that lands within the North Aldershot Policy Area not be included within the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>North Aldershot, to ensure clarity. Page numbers refer to the page of the Meridian Review, North Aldershot.</p> <p>1. Page 3: “North Aldershot has a long history as a distinct policy area that dates back to the 1970’s.”</p> <p>Comment: North Aldershot urban development proposals were recognized as far back as the 1950’s and 1960’s when lands were designated for urban development east of Old Waterdown Road and west of Waterdown Road. In 1969 the City of Burlington saw these lands as being ready for development and as a place to provide homes for 3000 people. The Burlington Official Plan, January 1992, page 90, recognized North Aldershot having three Category ‘b’ Settlement Areas: ‘Central Settlement Area’, ‘Lemonville Settlement Area’ and ‘York Settlement Area’. North Aldershot Areas are “long established and identified in OP’s” – “(b) lands which have been designated in an official plan for development over the long term planning horizon”, as provided for in Provincial Policy Statement 2020 - Policy 1.1.2.</p> <p>2. Page 8: “Figure 4: Total Area Impacted by Provincial Plans”</p> <p>This is a misleading chart as its percentages and area conclusions are confusing and conflicting. The area sizes may be accurate, but the Greenbelt and Parkway Belt lands along with NEP areas, overlay each other in places so the actual area of the lands in North Aldershot affected will be less than the total sum of the 3 provincial plans. The remaining lands column is especially perplexing.</p> <p>3. Page 9: “that 75.4% of North Aldershot is subject to three above provincial plans”.</p> <p>This statement is not supported by evidence in Figure 4. In many instances 2 of the 3 overlap and the land is double counted.</p> <p>4. Page 11: ROPR 2020, NORTH ALDERSHOT (3 Sectors)</p> <p>RE: EAST SECTOR – ROPR 2020 Meridian Review fails to identify North Aldershot Interagency Review (NAIR) designations of “390 Estate and Cluster Residential and Single Detached, Estate and Cluster Residential” DNA. (Reference: NAIR May 1994 Final Report, page 31)</p> <p>- ROPR 2020, page 11: states only “45 new dwellings”, which, in fact, does correspond to “Estimate of Infill” of “45”, as per NAIR, East Sector.</p> <p>- Therefore, this section is incomplete and misleading to the public.</p>	<p>The Discussion Paper and Appendix J identified a number of Provincial policy constraints limiting the eligibility of these lands for settlement boundary expansion. Additionally, consideration for water and wastewater opportunities and constraints (Appendix J1 to the Growth Concepts Discussion Paper) found that extension of municipal services to support residential development would be particularly challenging as compared to other potential growth areas due to topography and natural heritage constraints among other factors. The recommended settlement boundary expansion areas in Milton and Georgetown minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p> <p>Below are responses to the points raised.</p> <p>1. The policies of the 1992 Burlington Official Plan referenced in this comment have been superseded by newer policies in the Burlington Official Plan. No component of the North Aldershot Special Policy Area is within a settlement area.</p> <p>2. It is agreed that while the individual land areas subject to Provincial plans is correct, there is some overlapping - however, this table was only provided for information purposes and did not factor into the ultimate recommendation being made by staff that no component of the North Aldershot Special Policy Area be included within the urban area.</p>

No.	Source	Submission	Response
		<p>- RE: CENTRAL SECTOR – ROPR 2020 Meridian Review states: “550 Single Detached, Estate and Cluster Residential Designation”, with “Estimate of Infill” of “45”. This statement corresponds to NAIR, Central Sector, May 1994 Final Report, page 31.</p> <p>- Significantly, however, ROPR 2020 Meridian Review fails to identify OMB in 2002 and current appeal LPAT in 2019 for increased densities in the Central Sector of North Aldershot.</p> <p>- RE: WEST SECTOR – ROPR 2020 Meridian Review fails to identify NAIR designation of “350 Estate Cluster Residential” DNA. (Reference: NAIR May 1994 Final Report, page 31)</p> <p>- ROPR 2020, page 11: states only “45 new dwellings”, which, in fact, does correspond to “Estimate of Infill” of “45”, as per NAIR, West Sector.</p> <p>- Therefore, this section is incomplete and misleading to the public.</p> <p>5. Page 11: “The total number of dwellings anticipated based on the land use concept was therefore up to a maximum of 640, assuming that only the Central Sector would be on full services”.</p> <p>This statement is not supported by the NAIR documentation or by evidence. The Final NAIR Report dated May 1994 states the theoretical “Total for North Aldershot as 1,425 dwellings”. NAIR further stated that the land area mapping in the East Sector was not correct and called for additional studies to determine and define the development mapping. This was done in the late 1990’s and said mapping was noted in both the City of Burlington and the Regional OP’s.</p> <p>The East Sector environmental studies were also redone and updated at great cost for ROPA 28 OMB appeals by the landowners in 2015, with complete new environmental mapping studies completed (by Jim Dougan/Region’s Mirek Sharp) and the areas for development better defined, based on current standards for the lands in the East Sector located between the closed landfill and the boundary of the East and Central Sector, as owned privately by two landowners (Johnson Family and Shih Family). Seventy acres are identified as eligible for cluster home development at 3 per acre (per NAIR) on these identified East Sector open North Aldershot lands. Per Regional policy, these East Sector lands in addition to the ¾ acre estate lots along Old Waterdown Road in the Central Sector, require full municipal servicing.</p> <p>The OMB decision made it clear, by the density it approved, that it expected these lands to be developable using municipal services.</p>	<p>3. See response above.</p> <p>4. While the NAIR did indicate that there was development potential in the East Sector, the City did not implement any specific number of units into the Burlington Official Plan for the East Sector. In this regard, the lands in the East Sector are within the North Aldershot Special Study Area. The purpose of the North Aldershot Special Study Area is to define lands that shall remain undeveloped until studies are completed. The policies for the North Aldershot Special Study Area do not indicate number of residential units and only private servicing is permitted. The Burlington Official Plan and Zoning Bylaw takes precedence over NAIR as these are the implementing planning documents.</p> <p>5. See response above</p> <p>6. Both the Burlington and Regional Official Plans have long recognized the employment uses on the north side of Highway 403 (going eastwards from a point that is about 500 metres east of Waterdown Road) as being within the urban area.</p> <p>7. Lands in the East Sector are not eligible for servicing according to the Regional Official Plan as amended by ROPA 2. An Amendment to the Regional Official Plan would be required if servicing was proposed on these lands.</p> <p>8. See response above.</p> <p>9. For those lands zoned RNA1-366, the submission of an application would be</p>

No.	Source	Submission	Response
		<p>None of the above has been referenced in the North Aldershot Planning Review by Meridian Planning.</p> <p>6. Page 12: "This is supported by one of the objectives of OPA 197 which was to confirm Highway 403 as Burlington's northern boundary in the west part of the City."</p> <p>It is significant that since NAIR 1994 (Reference ROPR 2020, page 10, figure 6, mapping NAIR) , the Region of Halton and the City of Burlington have altered and pushed the urban boundary several hundred meters from the North Service Road in the area east of Waterdown Road and thus negated its own OPA policy 197. It appears that there is currently further activity to expand this boundary. Even the brick works, in addition to businesses, are designated within the urban boundary although originally they were not, as referenced in NAIR 1994 mapping, ROPR 2020, page 10, figure 6.</p> <p>7. Page 13, 14: "This framework identifies the areas within North Aldershot that would be "Area Eligible for Urban Services and is shown on MAP 1 of the ROP and reproduced as Figure 7."</p> <p>This Figure 7 fails to identify the ROPA 2 OMB sanctioned agreement between the two major landowners (Johnson &amp; Elstone, now Shih, landowners) and the Region in which the 2 landowners appealed the non servicing policy being imposed for the East Sector lands they owned. At that time, the Region agreed that these lands were eligible to apply for servicing and that the landowners would not be denied servicing for this area based on a general policy of denial. Provision of municipal servicing is to be based on the economics and feasibility of servicing development in the East Sector lands.</p> <p>Effective servicing criteria for the East Sector identified lands should be the same as the 4 parameters, as identified on page 14 of the ROPR 2020 Meridian Report, for the Central Sector and West Sector, which are the 4 parameters per section 139 (3) of the ROP.</p> <p>8. Page 14: "Additional policies of the ROP, is to provide urban services only within the Urban Areas, unless permitted by specific policies."</p> <p>Re: Specific Policies: Agreements were made with the Region to allow servicing applications for the East Sector lands. These agreements need to be respected. In addition, these should have no more restrictive assessment policies than those being applied to other serviced areas of North Aldershot.</p> <p>9. Page 15: Figure 8: Schedule D of the Burlington Official Plan, dated December 2019</p> <p>There are 2 issues that need clarification in this mapping:</p>	<p>required to eventually determine how many houses can be built, with such an application being supported by required studies and against the Provincial, regional and local planning policies that are in effect at the time of application.</p> <p>10. See response to point 4.</p> <p>11. The boundaries of the areas in question will be reviewed to confirm accuracy as required through the Official Plan review.</p> <p>12. This is correct - see response above to point 11.</p> <p>13. Comment noted.</p> <p>14. Comment noted. It is noted that an application to amend the Regional Official Plan would be required if servicing was desired on the lands zoned RMA1-366.</p> <p>15. The Cootes to Escarpment EcoPark System is a stewardship initiative and doesn't provide a regulatory approach. It is a partnership between governments and non-profit organizations who own or manage lands within the system. However, they do encourage stewardship on private property if a landowner wishes to participate.</p> <p>16. Comment noted.</p> <p>17. Comment noted.</p>



No.	Source	Submission	Response
		<p>Firstly, the mapping along Old Waterdown Road on the East side, as per City of Burlington OP, 2019, Schedule D-C in sub-area 4, is within the Central Sector of North Aldershot. The lot sizes are estate infill with 30 meter frontage by 0.3 ha sizes. This was decided by the OMB and is in the City of Burlington zoning section identified as RNA1-366. The zoning for the city clearly states that these lands are developable with municipal water and servicing.</p> <p>Secondly, the ROPR 2020 Meridian Review fails to identify that the Burlington OP, 2019, for the 'purple designated' lands in East Sector of North Aldershot identified as " North Aldershot Special Study Area", are still identified for development in accordance to NAIR which includes the cluster development density of 3/acre (or just over 7 per ha). The Regional OP under review also identifies development in accordance to NAIR is allowed.</p> <p>10. Page 16: "a considerable amount of land in the East and West Sectors is designated North Aldershot Study Area which requires the completion of a number of studies with recommendations that would need to be incorporated into the Burlington Official Plan by way of an Official Plan Amendment".</p> <p>To be clear, ROPA 38 appeals to the OMB in 2016, involved extensive environmental studies regarding the identified privately owned lands in the EAST SECTOR (Johnson/Shih/Walker lands) as submitted and reviewed with the Region environmental staff. Natural heritage boundaries were better defined with some additional development areas to be considered further. This confirmed the general layout of the identified lands and further identified some 70 acres of open lands for development in accordance to NAIR concepts (institutional, estate residential on ¾ acre lots, and cluster development with 3 per acre density). It is unclear if these changes have been made by the City and/or Region to their OP's.</p> <p>11. BOUNDARIES OF EAST SECTOR, North Aldershot :</p> <p>There is a discrepancy between City of Burlington's OP 2019 description for the boundaries of the East Sector, North Aldershot and the ROPR 2020's description for the boundaries of the East Sector, North Aldershot.</p> <p>NORTHERN boundary of the East Sector – Burlington OP 2019, Part V, page 1, states that the northern boundary is the Dundas-Burlington Ontario Hydro Transmission Line, whereas Halton states the municipal border of Flamborough and Burlington (Mountain Brow Road) with 'Waterdown Woods' owned by Halton Conservation along the northern boundary of the East Sector.</p> <p>WESTERN Boundary of the East Sector of North Aldershot is stated by both Burlington and Halton as "Old Waterdown Road". This is not actually accurate, as the boundary</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>between the Central Sector and the East Sector of North Aldershot runs north and south and is actually east of Old Waterdown Road.</p> <p>Reference: City of Burlington OP 2019, Schedule D-C North Aldershot Central Sector - Sub-Area Key Map that shows Rennick Road, Old Waterdown Road, both sides, and Sub-Area 4, as per Schedule D-C- 4, along Old Waterdown Road in the Central Sector.</p> <p>12. ROPR 2020, P. 18, Figure 10 – “Sectors in North Aldershot Area” heading:</p> <p>Figure 10 incorrectly shows the border between the Central Sector and the East Sector to be Waterdown Road. This is incorrect and misleading as the border between the Central Sector and the East Sector is actually a distance EAST of Old Waterdown Road. Curt Benson, Halton Region, was notified of this on September 28, 2020. Note: ROPR 2020 Page 10, Figure 6 correctly identifies North Aldershot Area Sectors (Source NAIR, 1994)</p> <p>13. “Sassafras Woods” in East Sector of North Aldershot</p> <p>The so called “Sassafras Woods” as referenced in ROPR 2020 and City of Burlington OP 2019, located EAST of Old Waterdown Road are PRIVATELY owned woods. These are not publically owned woods and are not supposed to be accessed by the public. Liability concerns require constant monitoring as done by the landowners.</p> <p>Although the name “Sassafras Woods” has a nice ring, the appropriation/name is a misnomer. As the owners of these privately owned woods, which extend east from Old Waterdown Road approximately to the landfill area and southerly to the closed road extension of Flatt Road running east off Waterdown Road, we make the following observations:</p> <p>First, the name “Sassafras Woods” is misleading. We, as landowners, have had 2 extensive environmental studies done, by Jim Dougan and by former MNRF David McLaughlin. Neither environmentalist found any evidence of ‘Sassafras’ trees. In fact, these woods, that have been declared “environmentally sensitive” for many years, are actually typical southern Ontario woods comprised predominately of oak, maple, beech, ash and a few evergreens, according to the two environmental reports done by Dougan and McLaughlin.</p> <p>Significantly, we request that the City of Burlington and Region of Halton state in their official plans that these woods as identified are PRIVATELY owned, in the same vein that Halton Conservation owns the ‘Waterdown Woods” on the northern boundary of North Aldershot.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>We may be asking in the future for a change to the name 'Sassafras Woods', to be determined by us, the landowners, in regard to our privately owned woods east of Old Waterdown Road extending southerly to closed Flatt Road extension.</p> <p>14. ROPR 2020, Page 20: refers to "servicing" to a "portion of Old Waterdown Road" - Central Sector</p> <p>This is misleading, as only one residence, located at 1795 Old Waterdown Road, is connected to the Waterdown Road water main. This smaller water main connection was paid for privately by a former owner, decades ago. As part of the Central Sector, both Rennick Road and Old Waterdown Road should be provided servicing. It is timely, in view of the current urbanization of Waterdown Road to 4 lanes with its significantly upgraded infrastructure, that adequate servicing should be extended to Rennick Road and Old Waterdown Road to be consistent, fair and in-line with all the other streets in the Central Sector of North Aldershot.</p> <p>15. ROPR 2020, Page 17, Figure 9, Cootes to Escarpment Eco-Park System Vision Map, January 2015:</p> <p>The Meridian Review fails to include the written parts of the Cootes to Escarpment EcoPark System report which give clarity to the map it is using. Without this clarity the Map is misleading and without context.</p> <p>This Figure 9 mapping concept was prepared by a pre-selected group which did not consider on-ground studies, zonings, OP's or private land ownership issues.</p> <p>The 'Cootes to Escarpment Eco Park System' mapping shows its extensive colour coding "vision" on our privately owned lands. This envisioned mapping is unacceptable to us, as the landowners. At no time have we agreed to any such designations or coding. Therefore, we are asking that this coding/mapping of our privately owned lands be removed from the 'Cootes to Escarpment Eco Park System' mappings, effective immediately.</p> <p>Furthermore, this mapping on privately owned lands without consent by the landowners, is a travesty of property rights. We question why the City of Burlington and the Region of Halton would ever have allowed said mapping in regard to privately owned lands to be released for public information. As such, we the owners state our opposition to any designations on our privately owned lands without our consent.</p> <p>16. ROPR 2020 states that 30.6% of the lands in North Aldershot are already owned by the City of Burlington, the Region of Halton and Conservation Halton. It would be</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>interesting to know what percentage of these lands are available to and are being used by the public (i.e. the taxpayers).  ROPR 2020 should identify the public use areas on lands as owned by the City of Burlington, Region of Halton and Conservation Halton in North Aldershot.</p> <p>17. ROPR 2020, Page 39: Regional Natural Heritage System (RNHS)</p> <p>We continue to uphold private property rights of landowners and residents and oppose any proposed environmentally protected zoning amendments as presented in ROPR 2020 that reference or include our privately owned lands.  Therefore, we oppose the proposed increase of 405 hectares to the RNHS in North Aldershot UNLESS said 405 hectares is OWNED by the City of Burlington and/or the Region of Halton and/or Conservation Halton, OR is on land that has been agreed to be designated RNHS by the landowner.  This “increase in the amount of land in the RNHS in North Aldershot as per ROP 2009 from 809.9 hectares to 1, 214.9 hectares in 2020”, which is over 90% of North Aldershot, is totally unacceptable UNLESS said land is OWNED by City of Burlington and/or the Region of Halton and /or Conservation Halton, OR is on land that has been agreed to be designated RNHS by the landowner.</p>	
38.	<p>Don Johnson</p> <p>E-mail dated November 14, 2020</p>	<p>Submission for Special Meeting of Regional Council, November 18th, 2020,</p> <p>Re: North Aldershot Planning Area, Regional Official Plan Review, ROPR 2020, Phase 2.</p> <p>To: The Regional Municipality of Halton, regionalclerk@halton.ca</p> <p>Cc: Curt Benson, Director of Planning Services and Chief Planning Official, Region of Halton, Curt.Benson@halton.ca</p> <p>Jane MacCaskill, Chief Administrative Officer, Region of Halton, Jane.MacCaskill@halton.ca</p> <p>From: Don Johnson, B.Sc. Agr.</p> <p>On behalf of:</p> <p>The Johnson Family, owner of 1761 Old Waterdown Road, Burlington,  The Shih Family, owner of 398 and 444 Mountain Brow Road, Burlington.</p>	<p>Based on the results of the North Aldershot Policy Area Discussion Paper and technical analysis conducted for the Growth Concepts Discussion Paper under Appendix J, staff are recommending that lands within the North Aldershot Policy Area not be included within the Preferred Growth Concept.</p> <p>The Discussion Paper and Appendix J identified a number of Provincial policy constraints limiting the eligibility of these lands for settlement boundary expansion. Additionally, consideration for water and wastewater opportunities and constraints (Appendix J1 to the Growth Concepts Discussion Paper) found that extension of municipal services to support residential development would be particularly</p>

No.	Source	Submission	Response
		<p>November 14th, 2020</p> <p>As members of Council you are going to be asked, by planning, to approve amendments to the Official Plan for the North Aldershot area of Burlington.</p> <p>We understand and recognize that North Aldershot in South West Burlington is far removed from most of your ridings and that with Covid and all the other pressures, it may not be an area of much concern to you.</p> <p>As a member of Council, you do have responsibility to protecting the rights of citizens, in ensuring appropriate and reasoned planning is done, and, that you have a good understanding of issues before you make decisions.</p> <p>As such you must rely on staff to provide accurate information and various options open for your consideration.</p> <p>With respect to North Aldershot, staff will be providing you with the Meridian “North Aldershot Planning Area Regional Official Plan Review – Discussion Paper” as the information they want you to understand and that you can support their proposals.</p> <p>With over 50 pages of information and background, it quickly becomes a rough read, especially for anyone who does not understand the history nor has much of a vested interest in this area. As such it would be easy to believe staff have given you the full and complete information and have provided you the best option for the areas future.</p> <p>Unfortunately this is not the case. The Meridian study has several errors and more critically, it omits key and significant information, information that would counter the implementation of staff recommendations.</p> <p>My family and I are long term residents in North Aldershot and major land owners in the same area. We have been involved since the 1960’s when our family acquired and moved to our lands, which at that time were in the Official Plan for development similar to that in Tyandaga subdivision area to the East in Burlington.</p> <p>North Aldershot has had extensive planning and study activity from the Province, Region, the City and by “property owners”, and has been the ongoing subject of significant OMB challenges and agreements over the past 40 years.</p> <p>The concept being brought to you by planning is that somehow this area is rural and was always intended to be rural. That these lands are so environmentally critical that the entire area needs to be declared an Eco-Park system and that no servicing, nor development, should be allowed in North Aldershot.</p>	<p>challenging as compared to other potential growth areas due topography and natural heritage constraints among other factors. The recommended settlement boundary expansion areas in Milton and Georgetown minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>The Meridian Review states that only limited potential development was identified in the North Aldershot Interagency Review (NAIR) and as such the plan being advocated is nothing more than said extension.</p> <p>The argument is that North Aldershot, as a “rural” area, doesn’t qualify as being a rural settlement and, as such, Provincial policy applies to deny servicing or lot creation. This is a mistruth.</p> <p>With this logic, Staff are advocating that Council approve that over 90% of the lands in North Aldershot be identified as Regional Natural Heritage and to become part of the New Eco-Park that staff are advocating Council to create.</p> <p>Significantly, the Meridian Review fails to identify that the Province in creating the Greenbelt, grandfathered all NAIR and pre-greenbelt identified development plans. The Meridian Review failed to identify how the Coutts to Escarpment Eco-Park system concept was created by a group from the Royal Botanical Gardens without recognizing or obtaining input from the major property owners. It also fails to inform you, that prior to council voting to accept the Coutts to Escarpment Eco-System report that the Region, in writing to land owners in North Aldershot area, assured them the eco-park system would not affect their private properties nor the value of their lands.</p> <p>Furthermore, regarding development lands, the Meridian Review fails to identify and indeed omits key information regarding developable lands in the NAIR West Sector with potential for 350 estate cluster residential homes. It further omits that on land areas in the East Sector 390 estate cluster homes were identified in NAIR and these were approved by the OMB, in addition to the infill residential.</p> <p>The Meridian Review states that NAIR did not envision municipal serviced lands in the East or West sectors. It further states that regional engineering studies were done and say these areas are not serviceable. This is not correct nor a valid assumption.</p> <p>The first statement re “servicing not intended”, is incorrect. Nowhere in NAIR, is this statement supported. In addition, regarding the second statement, “regarding engineering studies”, in the OMB hearings which were part of NAIR, the Region engineer testified “he was told not to do engineering studies for the East Sector by the Mayor of Burlington”. Going forward during both the ROPA 2 and ROPA 38 appeals, by our family, which included right to municipal servicing, no such studies were ever made available to us by the Region nor did the Region ever identify any having been done. We do note that for those hearings our engineering studies created with assistance of Regional input provided multiple servicing avenues for the lands in the East sector of North Aldershot, east of Old</p>	<p>Thank you for your comments. Please see response above relating to staff’s recommendation that lands within North Aldershot should not be included in the Preferred Growth Concept.</p>

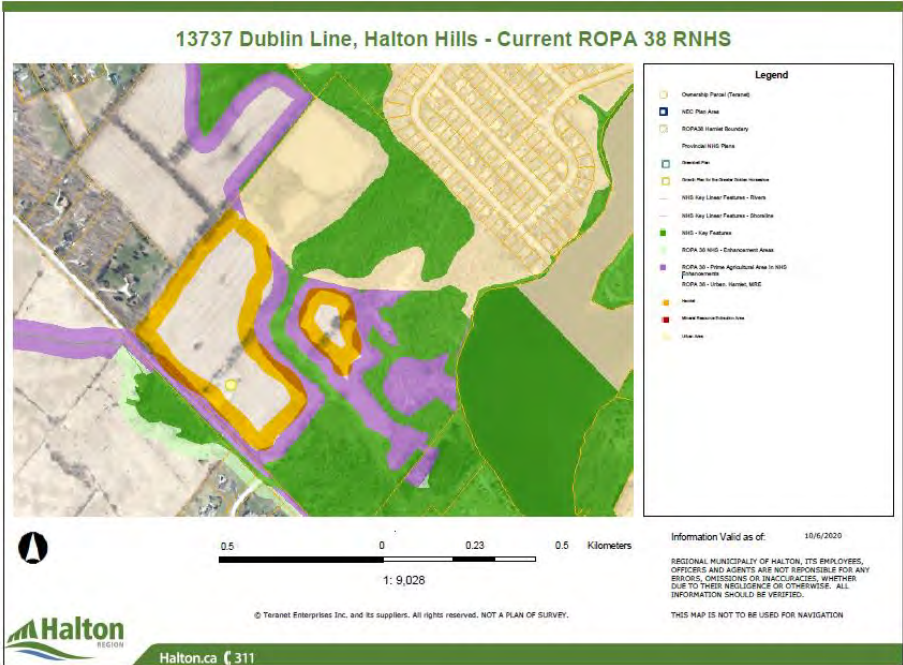
No.	Source	Submission	Response
		<p>Waterdown Road. Indeed the OMB ruled and gave approval for developments that require municipal servicing.</p> <p>Regarding the NAIR East Sector of North Aldershot, NAIR did identify that mapping used was incorrect and it instructed that further refinements needed to be done post NAIR. These studies were done and recognized in the subsequent OP's for both Burlington and the Region. These lands were then grandfathered for development when the Greenbelt came in about 2005. In 2016 new detailed on-ground studies confirmed there were 50 acres of development capable lands on the Johnson lands, and further 20 acres on the adjacent property owner lands. Respective to NAIR this roughly doubled the NAIR identified land area and had corresponding additional impact upon the "390" Cluster estate home number for the East sector.</p> <p>The Johnson Family has made our concerns known to our local Ward 1 Councillor Kelvin Galbraith, to the Mayor of Burlington and to the Director of Planning Services for the Region. We also submitted an extensive report to the City of Burlington in 2018, copied to the Region, during the City's Official Plan Review which awaits the approval of the Region before we can appeal it. That report included the 2016 agreements with the Region and the environmental studies identifying regional heritage boundaries for our lands.</p> <p>We are advised our concerns are being considered; however, our request for a meeting with Mr Benson, Director of Planning Services, has not been responded to and as such with the date for the Special Meeting of Council, November 18, regarding North Aldershot, we forwarded letters of our concern on Nov 10th, in advance of the Nov 18th meeting, to all members of the Region council to express our concerns and our position relative to the information and concepts being considered.</p> <p>Lands in North Aldershot are not of agricultural value, as agricultural infrastructure support services are not available and also because the soils are at very best, class 4, and as such the area is not an agricultural area. The valley lands with the mature forests are a testament to bad agricultural practices in early pioneer day's and to our forest management activity and timbering activities. We are not advocating their destruction for development. Under our land, are significant deposits of Queenston Shale which can be used for brick making. Removal of the clay on the adjacent lands resulted in large land fill site areas due to the layer of clay being impermeable to leachate runoff. We are not advocating mining these lands; however, we reserve this right pending any outcome from this OP Conformity Review.</p> <p>For the record: Our identified open field area, have no environmental issues, no justification for inclusion in any Regional Natural Heritage inclusion, nor do they have endangered species.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The Region does not want to develop on agricultural lands, yet staff are saying we shouldn't develop on open non-agricultural land that has no environmental conflicts and is 700 meters from urban services and a kilometer from a major urban Hub, Highway interchange and a GO Station.</p> <p>North Aldershot is an integral part of Burlington, Halton and the GTA. Its future was never to be part of the Niagara Escarpment plan, nor was it to remain a rural enclave surrounded by urban development. The evidence is self-evident if you are given all the facts.</p> <p>Please do not get us wrong about our intentions, they are not about bulldozing and destroying North Aldershot and its many environmental features. We are good stewards of our lands, and our track record of protecting our lands is self-evident.</p> <p>It is also very evident that "historical to current planning" for North Aldershot was to allow open areas to be developed with residential development. Many of these areas were so identified in the 1960's and the development areas were further identified and OMB sanctioned, during the 1990's in NAIR. These NAIR identified North Aldershot development pods are worth roughly 1.5 billion dollars of current potential economic activity in SW Burlington, using the 1990's NAIR densities.</p> <p>Development on our land, and adjacent land, is worth roughly 300 to 350 million of that potential value. These numbers are even higher, potentially exceeding 2 billion and 400 million respectively if we allow some intensification towards current provincial policies.</p> <p>Development of the lands already identified for development can provide, homes, jobs and a community for upwards of 10,000 residents without harming the environment, without harming any endangered species, nor does it affect or harm the regions agricultural lands.</p> <p>Indeed, even developing with full development envisioned in NAIR, and even allowing for Provincial increase in density, per the Provincial policy for development, roughly 65% of the area environmental areas will remain unaffected and continue to have significant environmental protection. This is far more that in any other development area in Halton.</p> <p>The solution to many issues concerning North Aldershot is relatively simple.</p> <p>Make the decision to "extend the Urban boundary in North Aldershot northward up to the Niagara Escarpment Plan Boundary". With this one simple decision, you resolve many of the provincially created development conflict problems in which the Province publishes documents, such as the Green Belt Plan, but then in writing say the mapping is not accurate and greenbelt policies do not apply to properties such as the Johnson lands.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response
		<p>Extending the Urban Boundary allows the residents in North Aldershot to all be treated fairly and equitably, as citizens in the rest of Burlington. Extending the Urban Boundary allows comprehensive planning based on economic and key environmental facts being the deciding factors re the future development capabilities. There is no downside to this decision. It costs the Region nothing if no development is requested. If development does take place, the Region stands to gain significant additional development and tax revenue.</p> <p>As a Councillor, your input is critical to provide an unbiased and evidence based decision. North Aldershot became a planning quagmire when prior politicians didn't like what the studies and planning came up with, so they created conflict.</p> <p>We, the Johnson Family and the Shih Family, are clear in our position that the North Aldershot Review by Meridian fails to provide an accurate and unbiased report of the facts.</p> <p>We, the Johnson and the Shih Family oppose use of non-scientific environmental based justifications advanced in the Meridian Review which does not recognize and allow for the facts based on the significant and intensive on ground studies and agreements. We oppose the concept that the Region can remove our rights of development and our other use rights. We are opposed to any plan advocating our lands be designated Regional Natural Heritage or to be included as part of any, "to be voted on", plan of the Region to create an eco-park system which includes or affects our land.</p> <p>Respective to our lands; Ownership of our lands is documented in the Registry and Land Titles as "Fee simple", "subject to the reservations in the Crown grants". These Crown Grants are registered Pre-Confederation Imperial Land Patents protected by the Crown. These are legal instruments by legislation in the Province of Ontario (Registry Act R.S.O. 1990). Furthermore the Supreme Court of Canada and the Privy Council both recognize these as "interests and trusts", as identified in section 109 of the Constitution Act of Canada. The Province must abide with the fact, control of these lands, per the Constitution, are not within its authority, as these trusts and interests are outside the Provinces authority to interfere with. We request you abide with the instructions of the Crown and honour our authority over these lands as given by the Crown. As such, any authority respective to planning for our lands that you might claim under legislation passed by the Province is without authority, as the Province is subordinate to the Crown which has given us, the property owners, this authority to act as its agent on the Crowns behalf</p> <p>We are prepared to meet and discuss the issues, and attempt to come to an agreement to resolve the future for our lands. We formally request we be made aware of any decisions</p>	<p>Comments are acknowledged. Please see response above relating to staff's recommendation that lands within North Aldershot should not be included in the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>being made by the Region concerning North Aldershot and any that affect our lands. We also ask that justifications be provided for any decision affecting us and our lands.</p> <p>Don Johnson 1761 Old Waterdown Road Burlington, Ontario L7P0T2</p> <p>Cc Michael Shih Michael@emshih.com</p>	
39.	<p>Morris Norman on behalf of Rekha Paranjape</p> <p>E-mail dated November 17, 2020</p>	<p>Re: 13737 Dublin Line</p> <p>We are owners of the above noted property in Acton in the Town of Halton Hills. This is our comments with respect to the current Region of Halton Official Plan Review.</p> <p>The easterly part of these lands is currently in the Urban Area. This is to confirm that easterly parcel is in the Urban Area. The westerly part of the property, which abuts Dublin Line is outside the Urban Area.</p> <p>This is to request that the westerly parcel, from Dublin Line, north to our property limit and east to the current Urban Area, as outlined in yellow on the attached plan, be included in the Urban Area. It would be logical to extend the Urban Area to Dublin Line.</p> <p>Please keep us apprised of the status and information on the ROPR.</p> <p>Sincerely,</p> <p>Morris Norman</p>	<p>Given the location of the subject lands within the Urban Area and Agricultural Area (including Prime Agricultural Lands in Natural Heritage System enhancement and buffers), the subject lands were not identified within any of the Growth Concepts developed and assessed as a part of the Integrated Growth Management Strategy. Based on the results of the technical analysis, staff are recommending that these lands not be included within the Preferred Growth Concept. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
			
40.	<p>Karl Gonnson on behalf of Penta Properties Inc. and Argo</p> <p>E-mail dated February 16, 2021</p>	<p>[ATTACHED LETTER]</p> <p><b>VIA EMAIL</b>  February 16, 2021  Regional Municipality of Halton  Planning Services Department  Attn: Mr. Curt Benson, RPP, MCIP, Director and Chief Planning Official  1151 Bronte Road Oakville, ON L6M 3L1</p> <p>Dear Mr. Benson,</p> <p><b>Re: Regional Official Plan Review (ROPR) Discussion Papers Comments on Behalf of Penta Properties Inc. and Paletta International Corporation File; P09006, Eagle Heights</b></p>	<p>Commentary in this response will not be provided on the site specific development application matters currently being deliberated through litigation as that is a separate process.</p> <p>With respect to NEPA Amendment UA 24, this Amendment had the effect of permitting infrastructure and municipal servicing within the Niagara Escarpment Plan Area. Consideration will be given to incorporating the NEPA within the ROP if required; however, the approval of the NEPA does not automatically mean that the Region will consent to services being</p>

No.	Source	Submission	Response
		<p>We are planners and engineers for Penta Properties Inc. and Paletta International Corporation (collectively "Penta"). Penta has extensive land holdings in the Region of Halton, including 106.67 ha (263.6 ac) in the City of Burlington in what is known as the North Aldershot Planning Area (NAPA).</p> <p>This submission relates to the three matters LPS05-21, LPS18-21 and LPS17-21 on the Council agenda for its meeting on Wednesday February 17, 2021. You may recall that Metropolitan Consulting (MCI) made a submission to the Region of Halton regarding Eagle Heights dated October 27, 2020. That submission was included in a submission to the Region of Halton dated October 30, 2020 made by counsel for Penta Properties Inc, Scott Snider.</p> <p>Of the three items on your agenda, I want to particularly comment on Appendix J, <i>North Aldershot Policy Area, Urban Area Expansion Assessment, February 2021, Regional Official Plan Review</i>. I would have liked to comment on the other reports and matters on your agenda but there was not enough time to read the hundreds and hundreds of pages between receiving notice and the date of the meeting to consider these matters. We in fact did not get any notice as requested in Mr. Snider's October 30, 2020 submission.</p> <p>We have always been surprised at how little mention or recognition there has been in the current Official Plan review of the history and status of the Eagle Heights property. That continues today in the three reports on the agenda for Wednesday. In the Meridian Report found at Appendix J there is no discussion or recognition of the history of Eagle Heights. In particular, there is no recognition that: <ul style="list-style-type: none"> <li>• the property is draft approved for residential development;</li> <li>• the property is designated and zoned for residential development</li> </ul>           • just last year, the portion of the property in the Niagara Escarpment Commission Planning Area was approved for "infrastructure and municipal servicing" on lands designated as Escarpment Protection Area and Escarpment Natural within the North Aldershot Policy area, on Map3 of the Niagara Escarpment Plan." (See NEP Amendment UA 24 at Tab 1) <ul style="list-style-type: none"> <li>• the 2016 Servicing Study prepared by MCI at the request of the Region demonstrates that the wastewater mains, front end financed by Penta, are sufficient to accommodate the development of the balance of the NAPA in the Central sector not included in Eagle Heights</li> </ul> <p>The analysis of the Region's historical approach to growth management in section 3.1 is misleading. The report claims that "up to 550 new dwellings could potentially be developed in the three pockets in the central Sector". This statement does not recognize that in addition to those 550 units, an elementary school was included in the Official Plan approval, the draft approval and the approved zoning. Subsequently, the school board decided that it did not require the block on Waterdown Road for an elementary school and that block is now intended for 123 residential units.</p> </p>	<p>extended into this area as this is a matter related to the application that is before the LPAT.</p> <p>With respect to comments on the Natural Heritage System, currently the Regional Natural Heritage System in North Aldershot comprises of the Natural Heritage System which is a designation in the current in-force and effect Regional Official Plan, and the Greenbelt Natural Heritage System, which is an overlay. Through the ROPR, the Region must incorporate new mapping and policies in the Regional Official Plan that implement the new Natural Heritage System for the Growth Plan. Therefore, there are three Natural Heritage Systems that are applicable to the North Aldershot area. Details on the Region's process for updating the RNHS can be found in the Region's <a href="#">Mapping Audit Technical Memo Review of the Regional Official Plan Natural Heritage System Policies + Mapping</a> and all of the data sets that were used are identified in the Region's <a href="#">Quality Assurance/Quality Control Process Memo on the draft 2019 Regional Natural Heritage System (RNHS)</a>. The Mapping Audit Technical Memo also provides details on the Greenbelt Natural Heritage System and Growth Plan Natural Heritage System.</p>

No.	Source	Submission	Response
		<p>In the last paragraph on page 7 there is a discussion of servicing. MCI believes that it is important to differentiate between Eagle Heights and other areas in the NAPA. Eagle Heights has been substantially studied in all respects including servicing by both Penta and the Region. The Penta studies were carried out by Cosburn, Patterson, Mather and MCI. The Region has examined this area on at least two occasions as part of its Master Servicing Plans and its Development Charge Background Studies. In fact, Phase A of the wastewater servicing project has been built. Discussions were underway with respect to a front ending scheme a year ago for the development of the rest of Eagle Heights (see Tab 2).</p> <p>The policy requirements cited at the bottom of page 8 were in the process of being satisfied but seemed to come to an end about a year ago.</p> <p>Meridian Planning has ignored the fact that NEPA Amendment UA 24 has been approved by the Province and allows municipal servicing and infrastructure in the part of Eagle Heights that is in the NEPA. This amendment was approved as part of a coordinated review at the same time as the reviews of the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Growth Plan for the Greater Golden Horseshoe. To interpret the Growth Plan as provincial policy that fundamentally undermines existing approvals for Eagle Heights is inconsistent with that amendment.</p> <p>At the top of page 14 and elsewhere there is some discussion of the Natural Heritage System. The most accurate and up to date mapping was done in 2014, 2015, and 2016 by Penta and its consultants with representatives of the Region, the City, CH, the NEC and the MNRF. This work was based on detailed, on-the-ground field work. To date, all attempts by MCI to engage with the Region regarding this mapping have failed.</p> <p>In the last paragraph of section 3.3 there is discussion of "revision of the NHS maps for the NAPA". No information is given on how this was done. Did it utilize the work of Penta, its consultants and the various agencies done in 2014, 2015 and 2016? In section 3.5 "Water and Wastewater Servicing in the NAPA" is discussed. GM Blue Plan notes that there may be some challenges. Servicing solutions were included in the 2011 Sustainable Halton Master Plan and the 2017 Development Charges Background Study. MCI attended the public information sessions for these initiatives and made representations. At no time were these alleged challenges identified.</p> <p>Based on MCI's background and study, we do not agree that there are significant servicing challenges. In fact, some of the infrastructure downstream of the NAPA was designed and sized to accommodate development of NAPA.</p>	

No.	Source	Submission	Response
		<p>On page 17, GM Blue Plan states that “extending servicing can be costly, inefficient, and technically challenging”. This is simply inconsistent with the many servicing reports that have been completed since these lands were approved for development.</p> <p>In section 3.5 of the Halton Region Integrated Growth Management Study, North Aldershot Policy Area Urban Expansion Assessment by Meridian Planning dated February 2021 updates to the extent of the RNHS in the NAPA is discussed. It is unclear where the updated information came from. MCI’s attempts to get this information have been fruitless. Furthermore, all of this has been done without the involvement of the owner of the land. It is not clear what role, if any, the staking out of the natural features carried out in 2014, 2015 and 2016 by Penta and the agencies played.</p> <p>On page 22, Meridian examines the possibility of extending the urban area to include NAPA. Extending the urban area is unnecessary to address development in Eagle Heights. Substantial urban development that requires full municipal services was approved in 1994. Relying on those approvals, Penta has spent millions of dollars refining and advancing development for the lands. In 2009, an agreement was signed by Penta and the City that reinforces that these lands are to be developed on full services. The notion of development was again reinforced in 2020 when the Province approved municipal servicing and infrastructure through an Order in Council. That order in Council was as a result of a “coordinated review at the same time as the reviews of the Greenbelt Plan, the Oak Ridges Moraine Conservation Plan and the Growth Plan for the Greater Golden Horseshoe”. Clearly it was the Provinces intent to allow development or there would be no need for “municipal servicing or infrastructure”.</p> <p><b>Summary</b></p> <p>We are concerned that the Region has so far not wished to engage Penta regarding the North Aldershot Planning Area. We hope that discussions can be held in the near future regarding the issues raised in this submission.</p> <p>Yours truly,</p> <p>Karl Gonnsen, P. Eng., RPP, President</p>	
41.	David McCully on behalf of Evergreen Community	<p>Dear Mr. Tovey,</p> <p>I am writing you on behalf of Evergreen Community (Burlington) Ltd. in regards to the ongoing Regional Official Plan Review. Please see the attached letter. We appreciate your attention to this matter. Thank you,</p>	

No.	Source	Submission	Response
	<p>(Burlington) Limited</p> <p>E-mail dated February 25, 2021</p>	<p>Davin</p> <hr/> <p>ATTACHED LETTER</p> <p><b>February 25, 2021</b>  Dan Tovey  Manager, Policy Planning  Halton Region  1075 North Service Road West Oakville, ON L6M 2G2  <b>Re: Halton Region Official Plan Review  Integrated Growth Management Strategy</b></p> <p>Dear Mr. Tovey,</p> <p>We are writing on behalf of Evergreen Community (Burlington) Ltd. in regards to the ongoing Regional Official Plan Review (ROPR) process. Evergreen Community (Burlington) Ltd. owns approximately 67 hectare site at the northwest corner of Tremaine Road and Dundas Street, and has been working for a number of years to advance the development of these lands. Please note that this letter should be read in conjunction with the letter from the Evergreen Team which was provided to Regional staff in January 2020 (Appendix 1)</p> <p><b>The Evergreen Community Approvals Context</b></p> <p>As you may be aware, the Tremaine Dundas Secondary Plan (OPA 107) was approved by the City of Burlington and Region of Halton in May 2019. The Secondary Plan establishes the overall land use and development framework for the area. The Evergreen-owned lands comprise the majority of the developable lands within the Secondary Plan area. While OPA 107 was approved by the City and Region, it was appealed by a third party. This appeal was recently withdrawn, allowing OPA 107 to come into full force and effect.</p> <p>In December 2020, a resubmission of the site-specific Evergreen Rezoning and Draft Plan of Subdivision applications were submitted to the City. The resubmission has since been circulated to the City and Regional staff for review. The resubmission includes updated supporting reports and studies, as well as an updated Draft Plan which accommodates approximately 900 residential units and over 800 jobs.</p>	<p>Subject lands already still fall within the urban boundary. More information about how the Integrated Growth Management Strategy and Preferred Growth Concept is in the Preferred Growth Concept Report. In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p> <p>In terms of development potential of the subject lands, Regional staff recommend engaging with Halton Region's Community Planning staff for development related inquiries. Please email <a href="mailto:ropr@halton.ca">ropr@halton.ca</a> and the development related inquiry can be redirected to the appropriate contact.</p>

No.	Source	Submission	Response
		<p>With this recent resubmission, the Evergreen Team is interested in engaging with Regional Policy staff to understand the interaction between the Evergreen applications and the Integrated Growth Management Strategy (IGMS) that is being developed as part of the Regional Official Plan Review (ROPR) process. More specifically, we are eager to understand how the development capacity on the Evergreen lands will be integrated into the forthcoming growth concepts.</p> <p><b>Input into the Preliminary Growth Scenarios (Report No. LPS41-19)</b></p> <p>On June 19, 2019, Report No. LPS41-19 was presented to Regional Council. The report provided an update on the ROPR process and included a technical consultant report which focuses on the Region's IGMS. It is anticipated that a preferred growth scenario will ultimately be identified by Regional Council and will form the basis of future Regional Official Plan amendments.</p> <p>A key concern raised in our January 6, 2019 letter was that while the IGMS report recognizes the planned residential growth on the Evergreen lands, the report assumes a total capacity of only 752 units. The design of the Evergreen Community has advanced over recent years, and the total number of residential units planned within the community is approximately 903 units, including a mix of single-family, townhouse and apartment units. We wish to confirm that this updated unit yield estimate will be carried forward in the emerging growth scenarios.</p> <p>The second concern identified in our January 2020 letter relates to the timing of development of the Evergreen Community. It is not clear in the June 2019 report whether the Evergreen units had been allocated to the 2021-2031 or 2031-2041 planning horizons. With the recent resolution of OPA 107 and the resubmission of the Evergreen applications, we are anticipating approval of the Evergreen Zoning By-law Amendment and Draft Plan by the end of 2021. In addition, we anticipate development occurring quickly once Draft Plan approval is secured, given the ongoing housing market supply constraints and strong demand for housing within the Region. As such, we would like to confirm that that potential residential growth within the Evergreen Community is included as part of the 2021-2031 timeframe.</p> <p>Finally, the third item we wish to better understand is the interaction between the Region's growth forecasts and the long-term development potential on the Evergreen lands. The Evergreen Community includes higher-density mixed-use blocks which are anticipated to be developed with a mix of townhouse forms and apartments. These blocks will be subject to a future detailed design process and Site Plan Approval, and as a result the precise number of units within these mixed-use blocks is only an estimate at this point. We would be interested in better understanding how longer-term development potential on the Evergreen lands would align with the Region's growth forecasts.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response
		<p><b>Next Steps</b></p> <p>The Evergreen Team is eager to engage with Regional staff to better understand the status of the growth management work and to clarify the issues raised in this letter. We kindly request a meeting with you to discuss these items. We also look forward to continuing to work with the Region to advance the Rezoning and Draft Plan approval processes for the Evergreen lands.</p> <p>I look forward to hearing from you soon.</p> <p>Yours very truly,</p> <p><b>URBAN STRATEGIES INC.</b></p> <p>Antonio De Franco, MCIP, RPP Senior Associate cc: Thomas Douglas, Senior Planner, City of Burlington John Krpan Jr., Krpan Group Scott Bland, Argo Development</p> <p>APPENDIX 1</p> <p><b>January 6, 2020</b> Curt Benson Director, Planning Services Halton Region 1075 North Service Road West Oakville, ON L6M 2G2 <b>Re: Halton Region Official Plan Review Integrated Growth Management Strategy</b></p> <p>Dear Mr. Benson,</p> <p>We are writing on behalf of Evergreen Community (Burlington) Ltd. in regards to the ongoing Regional Official Plan Review (ROPR) process. Evergreen Community (Burlington) Ltd. owns an approximately 67 hectare site at the northwest corner of Tremaine Road and Dundas Street, and has been working for a number of years to advance the redevelopment of these lands.</p> <p>On June 19, 2019, Report No. LPS41-19 was presented to Regional Council. The report provided an update on the ROPR process and included a technical consultant report which focuses on the Region's Integrated Growth Management Strategy (IGMS). The IGMS report discusses demographic, housing and economic trends, establishes a framework for growth within the Region to 2041, and puts forward eight initial growth scenarios for consideration. We understand that staff are currently undertaking additional consultation with the local municipalities regarding the initial evaluation of these</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>scenarios, with an updated staff report and formal public consultation expected to occur in early 2020. It is anticipated that a preferred growth scenario will ultimately be identified by Regional Council and will form the basis of future Regional Official Plan amendments.</p> <p><b>Comments on the IGMS Report</b></p> <p>We have reviewed the staff report and consultant study with a focus on understanding how the planned growth on the Evergreen lands has been accounted for as part of the IGMS study. As you know, the Tremaine Dundas Secondary Plan was approved by the Region in May 2019, and Evergreen owns the vast majority of the developable lands within the Secondary Plan area. With the approval of the Secondary Plan, the Evergreen team is in the process of preparing a resubmission of the site-specific Rezoning and Draft Plan applications in order to advance the approvals process.</p> <p>We acknowledge and appreciate that the IGMS report recognizes the planned residential growth on the Evergreen lands (Appendix A1, Page 6). However, the report indicates a total capacity of 752 units on the Evergreen lands. This figure should be updated to reflect the current concept plan for the Evergreen Community, which has evolved through the detailed design process. The current Evergreen concept plan has the potential to accommodate approximately 900 units, including a mix of ground-related units and apartment units.</p> <p>Importantly, it is not clear from the report how the Evergreen units have been allocated over the planning horizon. Table 21 indicates a total of 800 new units within Designated Greenfield Areas in Burlington between 2021-2031, while Table 26 suggests an additional capacity of 780 new units within Designated Greenfield Areas between 2031-2041. Given that the Tremaine Dundas Secondary Plan has been approved by both Burlington and Halton (although it remains under appeal by a third party), and given that the site-specific Evergreen development applications are expected to advance towards approval in 2020, it is critical to ensure that all potential residential growth within the Evergreen Community is included as part of the 2021-2031 timeframe, and not as part of the 2031-2041 time period. Moreover, the City of Burlington Growth Analysis Study, which was prepared in June 2019 in support of the IGMS process, identifies residential growth within Designated Greenfield Areas as a short-term priority, with these lands expected to be developed within the next 10 years. The Regional growth scenarios should adopt the same timing for development of the Tremaine Dundas area, as these lands are within the Designated Greenfield Area and therefore a short-term priority.</p> <p>The Greater Toronto Area is experiencing significant housing challenges due to limited supply. Demand for new residential units on the Evergreen lands is expected to be strong, and we therefore anticipate build-out of the community to occur relatively quickly once approvals have been secured. From a community planning perspective, it would also be</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

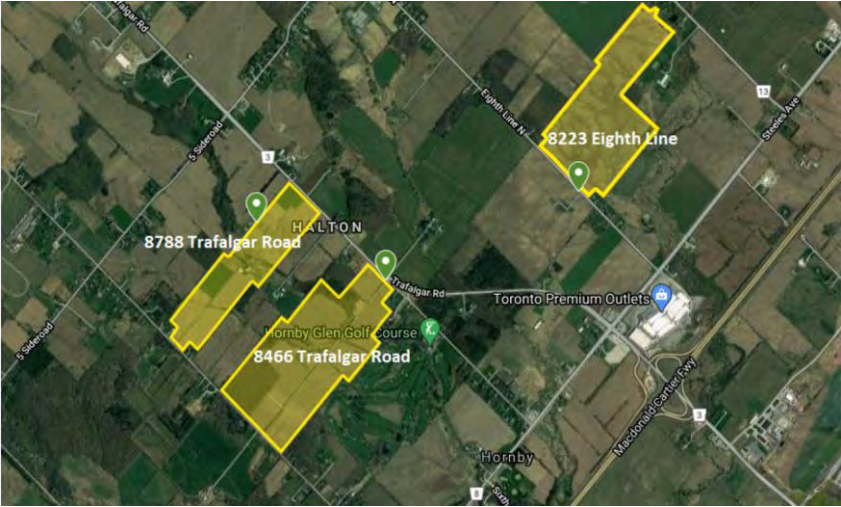
No.	Source	Submission	Response
		<p>beneficial to allow the entire Evergreen Community to be developed during the same timeframe in order to create a cohesive and complete community. Planned infrastructure upgrades will also provide the additional servicing capacity required to support the full build-out of the site. Given this context, it is appropriate that all potential growth within the Evergreen Community be allocated to the 2021-2031 period, so that new housing can be brought online as quickly as possible to meet demand and support healthy community development.</p> <p>Recommendations As the Region advances the ROPR process and further develops and evaluates the emerging growth scenarios, we request that the following refinements be incorporated:</p> <ol style="list-style-type: none"> <li>1. Ensure that the updated Evergreen residential growth capacity of approximately 900 units is reflected in the refined growth scenarios; and,</li> <li>2. Ensure that the residential growth allocated to the Evergreen lands be within the 2021-2031 timeframe to support continued processing of planning approvals, continuous build-out of the community, and to help address the significant demand for new housing within the Region.</li> </ol> <p>The Evergreen team would be pleased to meet or engage with Regional staff as may be required throughout the ROPR process to provide any additional information that may be of assistance. We would also appreciate remaining up-to-date on any further work that is completed with respect to the ROPR process.</p> <p>We look forward to continuing to work with the Region to advance development within the Tremaine Dundas Secondary Plan area.</p> <p>Yours very truly, URBAN STRATEGIES INC.</p> <p>Cyndi Rottenberg-Walker, MCIP, RPP Antonio De Franco, MCIP, RPP Partner Associate</p> <p>cc: Heather MacDonald, Executive Director of Community Planning, Regulation &amp; Mobility Rosalind Minaji, Coordinator of Development Review Andreas Houlias, Senior Planner John Krpan, Krpan Group Kevin Singh, Argo Development</p>	
42.	Sharon Zhao on	March 4, 2021 Reply To: Joel D. Farber	Regional staff have recommended this employment conversion (240 Leighland

No.	Source	Submission	Response
	<p>behalf of Rio Can Real Estate Investment Trust</p> <p>E-mail dated March 4, 2021</p>	<p>Direct Dial: 416.365.3707 E-mail: jfarber@foglers.com Our File No. 136492</p> <p><b>VIA EMAIL TO <a href="mailto:ELIZABETH.CUNNINGHAM@HALTON.CA">ELIZABETH.CUNNINGHAM@HALTON.CA</a></b></p> <p>Planning Services Legislative &amp; Planning Services Halton Region 1151 Bronte Road Oakville, Ontario L6M 3L1 Attention: Elizabeth Cunningham</p> <p>Dear Ms. Cunningham:</p> <p><b>Re: Halton Regional Official Plan Review - Employment Conversion Request RioCan Oakville Place – 240 Leighland Avenue, Oakville</b></p> <p>Thank you for your email of March 1, 2021 and for providing the materials for the February 17, 2021 Regional Council meeting including the IGMS Discussion Paper.</p> <p>On behalf of our client, we are pleased to support the recommended approach to include removal of the regional employment area overlay designation from Oakville Place as part of the Initial Scoped ROPA.</p> <p>While we support staff's recommendation and approach, we will continue to monitor the matter so as to ensure the timely implementation of the recommendation. A timely resolution will avoid any need to consider an alternative course of action such as a privately initiated ROPA to remove the employment area overlay from Oakville Place.</p> <p>Our client is continuing to engage with the Town of Oakville on the redevelopment and intensification prospects for the shopping centre. With an expeditious resolution of the Regional OP issues, our client and the Town can be secure in making the important investment of resources for the future planning of this important asset for our client, the Town and the Region.</p> <p>Thank you again for reaching out and for all the hard work that staff and the consultant team have put into the ROPR effort thus far.</p> <p>Yours truly,</p> <p><b>FOGLER, RUBINOFF LLP</b></p>	<p>Avenue, O-03) be advanced through the Regional Official Plan Amendment No. 48.</p> <p>More information on how these conversions meet the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>


No.	Source	Submission	Response
		<p>"Joel D. Farber"            Joel D. Farber*            *Services provided through a professional corporation            JDF/sz            cc. RioCan (Stuart Craig)</p>	
43.	<p>Laura Sciacca on behalf of 2300 Speers Road</p> <p>E-mail dated March 18, 2021</p>	<p>Hi Curt,</p> <p>Hope all is well.</p> <p>I am writing to you to follow up on this matter and appreciate receipt of your email to add our property re: inclusion of MTSA.</p> <p>We would like to if there has any steps to move forward with the project and the inclusion of our properties. We would like to know what we can do to move forward, what our next steps should be and when can we expect this to happen.</p> <p>Please advise,</p> <p>Thank you,</p> <p>Laura</p> <p>Sent from my iPhone</p>	<p>On July 7, 2021, through Council Report LPS60-21, Regional Council considered and adopted MTSA boundaries and policies in Halton Region through Amendment No. 48, "An Amendment to Define a Regional Urban Structure" (ROPA 48) to the Halton Regional Official Plan.</p> <p>The request to include 2300 Speers Road in the Bronte MTSA was assessed in Report LPS60-21 relating to the adoption of Regional Official Plan Amendment No. 48 (ROPA 48). The report identified that this property is located outside of the 800m radius identified by the Region's delineation methodology for MTSA's and are within the Regional Employment Area overlay requiring an Employment Area conversion. The property does not meet the evaluation criteria for an employment area conversion and therefore it was not recommended to include it in the Bronte GO MTSA and convert the lands through ROPA 48. Council adopted the ROPA in accordance with staff's recommendation for this property.</p> <p>ROPA No. 48 was approved with minimal changes by the Minister of Municipal Affairs and Housing on November 10, 2021 and is now in effect. The boundary of Bronte GO MTSA established in the Minister's approved ROPA 48 does not include 2300 Speers Road.</p>

No.	Source	Submission	Response
			<p>More information on ROPA 48, including mapping of the MTSA boundaries, is available on the project webpage online <a href="#">here</a>.</p>
44.	<p>Paul Brown on behalf of Anatolia Capital Corp.</p> <p>E-mail dated March 26, 2021</p>	<p>Dear Mr. Benson,</p> <p>We would like to take this opportunity to introduce our client, Anatolia Capital Corp. to you and your colleagues at Halton Region (the Region).</p> <p>Anatolia Capital Corp. (we) are a Canadian owned corporation who provide worldwide supply and distribution of ceramic and stone products to some of the largest distributors throughout Canada and the United States. We are proud to serve as partners in communities where we invest, works and live.</p> <p>We consider Halton Region and its partnering municipalities, Milton and Halton Hills, to be a strategic location for significant economic growth and prosperity as it provides many positive attributes in support of these opportunities.</p> <p>Realizing these opportunities, we have significantly invested in landholdings located throughout the Region in both municipalities of Milton and Halton Hills.</p> <p>For context, our lands are located in the following locations:</p> <p>Milton - Derry Green Corporate Business Park: Derry Road &amp; 6th Line  Milton - 0 East Lower Base Line  Halton Hills - 8223 Eighth Line  Halton Hills – 8788 Trafalgar Road  Halton Hills – 8466 Trafalgar Road</p> <p>A Figure depicting the locations of our landholdings above is enclosed for reference.</p> <p>Our Lands in Milton at Derry Road and 6th line are located within the Derry Green Corporate Business Park. We are currently working through a Subwatershed Impact Study (SIS) and will have a Planning Application submitted this summer (2021).</p> <p>Our additional land holdings, both in Milton and Halton Hills are located in immediate proximity to the current Urban Boundaries.</p>	<p>Majority of the subject lands were not within the Primary Study Area -- which is the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy.</p> <p>Those lands adjacent to Eighth Line (8223) are currently identified as Future Strategic Employment Area and based on the technical analysis are proposed to be included in the Preferred Growth Concept as Employment Area.</p> <p>Based on the technical analysis, those lands adjacent to East Lower Base Line are currently identified as Future Strategic Employment Area and based on the technical analysis, approximately one third of the subject lands at the eastern extent are proposed to be included in the Preferred Growth Concept as Employment Area.</p>

No.	Source	Submission	Response
		<p>We are aware the Regions current Official Plan Review (ROPA) is well underway concurrently with the Local Official Plan Amendments (LOPA) of Milton and Halton Hills. We have been engaged with the ROPA and LOPA's through participating in Staff Presentations and Council Reports, attending Council and Public Meetings (Prior to the Covid crisis in person and since that time virtually), participating in the Halton Developer's Liaison Committee Meeting wherein the ROPA is discussed, and reviewed Growth Options completed under the Regions Integrated Growth Management Strategy (IGMS).</p> <p>Through our engagement in this process, we are of the opinion that our landholdings provide strong merit in supporting the Regions four themes of assessment for growth being:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Theme 1: Regional Urban Structure</li> <li><input type="checkbox"/> Theme 2: Infrastructure and Financing</li> <li><input type="checkbox"/> Theme 3: Agriculture, Environment and Climate change</li> <li><input type="checkbox"/> Theme 4: Growing the Economy and Moving People and Goods</li> </ul> <p>We virtually attended Council's February 10, 2020 Workshop regarding Regional Official Plan Review Matters: Growth Concepts Discussion Paper, virtually attended the February 17, 2020 Council Meeting wherein the Growth Concepts Discussion Paper was the subject of extensive dialogue with Council and also virtually attend Regional Council's latest meeting on March 24, 2021 wherein a fifth growth option was discussed.</p> <p>As part of the Region's ongoing public consultation, we are requesting the opportunity to schedule an introductory virtual call with yourself and your Regional colleagues to introduce Anatolia Capital Corp. to you and to discuss the opportunities we both have before us through the Regions OP Process.</p> <p>At your convenience, we would greatly appreciate a few dates and times we could schedule a virtual call.</p> <p>We look forward to collaborating with the Region through this process and our future planning applications.</p> <p>Thank you,</p> <p>Paul Brown &amp; Associates Inc.  Paul Brown  President  Cc: Regional Chair Gary Carr  cc: Regional Councillor Clark Somerville  cc: Regional Councillor Mike Cluett</p>	<p>Those lands adjacent to the existing Urban Area and Hornby Road (8466) are proposed to be included in the Preferred Growth Concept as Employment Area.</p> <p>Those lands adjacent to Hornby Road but not the existing Urban Area (8788) are currently designated as Regional Natural Heritage System and Agricultural Area and based on the results of the technical analysis, are not proposed to be included within the Preferred Growth Concept. Please see Preferred Growth Concept mapping for additional detail. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>cc: Bob Grey, Commissioner, Legislative and Planning Services and Corporate Council</p> 	



No.	Source	Submission	Response
			
45.	<p>Jennifer Staden on behalf of Fieldgate Developments re: 5593 Reg Road 25 &amp; 5419 Third Line</p> <p>E-mail dated March 30, 2021</p>	<p>Good afternoon Curt,</p> <p>We are pleased to provide you with formal comments from Fieldgate Developments regarding the Region's Official Plan Review (Municipal Comprehensive Review) currently underway. The attached document includes covering letter with questions/comments and related appendices, as well as a report prepared by metro economics titled "The Market Demand for New Dwellings Halton Region to 2041" dated February 2021.</p> <p>As stated in the covering letter, we would like to request a meeting with Planning Staff to discuss further. Please advise of some date and time options.</p> <p>Thank you in advance,</p>	<p>For matters related to urban boundary expansion, please see response to March 25, 2020 submission in row 7 above.</p> <p>Regarding housing mix: the Preferred Growth Concept has a housing mix closer to the market mix than the densest of the four concepts, though more heavily weighted to apartments than the market. Details on the application of the Land Needs Assessment Methodology and the Growth Plan, including the consideration for the market demand of housing can be</p>

No.	Source	Submission	Response
		<p>ATTACHED LETTER</p> <p>GSAI represents Fieldgate Developments, owner of approximately 65.74 hectares (162.45 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Aerial Context Plan enclosed). As stated previously, in correspondence to the Region dated March 25, 2020 and August 14, 2020, our clients are desirous of the inclusion of their land into the 2041 Urban Area, for residential and mixed-use developments. In reviewing the Regional Urban Structure Discussion Paper and more notably Figure 29 – Potential Locations for new Community Area DGA, we note that our client’s above-noted lands are located within potential locations “1” and “2”. Furthermore, our client’s lands have previously been endorsed by Town of Milton Council as the desirable property for Milton Urban Boundary expansion for residential/mixed-use growth as per Staff Report PD-011-19 and previous correspondence between the Town of Milton and Premiere Doug Ford dated February 2019 (see attached). Our request to have our client’s lands included in the Milton Urban Boundary is therefore consistent with the Region’s identified potential locations for urban area expansion as well as the Town of Milton’s vision for future employment and residential growth.</p> <p>Fieldgate Developments has retained Tom McCormack from metro economics to monitor and review the work that has been done to date on the Municipal Comprehensive Review (MCR). As part of this review, the Integrated Growth Management Strategy Regional Urban Structure (IGMS) Discussion Paper (June 2020) was reviewed. A report prepared by metro economics titled “The Market Demand for New Dwellings Halton Region to 2041” dated February 2021, has been included with this submission providing a technical, market analysis. This letter contains a summary of the comments and concerns regarding the work to date. Furthermore, Regional staff released new, updated work as part of the MCR process including the Growth Concepts Discussion Paper (February 2021). We have provided our initial feedback on this Discussion Paper and look forward to providing further input once we have reviewed further.</p> <p>Market Analysis and the MCR work:</p> <ol style="list-style-type: none"> <li>1. Halton Region’s proposed 60%-80% intensification/densification in the urban area is unlikely to accommodate future growth based on historical trends for the Halton Region and population projections (as discussed by Tom McCormack in appended metro economics report). Furthermore, this rate of intensification/densification has not considered impacts on existing communities with respect to traffic, schools, parks and community infrastructure, as well as impacts on current residents of Halton Region.</li> </ol>	<p>found in the <i>Halton Integrated Growth Management Strategy Preferred Growth Concept Report</i> and the appended <i>Land Needs Assessment</i>. Impacts of future growth have been assessed through the infrastructure assessments and financial impact analysis. Memorandums on the technical assessments can be found in the appendix of the <i>Preferred Growth Concept Report</i>.</p> <p>Greenfield area densification is entirely with the currently planned units for these areas, and no changes to secondary plans are required as part of the PGC. Furthermore, Greenfield development in Halton exceeds 65 p+j/ha so there is no reason to consider a lower density than current, as implied in this comment.</p> <p>Regarding COVID-19 housing trends: contrary to the statement in this comment, new home sales in the Region of Halton and others parts of the GTA have trended towards a greater portion of apartment type unit sales. Further, all of the lasting effects of the COVID-19 pandemic and its impact on housing patterns are yet to be known.</p> <p>Impacts of future growth have been assessed through the infrastructure assessments and financial impact analyses. Greenfield area densification is entirely with the currently planned units for these areas, and no changes to secondary plans are required as part of the PGC.</p>

No.	Source	Submission	Response
		<p>2. The IGMS claims that a shift to higher density residential development is necessary. This does not reflect market demand (as detailed in the metro economics report appended).</p> <p>3. Halton Region would require 127,500 new ground-related units and 31,800 apartment units between 2016 and 2041 (according to metro economics report), compared to Halton's proposed IGMS Schedule 3 to 2041 allocations (78,000 ground-related and 78,700 apartment units). This incongruity of structural types will create a significant shortfall of supply for ground-related units (driving up price) and in turn, oversaturate the supply for apartment unit dwellings.</p> <p>4. In addition, this IGMS incongruity of housing projections is worsened by the failure to include projections from 2041 to 2051. We are concerned the focus on planning horizon to the year 2041 does not conform with the Growth Plan requirements and are concerned about implications going forward if future work builds upon this work done to date.</p> <p>5. It is worth highlighting that ground-level units are particularly desirable and will likely continue to be in the future, based on the following facts specific to Halton Region (as substantiated in metro economics report):</p> <ul style="list-style-type: none"> <li>o History – shows preference for ground related – lifestyle, etc.;</li> <li>o Future population growth will occur among individuals aged 25-44 and under 15;</li> <li>o Household decision-makers (of all age groups) favour ground-related units compared to other housing typologies;</li> <li>o Halton Region workers are the highest paid in the Greater Golden Horseshoe and likely to afford ground-related units;</li> <li>o The introduction of the Growth Plan (in 2006) saw an impact on housing typologies, yet ground-level units were still highly favoured (in particular rows, singles and semis). It is cause for concern, as preference for ground-level units supersedes the influence from a policy-based approach to growth management; and,</li> <li>o Apartment/ground related split staff are advocating has never been seen in Halton and based off historical trends and projections and therefore why would this deviate?</li> </ul> <p>6. We strongly recommend that the Region explore a Designated Greenfield Area density target of 50 residents and jobs per hectare to fully understand all options for growth and inform Growth Concepts.</p> <p>7. The Region prepared the initial IGMS prior to the passing of Amendment 1 of the Growth Plan (2019). This resulted in only one of four growth scenarios conforming to the Growth Plan. The Growth Scenarios/Concepts should be re-evaluated to ensure all Concepts conform to the Growth Plan (2020).</p>	

No.	Source	Submission	Response
		<p>8. As per the new Land Needs Assessment Methodology, market needs must be considered. The attached metro economics report highlights the deviations from the Region's work to date and the market-based research.</p> <p>9. Regional staff need to ascertain new trends due to COVID-19 and wide-spread working from home conditions, since more people are desiring ground related housing to self-isolate and have more room to work from home. This trend is continuing and you can now see impacts all around the Greater Toronto Area.</p> <p>Impacts of Densification and Intensification on Existing Residents</p> <p>The Province set a minimum of 50% allocation of future growth to the existing built boundary, and as such, Regional Council is expected by the Province to make some difficult choices between climate change impacts, preserving agricultural lands, ensuring that the existing neighbourhoods and residents who currently live in Halton are not negatively impacted by the additional growth in their communities, while ensuring that the Region can set aside opportunities to accommodate future Halton residents to the planned 2051 horizon.</p> <p>While the work that Regional staff prepared is comprehensive, we have not seen much discussion on the impacts of the future growth in the built boundary to the existing residents in terms of traffic, additional municipal capital infrastructure improvements to the existing system to accommodate intensification, municipal tax or fiscal impacts, the ability of the existing parks, schools and community centres (to name a few) to accommodate additional population in the existing communities. The existing Designated Greenfield Areas were not planned to accommodate the extra density that the Region is now proposing to direct to DGAs, which could result in insufficient schools, parks, community services and infrastructure.</p> <p>We have not seen the practicality of assessing if the existing communities in Halton Region can accommodate the minimum 50% of the future growth in the built boundary, particularly when it comes to adding so many apartment units into the existing communities. While we agree that MTSA's are great locations for intensification, we have yet to see any ground-truthing to verify if the Province's required minimum is truly feasible or achievable. We believe that this information plays a critical role in the MCR process. We would also like to remind staff that the Provincial Growth Plan enables the Region of Halton to request an alternative to the minimum 50% target for the built boundary where it is demonstrated that this target cannot be achieved and that the alternative target will be appropriate given the size, location and capacity of the delineated builtup area. Have staff explored an alternative intensification target that is less than 50% to see if less</p>	

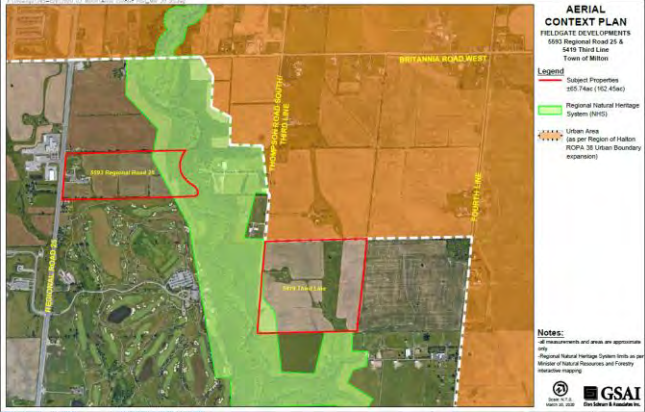
No.	Source	Submission	Response
		<p>intensification provide a better balanced growth/fiscal management/market-based housing mix approach between built boundary and greenfield areas?</p> <p>Growth Options Discussion Paper (February 2021)</p> <p>Upon review of the Growth Options Discussion Paper (February 2021), we have some questions and comments for Regional staff:</p> <ul style="list-style-type: none"> <li>• In our opinion the Region really did not assess the impacts on climate change from intensification. It has become a motherhood statement without substance.</li> <li>• Are the land needs presented in the Discussion Paper gross or net areas?</li> <li>• According to our math, 50% densification should result in 2,190 hectares of new community land needs and not 2,080 hectares.</li> <li>• Option 3 may be more cost effective from a municipal servicing perspective but this was not weighed against the severe impacts to vertical densification of existing neighbourhood and communities and the reduction in community services to accommodate the 80% densified population with the existing population. Moreover, Regional staff neglected to assess the importance of human/social impacts to financial costs to delivering services. This further builds on our point noted above on our concerns with densification.</li> <li>• From a transportation perspective, while the costs to providing transportation was assessed as being comparable between the options, Regional staff neglected to assess traffic impacts and gridlock to existing and future population by densifying the existing UGAs.</li> <li>• Regional staff discovered that densification in existing UGAs results in greater tax impacts to the existing and future residents. Are existing residents prepared to pay more tax to accommodate more density in their neighbourhoods?</li> <li>• Why factor in the GTA West Corridor when the Town of Halton Hills and the Region oppose the highway due to climate change impacts? Is this not against Regional Council position?</li> <li>• Has the Region analyzed the cost to upgrade the existing water and sewer infrastructure in the UGAs to accommodate the increased densification of 60%, 70% and 80%?</li> <li>• Climate change is not about densification but about carbon emissions. There is absolutely zero science provided to link carbon emissions to compact built form, developing a sustainable transportation system, protection of agricultural lands and soils,</li> </ul>	

No.	Source	Submission	Response
		<p>and protection of natural heritage and supporting healthy watersheds in the discussion papers. This is just a motherhood statement made in the papers, there is no technical proof at all.</p> <ul style="list-style-type: none"> <li>• Has the Region justified that 65 people &amp; jobs/hectare is transit-supportive? Appendix K (Evaluation of Growth Concepts)</li> </ul> <p>The use of a qualitative weighting system is very subjective, arbitrary and lacks any science, technical support or intuitiveness. The summary of evaluation of growth concepts is lacking in explanation and detail. When reviewed with an unbiased, more balanced and objective lens as per below, it shows a different weighting results.</p> <p>Furthermore, the themes used for the weighting system does not account for the social impacts of existing residents living in the four municipalities. By considering to allocate between 60% to 80% of new growth from 2021 to 2051 (104,400 to 139,200 housing units) in the existing built-up areas and densifying additional growth in the undeveloped areas in the urban community, this weighting system does not account for the impacts and lack of community services, traffic grid-lock, land use compatibility and interface with the existing mature and established neighbourhoods and communities.</p> <p>Regional staff have weighed the importance of agricultural permanence (protecting agricultural land loss) on the backs of existing residences of Halton Region who will need to compromise and sacrifice their existing level of service for community facilities and uses such as parks, schools, community centres, recreational facilities, traffic and visual dominance of apartments in their neighbourhoods. For these reasons, the following response and new weighting results are provided.</p> <p>If Regional Council accepts and endorses concepts 1, 2 and 3, the Region should ensure that the existing residents of Halton Region are aware of what they will be facing and what their Council members are asking them to tolerate and accept. If the Region's MCR process is about full and clear transparency, then this topic should be tabled with the residents during the upcoming public consultation process so that the existing residents of Halton Region are fully aware of the growth decisions by Regional Council.</p> <p>"1.1.1 Best meets or exceeds transit supportive densities in UGCs, MTSAs, and potential transit priority corridors."</p> <p>How can concepts 2 and 3 have a higher weighting on transit-supportive densities in UGCs, MTSAs and transit priority corridors when these locations are mainly within the built-up areas and all four concepts have the same 50% growth allocation in the built-up areas?</p>	

No.	Source	Submission	Response
		<p>“1.1.2 Locates primarily office employment development close to existing or potential priority multi-modal corridors and provides opportunities for multi-modal access.”</p> <p>This weighting does not account for the benefits of Hwy 407 as a multi-modal transportation and transit corridor for office employment development. The only difference between the four concepts is the amount of additional growth allocated to the existing undeveloped DGAs in the Urban Area so the weighting should be equal.</p> <p>“1.1.3 Locates new residential development close to existing or potential priority corridors and provides opportunities for multi-modal access.”</p> <p>The same amount of growth is considered for the existing built boundary in all four concepts so the only difference in new development close to priority corridors and multi-modal access is the amount of densification considered in concepts 1, 2 and 3. So the weighting between concepts 1, 2 and 3 is really based on where and how much growth is planned by the area municipalities outside of the built boundary in the urban area.</p> <p>“1.2.1 Protects existing employment and supports opportunities for new employment forms.”</p> <p>All four concepts protect existing employment but concepts 1, 2 and 4 support opportunities for new employment forms. Further from a practical point of view, if there is insufficient employment land available in the DGAs, how does putting all future employment in the built-up areas protect existing employment?</p> <p>“1.2.2 Best accommodates the target population and jobs for the gross developable area within MTSAs.”</p> <p>Not correct that only concept 3 should be weighted highest since the same amount of growth is considered in all four concepts in the built-up areas and MTSAs are mainly in the built-up areas so all four concepts should be weighted equally.</p> <p>“1.4.1 Promotes a multi-modal transportation system that supports active transportation and transit use.”</p> <p>Not correct that only concepts 2 and 3 should have the higher weighting since all four concepts have the same allocation of growth in the built-up areas where the existing multi-modal transportation system exists and all four concepts can be planned to support active transportation (complete community principle) and plan for mixed-use and higher densities along key transit routes to promote transit use.</p> <p>“3.1.1 Retains the largest amount of contiguous agricultural land possible.”</p>	

No.	Source	Submission	Response
		<p>“3.1.2 Protects and avoids Prime Agricultural Land to maintain the most productive and fertile soils for agriculture.”</p> <p>“3.1.3 Maximizes the amount of agricultural lands to support the Agricultural System.”</p> <p>We concur that concept 3 has the highest weight on these three factors but how would this fare with the potential traffic impacts/congestion, service levels for schools, parks, community centres, recreational facilities to the existing residents in the built-up areas (see commentary above on densification)? Aren't these weights implying that agriculture is more important than the existing residents' liveability and well-being?</p> <p>“3.3.1 Best creates opportunities for residential uses, employment uses, and community services to be located in close proximity to one another and supported by existing or planned transit service.”</p> <p>“3.3.2 Generates the fewest lane kilometres, provides transit-supportive densities, and generates opportunities for multi-modal access.”</p> <p>This weighting only accounts for existing infrastructure and services. As such, the weighting may be different if future and planned services are accounted for in the weighting system.</p> <p>“3.5.1 Limits proximity of incompatible uses to mineral aggregate operations and mineral extraction areas.”</p> <p>“3.5.2 Retains areas for mineral extraction, which can be rehabilitated to high value agricultural areas.”</p> <p>This weighting is incorrect as it assumes that any urban expansion has impacts to the mineral aggregate extraction and operations. There is only one area in Halton Region outside of the Urban Area that has been identified as potential mineral aggregate resource areas and most (if not all) existing operations are not near the candidate urban expansion area. The amount of land needs even at concept 4 could be provided without any potential incompatible uses to mineral aggregate operations and extraction areas since there are sufficient Whitebelt lands in Milton and Halton Hills to avoid this potential incompatible uses.</p> <p>“4.1.1 Directs new mixed use and residential development to nodes and corridors.” “4.1.2 Locates new residential development closest to nodes and corridors.”</p> <p>Concept 3 has been weighted higher since most of the future growth would be allocated to the built-up areas and UGAs. However, concepts 1, 2 and 4 still contemplate 50% of the future growth to the built-up areas where existing and planned nodes and corridors are planned so it is not accurate to only weigh concept 3 to be higher.</p>	



No.	Source	Submission	Response
		<p>At this time, we would like to request a meeting with Planning staff to further discuss this letter. Please contact the undersigned with some meeting date and time options. Thank you for your considerations. Please contact the undersigned should you have any questions.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p> 	
46.	<p>Elise Ralston</p> <p>E-mail dated April 7, 2021</p>	<p>To whom it may concern,</p> <p>My name is Elise Ralston and I am a 4th-year student at the University of Guelph studying Landscape Architecture as well as a resident of Halton Hills. I recently came across the article published in The IFP titled <i>'Keep Halton a great place to live': Region seeking feedback on growth concepts</i> regarding the Region looking for resident's input as it plans for growth. I am reaching out as I have just completed my landscape architecture honours thesis and capstone design project where I focused my attention on suburban sprawl and the design of walkable cities. For my capstone design project, I proposed the redevelopment of the Georgetown Market Place Mall into a vibrant, mixed-use community hub through the concept of suburban retrofitting. Through extensive research, my goal was to address Georgetown's issues relating to sprawl and walkability as well as develop a complete community, one that is significantly different than typical suburban development.</p> <p>I am reaching out in hopes my ideas may help to strike up a conversation regarding possible future growth concepts for the Region of Halton, with a focus on designing</p>	<p>The Preferred Growth Concept is based on a set of planning principles which include creating mixed-use and compact communities that support transit and active transportation, including opportunities to create more walkable and cycling-friendly neighbourhoods. Climate change and sustainability are also being considered through the Regional Official Plan Review (ROPR), including opportunities to reduce Greenhouse Gas Emissions.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the</p>

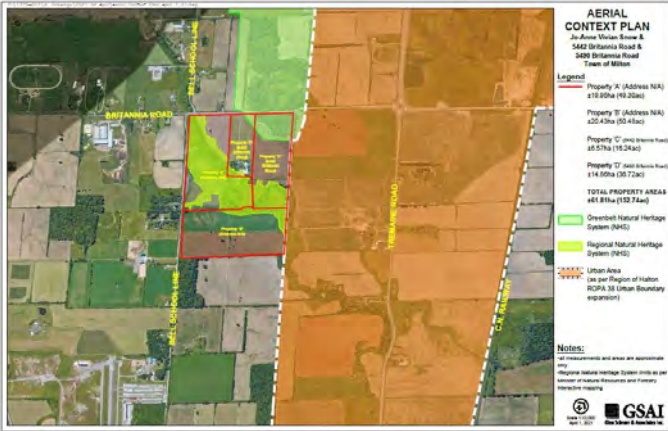
No.	Source	Submission	Response
		<p>sustainable communities with a strong sense of place. I have attached my capstone project below and would appreciate your thoughts, consideration, or feedback.</p> <p>Thank you for your time and I look forward to hearing from you.</p> <p>Kindly,</p> <p>Elise Ralston</p> <p><i>ATTACHMENT</i></p> <p>Note: Capstone Design Project which illustrates the proposed redevelopment of the Georgetown Market Place Mall was redacted for the purposes of this chart.</p>	<p>Preferred Growth Concept. Staff welcome the opportunity to meet to discuss comments during the next stage of the Integrated Growth Management Strategy, including policy development and implementation.</p> <p>More details are also available in the IGMS Policy Directions and will be in the future Regional Official Plan Amendment which is being proposed to implement the Preferred Growth Concept.</p>
47.	<p>Jo-Anne Thompson on behalf of Halton Action for Climate Emergency</p> <p>E-mail dated April 8, 2021</p>	<p>April 8, 2021</p> <p>Dear Chair Carr,</p> <p>Re: Motion to request a hard urban boundary option to be included in the Region Official Plan Review</p> <p>HACEN (Halton Action for Climate Emergency Now) is a volunteer organization dedicated to responding to the current climate emergency by acting on and promoting initiatives that will result in lowering of greenhouse gasses as soon as possible. Decisions made at the regional and municipal planning stage cost the least and impact the most when it comes to carbon emissions. We at HACEN believe we need to plan now in Halton for future growth that will meet our climate change goals, act on our declared climate emergency, and provide a healthy future for generations to come.</p> <p>When planning for growth, consultation and full integration with emissions planning is a must in order to avoid a near sighted decision based on insufficient regard for the emissions growth it will create, a lack of integration with energy and emissions plans and goals, uncertain population growth forecasts, and outdated and unsustainable market based assessments.</p> <p>We need to protect our farmlands from land speculators and insure that the class A farmland that we are fortunate enough to be surrounded by continues to provide environmental and economic benefits. Grasslands, woodlots and wetlands sequester carbon emissions and the agricultural sector adds \$13.7 billion to the Ontario economy. Agriculture provides a form of energy that is even more important than oil or electricity-food. According to the Ontario Federation of Agriculture, Ontario loses 175 acres of</p>	<p>The Integrated Growth Management Strategy considered a number of potential options including Growth Concept 3A/3B with no proposed settlement area boundary expansion. The concept was based on assumption that a shortfall of 15,500 ground-related units (singles/semis and rows) could instead be accommodated in apartment units. The shortfall was identified through the Region's Draft Land Needs Assessment, prepared in 2021 consistent with the Provincial Land Needs Assessment Methodology, which represents ground-related units that could not be accommodated within the Delineated Built-Up Area (DBUA) or the current Designated Greenfield Area (DGA) of the Region.</p> <p>Review of the options considered plans and priorities of the Local Municipalities, responding to the Climate Change emergency, reinforcing the Regional Urban Structure while protecting the Agricultural System and Natural Heritage System by minimizing urban boundary</p>

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		<p>farmland every day. If we are to provide agricultural products, this is unsustainable. A country that cannot feed itself is neither truly sovereign nor secure. We do not need to expand settlement areas into our existing farmlands. Instead, we can support accommodating newcomers within existing neighbourhoods, or land that is already allocated to development. We want our rural and natural areas to remain rural and natural!</p> <p>We can create a plan that works with our current growth projections because the vast majority of the GTHA was developed at densities much too low to support quality public transit, cycling and pedestrian access to education, services and shopping. Innovations like garden suites and laneway suites allow for large amounts of ground-related housing (as well as flats) to be accommodated through “soft intensification.” These and other infill initiatives will allow us to establish hard urban boundaries, thus preserving our agricultural lands and work towards meeting our climate goals. We are in a climate emergency and must act accordingly.</p> <p>Please consider adding the option of a hard urban boundary when planning and consulting for Halton’s future.</p> <p>Sincerely, Jo-Anne Thompson for HACEN</p>	<p>expansion, and the need to provide a diverse range and mix of housing options as directed by the Province.</p> <p>Ultimately, Growth Concept 3A/3B does not provide a sufficient supply of ground-related housing in accordance with the Provincial Land Needs Assessment Methodology. The recommended Preferred Growth Concept reflects the Planning Vision of the Regional Official Plan founded in the concept of sustainable development and meets all the land use planning considerations noted above by directing 86% of housing unit growth to the DBUA and the existing DGA of the Region with only 14% of the housing units through the proposed urban boundary expansion.</p>
48.	<p>Jennifer Staden on behalf of Jo-Anne Vivian Snow and James Scott</p> <p>E-mail dated April 14, 2021</p>	<p>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</p> <p><b>Re: Halton Region Official Plan Review Regional Official Plan Review Discussion Papers Formal Response from Ms. Jo-Anne Vivian Snow and Mr. James Scott</b></p> <p>Glen Schnarr &amp; 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 <i>Aerial Context Plan</i> enclosed). Our clients’ lands are designated “<i>Future Strategic Employment Area</i>” in the current Regional Official Plan. Our clients are desirous of the inclusion of their land into the 2051 Urban Area.</p>	<p><u>Integrated Growth Management Strategy</u></p> <p>The majority of subject lands which are outside of the Provincial Greenbelt Plan Area are currently identified as Future Strategic Employment Area.</p> <p>Based on the results of the technical analysis, staff are recommending that these lands not be included within the</p>

No.	Source	Submission	Response
		<p>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.</p> <p>Region's Discussion Papers (June 2020)</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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;</li> <li>• The Region should consider Town of Milton's previously identified whitebelt lands for candidate settlement area boundary expansion;</li> <li>• ROP policies for employment lands should permit a broad range of uses to promote complete communities (see further discussion below);</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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;</li> <li>• 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</li> </ul>	<p>Preferred Growth Concept. The lands are currently designated as Regional Natural Heritage System, Agricultural Area, and are partially within the Provincial Greenbelt Plan Area. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people. In addition, plans for enhanced freight rail infrastructure in the area have created uncertainty and could limit potential urban uses or cause delays in the development of lands in the area.</p> <p><u>Natural Heritage</u></p> <p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve</p>

No.	Source	Submission	Response
		<p>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> <ul style="list-style-type: none"> <li>• 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,</li> <li>• 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.</li> </ul> <p>Please see appended Comment Matrix prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 for further detail.</p> <p>Urban Structure Discussion Paper (July 2020)</p> <p>In reviewing the Regional Urban Structure Discussion Paper and more notably <i>Figure 30 – Potential Locations for new Employment Area DGA</i>, we note that our clients' above-noted lands are located within "<i>Remaining Future Strategic Employment Areas</i>". 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.</p> <p>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.</p> <p>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</p>	<p>the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p>

No.	Source	Submission	Response
		<p>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.</p> <p>Integrated Growth Management Strategy- Growth Concepts Discussion Paper (February 2021)</p> <p>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 "<i>Future Strategic Employment Area</i>" 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).</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Growth Concept 1 requires an additional 1,170 hectares of developable land;</li> <li>• Growth Concept 2 requires an additional 1,100 hectares of developable land;</li> <li>• Growth Concept 3 requires an additional 980 hectares of developable land; and,</li> <li>• Growth Concept 4 requires an additional 1,220 hectares of developable land.</li> </ul> <p>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.</p> <p>Conclusion</p> <p>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</p>	

No.	Source	Submission	Response									
		<p>considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p><b>GLEN SCHNARR &amp; ASSOCIATES INC.</b></p> <p><b>Colin Chung, MCIP, RPP Partner</b></p>  <table border="1" data-bbox="457 959 1318 1419"> <thead> <tr> <th data-bbox="457 959 611 1036">Question #</th> <th data-bbox="611 959 1031 1036">Halton Region Discussion Paper Question</th> <th data-bbox="1031 959 1318 1036">GSAI Response</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="457 1036 1318 1065" style="text-align: center;"><b>Regional Urban Structure – Technical Questions</b></td> </tr> <tr> <td data-bbox="457 1065 611 1419">9</td> <td data-bbox="611 1065 1031 1419"><b>Are there any other factors that should be considered when assessing Employment Area conversion requests in Halton Region?</b></td> <td data-bbox="1031 1065 1318 1419">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</td> </tr> </tbody> </table>	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	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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										

No.	Source	Submission		Response	
				<p>municipalities can decide on employment conversions and those that require Regional approval, since come conversion requests may have Regional implications. As such, the Region should not be the approval authority for all employment conversions.</p>	
		10	<p><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></p>	<p>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.</p> <p>11</p>	



No.	Source	Submission		Response	
		11	<p><b>How can the Regional Official Plan support employment growth and economic activity in Halton Region?</b></p>	<p>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</p>	
		12	<p><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></p>	<p>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</p>	

No.	Source	Submission		Response
			<p>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</p>	

No.	Source	Submission		Response	
				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.	
		14	<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>	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. Urban Expansion should be contiguous to existing urban areas where the Region and local municipality have	

No.	Source	Submission		Response
			<p>already made commitments and planning for municipal services and community services and amenities.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</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.</p> <p>The Region should ensure there is a mix of housing and that the density can meet market-based supply, rather than policy-based objectives. 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</p>	

No.	Source	Submission		Response	
				<p>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</li> </ul>	

No.	Source	Submission		Response	
				<p>and to determine if it will meet current and future market demand conditions over the next 30 years?</p> <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. Page</p>	
<b>Regional Urban Structure – General Questions</b>					
		1	<p><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?</b></p>	<p>The Region should balance growth between the built boundary and new greenfield at a ratio of 50/50, in conformity with the Growth Plan</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission		Response	
				<p>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.</p>	
		2	<p><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></p>	<p>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.</p>	
		5	<p><b>How can the Regional Official Plan support employment growth and economic activity in Halton Region?</b></p>	<p>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</p>	

No.	Source	Submission		Response	
				<p>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.</p>	
		6	<p><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>	<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</p>	



No.	Source	Submission		Response	
				<p>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>	

No.	Source	Submission		Response	
		7	<p><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></p>	<p>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.</p>	<p>Comments are acknowledged. Please see above for a detailed response. Additional responses to public and stakeholder submissions can also be found in the Policy Directions Submission-Response charts.</p>
		8	<p><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></p>	<p>Issue 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.</p>	
<b>Rural and Agricultural System – Technical Questions</b>					
		1	<p><b>Should the updated ROP designate prime agricultural areas with a separate and unique land use designation?</b></p>	<p>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.</p>	

No.	Source	Submission		Response
		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 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.
		5	<b>What additional conditions or restrictions should be required for any agriculture- related uses?</b>	We agree with the Town of Milton comments that additional restrictions for agriculture related uses

No.	Source	Submission		Response
				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.
		6	<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>	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.
		7	<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>	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.
		8	<b>What additional conditions or restrictions should be required for any on-farm diversified uses?</b>	We agree with the Town of Milton that further restrictions to on-farm diversified uses should be restricted to the local municipalities.
		10	<b>Do the Agricultural Impact Assessment policy requirements in the ROP sufficiently protect</b>	We agree with the Town of Milton that the current

No.	Source	Submission		Response
			<p><b>agricultural operations in the Prime Agricultural Area and Rural Area? If not, what additional requirements do you think are needed?</b></p>	AIA policies in the ROP are sufficient.
		11	<p><b>Should the requirements for an Agricultural Impact Assessment be included in any other new or existing Regional Official Plan policies?</b></p>	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	<p><b>Should special needs housing be permitted outside of urban areas and under what conditions?</b></p>	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 Question</b>				
		1	<p><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></p>	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	<p><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
				<p>Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction</p>

No.	Source	Submission		Response	
				<p>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 boundaries, features and buffers. Decisions need to be made based on a science-based, case-by-case analysis.</p> <p>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>	<p>on where development and site alteration may occur within settlement areas. Identification of the NHS outside of the Greenbelt and Growth Plan area is required by Policy 2.1.3 of the Provincial Policy Statement 2020.</p> <p>The Regional NHS was developed based on an understanding of existing landscapes and delineation of a system based approach to natural heritage features and functions intended to achieve the goal of long term protection and enhancement of native biodiversity. The implementation framework acknowledges that additional studies will be completed as part of future development in Halton Region with additional natural heritage information and analysis that will be available from associated detailed field studies. Regional Official Plan policies allow for refinements to the Regional NHS mapping through a Sub-watershed Study and/or Environmental Impact Assessment that is accepted by the Region through an approval process under the Planning Act.</p>
		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?</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,</p>	<p>A systems-based approach has been used to identify and protect the Region's NHS. The goal of the Halton's NHS is to provide a high degree of confidence that the biological diversity and ecological functions of the Region of Halton will be</p>

No.	Source	Submission		Response	
			<p><b>How the can Regional Official Plan be revised further to address these goals and objectives?</b></p>	<p>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>	<p>preserved and enhanced for future generations, through the creation of a Natural Heritage System consisting of key features and substantial core areas connected by multiple linkages that enhance long-term ecological integrity. To provide clarification on the mapping of key features and components of the system, Policy Direction NH-6 is identifying that the approach to Natural Heritage System (NHS) mapping is to identify the Natural Heritage System overlay with Key Features designated in rural areas and maintain the Natural Heritage System designation in Settlement Areas. Within settlement areas, the NHS will be designated. The designation of the NHS allows for clear delineation between the types of land uses and provides direction on where development and site alteration may occur within settlement areas. Policy Direction NH-7 recommends that a guideline is prepared that builds on the existing Regional Official Plan policy framework and the definitions for linkages, buffers and enhancements areas to key features. It will provide further direction on the identification of these components, outline approaches that can be used to satisfy the relevant policies and used to support restoration and enhancement within the Regional Natural Heritage System that can be achieved through development proposals.</p> <p>Policy Direction NH-8 recommends that the Regional Official Plan addresses the quality of a woodland in recognize the</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>			

No.	Source	Submission		Response	
		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>	<p>impacts of invasive species on the determination of the significance of woodlands. Through Stage 3 of Phase 3 of the ROPR, Regional Planning staff will identify opportunities to address the quality of a woodland through potential updates to the definitions of significant woodland and woodland within the Regional Official Plan. Further, explore opportunities to provide direction within the Regional Official Plan for enhancement and restoration of woodlands that have been impacted by invasive non-native species and/or have experienced severe disturbance due extreme weather events and the impact of forest pathogens.</p> <p>Maps 1 and 1G of the ROP have been refined as part of this ROPR to better reflect the policies that define the NHS. The draft 2019 RNHS also utilized updated base data information available from the Province and conservation authorities to assemble the RNHS. Using updated base layers ensures that NHS mapping in the ROP reflects the most current data available and thus the maps are as accurate as possible. In addition to the base layers updates, a review of the NHS mapping was undertaken to recognize planning decisions and updated information since ROPA 38 and this includes OMB decisions, approved planning applications, special Council Permits and staff refinements based on in-field observations. The final step in the RNHS mapping update process was a Quality Assurance/Quality Control (QA/QC) evaluation of the draft 2019 RNHS. The purpose of this exercise was to complete a visual inspection of the draft</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>	



No.	Source	Submission		Response
		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. 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 refinement and incorporate them as part of the Region's statutory review of its Official Plan."</i></p> <p>2019 RNHS to confirm that a consistent approach to the mapping in accordance with the Regional Official Plan, identify mapping errors. Therefore, the Regional NHS mapping was subject to a rigorous technical process to ensure accuracy at a Regional-scale. As noted above, refinements to Halton's NHS may occur through subsequent Planning Approval processes under the Planning Act. We acknowledge the support for Policy 116.1 to remain in the ROP.</p> <p>Acknowledged comments with regards to Parks. Permitted uses in Prime Agricultural Area and Natural Heritage System are not being revised as part of the ROPR, except in accordance with on-farmed diversified uses and exploring opportunities for expansions for agricultural buildings in the RNHS.</p> <p>Acknowledged. Policy Direction NH-5 recommends that a new "Natural Hazards" section of the Regional Official Plan introduce natural hazards policies that are consistent with the Provincial Policy Statement, 2020, and Provincial Plans, and direct the Local Municipalities to include policies and mapping within their official plans and zoning by-laws to prohibit and restrict development within natural hazard lands and be required to consult and be in conformity with Conservation Authority policies.</p>



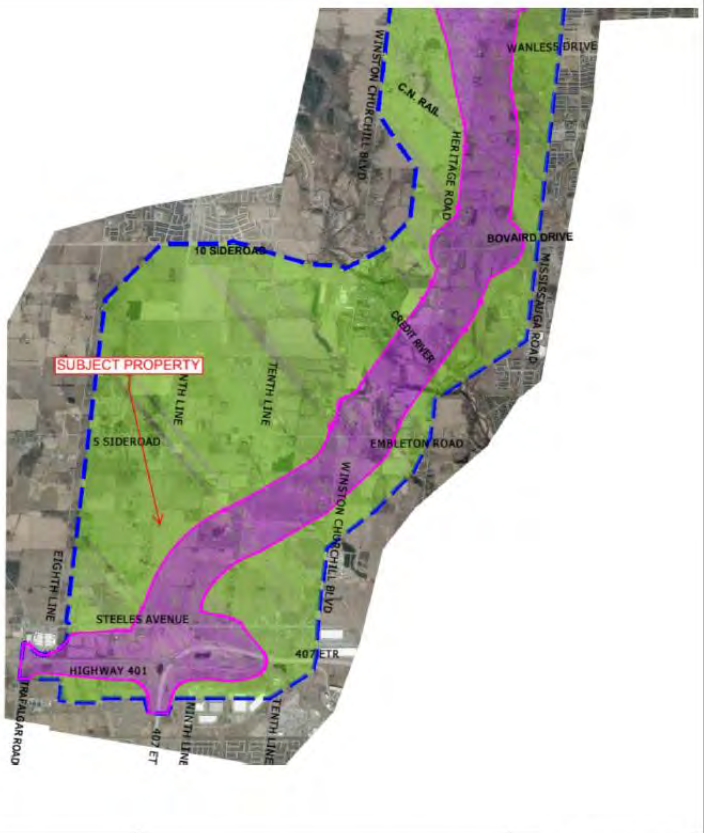
No.	Source	Submission		Response
			<p><b>enhance the Natural Heritage System?</b></p> <p>should differentiate between different Provincial Plan areas, not just adopt a blanket, most restrictive approach.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
		<p>Climate Change – Technical Questions</p>		
		<p>1</p>	<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 greenhouse 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>	
		<p>2</p>	<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</p>	

No.	Source	Submission		Response	
				<p>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? 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>	
49.	<p>David Igelman on behalf of Design Plan Services Inc.</p>	<p>[ATTACHED LETTER]</p> <p>Scott MacLeod Senior Planner Halton Region 1151 Bronte Road Oakville, On L6M 3L1 Canada</p> <p>By e-mail: Scott.MacLeod@halton.ca</p>			

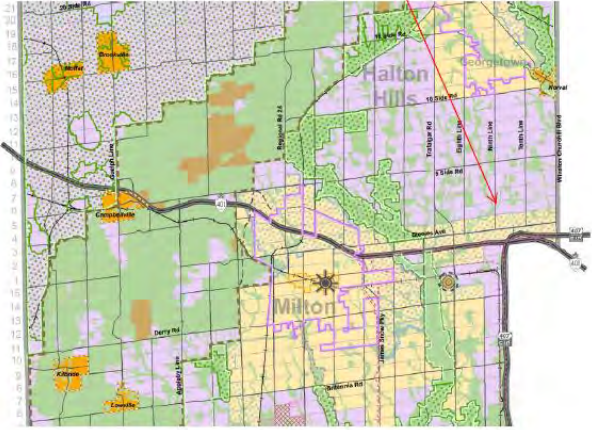
No.	Source	Submission	Response
		<p>Friday May 7th, 2021</p> <p>DPS File: 1933  <b>RE: Halton Region Regional Official Plan Review  8519 Ninth Line, Halton Hills  Comments on Draft Regional Official Plan Amendment 48</b></p> <p>We are writing this letter on behalf of the owners of the above noted property in the Town of Halton Hills. This letter constitutes our formal submission to the Region on the Draft Region Official Plan Amendment No. 48 (“ROPR 48”), released through the Region’s website and specifically located at <a href="https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Halton-s-Regional-Of-ficial-Plan-Review-(ROPR)/Regional-Official-Plan-Amendment-48">https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Halton-s-Regional-Of-ficial-Plan-Review-(ROPR)/Regional-Official-Plan-Amendment-48</a> as found on May 3rd, 2021.</p> <p>The subject property is located north of Steeles Avenue and south of 5 Sideroad with frontage along the east side of Ninth Line (see attachment “1”). The legal description of the subject property is the West Half Lot 3 Concession 10. There is currently one single detached dwelling as well as accessory structures located on the subject property.</p> <p>In regards to the GTA West Corridor Study, a large portion of the subject property has been identified as “Green” as per the 2020 Focused Area Analysis Map (see attachment “2”). “Green” identifies that the “MTO has reduced interest in properties located in the green areas and notes that applications can proceed through municipal development processes.</p> <p>In regards to the Halton Region Official Plan, the subject property is currently designated as “Agricultural Area” (see attachment “3”). Map 1c of the proposed Draft OPA No.48 identifies an area in close proximity to the subject property as “Future Strategic Employment Areas” (see attachment “4”).</p> <p>Considering the MTO has reduced interest in the subject property in regards to the GTA West Corridor preferred route, the subject property’s proximity to the identified “Future Strategic Employment Areas” and the subject property’s proximity to the future GTA West Corridor, there is merit in including the subject property within the area identified as “Future Strategic Employment Areas” and we would request that the Draft OPA be revised to indicate the same.</p> <p>In addition, we would note that the Province of Ontario has recently released “A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020)”. This plan reinforces that all</p>	<p>Additions to Halton’s Future Strategic Employment Area (FSEA) were not considered as a part of the Regional Official Plan Amendment (ROPA) No. 48. ROPA 48 was approved, with a limited number of changes, by the Minister of</p>

No.	Source	Submission	Response
		<p>municipalities in the Growth Plan area should be looking at encouraging intensification throughout the municipality and to achieve complete communities that can provide a variety of choices for living, working and playing throughout an entire lifetime.</p> <p>We agree that this is an important consideration in any Official Plan, and would encourage the Region to consider the subject property for future strategic employment development beyond the horizon of the Official Plan. This will make the application of the Official Plan more efficient for the Region in the future.</p> <p>We would be happy to discuss these comments further with the Region at your convenience. Should you have any questions or concerns please do not hesitate to contact the undersigned.</p> <p>Sincerely,</p> <p><b>DESIGN PLAN SERVICES INC. T.J. Cieciora, MSc MCIP RPP PRESIDENT</b></p>	<p>Municipal Affairs and Housing on November 10, 2021. More information is available on the Region's webpage here: <a href="https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Halton-s-Regional-Official-Plan-Review-(ROPR)/Regional-Official-Plan-Amendment-48">https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Halton-s-Regional-Official-Plan-Review-(ROPR)/Regional-Official-Plan-Amendment-48</a>.</p>

No.	Source	Submission	Response		
		<div data-bbox="457 256 1161 1089" data-label="Image"> </div> <div data-bbox="457 1089 1161 1170" data-label="Complex-Block"> <table border="1"> <tr> <td data-bbox="457 1089 598 1170">Attachment 1</td> <td data-bbox="598 1089 968 1170">Location Map</td> <td data-bbox="968 1089 1161 1170"> <p><b>DESIGN PLAN SERVICES INC.</b> Town Planning Consultants</p> <p>800 The Loop Mall, Suite 300 Scarborough, ON M1B 0Z7 Tel: (416) 291-4444 www.designplan.ca</p> <div style="border: 1px solid black; padding: 2px; display: inline-block;"> D P S </div> </td> </tr> </table> </div>	Attachment 1	Location Map	<p><b>DESIGN PLAN SERVICES INC.</b> Town Planning Consultants</p> <p>800 The Loop Mall, Suite 300 Scarborough, ON M1B 0Z7 Tel: (416) 291-4444 www.designplan.ca</p> <div style="border: 1px solid black; padding: 2px; display: inline-block;"> D P S </div>
Attachment 1	Location Map	<p><b>DESIGN PLAN SERVICES INC.</b> Town Planning Consultants</p> <p>800 The Loop Mall, Suite 300 Scarborough, ON M1B 0Z7 Tel: (416) 291-4444 www.designplan.ca</p> <div style="border: 1px solid black; padding: 2px; display: inline-block;"> D P S </div>			

No.	Source	Submission	Response
		 <p data-bbox="457 1089 968 1170">Attachment 2      GTA West Corridor, 2020 Focused Area Analysis Map</p> <p data-bbox="974 1089 1163 1170"> <b>DESIGN PLAN SERVICES INC.</b>  Town Planning Consultants  900 The Lakes Mall Suite 600  Scarsdale, ON M1B 4Z7  Telephone: 416-292-5245  www.designplanservices.com </p>	

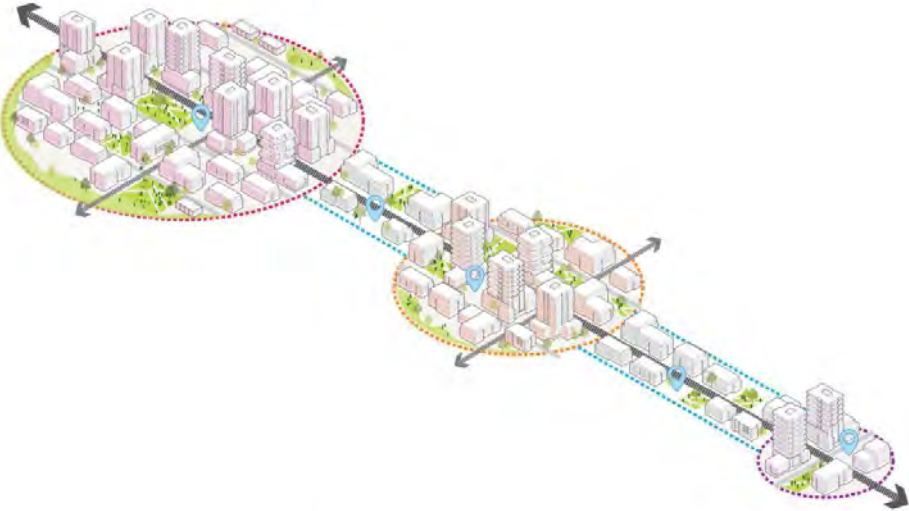


No.	Source	Submission	Response
		<div style="text-align: center; margin-bottom: 10px;"> <span style="border: 1px solid red; padding: 2px;">APPROX. LOCATION OF SUBJECT PROPERTY</span>   </div> <div style="display: flex; justify-content: space-between; align-items: flex-end; padding: 5px;"> <div data-bbox="457 1089 600 1177"> <p>Attachment 3</p> </div> <div data-bbox="600 1089 972 1177"> <p>Halton Region Official Plan, Regional Structure Map 1</p> </div> <div data-bbox="972 1089 1163 1177" style="border: 1px solid black; padding: 2px;"> <p><b>DESIGN PLAN SERVICES INC.</b>  Town Planning Consultants  183 The Lakes Mall, Suite 200  Georgetown, ON N7B 4J7  Telephone: 416-228-5445  www.designplanservices.com</p> <div style="display: flex; align-items: center; justify-content: center;"> <div style="border: 1px solid black; padding: 2px; margin-right: 2px;">D</div> <div style="border: 1px solid black; padding: 2px; margin-right: 2px;">P</div> <div style="border: 1px solid black; padding: 2px; margin-right: 2px;">S</div> </div> </div> </div>	

No.	Source	Submission	Response
50.	Andrew Hannaford on behalf of Milton Phase 4 (MP4) West	<p>Good morning,</p> <p>The MP4 Landowners Group consulting team have now commenced a review of the IGMS Discussion Paper, the proposed four growth concepts, the newly endorsed fifth concept by Regional Council, as well as StrategyCorp's presentation assessing the impacts of Covid-19 on the Region's economy and employment.</p>	<p>Thank you for your comment regarding the Growth Concepts Discussion Paper. Feedback regarding the four growth concepts has been taken and incorporated into the development of the Preferred Growth Concept.</p>

No.	Source	Submission	Response
	<p>Landowners Group</p> <p>E-mail dated May 18, 2021</p>	<p>Prior to submitting a formal submission in response to the IGMS Discussion Paper, the consulting team have collectively noted several initial questions which require clarification from Halton Region in order to provide effective and informative comments.</p> <p>Please see attached for a response letter to the above-mentioned Regional documents requesting additional clarification and providing initial questions and comments.</p> <p>We look forward to the Region of Halton's responses and clarifications regarding the above-noted questions in order to inform the more detailed comments to be provided by the consulting team on behalf of the MP4 Landowners Group.</p> <p>Thank you, Andrew Hannaford, BES, MCIP, RPP   Senior Planner</p> <hr/> <p>ATTACHED LETTER</p> <p>Dear: Mr. Benson:</p> <p>RE: Region of Halton: IGMS Discussion Paper: Requested Clarifications and Initial Questions and Comments Milton Phase 4 Landowners Group, Britannia Secondary Plan, Milton OUR FILE: 18186A</p> <p>MHBC Planning is currently retained by the Milton Phase 4 (MP4) West Landowners Group, who have extensive land holdings in the Milton Phase 4 Urban Expansion Area, also known as the Britannia Secondary Plan Area in the Town of Milton. The Britannia Secondary Plan Area is located within the Urban Area of the Town of Milton and represents approximately 900 hectares of developable land. The Town of Milton has now commenced the Britannia Secondary Plan study process. The Region of Halton released the Integrated Growth Management Strategy (IGMS) Discussion Paper for public input, and has since extended the deadline for comments from May 31st to an undetermined date in June 2021.</p> <p>The MP4 Landowners Group consulting team have now commenced a review of the IGMS Discussion Paper, the proposed four growth concepts, the newly endorsed fifth concept by Regional Council, as well as StrategyCorp's presentation assessing the impacts of Covid-19 on the Region's economy and employment. Prior to submitting a formal submission in response to the IGMS Discussion Paper, the consulting team have collectively noted several initial questions which require clarification from Halton Region in order to provide effective and informative comments. Integrated Growth Management Strategy Discussion Paper The following list of questions represents key matters that</p>	<p>Not all questions will be addressed directly, but for more details please see the <i>Preferred Growth Concept Report</i> as well as the appended documents.</p> <p>#1 – Concerning the provincial Built Up Area boundary, the matter is provincial jurisdiction and is unrelated to the <i>Integrated Growth Management Strategy</i>.</p> <p>#2-6 – All mapping shows the area developing within the horizon of the new plan. Furthermore, densification is only the suggestion of building the currently planned apartments within the secondary plan area, particularly the Trafalgar Corridor area in Oakville and the Education Village area in Milton. Greenfield area densification is entirely with the currently planned units, and no changes to secondary plans are required. Further details on densification can be found in the <i>Preferred Growth Concept</i> and the attached <i>Land Needs Assessment</i>.</p> <p>#9 – Base growth in the ROPA 38 DGA land will be slower than reported in ROPA 38. All of these areas have not begun development past 2021. 10 year demand is lower because of a lower overall forecast, and a higher level of intensification as required by the Growth Plan.</p> <p>#10 – From a 2022 and Growth Plan 2019 perspective, the lands will not be fully developed by 2031. The IGMS looks at the demand and supply from a 2021 perspective. Based on that, the HUSP are not yet fully developed and the Sustainable Halton have not yet begun</p>

No.	Source	Submission	Response
		<p>require clarification regarding the proposed concepts and growth and development proposed to 2051. There are some Figures attached for reference.</p> <p>Question 1: The IGMS maps continue to utilize the 2006 Built Up Area boundaries which date back to the 2006 Growth Plan. Figure 1 shows the actual 2021 Built Up Area which is significantly larger than the 2006 Built Boundary. While we understand the 2006 Built Boundary is established by the Province to establish intensification versus greenfield areas, why has the Region not identified the growth between the 2006 Built Boundary and the 2021 Built 204-442 BRANT STREET / BURLINGTON / ONTARIO / L7R 2G4 // WWW.MHBCPLAN.COM KITCHENER WOODBRIDGE LONDON KINGSTON BARRIE BURLINGTON 2 Up Area in the IGMS to confirm where and how growth has occurred and in what built form in each municipality, and included the areas in ROPA 38, proposed but not built to 2031, to illustrate where and how and how much growth is to be planned within the existing urban boundary? There appears to be no consistent baseline in the IGMS with which to assess the proposed growth in the concepts from where it is today.</p> <p>Question 2: Why does the IGMS not show ROPA 38 Map 5's proposed 2031 growth in Milton (approved within the urban boundary) and as established and shown in the yellow outlined lands in Figure 2? In each of the Growth Concepts, the Britannia Secondary Plan Area is shown as a Designated Greenfield Area or DGA. The following questions are specific to what that means in each concept.</p> <p>Question 3: Concept 1 Growth Concept: What does 60% densification represent in terms of people and jobs per hectare within the DGAs)? Is 60% densification representative of 50 ppj/ha as per the Growth Plan? Is it assumed that densification is expected to occur within the 2021 to 2031 growth period for lands where Secondary Plans are well underway or adopted by the Town of Milton? How does the Region rationalize densification for planned growth to 2031?</p> <p>Question 4: Concept 2 Growth Concept: The Region identifies that in Concept 2 densification occurs after 2031. How would this apply to an adopted Secondary Plan in Milton?</p> <p>Question 5: Concept 3 Growth Concept: The Region identifies that in Concept 3, growth is within the 'built out DGA'. What are the boundaries of the 'built out DGA' in Milton and does this include the Britannia Secondary Plan? What does "80% densification occurs from 2031 to 2051 that represents a 'share of apartments'" mean in terms of actual land area and density targets? What is proposed from 2021 to 2031 in this concept and at what density target? How will the Region determine the form of 'share' when it has identified a hierarchy of density within Strategic Growth Areas or SGAs?</p>	<p>development. Growth for the 2020s is slower than in the current Official Plan and there is less Greenfield development due to the higher intensification rate. All of which means that Greenfield land will last well into the 2030s.</p> <p>#11 – During COVID, new home sales in the Region of Halton and other parts of the GTA have trended towards a greater portion of apartment type unit sales. Further, all of the lasting effects of the COVID-19 pandemic have yet to be known.</p> <p>#14 – There is no basis to suggest the need for a higher forecast.</p> <p>#15 -- The Growth Plan and the LNA do not require market evidence. The interest in a market supply of housing is a principle.</p> <p>#16 – The term "densification" is only a descriptor in our policy and is not intended to reflect Growth Plan policies.</p> <p>#19 – Feedback is received and many tables have been adjusted accordingly.</p>

No.	Source	Submission	Response
		<p>Question 6: Concept 4 Growth Concept: Concept 4 identifies 50% intensification within the Built Up Area from 2021 to 2051 and the greatest amount of greenfield expansion. What is the density target proposed within the 50% intensification? What is the 'apartment share' in terms of percentages for Built Up Areas?</p> <p>Question 7: The Region has displayed the hierarchy of densities for Strategic Growth Areas or SGAs (see below). How is the hierarchy being applied through the IGMS Concepts in the Built Up Area and DGAs in terms of intensification targets for 2031-2051?</p> <p>Hierarchy of Strategic Growth Areas</p>  <p>Legend</p> <ul style="list-style-type: none"> <li>■ Urban Growth Centre</li> <li>■ Corridor to Support Transit</li> <li>■ Major Transit Station Area</li> <li>■ Additional Strategic Node</li> <li>■ Higher Order Transit Corridor</li> <li>■ Transit Stations</li> <li>■ Parks</li> <li>■ Natural Areas</li> </ul> <p>Question 8: Can the Region please provide clear density targets and land areas for each municipality and specifically for DGAs, MTSAAs, UGCs, Nodes/Corridors, and the new DGAs for 2031 to 2041 and 2041 to 2051?</p> <p>Question 9: What is the base growth proposed between 2021 and 2031 in the DGAs as approved under ROPA 38?</p> <p>Question 10: On pages 37 to 38 of the IGMS, the following is stated: <i>"In preparing the Land Needs Assessment for this current exercise, all concepts assume that DGA</i></p>	

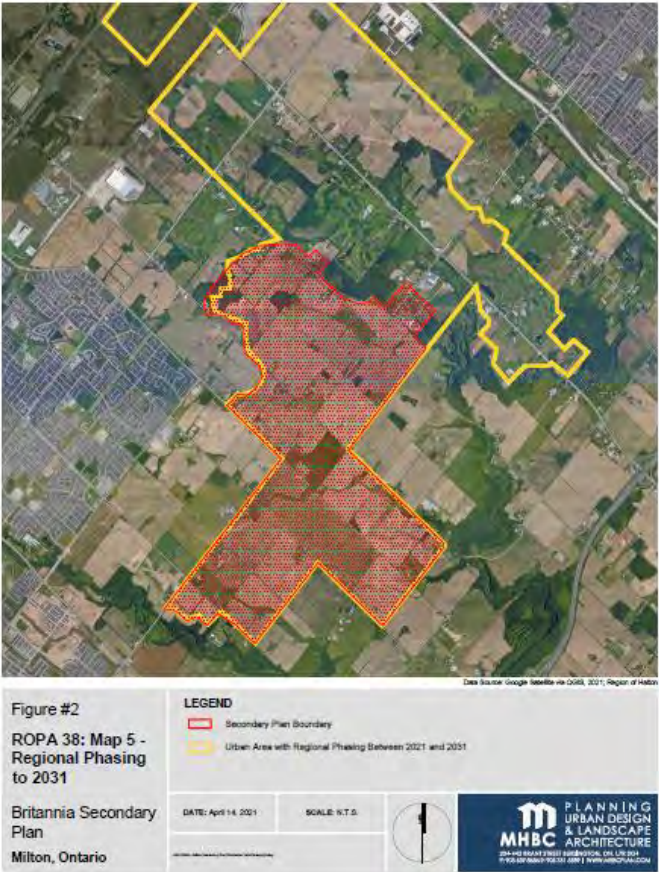
No.	Source	Submission	Response
		<p><i>previously identified through the HUSP and Sustainable Halton plans will be fully developed prior to any new development occurring within any new urban expansion areas. It is anticipated that these lands can reasonably satisfy greenfield demand into the 2031-2041 time period".</i> Is this stating that the Britannia Secondary Plan area will satisfy greenfield demand from 2031 onwards and not be accounted for in growth to 2031? Is the demand not already established and met under ROPA 38 for demand to 2031?</p> <p>Question 11: The IGMS does not address changes to market demand in terms of increasing demand for ground-related, low density housing as a result of Covid-19. Is the Region assuming it can control market demand and change housing choice by limiting housing choice? Given the fact that intensification rates under the current plan have not been achieved in the existing BUAs and SGAs, does the Region believe the current trends will shift or that it can force changes to choices in the market by limiting supply</p> <p>Question 12: In terms of density, the Province's Schedule 3, provides targets. We understand the "regional interest" should be to allocate general population targets to each municipality. It would then be up to the local municipalities as to where (location) the density should be situated and planned and in what form that best suits the local municipality's context and interests. Will the Region identify the density targets that each municipality must achieve, based on the population and employment projections of Schedule 3? A Place to Grow, s.2.2.7.3 Designated Greenfield Area, states that the minimum density target will be measured over the entire DGA of each upper-tier, excluding NHS, ROWs, employment areas and cemeteries.</p> <p>Question 13: The IGMS provides comments on climate change. The interpretation of adaptation and mitigation seems unique to Halton Region and not a commonly used interpretation. Achieving lower greenhouse gas emissions is not usually defined by development restrictions along humanly-conceived boundary lines or solely through 'protecting Agriculture lands'. On what basis or with what evidence does the Region provide this interpretation?</p> <p>Question 14: The Growth Plan considers the Schedule 3 population forecasts as minimums which can be increased through the MCR process. What analysis has the Region done to determine that the Schedule 3 forecasts as minimums are appropriate for the Region and should not be increased?</p> <p>Question 15: What market evidence has been used to develop scenarios which provide for a sufficient housing supply that reflects the local housing market as required by the Growth Plan, rather than those scenarios which appear to deviate from the market?</p> <p>Question 16: The term "densification" and its definition are not part of the Growth Plan policies. Could the Region indicate where it derived the concept of densification from and</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>provide examples of other jurisdictions where this concept has been applied and how successful it has been.</p> <p>Question 17: According to the Growth Concepts Discussion Paper, inflation was not included in the fiscal impact analysis. Adding inflation to the projected tax increases results in annual property increase of around 5% for both Regional and Area Municipal property taxes for all scenarios. Is this tax increase sustainable? Could the Region provide more detailed calculations with regards to the fiscal impact analysis.</p> <p>Question 18: Notwithstanding the StrategyCorp White Paper, the Growth Concepts Discussion Paper seems to dismiss the impacts of Covid on the long term projections. Will the Region examine the scenarios recognizing the significant changes to housing needs, office needs and municipal servicing needs that are occurring through increased working from home?</p> <p>Question 19: The report is often difficult to read owing to the time periods being discussed and analyzed which keep switching between the 2021-2051 and the 2031-2051 time frames. For example, the concept of densification refers to the proportion of apartments constructed between 2031 and 2051, but key tables and graphs only show growth between 2021 and 2051. It would be helpful to clearly show growth during both time frames so as to compare the assumptions to the outcomes. 5</p> <p>Question 20: Corridors were not included within ROPA 48, but as indicated in the IGMS Concepts Discussion Paper, would be addressed through the subsequent Growth Management Process. Section 79.3 (7.2) of ROPA 48 reads that the Region will consider intensification and development of Strategic Growth Areas as the highest priority of urban development in the Region". This suggests that as per Section 79.3 of ROPA 48, corridors, such as the Trafalgar Corridor, are subordinate to the Strategic Growth Areas identified in the ROPA, in terms of adding additional intensification and timing? Can the Region confirm that this is correct?</p> <p>Question 21: On page 56 of the IGMS Concepts Discussion Paper, the footnote under Figure 12 refers to the Trafalgar Corridor in Oakville and Milton as a Strategic Growth Area, which could be subject to densification. What analysis has the Region undertaken to determine how additional apartment units could be accommodated within the adopted Secondary Plan for Trafalgar- Agerton in Milton and what the impact would be for additional municipal, community and social services in the area?</p> <p>Proposed Fifth Growth Concept Question 23: We are not aware that Halton Region undertook any science-based assessment of GHG emissions that assesses existing built-up area emissions (buildings, transportation, etc.) or emissions and impact from outside of the Region to inform the current IGMS Discussion Paper. What is the current base line for</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>GHG emissions in 2021 in terms of developed municipalities? Is the Region establishing a 2021 baseline prior to assessing, as yet unknown emissions from new development post-2021?</p> <p>Question 24: As of 2021, what is the base GHG emissions from the built-up areas of Halton Hills, Oakville, Burlington and Milton? What is the breakdown by sector of each municipality's GHG emissions (e.g. existing residential, institutional, commercial/industrial, transportation)?</p> <p>Question 25: Any study of greenhouse gas emissions will be heavily dependent on the assumptions used. Will there be an opportunity to comment on the assumptions to be used prior to the completion of the study?</p> <p>Question 26: How does Halton Region's agricultural area currently contribute to the agricultural economy for Ontario compared to areas west of the GGHA and the Niagara Region, which represent a greater land area of food-producing lands in Ontario. Are the farm lot sizes in Halton Region sufficient to sustain viable commercial farming practices given that many farms are consolidating lands to form sustainable, large-scale land areas for the competitive, global food market? Has this or will this be factored into the concept assessments?</p> <p>Question 27: In the White Paper by Strategy Corp., they have recognized that logistics and warehousing are needed to support the new economy. Has the Region assessed the impact of capping industrial development by eliminating the greenfield expansion of employment lands, including lands already designated for future employment Has the loss of tax revenue, supply of products as well as local jobs for residents been identified as an impact of the fifth concept? 6</p> <p>Question 28: Logistics firms, including cold storage distribution facilities are key to supporting the local agricultural industry. This seems not to have been considered by Strategy Corp. Has the Region taken this into consideration with regards to Concept 5?</p> <p>Question 29: Will the Region evaluate the implications of the property tax split between industrial/commercial and residential uses under concept 3B and the impacts on future assessment?</p> <p>Question 30: Will the Region identify the impacts of no additional land to accommodate all required community services and parks within the urban boundary and how the local municipalities will meet their parkland needs with no added land? We look forward to the Region of Halton's responses and clarifications regarding the above-noted questions in order to inform the more detailed comments to be provided by the consulting team on behalf of the MP4 Landowners Group. Sincerely,</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response
		<p>MHBC Dana Anderson cc: Dan Tovey, Manager, Planning Policy Myron Pestaluky, Delta Urban Rowan Faludi, urbanMetrics MP4 Landowners Group</p>  <p>Figure #1  <b>SUSTAINABLE HALTON</b>  Milton 2006 BUA vs 2021 Actual  Milton, Ontario</p> <p><b>LEGEND</b>  <span style="color: purple;">—</span> Built Boundary  <span style="color: red;">—</span> Bittern's Secondary Plan</p> <p>DATE: March 26, 2021      SCALE: N.T.S.</p> <p><b>MHBC</b> PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE  225-102 BROADVIEW STREET, SUITE 200, OAKVILLE, ON L6K 3H7  TEL: 905.846.7400 FAX: 905.846.7401 WWW.MHBCONTO.COM</p>	

No.	Source	Submission	Response
		 <p>Figure #2 ROPA 38: Map 5 - Regional Phasing to 2031</p> <p>Britannia Secondary Plan Milton, Ontario</p> <p>DATE: April 14, 2021      SCALE: N.T.S.</p> <p>PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE MHBC 204-40 BRANT STREET, BRANTFORD, ON L6Y 6K4 P: 547-222-1100 F: 547-222-1101 WWW.MHBCON.COM</p>	
51.	Andrew Bottomley on behalf of W.H Morden Public School	<p>To Whom this may Concern,</p> <p>We are a grade 8 self-contained gifted class from W.H. Morden Public School and we are based in Oakville Ontario. On behalf of our class, we would like to understand how the Halton region plans to make the economy sustainable over the next coming years. Unfortunately through our research we have been unable to find concrete evidence and facts regarding Halton's sustainability and development, and how we plan to improve it in the future. We are adamant that Halton not only grows, but thrives. We believe that by sharing these goals, then Halton's economy will not only grow but thrive.</p>	<p>While no specific reference to the Halton's Regional Official Plan Review (ROPR), it appears that many of the questions are being considered in that context.</p> <p>The Region values the importance of planning for a sustainable economy, including exploring new models to attract</p>

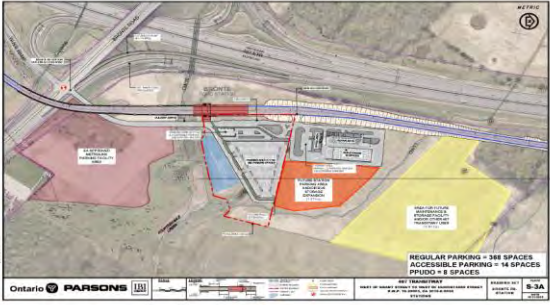
No.	Source	Submission	Response
	E-mail dated May 21, 2021	<p>Because of the unclear formatting of the information that was given to the community, we found it extremely difficult to research. Therefore, we wanted to ask you a few questions that can hopefully be addressed in a return email. What specific things will you improve to make the Halton economy more sustainable? How will improving Halton's sustainability affect employment growth specifically, as well as the depletion rate? What is your comprehensive planning that is going to ensure a sustainable future? What are your goals to make the economy in Halton more sustainable?</p> <p>We understand the difficulty, especially in these times, to sustain Halton's economy, let alone inspire development. With the COVID rates so sporadic, Halton's economy is suffering greatly from the unease. We were wondering if you had any plans to solve this issue as many people are being affected in large ways. We were also wondering how has/is Halton adapting to, COVID-19 affecting our economy, not only through the market, but also through jobs, and educational facilities, and how do you intend to improve it? Do you have a solution to expand job opportunities, or other forms of money intake, as many people are stuck between a rock and a hard place, in terms of testing positive for COVID or needing money for food and such?</p> <p>The first step towards building a safe, resilient and a green economy is to stop relying on non-renewable energy sources. By switching to renewable energy sources, the Halton economy is making huge progress to becoming a resilient and green economy that you have promised. Becoming sustainable also means investing in the future, and restructuring existing aspects of the economy. As well as creating new job opportunities, and most importantly, making sure that using renewable energy is cheaper than the alternative.</p> <p>Sustainability, as you know, is an extremely important part of growth and development. We want the same thing that everyone wants, a future that can be sustained, and we want to know how. We appreciate you taking the time to read this letter, and address our concerns. If this letter has been sent to the wrong person, and you feel that there is a person more qualified to answer our questions, please let us know.</p> <p>Thank you for your time, Class 8-2</p>	<p>people and employers, planning for opportunities to incorporate employment uses with residential uses and community amenities (i.e. recreational facilities, schools) through mixed use development, utilizing access to transit to plan for efficient movement of people and goods by directing future growth to Major Transit Station Areas (MTSAs), as well as adopting mitigation measures such as renewable energy technologies.</p> <p>To learn more about a study on the changing nature of the economy and employment, and implications for Halton Region, including approaches to address these impacts, please see the <a href="#">report</a>: Planning for Change: An Analysis of COVID-19's Acceleration of Economic Trends in Halton Region.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>
52.	Paul Keul on behalf of Cross of Life Lutheran Church	<p>Dear Planning Team,</p> <p>We are owners of property (13 acres) at 14212 Derry Road, just east of Eighth Line. We support re-designation of the lands for a broad range of employment uses, including places of worship, and their inclusion in the urban area. Ideally the uses would be business park or similar commercial uses, not industrial uses. Our vision for this site</p>	<p>Subject lands are currently identified as Future Strategic Employment Area. Based on the results of technical analysis, these lands are proposed to be included in the</p>

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	E-mail dated May 25, 2021	<p>includes mixed employment uses complementary to the surrounding development, and also a small worship facility. Re-designation as employment area is logical for our property and the adjacent properties because:</p> <ul style="list-style-type: none"> <li>- They are adjacent to Highway 407, and nearby the Agerton and Trafalgar lands which are planned for development.</li> <li>- As Agerton and Trafalgar develop, and the population of Milton grows, there will be a need for more employment lands so that jobs do not leave the Region. We believe this can be accommodated on our lands.</li> </ul> <p>If you would like to discuss this further, please feel free to contact us at the numbers below.</p> <p>Sincerely,</p> <p>Cross of Life Lutheran Church,</p> <p>Paul Keul, Treasurer, 647-295-8194</p> <p>Stephen Allsopp, Secretary, 416-275-6483</p>	Preferred Growth Concept as Employment Area.
53.	<p>Alison Bucking on behalf of Argo Palermo Village Corporation</p> <p>E-mail dated May 26, 2021</p>	<p>Good Afternoon Curt,</p> <p>On behalf of Palermo Village Corporation (PVC), please find the attached comment letter in regards to ROPA 48. The purpose of the letter is to provide our rationale for the requested expansion to the Palermo Village Growth Area up to the 407 Transitway and request that the expanded Growth Area be identified as such in ROPA 48 and the employment overlay be removed from the PVC lands.</p> <p>Thank you for your consideration and we are available to discuss our comments at your convenience.</p> <p>Sincerely,</p> <hr/> <p>ATTACHED LETTER</p> <p>Thank you for taking the time to meet on March 31st to discuss Palermo Village Corporation's (PVC) proposal to expand the Palermo Village Growth Area north to Highway 407 to support and strategically plan for the recently approved 407 Transitway and Bronte 407 Transitway Station. The purpose of this letter is to provide our rationale for the requested expansion to the Palermo Village Growth Area up to the 407 Transitway</p>	<p>Regional staff recommend retaining the subject lands (Palermo Village, O-24) within the Regional Employment Areas.</p> <p>More information on how this conversion meets the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>

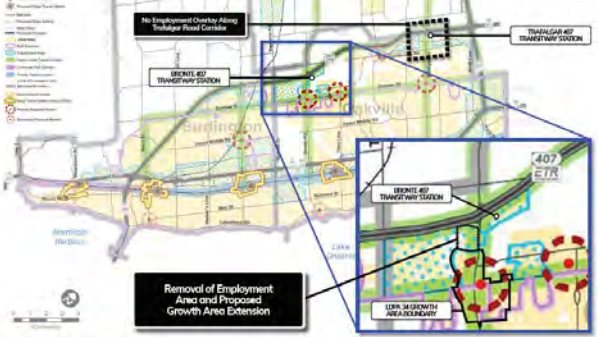
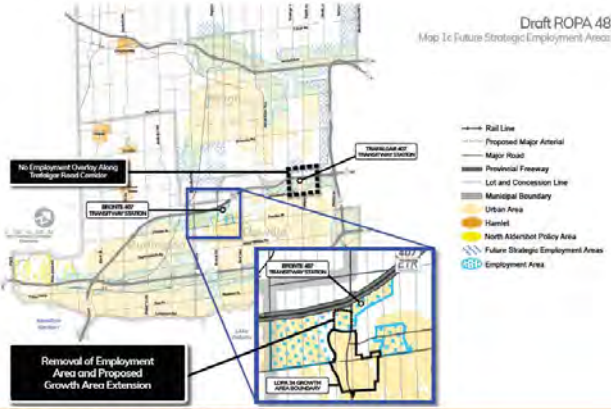
No.	Source	Submission	Response
		<p>and, specifically, to request that the expanded Growth Area be identified as such in ROPA 48. This letter is intended to supplement comments provided by Aird &amp; Berlis dated February 16, 2021, a copy of which is attached for your convenience.</p> <p>The PVC lands (formerly referred to as Newmark Developments) are the subject of ongoing appeals to the Regional and Town Official Plans. Given the appeals, the lands remain undesignated in both Plans. Town Council recently adopted LOPA 34, which had the effect of including a portion of the PVC property within the Palermo Village Growth Area. We are generally supportive of the Town's initiative to expand the Growth Area; however, we believe that the Growth Area needs to be extended further north to support and fully optimize the use of the 407 Transitway and the Bronte 407 Transitway Station. The Environmental Assessment for both was approved by the Province in October of 2020. The approved bus rapid transitway alignment and transitway station design is shown on Figure 1: <i>407 Transitway EA</i>. Given this recent approval, it is appropriate for Regional and Local planning policy to incorporate policies to optimize its use. This is a very significant Provincial transit facility and the ongoing planning for this area needs to "catch up".</p> <p>On Map 1H: Regional Urban Structure from draft ROPA 48, the PVC lands that lie within the limits of LOPA 34 are proposed to be within a "<i>Primary Regional Node</i>". The lands outside of the limits of LOPA 34 are proposed to be designated "<i>Employment Area</i>" (see Figure 2). In our opinion, the ongoing Regional Official Plan Review needs to recognize the significance of the recently approved Transitway Station and include the area outside of LOPA 34 within the "<i>Primary Regional Node</i>". The PVC lands are <b>not</b> within a Provincially Significant Employment Zone, and as shown on Map 1C: Future Strategic Employment Areas from draft ROPA 48 (Figure 3), the PVC lands are <b>not</b> within a <i>Future Strategic Employment Area</i>. Accordingly, we request that the proposed "<i>Employment Area</i>" designation be removed from the PVC lands on all Maps in draft ROPA 48.</p> <p>Our request to remove the proposed "<i>Employment Area</i>" designation and include the lands within an expanded Growth Area is supported by prevailing Provincial policy. Specifically, the guiding principles of the <i>Growth Plan (2020)</i> prioritise intensification and higher densities around existing and <u>planned</u> transit stations to support transit viability, and to make efficient use of land and infrastructure. The 407 Transitway meets the <i>Growth Plan's</i> definition of a "<i>Higher Order Transit</i>" corridor as the buses will be travelling on a dedicated right-of-way. We note that the Regional Plan already identifies the area along the 407 as a "<i>Higher Order Transit Corridor</i>", and that this designation is being carried forward in draft ROPA 48. We also note that Bronte Road is designated as a "<i>Higher Order Transit Corridor</i>" in the existing Regional Plan from Speers Road in Oakville all the way north to Main Street in Milton and is being maintained as such in draft ROPA 48. The long-term plan is to have dedicated bus lanes on Bronte Road. The Bronte 407 Transitway Station, being at the</p>	


No.	Source	Submission	Response
		<p>intersection of 2 designated “<i>Higher Order Transit Corridors</i>”, will fulfill a key role in providing connections between local (Oakville &amp; Milton) and Provincial GO transit services.</p> <p>The area around the Bronte 407 Transitway Station meets the <i>Growth Plan’s</i> definition of a “<i>Major Transit Station Area</i>” since it is a “<i>planned higher order transit station...within a settlement area.</i>” As you are aware, a <i>Major Transit Station Area</i> is further defined as “<i>the area within an approximate 500 to 800 metre radius of a transit station, representing about a 10-minute walk.</i>” The attached Figure 4: <i>Planning Context</i>, shows that most of the PVC lands outside of the currently proposed “<i>Primary Regional Node</i>” are within an 800 metre radius of the planned Bronte 407 Transitway Station and should be considered as being within a “<i>Major Transit Station Area</i>”. Figure 4 also shows that the PVC lands are the only potentially developable lands with 800 metres of the station since the remaining lands are occupied by Glenorchy Conservation Area and the 407 corridor. We emphasize that the PVC lands will be exceptionally well serviced by transit due to its proximity to both the Bronte 407 Transitway Station and Palermo Transit Terminal. This further supports the need to take advantage of the PVC lands and plan appropriately to create a compact urban form with a diverse mix of land uses, housing types, employment, and amenities.</p> <p>Section 2.2.4.8. of the <i>Growth Plan</i> requires that “<i>all major transit station areas will be planned and designed to be transit-supportive</i>”. The <i>Growth Plan</i> defines “<i>Transit-supportive</i>” as “<i>Relating to development that makes transit viable and improves the quality of the experience of using transit. It often refers to <b>compact, mixed-use development</b> (our emphasis) that has a high level of employment and residential densities.</i>” Section 2.2.4.9 of the <i>Growth Plan</i> also requires that “<i>Within <b>all</b> (our emphasis) major transit station areas, development will be supported, where appropriate, by... planning for a <b>diverse mix of uses</b> (our emphasis), including additional residential units and affordable housing, to support existing and planned transit service levels</i>”, and “<i>prohibiting land uses and built form that would adversely affect the achievement of transit-supportive densities.</i>” The <i>Growth Plan</i> clearly directs municipalities to plan and design areas around planned and existing <i>major transit stations</i> to be transit supportive. Where appropriate, they are to include a diverse mix of uses. In our opinion, planning for a diverse mix of uses is appropriate given that this area is not within a Provincially designated Significant Employment Zone and is isolated from other approved employment areas by the extensive Natural Heritage Systems associated with 14 Mile Creek and Glenorchy Conservation Area. Figure 4 shows how these lands have no connection to the employment areas and represent a logical extension of the proposed Palermo Village Growth Area.</p> <p>As per ROPA 48, “<i>Primary Regional Nodes</i>” are “<i>intended to accommodate growth and contain a concentration of public service facilities or <b>transit supportive high density mixed uses</b> (our emphasis) or perform a regional transit network function at an appropriate scale for their context</i>”. Given that the Region is only identifying <i>major transit stations</i> along <i>priority transit corridors</i>, “<i>Primary Regional Nodes</i>” function as a different</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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

No.	Source	Submission	Response
		<p>lands as being within the “<i>Primary Regional Node</i>” for the Palermo Village Growth Area on draft Map 1H: Regional Urban Structure.</p> <p>Thank you for your consideration. As always, we are available to discuss our comments at your convenience.</p> <p>Yours truly,</p> <p><b>KORSIAK URBAN PLANNING</b></p> <p>Terry Korsiak, MA, RPP  Copy: Neil Garbe, Gabe Charles – Town of Oakville</p> <p>Kevin Singh, Adrian Marsili, Argo/PVC</p> <p>Patrick Harrington, Aird &amp; Berlis LLP</p>  <p>REGULAR PARKING = 388 SPACES  ACCESSIBLE PARKING = 14 SPACES  RV/BOAT = 8 SPACES</p> <p>Ontario <b>PARSONS</b> <b>UBI</b></p> <p>FIGURE 1: Bronke/407 Transitway Station</p>	



No.	Source	Submission	Response
		<p data-bbox="982 272 1079 293">Draft ROPA 48</p> <p data-bbox="932 289 1079 305">Map 1H Regional Urban Structure</p>  <p data-bbox="464 646 758 667">FIGURE 2: ROPA 48 Map 1H: Regional Urban Structure</p> <p data-bbox="1031 732 1127 753">Draft ROPA 48</p> <p data-bbox="932 748 1127 764">Map 1C Future Strategic Employment Areas</p>  <p data-bbox="464 1133 842 1154">FIGURE 3: ROPA 48 Map 1C: Future Strategic Employment Areas</p>	

No.	Source	Submission	Response
		<p style="text-align: center;">Planning Context</p>  <p style="text-align: center;">FIGURE 4: Planning Context</p>	
54.	<p>Nancy Mott on behalf of Niagara Escarpment Commission</p> <p>E-mail dated May 26, 2021</p>	<p>ATTACHED LETTER</p> <p>May 25, 2021 VIA EMAIL Ms. Karyn Poad, MCIP, RPP Senior Planner Transportation Planning Services Legislative and Planning Services Region of Halton 1151 Bronte Road Oakville, ON L6M 3L1</p> <p>Dear Ms. Poad:</p> <p>Re: Integrated Growth Management – North Aldershot Discussion Paper Halton Region Official Plan Review</p> <p>Staff of the Niagara Escarpment Commission (NEC) has reviewed Appendix J of the Integrated Growth Management Growth Concepts Discussion paper relating to the North Aldershot Policy Area Urban Expansion Assessment and the related Appendix J.1, North Aldershot Water and Wastewater Constraints and Opportunities prepared by the Region’s consultants. NEC staff also attended the Public Information Centre (PIC) on May 17.</p>	<p>Commentary in this response will not be provided on the site specific development application matters currently being deliberated through litigation as that is a separate process.</p> <p>As summarized in Report No. LPS18-21, the review undertaken as part of the Integrated Growth Management Strategy concluded that urban expansion within the</p>


No.	Source	Submission	Response
		<p>NEC staff supports the Region's recommendation not to expand the urban area into the North Aldershot Policy Area. The portion of North Aldershot within the Niagara Escarpment Plan Area contains areas with significant scenic resources, karst features, Environmentally Sensitive Areas and Areas of Natural and Scientific Interest and the majority of the lands are designated Escarpment Natural and Protection Areas, to reflect those characteristics. The intensification of development within this area would not be consistent with the Objectives for lands in those designations and could create pressure to expand the availability of urban services. It would be challenging, as outlined in your consultant's report, to provide such services without significant impact on natural heritage and water resources on the Escarpment.</p> <p>There are two sets of policies specific to North Aldershot in the Niagara Escarpment Plan. These are Parts 2.2.17 and 2.4.21. The policies in Part 2.2 set out overall policy for the area and refer back to Amendment 197 to the Burlington OP. Part 2.2.17.1 allows the Eagle Heights lands to proceed on municipal services and was the result of an amendment to the NEP approved during the Co-ordinated Review. The ability to construct those services is of course subject to being able to satisfy all relevant policy and development criteria in the NEP.</p> <p>The policy in Part 2.4 allows lot creation in accordance with the Burlington OP. The Region should have regard for these policies if new policies are being considered for the Regional Official Plan for North Aldershot. Note that the Region can be more restrictive than the NEP, in accordance with Part 1.1.1.</p> <p>We appreciate that the Region has updated the Regional Natural Heritage System, (RNHS) which we assume includes the most recent boundaries of the Escarpment Natural and Protection Areas in the NEP, as a result of the Co-ordinated Provincial Plan Review from 2017. Enhancing the RNHS is consistent with the Objective for the natural heritage system in the NEP which is to "protect and where possible enhance natural heritage features and functions, in order to maintain the diversity and connectivity of the continuous natural environment".</p> <p>We provide the following updates with respect to current NEC applications in North Aldershot.</p> <p>1. Three Development Permit applications for properties on Mountain Brow Road West were approved by the NEC at the May 20 Commission meeting. The applications would allow 3 rural properties to connect to municipal water in Hamilton. A copy of the report is available from our website. The provision of municipal water to the subject properties is subject to a pending agreement on the inter-municipal supply of water from Hamilton to Halton.</p>	<p>North Aldershot Policy Area as a whole is not supportable given the overriding policy considerations of the Growth Plan, 2019. This conclusion was based on considerations such as the prevalence of significant and sensitive natural heritage features and functions; the 19 challenge of optimizing major infrastructure investment to service very limited and dispersed pockets of developable land; and, the challenge of achieving a complete community through more compact urban form and a complete range and mix of housing.</p> <p>In addition, upon further analysis in the development of the Preferred Growth Concept, it has been concluded that any other areas contiguous to the existing settlement boundary that may have limited potential for redevelopment, are in comparison to the areas identified in the Preferred Concept, not appropriate for urban expansion given considerations such as feasibility of servicing, protection of the natural heritage system and water resources, and financial viability. It should be noted that existing, historical development approvals will be taken into consideration in the North Aldershot Policy Area.</p>

No.	Source	Submission	Response
		<p>2. A decision on the Development Permit application for the Eagle Heights development (which was of interest to people attending the PIC) is still pending. NEC staff are awaiting the submission of additional technical reports from the applicant. Once those are received, we will take a recommendation report to the Commission. I understand that the City of Burlington has given the applicant one year to complete the remaining studies in relation the Planning Act applications, but a decision on the Development Permit application must precede any decision on the applications to the City. In relation to servicing the subject lands, Regional staff has noted in its comments to the NEC that a Municipal Class EA must be conducted before there is any commitment to allow a proposed reservoir on Horning Road.</p> <p>Thank you for the opportunity to comment on the Region's ongoing Official Plan Review. Please contact me if you have any questions regarding our comments.</p> <p>Yours truly, Nancy Mott, MCIP, RPP Senior Strategic Advisor</p> <p>cc. D. Ramsay, Acting Director, NEC</p>	
55.	<p>Dory Ainsworth on behalf of Westerkirk Capital Inc.</p> <p>E-mail dated May 27, 2021</p>	<p>Dear Mr. Tovey</p> <p>RE: REGION OF HALTON EMPLOYMENT CONVERSION NORTHEAST QUADRANT OF NEYAGAWA BOULEVARD AND BURNHAMTHORPE ROAD WEST, OAKVILLE - EMPLOYMENT CONVERSION REQUEST OUR FILE: 20262A</p> <p>MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") are retained by Westerkirk Capital Inc., the owners of the land located northeast quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands"). The Subject Lands are approximately 18.8 hectares in size. A location map is provided in Figure 1.</p> <p>On August 24, 2020, we submitted a request to the Region in response to the Region's Integrated Growth Management Strategy ("IGMS") Urban Structure Discussion Paper dated June 2020, which was prepared as part of Regional Official Plan Review Process ("ROPR"). A copy of our initial submission is attached as Appendix 1. On February 17, 2021, the Growth Concepts Discussion Paper prepared as part of the IGMS portion of the ROPR was received and released for public consultation by Regional Council. The Discussion Paper built upon the previous IGMS Discussion Papers and presented information on how the Region could accommodate population and employment growth to 2051 and included consideration of employment conversions with an initial assessment of</p>	<p>Regional staff have recommended this employment conversion (337 &amp; 353 Burnhamthorpe Road West, O-02) be advanced in their entirety through the Preferred Growth Concept.</p> <p>As originally submitted, the employment conversion request as submitted by Westerkirk Capital applied to a portion of the lands with frontage onto Burnhamthorpe Road West. The result of the initial assessment was to support the conversion of this portion of the subject lands, and to advance the conversion as part of a Preferred Growth Concept.</p> <p>The initial recommendation for the employment conversion request ((337 &amp; 353 Burnhamthorpe Road West, O-02) has been updated following a revised</p>

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		<p>the requests received through the ROPR process. Appendix C2 to the Discussion Paper contained information on the initial assessment of the conversion requests received.</p> <p>The request submitted for the Subject Lands was identified as Request 0-02 in Appendix C2. The initial assessment concluded that the conversion should be supported and recommended that it be implemented through the Preferred Growth Concept. An extract of the Region's assessment is attached as Appendix 2.</p> <p>The initial conversion request provided a full description of the site context. In our initial request we noted that the total land area for the Subject Lands was 18.80 ha, approximately 5.7 ha being located within the Neyagawa Urban Core and the balance (13 .1 ha) designated Employment District and Transitway. We had requested at that time that only 3.3 ha of the Employment District lands be converted to be consolidated for development with the lands designated as Neyagawa Urban Core to the west. Our request included a detailed assessment of the Region's Conversion Criteria from Section 77.4(4) of the Regional Official Plan.</p> <p>Regional Official Plan Amendment 48 ("ROPA 48")</p> <p>We understand the Region will be proceeding with a first phase of the IGMS work through ROPA 48 to advance strategic local planning priorities and needs related to urban structure. As such the Region released a draft of ROPA 48 on March 11,2021.</p> <p>On March 22, 2021 we forwarded an email to the Region noting that the Subject Lands were part of the Town's study of the Neyagawa Urban Core Node which came out of the Town's Official Plan Amendment 15 ("OPA 15") approved by the Region. We noted that the Town should be able to secure the conversion of lands within that Node prior to their study and questioned why they could not be included in ROPA 48 which would then allow the Town to advance its important planning for growth for the area. The Region responded that the intent of ROPA 48 was to address a limited set of conversions that advance strategic planning objectives and support the Regional/ Local Urban Structures. The Region recognized that the Subject Lands were in the vicinity of a proposed Secondary Regional Node and the Town's Neyagawa Urban Core Area and stated that feedback on the appropriateness of advancing the conversion of the Subject Lands as part of ROPA 48 would be appreciated and considered as part of the public consultation process on ROPA 48.</p> <p>Town of Oakville Report- Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (may 10, 2021)</p> <p>At the May 10, 2021 Oakville Planning and Development Committee, Town of Oakville staff presented a report as input into the Region's ROPA 48 process that addressed a</p>	<p>request by the proponent and the comments from the Town of Oakville.</p> <p>More information on the updated assessment is available in Appendix B of the Preferred Growth Concept Report.</p>

No.	Source	Submission	Response
		<p>number of matters including the importance of the Neyagawa Urban Core. In the report the Town noted the following:</p> <p>"Neyagawa Urban Core</p> <p>These lands are identified in the town's urban structure as a Node for Further Study as a mixed use area. Through the town's ongoing official plan review, a study will be undertaken of the Neyagawa Urban Core Area (NUC) to delineate a boundary and to determine an appropriate mix, scale and intensity for this SGA. Town staff anticipate that this study will be initiated in 04 2021. This study would also examine the potential role, support and connectivity of the NUC with a future 407 Transitway station at Neyagawa Boulevard and Highway 407. Although the town will study all four quadrants of the NUC at the intersection of Neyagawa Boulevard and Burnhamthorpe Road West, the northeast and northwest quadrants are currently designated in the region's Employment Area overlay.</p> <p>Town Staff Opinion: Town staff is of the opinion that the region's Employment Area overlay should be removed from the NUC north of Burnhamthorpe Road West in order for the town's study to proceed. More specifically:</p> <p>For the northeast quadrant, the lands extending eastward to line up approximately with the northerly extension of Carding Mill Trail, and</p> <p>For the northwest quadrant, the lands west of Neyagawa Boulevard should be removed, as well as the lands west of Fourth Line over to the limit of the Region's Natural Heritage System."</p> <p>Updated Request</p> <p>In light of the Town's clear objectives, we fully support the inclusion of the Subject Lands as part of the conversion of employment lands within ROPA 48 and in their entirety as outlined in the staff report. The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix, scale and intensity for the Secondary Growth Node inclusive of employment uses.</p> <p>The following additional considerations justify the advancement of the Subject Lands for conversion in their entirety (18.Sha):</p> <p>The full conversion will facilitate the comprehensive development of the site as part of the Neyagawa Urban Core and the North Oakville East Secondary Plan. The lands are part of</p>	

No.	Source	Submission	Response
		<p>a Node that serves an important function to support the transition with mixed use, compact urban development;</p> <p>The conversion of the full site will also ensure more integrated and compatible land uses while still providing for employment opportunities through the mixed use Node;</p> <p>The conversion of the full site will not compromise the Region's or the Town's ability to meet the employment forecasts as the mixed use node policies can ensure a mix and density of jobs and residents is retained and in fact provide for a higher yield of jobs in the short term;</p> <p>The conversion of the full site can ensure the remaining employment area to the east is not negatively impacted through additional design and land use policies to address transition and ensure compatibility; and,</p> <p>The conversion of the full site will also allow for more compatible land uses to be integrated and comprehensively developed with the balance of the node to the west and south</p> <p>We trust the above information will be used by the Region to support the advancement of the full conversion of the Subject Lands as part of the ROPA 48 process We thank the Region for providing the opportunity to comment further and would be pleased to provide any additional information or clarification of our request.</p> <p>Sincerely, MHBC</p> <p>Dana Anderson, MA, FCIP, RPP Partner</p> <p>Cc: Curt Benson, Region of Halton Diane Childs, Town of Oakville Kirk Biggar, Town of Oakville</p>	

No.	Source	Submission	Response
			
56.	Dory Ainsworth on behalf of 3309	MacNaughton Hermesen Britton Clarkson Planning Limited (“MHBC”) are retained on behalf of Penta Properties Inc. (“Penta”) in relation to various properties located throughout the City of Burlington. Over the past year, Penta has made a number of submissions in relation to the Region’s Municipal Comprehensive Review and the Integrated Growth Management Study (“IGMS”) process as it affects its properties.	A final assessment has been completed and Regional staff have recommended retaining 3309 Harrison Court (identified as request B-19 in the Growth Concepts



No.	Source	Submission	Response
	<p>Harrison Court</p> <p>E-mail dated June 1, 2021</p>	<p>In February 2021, the Region formally released a draft of Regional Official Plan Amendment No. 48 ("ROPA 48") which is as a first phase amendment to the Regional Official Plan to address the Region's urban structure to 2051. ROPA 38 is focused on identifying the Region's growth targets and growth areas, delineating the Major Transit Station Area boundaries, and advancing several local strategic planning objectives including key employment land conversions.</p> <p>As noted, over the past few years, Penta has submitted multiple requests with detailed supporting information to the City of Burlington and to the Region of Halton, to consider both employment land conversions and revisions to the proposed MTSA boundaries in the City of Burlington. Most recently, Penta submitted a response to the Region's Integrated Growth Management Strategy Urban Structure Discussion Paper, a copy of which is attached as Appendix A. The submission provided a detailed justification for employment conversion requests for a number of properties. In many cases, the requests were seeking to expand existing use permissions to include commercial, community and employment supportive uses otherwise restricted under the Region's current Employment Overlay policies. The following is a summary of the information provided to the Region to date and a request for further consideration by Council to amend ROPA 48.</p> <p><b>Employment Land Conversion Requests</b></p> <p>In June, 2020, the Region released an Integrated Growth Management Strategy Urban Structure Discussion Paper. The Discussion Paper set out additional criteria for employment conversion requests and established a deadline for additional submissions to be made for consideration by the Region through its Regional Official Plan Review ("ROPR") process related to existing or new conversion requests. In August, 2020, a detailed request (attached as Appendix A) was submitted to Halton Region to consider employment land conversions for the following four Penta properties:</p> <ul style="list-style-type: none"> <li>• 1200 King Road;</li> <li>• 3309 Harrison Court;</li> <li>• 4450 &amp; 4480 Paletta Court; and,</li> <li>• 5164, 5366, 5470, 5900 Upper Middle Road &amp; 5201 Mainway.</li> </ul> <p>As noted in many cases, the employment land conversion requests were to remove the Employment Overlay as a restriction to development and in some cases redevelopment of the sites with employment generating uses. Providing for a wider range of uses on many of the properties will actually better meet the Region's minimum job targets and better respond to current market needs given the physical location and context of the properties.</p>	<p>Discussion Paper within the Regional Employment Area.</p> <p>An updated submission was received for the subject lands at 3309 Harrison Court in the City of Burlington. The submission responds to the Region's initial assessment and provides additional information for Regional consideration on the final recommendation for this conversion.</p> <p>More information on how this conversion does not meet the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p> <p><b>MTSA Boundary Delineations</b></p> <p>On November 10, 2021, the Minister of Municipal Affairs and Housing approved Amendment No. 48, "An Amendment to Define a Regional Urban Structure" (ROPA 48).</p> <p>ROPA 48 delineates Major Transit Station Area (MTSA) boundaries, including Appleby GO and Aldershot GO Stations in accordance with the Growth Plan. In terms of whether the subject lands fall outside or within the recommended MTSA Boundary delineation:</p> <p>4480 Paletta Court is within the MTSA and will remain Regional Employment Area. However, the following lands are not within an MTSA:</p> <ul style="list-style-type: none"> <li>• 1200 King Road</li> <li>• 4450 Paletta Court</li> </ul>

No.	Source	Submission	Response
		<p>It was requested that these lands should not be restricted to industrial only uses but should be permitted to provide for uses that allow for a wider range of opportunities to meet market demands that have significantly changed since the planning framework for employment in the Region was established. As noted in the submission, the conversions would assist in creating complete communities by increasing the range of permitted uses located close to existing and planned neighbourhoods.</p> <p>On April 13, 2021, MHBC staff had an opportunity to meet with Regional staff to review the Region's response to the employment requests as provided in Appendix C1 of the Integrated Growth Management Strategy Growth Concepts Discussion Paper. The focus of that meeting was to discuss 1200 King Road, 4450 &amp; 4480 Paletta Court and 3309 Harrison Court. During the meeting Regional staff reiterated their reliance on the assessment of the conversion criteria which in many cases was extremely subjective and without any detailed analysis at the time or quantitative/factual consideration. Some of the concerns noted from the meeting included the following:</p> <ul style="list-style-type: none"> <li>• There has been limited study of the provision of commercial uses as part of the IGMS work related to how commercial land use needs will be provided only through mixed use development forms;</li> <li>• Much of the additional work referenced has not yet been completed is not yet public.</li> <li>• Changes to policies related to the permitted uses within the Employment Areas based on the changing nature of employment in the Region and changing retail markets will be presented later for review and discussion and not in advance of considerations for employment land conversions. It is strongly recommended that employment land conversions be considered together with proposed changes to employment policies. Should those policies remain restrictive, retention of the overlay will sterilize many sites.</li> </ul> <p>One specific employment conversion request made by Penta relates to its vacant site located adjacent to the existing Lowes store, east of Appleby Line in the City of Burlington. When meeting with Regional staff, 3 a number of concerns were raised related to the Region's assessment of the criteria and recommendation not to convert the Harrison Court lands. Following the meeting, MHBC submitted additional information to further justify the importance of converting the lands, a copy of which is attached as Appendix B.</p> <p>In summary, the lands located at 3309 Harrison Court in Burlington, represent a similar context to other sites recommended for approval for conversion and the lands meet all of the conversion criteria. The adjacent lands on which the Lowes is currently located is within the same Plan of Subdivision as the 3309 Harrison Court site and should be developed as part of the commercial node to serve the current and growing community</p>	<ul style="list-style-type: none"> <li>• 3309 Harrison Court</li> <li>• 5201 Mainway</li> <li>• 5164, 5366, 5470, 5900 Upper Middle Road</li> </ul> <p>Please see rows above for more information on employment conversion requests for 5164, 5366, 5470, 5900 Upper Middle Road &amp; 5201 Mainway.</p> <p>More information on ROPA 48, including mapping of the MTSA boundaries, is available on the project webpage online <a href="#">here</a>.</p>

No.	Source	Submission	Response
		<p>area. It is strongly recommended that both Harrison Court sites be included for conversion and be included with ROPA 48 for the planning reasons set out in the letter that address both Provincial and Regional policies.</p> <p>MTSA Boundary Delineations</p> <p>Over the past few years, multiple requests have been submitted to the City of Burlington to include the following Penta properties within proposed MTSA boundaries for Appleby GO and Aldershot GO Stations as they are both within 800 metres of the stations:</p> <ul style="list-style-type: none"> <li>• 1200 King Road (Aldershot GO)</li> <li>• 4450 Paletta Court (Appleby GO)</li> </ul> <p>The 1200 King Road lands represent an extension of lands directly eastward from the existing Metrolinx Aldershot GO Station. It is a prime location for intensification given that it is within the '15-minute neighbourhood' of the station and would achieve the Growth Plan objectives of creating a complete community. Similarly, 4480 &amp; 4450 Paletta Court is also within the 15-minute neighbourhood and provides opportunities for population and job growth near a public transit facility.</p> <p>The exclusion of 4450 Paletta Court results in one half of the parcel being located outside of the MTSA. One of the key criteria of the Region for the delineation of MTSA's in its methodology is to include whole parcels. As noted by the Regional criteria "blocks should remain intact to facilitate the cohesive and comprehensive development of the MTSA". This was clearly not applied to 4480 and 4450 Paletta Court. A map illustrating the "splitting" of the boundary is attached as Appendix C. While the City of Burlington had opportunities to include these lands within proposed MTSA boundaries, the City did not include the lands in the recently approved new Official Plan (under appeal). The inclusion of the lands would provide both the Region and the City with opportunities for intensification of these two Strategic Growth Areas.</p> <p>In accelerating ROPA 48 ahead of the Preferred Growth Concept, it is not clear how the proposed MTSA boundaries will achieve the minimum density targets of 150 people and jobs per hectare to meet ROPA 38's targets for 2031, not to mention 2051 targets. We trust the staff report will provide the detailed growth projections and distribution of growth based on the proposed land areas for the MTSA's.</p> <p>Public Engagement: Halton Region's Response</p> <p>While we acknowledge Halton Region has met the minimum Planning Act requirements for public engagement, through Open Houses and various virtual workshops, the Region has not documented publicly how all submissions have been addressed through proposed policy amendments. The Region produced one "communication plan" that provided a</p>	

No.	Source	Submission	Response
		<p>conceptually themed report. That report was general to Phase 2 of the Region Official Plan Review. Halton Region Report no. LPS05-21: "Regional Official 4 Plan Review - Phase 2 Initial Consultation Summary" provided Attachment 1, "Regional Official Plan Review: Phase 2 Initial Consultation Summary." The summation was based on the prescribed on-line survey results and common responses. The summary did not identify how the Region addressed comments and what changes were considered, or not, to the proposed policies. The draft of ROPA 48 was in fact completed without consideration of the comments requested by December 21, 2021.</p> <p>Affected landowners and stakeholders were actively engaged in discussions with Regional staff regarding comments and responses in advance of the draft amendment. This has been a different approach to public engagement than ROPA 38 where comments were noted and made part of the public record.</p> <p>ROPA 48, if adopted with the proposed boundaries for MTSAs, and without the additional requested employment conversions will split the potential redevelopment of two key properties within the MTSAs and will represent a lost opportunity for economic development and job creation within the Region. The public engagement to date on employment and future needs has lacked informed input from key stakeholders in the business and investment community of the Region We trust these submissions and comments will be further considered to ensure those interests are at a minimum acknowledged.</p> <p>Sincerely, MHBC</p> <p>Dana Anderson, FCIP, RPP Attach. Appendix A Submission Response: Region's Integrated Growth Management Strategy Urban Structure Discussion Paper Appendix B Meeting Minutes: Region &amp; Penta, Employment Conversion Appendix C Map: MTSA Delineated Boundary: Paletta Court</p> <p>cc: David Pitblado, Penta Properties</p>	
57.	Dory Ainsworth on behalf of Dorham Holdings	<p>Dear Mr. Tovey</p> <p><b>RE: REGION OF HALTON EMPLOYMENT CONVERSION NORTHWEST QUADRANT OF NEYAGAWA BOULEVARD AND BURNHAMTHORPE ROAD WEST, OAKVILLE - EMPLOYMENT CONVERSION REQUEST OUR FILE: 21255A</b></p>	Please see a response to item in row No. 15.

No.	Source	Submission	Response
	E-mail dated June 4, 2021	<p>MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") are retained by Dorham Holdings, the owners of the land located in the northwest quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands"). The Subject Lands are approximately 11.3 hectares in size. A location map is provided in Figure 1.</p> <p>On August 24, 2020, we submitted a request to the Region for the Subject Lands in response to the Region 's Integrated Growth Management Strategy ("IGMS") Urban Structure Discussion Paper dated June 2020, which was prepared as part of Regional Official Plan Review Process ("ROPR"). A copy of our initial submission is attached as Appendix 1. On February 17, 2021, the Growth Concepts Discussion Paper prepared as part of the IGMS portion of the ROPR was received and released for public consultation by Regional Council. The Discussion Paper built upon the previous IGMS Discussion Papers and presented information on how the Region could accommodate population and employment growth to 2051 and included consideration of employment conversions with an initial assessment of the requests received through the ROPR process. Appendix C2 to the Discussion Paper contained information on the initial assessment of the conversion requests received.</p> <p>The request submitted for the Subject Lands was identified as Request 0-22 in Appendix C2. The initial assessment concluded that further analysis was required to determine a recommendation regarding the Subject Lands. An extract of the Region's assessment is attached as Appendix 2.</p> <p>The initial conversion request provided a full description of the site context, the applicable policy context and a full assessment of the employment conversion based on the Region's conversion criteria found in Section 77.4 of the Regional Official Plan and the additional criteria provided in the Urban Structure Discussion Paper. We maintain that our assessment of the criteria fully supports and justifies the conversion of the Subject Lands.</p> <p>Further Analysis and Meeting with Regional Staff</p> <p>On April 26, 2021 we met with Regional staff to discuss the conversion and the further analysis to support the conversion. During the meeting we responded to the Region's comments with additional information as noted below. Several examples were provided of where the Region has specially supported strategic employment conversions for land s where current operating employment uses exist (i.e. Aldershot and Burlington GO Station MTSAs) and the Region has justified significant land conversion by noting that the "removal of lands from the Regional Employment Area is requested in order to permit the development of an Area Specific Plan for strategic growth that includes a mix of uses". These lands also share the same peripheral locational context as the Subject Lands. The Town of Oakville's Neyagawa Urban Core is an approved Strategic Growth Node where a</p>	

No.	Source	Submission	Response									
		<p>similar area study is to be undertaken. Conversion of the lands within it should be accommodated on the same planning basis and rationale.</p> <table border="1" data-bbox="453 337 1125 1411"> <thead> <tr> <th colspan="3" data-bbox="459 342 1119 363">Assessment O-22</th> </tr> <tr> <th data-bbox="459 367 554 420">Criteria</th> <th data-bbox="558 367 894 420">Regional Comment</th> <th data-bbox="898 367 1119 420">Response</th> </tr> </thead> <tbody> <tr> <td data-bbox="459 423 554 565">Employment Land Supply</td> <td data-bbox="558 423 894 1406"> <p>The Subject Lands currently function as part of the supply of lands that could accommodate certain types of Employment uses in Halton. They are of a significant size, are vacant, are strategically located in relation to goods movement facilities, and are part of a contiguous Regional Employment Area identified south of Highway 407.</p> <p>As a result, and given their location in relation to the Local Urban Structure, further analysis is required to determine whether the conversion would have the potential to adversely impact the overall supply of employment lands or the ability to achieve employment targets by 2051.</p> </td> <td data-bbox="898 423 1119 1406"> <p>The Subject Lands are located at a strategic location within the Town of Oakville. The Subject Lands have great potential to support increased densities and jobs through a mixed-use designation within the planned Neyagawa Urban Core as approved through OPA 15. The lands are not part of an existing development employment area and as part of the existing planned area are at the terminus of the area and part of a key node to be redeveloped.</p> <p>The conversion will not adversely impact the overall supply of Regional employment lands or the ability to achieve employment</p> </td> </tr> </tbody> </table>	Assessment O-22			Criteria	Regional Comment	Response	Employment Land Supply	<p>The Subject Lands currently function as part of the supply of lands that could accommodate certain types of Employment uses in Halton. They are of a significant size, are vacant, are strategically located in relation to goods movement facilities, and are part of a contiguous Regional Employment Area identified south of Highway 407.</p> <p>As a result, and given their location in relation to the Local Urban Structure, further analysis is required to determine whether the conversion would have the potential to adversely impact the overall supply of employment lands or the ability to achieve employment targets by 2051.</p>	<p>The Subject Lands are located at a strategic location within the Town of Oakville. The Subject Lands have great potential to support increased densities and jobs through a mixed-use designation within the planned Neyagawa Urban Core as approved through OPA 15. The lands are not part of an existing development employment area and as part of the existing planned area are at the terminus of the area and part of a key node to be redeveloped.</p> <p>The conversion will not adversely impact the overall supply of Regional employment lands or the ability to achieve employment</p>	<p>Comments noted. Please see a response to item in row No. 15.</p>
Assessment O-22												
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No.	Source	Submission		Response
			<p>targets by 2051 as the provision of a mix of uses at a much higher density will provide for more employment opportunities on the lands.</p>	
		<p>Demonstrated Need</p>	<p>A need for the conversion may be established based on the strategic location of the lands in the context of the Regional Urban Structure and/or Local Urban Structure given the location of the Subject Lands in relation to the Neyagawa Urban Core and the identification of a portion of the lands as a node for further study in the Town's urban structure.</p> <p>Further analysis is required to confirm the need for the conversion on the basis of its strategic location and strategic opportunity, including how the conversion contributes to the key strategic growth management objectives, as well as in relation to the considerations related to the overall supply of employment lands as discussed above.</p>	<p>The Town has clearly stated the importance and need for the conversion to meet future growth needs as approved through OPA 15. As part of a strategic mixed use node, the lands will meet key strategic growth management objectives as directed by the Town's approved urban structure and will not negatively impact the overall supply of employment lands.</p>

No.	Source	Submission		Response	
		<p>Employment Area Variability</p>	<p>The Subject Lands are not located at the periphery of the Regional Employment Area as it is currently delineated. The removal of the lands would not result in a logical boundary for the Regional Employment Area and would change a contiguous employment area into an isolated employment area to the west of the Subject Lands.</p> <p>The removal of the lands would create an isolated Regional Employment Area, which could in turn impact the overall viability of the employment area over the long-term. Further analysis is required to determine the impacts to the viability of the Regional Employment Area, considered in relation to the land supply and need principles discussed above.</p>	<p>The Subject Lands are located at the periphery of the Regional Employment Area. The conversion of the lands will not impact the remaining employment area to the east. The overall viability of the Regional Employment Area is not impacted by the conversion.</p>	
		<p>General Considerations</p>	<p>No cross-jurisdictional issues were identified in the review of the request.</p> <p>Given the nature of the conversion and the location of the Subject Lands, further analysis is required to ensure the conversion can be supported by existing or planned infrastructure and public service facilities.</p>	<p>The Subject Lands area located where services and infrastructure to accommodate the conversion will be provided.</p> <p>The Town has provided clear support for the full conversion of the Subject Lands based on its report entitled Regional</p>	



No.	Source	Submission	Response			
		<table border="1" data-bbox="457 256 1125 505"> <tr> <td data-bbox="457 256 558 505"></td> <td data-bbox="562 256 890 505">Further information on the Town's position can be provided through subsequent consultation.</td> <td data-bbox="894 256 1125 505">Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021).</td> </tr> </table> <p data-bbox="457 532 1392 586">Town of Oakville Report - Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021)</p> <p data-bbox="457 613 1373 722">At the May 10, 2021 Oakville Planning and Development Committee, Town of Oakville staff presented a report as input into the Region's ROPA 48 process that addressed a number of matters including the importance of the Neyagawa Urban Core. In the report the Town noted the following:</p> <p data-bbox="457 750 1409 1024">"Neyagawa Urban Core These lands are identified in the town's urban structure as a Node for Further Study as a mixed use area. Through the town's ongoing official plan review, a study will be undertaken of the Neyagawa Urban Core Area (NUC) to delineate a boundary and to determine an appropriate mix, scale and intensity for this SGA. Town staff anticipate that this study will be initiated in 04 2021. This study would also examine the potential role, support and connectivity of the NUC with a future 407 Transitway station at Neyagawa Boulevard and Highway 407. Although the town will study all four quadrants of the NUC at the intersection of Neyagawa Boulevard and Burnhamthorpe Road West, the northeast and northwest quadrants are currently designated in the region's Employment Area overlay.</p> <p data-bbox="457 1052 1402 1133">Town Staff Opinion: Town staff is of the opinion that the region's Employment Area overlay should be removed from the NUC north of Burnhamthorpe Road West in order for the town's study to proceed More specifically:</p> <p data-bbox="457 1161 1369 1219">For the northeast quadrant, the lands extending eastward to line up approximately with the northerly extension of Carding Mill Trail; and</p> <p data-bbox="457 1247 1388 1328">For the northwest quadrant, the lands west of Neyagawa Boulevard should be removed, as well as the lands west of Fourth Line over to the limit of the Region's Natural Heritage System."</p> <p data-bbox="457 1356 810 1382">Restated Request for Conversion</p>		Further information on the Town's position can be provided through subsequent consultation.	Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021).	
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No.	Source	Submission	Response
		<p>In light of the Town's clear objectives as set out in their recent report, the Subject Lands should be supported as part of the conversion of employment lands within ROPA 48 as outlined in the Town's staff report. The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix, scale and intensity for the Secondary Growth Node inclusive of employment uses.</p> <p>We trust the above information provides the further analysis and support required by the Region to support the advancement of the full conversion of the Subject Lands as part of the ROPA 48 process. We thank the Region for providing the opportunity to comment further and would be pleased to provide any additional information or clarification of our request</p> <p>Sincerely, MHBC Dana Anderson, MA, FCIP, RPP Partner</p> <p>Cc Mary Mitar, Dorham Holdings Curt Benson, Region of Halton Diane Childs, Town of Oakville Kirk Biggar, Town of Oakville</p>	
58.	<p>Paul Lowes on behalf of Milton P4 Trafalgar Landowners Group</p> <p>E-mail dated June 8, 2021</p>	<p>Hi Curt</p> <p>Please find attached our initial comment letter on the IGMS Discussion Paper on behalf of the Milton P4 Trafalgar Landowner Group Inc.</p> <p>You will see that we have number of questions that we would like to discuss with Region staff prior to finalizing a fulsome comment letter on the Discussion Paper. We would like to request a meeting with Region staff and representatives of the landowners to discuss these questions.</p> <p>Please let us know when a meeting could be arranged at your earliest convenience.</p> <p>Thanks</p> <p>Paul</p> <hr/> <p>ATTACHED LETTER</p>	<p>Regional staff met with the MP4 landowners on July 15, 2021 to discuss their comments in detail.</p> <p>Comments are acknowledged.</p> <p>#2/3 – The units in the DGA as of 2021 is estimated to be 33,500. The vacant supply of this area is 147,000, of which nearly 95,000 are apartments.</p> <p>#4 – The Preferred Growth Concept shows a land need of 15,500 ground-related units beyond the current capacity.</p> <p>#5 -- The percentages are the share of total housing unit growth in the Region which are the additional DGA apartments.</p>


No.	Source	Submission	Response
		<p>June 3, 2021 Project: MP4.ML VIA EMAIL Curt Benson, Director of Planning Services Regional Municipality of Halton Planning Services 1151 Bronte Road Oakville, Ontario L6M 3L1</p> <p>Re: Regional Official Plan Review IGMS Discussion Paper - Milton P4 Trafalgar Landowner Group Inc. Group Comments</p> <p>SGL Planning &amp; Design is the planning consultant to the Milton P4 Trafalgar Landowners Group Inc. The Milton P4 Trafalgar Landowners Group is comprised of the following landowners:</p> <ul style="list-style-type: none"> <li>• 2076828 Ontario Limited</li> <li>• White Squadron Development Corporation</li> <li>• Frontenac Forest Estates Inc.</li> <li>• Hannover Trafalgar Farms Limited &amp; Milton Sheva Land Limited O/A Hornby Land JV</li> <li>• York Trafalgar Golf Corp.</li> <li>• Comarin Corp.</li> <li>• Remington Trafalgar Inc.</li> </ul> <p>Together the landowners group owns approximately 415 hectares in the Trafalgar Corridor Secondary Plan Area. The secondary plan was adopted by the Town of Milton in March 2019 and is currently being reviewed by Region of Halton staff.</p> <p>We have been asked to provide comments, on behalf of the landowners group, on the IGMS Discussion Papers. Prior to submitting our comments, we have several questions that require clarification so that we can provide informed comments.</p> <p>1) What does “Densification” mean specifically in terms of the %’s in each of the options. Does it mean that intensification in the Built-up Area (BUA) is held constant in all 4 options but the amount of “densification” in the BUA increases from 0 in Concept 4 to 30% in Concept 3?</p> <p>2) What is the capacity in units of the built portion of the current Designated Greenfield Area (DGA)?</p> <p>3) What is the capacity in units of the un-built portion of the current DGA?</p>	<p>#6 – There is no change.</p> <p>#7 – No. As noted with Question 4, there is an enormous supply potential without approaching the high end of the range.</p> <p>#10 – None, as required. The change of unit type directly follows from growth plan policy.</p> <p>#13 – The Preferred Growth Concept is now based on four unit types, of which apartments are in accordance with the Census definition. There is also a category for accessory units which would include secondary suites, garden suites, and laneway housing.</p> <p>#14 – Densification is merely a descriptor for apartments in the DGA that are in excess of the small proportion we would typically expect. The location of this densification is where apartments are currently planned in the DGA.</p> <p>#15 – No area is being replanned.</p> <p>#17 – In the PGC, there are complete tables on DGA density in new and existing areas which address this.</p> <p>#18 – The housing mix contains more ground-oriented units than the two denser of the growth concepts.</p> <p>#19 – New home sales in the Region of Halton and others parts of the GTA have trended towards a greater portion of apartment type unit sales. Further all of the lasting effects of the COVID-19 pandemic have yet to be known.</p>

No.	Source	Submission	Response
		<p>4) What is the specific increase in units by type in the current DGA over and above the current capacity for each concept?</p> <p>5) The footnote to Figure 12 on page 56 states that densification approximates the share of apartments in the mix of housing growth and provides a % increase in the Concepts 1, 2, 3 and 4 of 10%, 17%, 24% and 2.5% of units as DGA densification. It is unclear what these percentages mean. Are they the total share of apartments that will be allocated to the DGA or is it the % of the total units in the DGA that will be apartments?</p> <p>6) If the % of apartment units are to be increased in the Trafalgar corridor in Milton as the note states, how does this occur with an adopted Secondary Plan?</p> <p>7) We understand that you stated that the densification target can be achieved using the top of the density range in existing Secondary Plans. However, the density ranges in land use designations in a Secondary Plan are just that – ranges. Is the Region implying that development must occur at the top end of all density ranges and how is the Region proposing to ensure the top of the range is achieved when development is permitted at the lower end of the range? Will the Region be requiring amendments to the secondary plans? If not, will the densification target be unable to be achieved?</p> <p>8) The footnote to Figure 12 on page 56 references Trafalgar Road in north Oakville and Milton as being a DGA strategic growth area. However, Trafalgar Road in ROPA 48 is not identified as a strategic growth area and neither is it identified as such in the Trafalgar Secondary Plan although the secondary plan identifies four Neighbourhood Centres along the Trafalgar corridor. Please identify why the entire Trafalgar Road corridor is identified as a strategic growth area.</p> <p>9) What is the total apartment unit share in terms of percentage of unit types in the DGA in each of the Concepts?</p> <p>10) What market research has been conducted to support the notion that the same consumer looking to purchase a ground related dwelling under various options will just as likely purchase an apartment under option 3?</p> <p>11) The Growth Outlook Report prepared by Hemson in 2020 to support the 2020 Growth Plan amendment highlighted that based on market demand the split for apartments vs. ground related units is generally 25% vs. 75%, respectively. Has the Region undertaken a risk assessment analysis to determine the impacts of deviating substantially from market-based demand (i.e., shortfall of units, impacts to the Region's current infrastructure funding model of front-ending DC payments (the allocation program), DC revenues, demographic shifts, etc.)?</p>	<p>#20 – Yes, and one of the reasons that the additional apartments are considered in the DGA are the challenges in accommodating all high density growth in the existing BUA in Halton.</p> <p>#21 – For the PGC, the intensification rate in the BUA is 45% and 65 ppj/ha in the new DGA.</p> <p>#24 -- From a 2022 and Growth Plan 2019 perspective, the lands will not be fully developed by 2031. The IGMS looks at the demand and supply from a 2021 perspective. Based on that, the HUSP are not yet fully developed and the Sustainable Halton have not yet begun development. Growth for the 2020s is slower than in the current Official Plan and there is less Greenfield development due to the higher intensification rate. All of which means that Greenfield land will last well into the 2030s.</p>

No.	Source	Submission	Response
		<p>12) Affordability is a significant concern for families looking to move to Halton Region. Has the Region reviewed market affordability of 2/3 bedroom apartments for families? What impact does the policy shift to apartments have on affordability of other housing forms that have traditionally drawn families to Halton?</p> <p>13) What constitutes “apartments” in the densification assumptions – i.e., does it include stacked townhouse, back-to-back townhouse, secondary suites, low-rise apartments?</p> <p>14) Can the Region be more specific with regards to where the concept of Densification will apply in the DGA? We have heard from the Region that densities within existing DGA Secondary Plan areas will not be impacted. If this is the case, where will Densification occur, what work has been done to determine where the densification will occur and have these areas been mapped?</p> <p>15) What areas of each municipality will be replanned to accommodate densification? Has the feasibility of achieving these densification rates been tested?</p> <p>16) What major transit initiatives are planned to support the proposed population / job growth in the Designated Greenfield Area through densification?</p> <p>17) The report discusses a consistent DGA density, but how does the densification rate in each concept change the overall DGA density in the existing DGA and the 2031-2051 DGA?</p> <p>18) How has the PPS and Growth Plan requirement for providing for an appropriate range and mix of housing options and densities to meet projected market-based housing market been reflected in the Concepts?</p> <p>19) How has the COVID pandemic and the resulting shift in housing preferences been considered in the Concepts?</p> <p>20) The Concepts appear to keep the intensification target constant. Why is there a focus on densification of the DGA rather than intensification of the Strategic Growth Areas in the BUA?</p> <p>21) What are the proposed BUA intensification targets and DGA density targets for each municipality under each of the Concepts?</p> <p>22) Page 31 discusses affordable housing and says Concept 3 has the greatest amount of intensification and growth allocated to Strategic Growth Areas (SGAs) including MTSAs, therefore having the most potential for affordable housing through inclusionary zoning. This statement is simply misleading. Affordable housing is not just delivered through</p>	

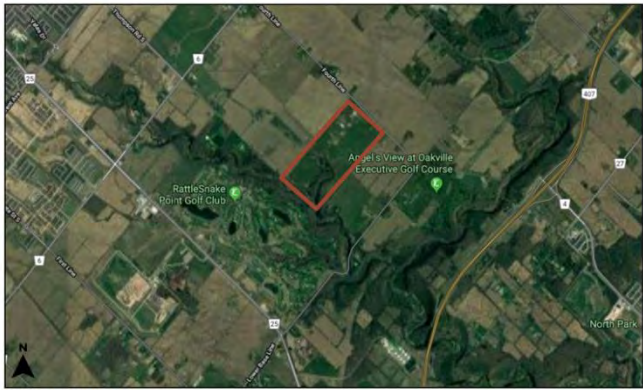
No.	Source	Submission	Response
		<p>inclusionary zoning. Townhouses and other multiple housing forms can also deliver affordable housing in a greenfield situation and in fact the Trafalgar Secondary Plan is required to deliver 30% of its greenfield housing as affordable housing.</p> <p>23) What is the total area of Prime Agricultural Lands in Halton? What % is being removed under Concepts 1 – 4? What impact does this have on local food supply?</p> <p>24) On page 37, the report states that, “in preparing the Land Needs Assessment for this current exercise, all concepts assume that DGA previously identified through the HUSP, and Sustainable Halton plans will be fully developed prior to any new development occurring within any new urban expansion areas. It is anticipated that these lands can reasonably satisfy greenfield demand into the 2031-2041 time period”. Is this statement saying that the Trafalgar Secondary Plan area will satisfy greenfield demand past 2031? Wasn't the demand established under ROPA 38 for up to 2031 and didn't ROPA 39 put in place phasing policies for how growth and infrastructure needs are to be phased to 2031 including phasing according to 5-year increments in Table 2C of the Halton Region Official Plan?</p> <p>25) Map 5 of the Halton Region Official Plan delineates areas that are to be phased for growth between 2021 and 2031. If ground related units within the HUSP and Sustainable Halton settlement expansion areas are to be developed by 2031 and the population in all four scenarios remains constant, how can Option 3 deliver the ground related units and achieve the PPS requirement for market-based housing needs with no settlement area boundary expansion?</p> <p>26) The draft concepts show Trafalgar Road through the entirety of the Trafalgar Secondary Plan as “Nodes and Corridors”. This delineation does not reflect the designations in the Trafalgar Secondary Plan. Does this mean the approval of the Secondary Plan is to be held up until the IGMS is completed and the amendments to the Halton OP are approved? Does this mean the Region is suggesting that the Town adopted Secondary Plan is to be revised?</p> <p>Thank you for the opportunity to preliminary comments and questions on the IGMS Discussion Paper. We request a meeting with Region staff to discuss our questions so that we can provide a more fulsome response to the IGMS Discussion Paper.</p> <p>Yours very truly,</p> <p>SGL PLANNING &amp; DESIGN INC. Paul Lowes, MES, MCIP, RPP Principal Region of Halton Official Plan Review, ropr@halton.ca</p>	

No.	Source	Submission	Response
		Barb Koopmans, Town of Milton Jill Hogan, Town of Milton John Tjeerdsma, Milton P4 Trafalgar Landowners Group Inc.	
59.	Arthur Grabowski on behalf of Samuel, Son & Co. Ltd.  E-mail dated June 11, 2021	<p>Good afternoon,</p> <p>Thank you for confirming our earlier submission.</p> <p>We would like to clarify that the site area is actually 82.1 hectares (200 acres), rather than the 8.21 hectares (20 acres) as shown in the June 3rd, 2021 and August 13, 2019 letters. However, the extent of the site as shown on Figure 1 and municipal address is correctly shown in both letters.</p> <p>Accordingly, we would like to replace our earlier June 3th submission with the attached updated letter to prevent any further confusion on this matter.</p> <p>Thanks again and have a great weekend.</p> <hr/> <p>ATTACHED LETTER</p> <p><b>June 11, 2021</b>            Curt Benson, RPP, MCIP            Director, Planning Services and Chief Planning Official            1151 Bronte Road            Oakville, Ontario, L6M 3L1</p> <p><b>Re: Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy</b></p> <p>The Planning Partnership acts for Samuel, Son &amp; Co. Ltd (“landowner”), the owners of the lands at the northwest corner of Fourth Line and Lower Baseline West, known municipally as 5274 Fourth Line, in the Town of Milton (“Subject Site”). The Subject Site is approximately 82.1 hectares (200 acres) in lot area (Figure 1).</p>	<p>Based on the results of technical analysis, lands within the Primary Study Area (which is the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy) and outside of the Provincial Greenbelt Plan Area are proposed to be included in the Preferred Growth Concept as Community Area.</p>

No.	Source	Submission	Response
		 <p data-bbox="457 719 632 740">Figure 1: Subject Site</p> <p data-bbox="457 769 1402 1040">We have continued to monitor the Region's MCR process since our initial comment letters, dated August 13, 2019, and February 24, 2020 and meeting with Halton Region staff on October 8, 2019. We would like to correctly note that the site area is indeed approximately 82.1 hectares (200 acres), and not 8.21 hectares (20 acres) as indicated in our August 13, 2019 submission. The property boundaries as shown in Figure 1 (on both letters) remains unchanged and generally shows the extent of our client's lands. We have attached the letters that we previously submitted to the Region on behalf of our client for your reference. We were also in attendance for the Region's recent Public Information Centre (PIC) for the Town of Milton regarding the Regional Official Plan Growth Concepts on May 6, 2021, and we look forward to attending the Region-wide PIC on June 29, 2021.</p> <p data-bbox="457 1073 1381 1235">We would again like to reiterate our support for Growth Concept 4 as a balanced approach to growth that incorporates both intensification and new designated greenfield development. We believe Growth Concept 4 represents a healthy and sustainable approach to accommodating growth that would establish a strong foundation for the Region's continued economic success and further build on its reputation as a desirable place to work and live.</p> <p data-bbox="457 1268 1402 1373">The Town of Milton Planning Staff (Staff Report DS-028-21 dated May 3, 2021) appear to share our concerns with the Growth Concepts 1, 2 and 3 (and 3B). The Town has instead indicated support for Growth Concept 4, which envisions a balance of intensification and new greenfield areas to support the rapid new growth that is forecast for Halton Region.</p>	



No.	Source	Submission	Response
		<p>We agree with the Town of Milton’s position, and believe that Growth Concept 4 is the most desirable for the growth of Halton Region.</p> <p>The timing of this letter coincides with an important juncture in the MCR process as the Region nears completion of Phase 2 of the Regional Official Plan Review (ROPR). The Region will move into Phase 3 of its workplan, where a Preferred Growth Concept and Policy Directions Report will be presented for Regional Council’s consideration. The timing of this letter also coincides with the preparation of draft Regional Official Plan Amendment 48 (ROPA 48), which will update the current Regional Structure through the delineation of the updated Urban Growth Centres and Major Transit Station Areas, Regional Nodes and Corridors and Employment Areas.</p> <p>We respectfully submit this letter for your consideration. Please feel free to contact the undersigned, with any questions or comments.</p> <p>Sincerely,</p> <p>Ron Palmer, MCIP, RPP, Principal</p> <p><b>Attachments:</b>  Appendix 1 – Comments on the Halton Region MCR in regards to 5274 Fourth Line, Milton dated August 13, 2019  Appendix 2 – Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy dated February 24, 2020</p> <p>August 13, 2019  Curt Benson, RPP, MCIP  Director, Planning Services and Chief Planning Official  1151 Bronte Road  Oakville, Ontario, L6M 3L1</p> <p>Re: Comments on the Halton Region MCR in regards to 5274 Fourth Line, Milton</p> <p>The Planning Partnership acts for Samuel, Son &amp; Co. Ltd (“landowner”), the owners of the lands at the northwest corner of Fourth Line and Lower Baseline West, known municipally as 5274 Fourth Line, in the Town of Milton (“subject site”). The subject site is approximately 8.21 hectares (20 acres) in lot area (Figure 1).</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p data-bbox="457 646 604 662">Figure 1: Subject Site</p> <p data-bbox="457 665 966 690">The subject site is currently identified as follows:</p> <ul data-bbox="457 722 1365 909" style="list-style-type: none"> <li data-bbox="457 722 1365 771">• Immediately abutting the future settlement area boundary of the “Sustainable Halton Lands”;</li> <li data-bbox="457 803 1365 828">• Designated as Prime Agricultural lands, but not a Specialty Crop Area; and,</li> <li data-bbox="457 860 1365 909">• A portion of the site is identified within the Provincial Natural Heritage System Mapping and located within the Greenbelt Plan Area.</li> </ul> <p data-bbox="457 941 1407 1047">We have been monitoring the Region’s Municipal Comprehensive Review (MCR) process on behalf of the landowner. We understand that the Town has been working closely with the Region, and has also recently initiated a review of its Official Plan, which will generally be concurrent with the Region’s MCR timeline.</p> <p data-bbox="457 1079 1407 1242">We have reviewed the Region’s “Integrated Growth Management Strategy Growth Scenarios: Halton Region to 2041” technical paper, which was circulated to local area municipalities. It is our understanding that the Region will issue a Draft Growth Concept later in 2019 for consultation based on eight “draft” scenarios that were identified in the technical paper. The final Regional Official Plan Amendment (ROPA) is targeted for approval sometime in late 2020.</p> <p data-bbox="457 1274 577 1299"><b>PURPOSE</b></p> <p data-bbox="457 1323 1407 1404">The Town of Milton has experienced rapid ongoing growth and is expected to grow to a population of over 400,000 people. It is also rapidly urbanizing through recent urban expansions in a southern direction towards Oakville and Highway 407, and more recently</p>	

No.	Source	Submission	Response
		<p>intensification, particularly around areas within the Downtown Milton Major Transit Station Area and Urban Growth Centre.</p> <p>The purpose of this letter is to express a desire on behalf of the landowner to work with the Region to achieve an orderly, logical expansion to its Urban Area in Milton, that would allow for the development of urban uses on the subject site. This would require the redesignation of the eastern portion of the subject site (outside of the natural heritage feature) from “Agricultural Area” to “Urban Area”. We note that the inclusion of the subject site within the Urban Area is consistent with local priorities.</p> <p>We understand that the Growth Management Study/MCR is ongoing and will, ultimately, allocate growth to the Town to 2041. We have reviewed available public documentation to-date and offer the following issues for discussion:</p> <p><b>ISSUES FOR DISCUSSION</b></p> <p>1. LONG TERM URBAN STRUCTURE IMPLICATIONS - The Region has experienced several waves of growth over time to accommodate its rapid demand for new housing. Originally, this was served by the growth of the lakefront municipalities of Burlington and Oakville, and more recently has included the greenbelt communities of Milton and Halton Hills. In Milton, the most recent era of urban expansion through ROPAs 38 and 39 allocated significant additional lands in the Southeast Milton Expansion Area. The allocation of new growth requires a consideration of the resultant urban structure.</p> <p>Through your Growth Management Study/MCR process, and ultimately in an Amendment to the Regional Official Plan, you will be allocating growth to all of the Region’s constituent municipalities. The Region as a whole is rapidly urbanizing, and it is important, and desirable to create distinct communities, rather than an amorphous mass, barely recognizable when moving from one to another.</p> <p>As you are aware, Milton is a desirable community that provides an alternative to the increasingly urban and compact communities of Oakville and Burlington. Further, as land in Oakville and Burlington and other areas in the Greater Golden Horseshoe (GGH) becomes too expensive and/or is exhausted and housing values continue to increase, it is expected that communities like Milton will continue to be attractive to purchasers in the long-term. In observing existing land use patterns, the allocation of new growth must recognize unique characteristics and built form trends.</p> <p>We have reviewed the Region’s draft growth scenarios to 2041, which range from no new greenfield growth to moderate new greenfield growth. Designated Greenfield Areas within Burlington and Oakville are fully accounted for in the 2031 horizon, and almost fully built out. Therefore, the majority of any greenfield expansion contemplated by the scenarios</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>would occur in Milton and/or Halton Hills. Based on the current trajectory of the growth in Milton, the subject site is an excellent candidate to accommodate new greenfield growth in the Region.</p> <p>2. TOWN'S PREFERRED URBAN STRUCTURE - In a report to Council on September 24, 2018 (Report No. ES-016-08), Town Staff identified its preferred growth scenario for accommodating new growth in the Town to 2041. Appendix "C" of the Report identifies the subject site for inclusion within the Settlement Area Boundaries as part of the "Phase III Residential Area". We appreciate the Town's proactive approach in planning growth in Milton, and concur with the recommendations of Town Staff.</p> <p>Milton has become a very desirable community, providing an alternative and more affordable location than the southernmost municipalities of Oakville and Burlington. The lakefront municipalities in Halton have become unaffordable to many and/or first-time home buyers, and Milton has become increasingly attractive as prices in the south continue to rise. The need to address housing affordability has been a priority of the current Provincial government. Growth, in itself, can be identified as a key driver of economic development and necessary to create a larger tax base and create a better opportunity for financial sustainability. Thoughtful and fiscally responsible planning can help increase property values, contribute to public health and ease transport problems. The Town of Milton can be identified as a key driver of economic development, facilitating a larger tax base to create a better opportunity for financial sustainability. The fiscal sustainability of the Town must be a focus for your Growth Management Study/MCR and, ultimately, within your updated Official Plan.</p> <p>3. POLICY 2.2.8.2 AND 2.2.8.3 OF THE GROWTH PLAN (2019) - The new policies of the Growth Plan for the Greater Golden Horseshoe have come into force on May 16, 2019, which define the new criteria that the Province will use to evaluate the feasibility and appropriateness of a proposed settlement area boundary expansion. We recognize that the proposed Settlement Area Expansion needs to be justified through the Region's ongoing Growth Management Study/Municipal Comprehensive Review.</p> <p>Milton is a greenbelt municipality and is surrounded by protected and significant natural heritage features all of which are protected by the Greenbelt Plan. The Town also contains a significant, but quickly diminishing prime agricultural area, which has increasingly been replaced by new urban areas. Milton's opportunities for future growth appear to be physically limited by the Greenbelt Area to the north.</p> <p>As referenced above, the subject site immediately contiguous and adjacent to the Southeast</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Milton Expansion Area to the east. The inclusion of the subject site within the Urban Area, provides for a logical “rounding-out” of the settlement area, which is well demarcated and bounded to the west by the natural heritage system.</p> <p>4. DESIGNATED GREENFIELD AREA DENSITIES – The Town is forecasted to grow to 238,000 persons and 114,000 jobs by 2031. The vast majority of this growth to-date has occurred through the identification of Designated Greenfield Areas, most recently which included the Southeast Milton Expansion Area. Given that Milton is expected to continue to grow at a rapid pace, the identification of new Designated Greenfield Areas is likely required to accommodate new growth, and respond to prevailing market conditions.</p> <p>Recent changes to the Growth Plan have reduced the Region’s minimum Designated Greenfield Area target to 50 persons and jobs combined per hectare, which is effectively a return to the targets that were included in the 2006 Growth Plan. ROPA 38, requires the Town to accommodate a minimum of 58 persons and jobs per hectare. This is a town-wide Greenfield density target, though the Town has approved much higher targets for the Southeast Milton Expansion Area. We believe the current target will:</p> <ul style="list-style-type: none"> <li>• Impact housing affordability by constraining the supply of new land to accommodate Milton’s significant population and employment growth;</li> <li>• Result in a reduction in housing choices, particularly for more traditional ground oriented housing; and,</li> <li>• Promote an urban structure wherein the greatest densities are located on the periphery of the Town.</li> </ul> <p>We note that many existing greenfield areas in Milton have already been planned, or “committed” at much lower densities. Consequently, the Southeast Milton Expansion Area appears to have been planned at much higher densities to compensate for these lower densities, and results in an average of 70 persons and jobs per hectare. It is also understood that these greenfield densities were an effort by the Town to begin transitioning towards higher greenfield densities that were contemplated by the previous 2017 Growth Plan. The continued lower density housing forms shortage is one of the primary contributing factors to the increase in housing prices in the GTHA.</p> <p>The current greenfield densities are overly aggressive for residential growth, and appear to be disproportionately high to compensate for lower densities elsewhere in Milton. This is not desirable from a regional and local urban structure perspective. Directing greater densities to fringe locations, away from potential existing or planned rapid transit is counterintuitive, and would result in greater congestion and traffic. Overall, we believe that the MCR should require that new growth maintains an appropriate mix of housing</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>types, and densities to serve a wide range of income types, while responding to market conditions. A more diverse array of housing options in Milton can act as an attractor to more, and different types of employment opportunities throughout the Town. In our opinion, a lower greenfield density target should be considered for urban expansion areas in Milton as part of the MCR.</p> <p>5. INTENSIFICATION - The Growth Plan continues to evolve, and requires 50 percent of new residential growth to be within the built boundary. Similar to the discussion on greenfield density, in our opinion, it is essential that the intensification target be reviewed in terms of urban structure, built form, housing mix, housing affordability and marketability perspectives.</p> <p>Rates of intensification have varied across the region and its area municipalities. The majority of new intensification has been planned to occur in Oakville and Burlington, though new higher density-built forms have become increasingly prevalent around the Milton GO Station. Nevertheless, the vast majority of new growth in Milton to-date has been in greenfield areas. Based on historic growth patterns in Milton and market preference to ground oriented housing, it is unlikely that the Town will achieve its forecasted 2041 targets on intensification alone.</p> <p>6. LINKING GROWTH WITH INFRASTRUCTURE INVESTMENT – It is our understanding that the subject site will be within proximity to new available water and wastewater services on Fourth Line. This would allow for the orderly, and cost-effective implementation of new planned infrastructure. It is recognized that the allocation of capacity and/or the expansion of facilities are long-term initiatives and that any capacity issues to accommodate long-term growth and development will need to be in your long-term capital planning considerations.</p> <p>Additionally, the subject site would also able to capitalize on existing Highway 407 service, particularly a readily available on-ramp to the highway located on Fourth Line. In the future, transit service may be provided to the Sustainable Halton Lands, of which the subject site would also be able to make efficient use of, to further support the use of transit.</p> <p>CONCLUSION</p> <p>Please consider the following as you work through your Growth Management Study/MCR:</p> <ul style="list-style-type: none"> <li>• Capitalize on Milton’s rapid population and employment growth to promote long-term economic development, and financial sustainability;</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Consider a reduction in the greenfield density target in Milton to better reflect the demands of the housing market, and to ensure that there is a sufficient supply of more affordable, ground oriented housing forms;</li> <li>• Ensure that there is an appropriate balance between intensification, and new Designated Greenfield Areas to allow for a diverse housing mix that reflects market conditions in Milton;</li> <li>• Work with the Town of Milton to identify new growth opportunities and priorities, including the identification of new employment areas in strategic locations with good access to major goods movement facilities and corridors, and areas well served by transit; and,</li> <li>• Ensure future expansions to the water and wastewater facilities are considered in long-term capital planning considerations to ensure that land is development ready.</li> </ul> <p>We thank you for providing an opportunity to submit comments, and look forward to future participation in the MCR process. We look forward to meeting with you as work progresses. Please feel free to contact the undersigned, with any questions or comments.</p> <p>Sincerely, Ron Palmer, MCIP, RPP, Principal</p> <p>February 24, 2020 Curt Benson, RPP, MCIP Director, Planning Services and Chief Planning Official 1151 Bronte Road Oakville, Ontario, L6M 3L1 Re: Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy</p> <p>The Planning Partnership acts for Samuel, Son &amp; Co. Ltd (“landowner”), the owners of the lands at the northwest corner of Fourth Line and Lower Baseline West, known municipally as 5274 Fourth Line, in the Town of Milton (“subject site”). Since our initial letter submission dated August 13, 2019, we have continued to monitor the status of the Region’s Municipal Comprehensive Review (“MCR”) on behalf of the landowner.</p> <p>On October 8, 2019, we met with Halton Region staff to discuss the status of the MCR, as well as the “Progress Update on the Integrated Growth Management Strategy” (June 19, 2019) as it relates to our client’s lands. It is understood that the Region will issue a Draft Growth Concept in September 2020 for consultation based on the input received from local municipalities in Halton.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>We commend the Region for working with each local municipality in Halton on determining an appropriate urban structure and weighting criteria to accommodate new growth to 2041. We have reviewed the comments that have been provided by each of the local municipalities.</p> <p>We have recently met with the Town of Milton planning staff, who has been proactive in working with the Region in providing for an urban structure that is reflective of local priorities. On January 20, 2020, the Town of Milton issued a report to Council recommending that local Council endorse Option 4B of the Region's Integrated Growth Management Strategy. We concur with the recommendations of local staff, and offer the following for consideration:</p> <p><input type="checkbox"/> <b>GROWTH CANNOT BE ACCOMODATED BY INTENSIFICATION ALONE:</b> As noted, all four of the local municipalities are expected to significantly growth in population and employment to 2041. This new growth cannot be accommodated only through intensification, as suggested by the response issued by the Town of Oakville (dated November 20, 2019).</p> <p>Identifying a new urban structure requires a balanced approach of intensification and the identification of new greenfield areas. We reiterate that it is essential that the intensification target be reviewed in terms of urban structure, built form, housing mix, housing affordability and marketability perspectives.</p> <p><input type="checkbox"/> <b>NO REMAINING GREENFIELD AREAS IN OAKVILLE AND BURLINGTON:</b> The southernmost area municipalities of Burlington and Oakville have almost no remaining greenfield areas to accommodate new ground oriented built forms and have been unable accommodate new growth through intensification. Therefore, the majority of any greenfield expansion contemplated by the scenarios would occur in Milton and/or Halton Hills. Based on the current trajectory of the growth in Milton, the subject site is an excellent candidate to accommodate new greenfield growth in the Region.</p> <p><input type="checkbox"/> <b>MARKET CONSIDERATIONS:</b> Milton has experienced rapid and continued growth, and has a current market demand to accommodate a balanced mix of a new intensification and new greenfield areas. In addition, the lakefront municipalities of Oakville and Burlington have become unaffordable to many and/or first-time homebuyers, and Milton has become increasingly attractive as prices in the south continue to rise.</p> <p>Overall, we believe that the MCR should require that new growth maintains an appropriate mix of housing types, and densities to serve a wide range of income types, while responding to market conditions.</p>	



No.	Source	Submission	Response
		<p>□ URBAN STRUCTURE WEIGHTING CRITERIA: We believe that “Theme 1: Regional Urban System and Local Urban Structure” is the most important from a Region and Local perspective and should be given the highest consideration from a weighing perspective. While all weighting criteria are interconnected, a comprehensive and well-planned urban structure provides a means to direct population and employment growth, ensure the efficient movement and people and goods, protect natural heritage and, and help with resiliency against climate change.</p> <p>We respectfully submit this letter for your consideration in advance of the Regional Council Meeting on March 25, 2020. Please feel free to contact the undersigned, with any questions or comments.</p> <p>Sincerely,</p> <p>Ron Palmer, MCIP, RPP, Principal</p>	
60.	<p>Dory Ainsworth on behalf of Penta Properties Inc.</p> <p>E-mail dated June 11, 2021</p>	<p>Please see the attached on behalf of Penta Properties Inc.</p> <p>Regards,</p> <p>Dory</p> <hr/> <p>ATTACHED LETTER</p> <p>MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) are retained on behalf of Penta Properties Inc. (“Penta”) in relation to various properties located throughout the City of Burlington. Over the past year, Penta has made a number of submissions in relation to the Region’s Municipal Comprehensive Review and the Integrated Growth Management Study (“IGMS”) process as it affects its properties.</p> <p>In February 2021, the Region formally released a draft of Regional Official Plan Amendment No. 48 (“ROPA 48”) which is as a first phase amendment to the Regional Official Plan to address the Region’s urban structure to 2051. ROPA 38 is focused on identifying the Region’s growth targets and growth areas, delineating the Major Transit Station Area boundaries, and advancing several local strategic planning objectives including key employment land conversions.</p> <p>As noted, over the past few years, Penta has submitted multiple requests with detailed supporting information to the City of Burlington and to the Region of Halton, to consider both employment land conversions and revisions to the proposed MTSA boundaries in the</p>	<p><u>Employment Conversion Request</u></p> <p>Regional staff have recommended retaining these subject lands (B-05, B-15, 3309 Harrison Court/B-19, 4450-4480 Paletta Court/B-20, Bronte Creek Meadows/B-21, and 1200 King Road (Eastern Portion)/B-22) within the Regional Employment Area.</p> <p>Requests B-05 and B-15, the western portions of 1150 and 1200 King Road, were initially identified as requiring further analysis in the <a href="#">Growth Concepts Discussion Paper</a>.</p> <p>After further analysis, the conversion requests related to the western portions of 1150/1200 King Road, were not supported.</p> <p>More information on how these conversions do not meet the principles of the Region’s employment conversion</p>

No.	Source	Submission	Response
		<p>City of Burlington. Most recently, Penta submitted a response to the Region’s Integrated Growth Management Strategy Urban Structure Discussion Paper, a copy of which is attached as Appendix A. The submission provided a detailed justification for employment conversion requests for a number of properties. In many cases, the requests were seeking to expand existing use permissions to include commercial, community and employment supportive uses otherwise restricted under the Region’s current Employment Overlay policies.</p> <p>The following is a summary of the information provided to the Region to date and a request for further consideration by Council to amend ROPA 48.</p> <p>Employment Land Conversion Requests</p> <p>In June, 2020, the Region released an Integrated Growth Management Strategy Urban Structure Discussion Paper. The Discussion Paper set out additional criteria for employment conversion requests and established a deadline for additional submissions to be made for consideration by the Region through its Regional Official Plan Review (“ROPR”) process related to existing or new conversion requests. In August, 2020, a detailed request (attached as Appendix A) was submitted to Halton Region to consider employment land conversions for the following four Penta properties:</p> <ul style="list-style-type: none"> <li>• 1200 King Road;</li> <li>• 3309 Harrison Court;</li> <li>• 4450 &amp; 4480 Paletta Court; and,</li> <li>• 5164, 5366, 5470, 5900 Upper Middle Road &amp; 5201 Mainway.</li> </ul> <p>As noted in many cases, the employment land conversion requests were to remove the Employment Overlay as a restriction to development and in some cases redevelopment of the sites with employment generating uses. Providing for a wider range of uses on many of the properties will actually better meet the Region’s minimum job targets and better respond to current market needs given the physical location and context of the properties.</p> <p>It was requested that these lands should not be restricted to industrial only uses but should be permitted to provide for uses that allow for a wider range of opportunities to meet market demands that have significantly changed since the planning framework for employment in the Region was established. As noted in the submission, the conversions would assist in creating complete communities by increasing the range of permitted uses located close to existing and planned neighbourhoods.</p> <p>On April 13, 2021, MHBC staff had an opportunity to meet with Regional staff to review the Region’s response to the employment requests as provided in Appendix C1 of the Integrated Growth Management Strategy Growth Concepts Discussion Paper. The focus</p>	<p>assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p> <p><u>MTSA Boundary Delineations</u></p> <p>On November 10, 2021 the Minister of Municipal Affairs and Housing approved Amendment No. 48, “An Amendment to Define a Regional Urban Structure” (ROPA 48).</p> <p>ROPA 48 delineates Major Transit Station Area (MTSA) boundaries, including Appleby GO and Aldershot GO Stations in accordance with the Growth Plan. In terms of whether the subject lands fall outside or within the recommended MTSA Boundary delineation:</p> <p>4480 Paletta Court is within the MTSA and will remain Regional Employment Area. However, the following lands are not within an MTSA:</p> <ul style="list-style-type: none"> <li>• 1200 King Road</li> <li>• 4450 Paletta Court</li> <li>• 3309 Harrison Court</li> <li>• 5201 Mainway</li> <li>• 5164, 5366, 5470, 5900 Upper Middle Road</li> </ul> <p>Please see rows above for more information on employment conversion requests for 5164, 5366, 5470, 5900 Upper Middle Road &amp; 5201 Mainway.</p> <p>More information on ROPA 48, including mapping of the MTSA boundaries, is available on the project webpage online <a href="https://www.halton.ca/The-">https://www.halton.ca/The-</a></p>

No.	Source	Submission	Response
		<p>of that meeting was to discuss 1200 King Road, 4450 &amp; 4480 Paletta Court and 3309 Harrison Court. During the meeting Regional staff reiterated their reliance on the assessment of the conversion criteria which in many cases was extremely subjective and without any detailed analysis at the time or quantitative/factual consideration. Some of the concerns noted from the meeting included the following:</p> <ul style="list-style-type: none"> <li>• There has been limited study of the provision of commercial uses as part of the IGMS work related to how commercial land use needs will be provided only through mixed use development forms;</li> <li>• Much of the additional work referenced has not yet been completed is not yet public.</li> <li>• Changes to policies related to the permitted uses within the Employment Areas based on the changing nature of employment in the Region and changing retail markets will be presented later for review and discussion and not in advance of considerations for employment land conversions. It is strongly recommended that employment land conversions be considered together with proposed changes to employment policies. Should those policies remain restrictive, retention of the overlay will sterilize many sites.</li> </ul> <p>One specific employment conversion request made by Penta relates to its vacant site located adjacent to the existing Lowes store, east of Appleby Line in the City of Burlington. When meeting with Regional staff, a number of concerns were raised related to the Region's assessment of the criteria and recommendation not to convert the Harrison Court lands. Following the meeting, MHBC submitted additional information to further justify the importance of converting the lands, a copy of which is attached as Appendix B. In summary, the lands located at 3309 Harrison Court in Burlington, represent a similar context to other sites recommended for approval for conversion and the lands meet all of the conversion criteria. The adjacent lands on which the Lowes is currently located is within the same Plan of Subdivision as the 3309 Harrison Court site and should be developed as part of the commercial node to serve the current and growing community area. It is strongly recommended that both Harrison Court sites be included for conversion and be included with ROPA 48 for the planning reasons set out in the letter that address both Provincial and Regional policies.</p> <p>MTSA Boundary Delineations</p> <p>Over the past few years, multiple requests have been submitted to the City of Burlington to include the following Penta properties within proposed MTSA boundaries for Appleby GO and Aldershot GO Stations as they are both within 800 metres of the stations:</p> <ul style="list-style-type: none"> <li>• 1200 King Road (Aldershot GO)</li> <li>• 4450 Paletta Court (Appleby GO)</li> </ul>	<p>Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Halton-s-Regional-Official-Plan-Review-(ROPR)/Regional-Official-Plan-Amendment-48.</p>

No.	Source	Submission	Response
		<p>The 1200 King Road lands represent an extension of lands directly eastward from the existing Metrolinx Aldershot GO Station. It is a prime location for intensification given that it is within the '15-minute neighbourhood' of the station and would achieve the Growth Plan objectives of creating a complete community. Similarly, 4480 &amp; 4450 Paletta Court is also within the 15-minute neighbourhood and provides opportunities for population and job growth near a public transit facility.</p> <p>The exclusion of 4450 Paletta Court results in one half of the parcel being located outside of the MTSA. One of the key criteria of the Region for the delineation of MTSA's in its methodology is to include whole parcels. As noted by the Regional criteria "blocks should remain intact to facilitate the cohesive and comprehensive development of the MTSA". This was clearly not applied to 4480 and 4450 Paletta Court. A map illustrating the "splitting" of the boundary is attached as Appendix C. While the City of Burlington had opportunities to include these lands within proposed MTSA boundaries, the City did not include the lands in the recently approved new Official Plan (under appeal). The inclusion of the lands would provide both the Region and the City with opportunities for intensification. of these two Strategic Growth Areas.</p> <p>In accelerating ROPA 48 ahead of the Preferred Growth Concept, it is not clear how the proposed MTSA boundaries will achieve the minimum density targets of 150 people and jobs per hectare to meet ROPA 38's targets for 2031, not to mention 2051 targets. We trust the staff report will provide the detailed growth projections and distribution of growth based on the proposed land areas for the MTSA's.</p> <p>Public Engagement: Halton Region's Response</p> <p>While we acknowledge Halton Region has met the minimum Planning Act requirements for public engagement, through Open Houses and various virtual workshops, the Region has not documented publicly how all submissions have been addressed through proposed policy amendments. The Region produced one "communication plan" that provided a conceptually themed report. That report was general to Phase 2 of the Region Official Plan Review. Halton Region Report no. LPS05-21: "Regional Official Plan Review - Phase 2 Initial Consultation Summary" provided Attachment 1, "Regional Official Plan Review: Phase 2 Initial Consultation Summary." The summation was based on the prescribed on-line survey results and common responses. The summary did not identify how the Region addressed comments and what changes were considered, or not, to the proposed policies. The draft of ROPA 48 was in fact completed without consideration of the comments requested by December 21, 2021.</p> <p>Affected landowners and stakeholders were actively engaged in discussions with Regional staff regarding comments and responses in advance of the draft amendment.</p>	

No.	Source	Submission	Response
		<p>This has been a different approach to public engagement than ROPA 38 where comments were noted and made part of the public record.</p> <p>ROPA 48, if adopted with the proposed boundaries for MTSAs, and without the additional requested employment conversions will split the potential redevelopment of two key properties within the MTSAs and will represent a lost opportunity for economic development and job creation within the Region. The public engagement to date on employment and future needs has lacked informed input from key stakeholders in the business and investment community of the Region We trust these submissions and comments will be further considered to ensure those interests are at a minimum acknowledged.</p> <p>Sincerely, MHBC Dana Anderson, FCIP, RPP Attach. Appendix A Submission Response: Region's Integrated Growth Management Strategy Urban Structure Discussion Paper Appendix B Meeting Minutes: Region &amp; Penta, Employment Conversion Appendix C Map: MTSA Delineated Boundary: Paletta Court cc: David Pitblado, Penta Properties</p>	
61.	<p>Dory Ainsworth on behalf of Dorham Holdings</p> <p>E-mail dated June 11, 2021</p>	<p>MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") are retained by Dorham Holdings, who are the owners of the land located in the northwest quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands").</p> <p>In light of the Town of Oakville's strategic local objectives as set out in their recent report on Regional Official Plan Amendment No. 48 ("ROPA 48") presented on May 10, 2021, the Subject Lands should be supported as part of the conversion of employment lands within ROPA 48 as outlined in the Town's staff report. The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix scale and intensity for the Secondary Growth Node inclusive of employment uses.</p> <p>Please find attached our submission to staff on matters related to ROPA 48. We trust these matters will be considered and addressed and the appropriate revisions made to ROPA 48.</p> <p>Sincerely, MHBC Dana Anderson, FCIP, RPP</p>	<p>Regional staff have recommended this employment conversion (Burnhamthorpe / Neyagawa (Northwest Quadrant), O-22) be advanced through the Preferred Growth Concept.</p> <p>Request O-22 was initially identified as requiring further analysis and was tested in the Growth Concepts.</p> <p>To consider the Neyagawa Urban Core comprehensively the request was combined with requests O-02.</p> <p>The final assessment has recommended this employment conversion be advanced through the Preferred Growth Concept Regional Official Plan Amendment.</p>

No.	Source	Submission	Response
		<p>CC: Kirk Biggar, Town of Oakville Mary Mitar, Dorham Holdings</p> <p>June 3, 2021 Dan Tovey, RPP, MCIP Manager of Policy Planning Region of Halton 1075 North Service Road West Oakville, Ontario L6M 2G2 Dear Mr. Tovey</p> <p>RE: REGION OF HAL TON EMPLOYMENT CONVERSION</p> <p>MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") are retained by Dorham Holdings, the owners of the land located in the northwest quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands"). The Subject Lands are approximately 11.3 hectares in size. A location map is provided in Figure 1.</p> <p>On August 24, 2020, we submitted a request to the Region for the Subject Lands in response to the Region 's Integrated Growth Management Strategy ("IGMS") Urban Structure Discussion Paper dated June 2020, which was prepared as part of Regional Official Plan Review Process ("ROPR"). A copy of our initial submission is attached as Appendix 1. On February 17, 2021, the Growth Concepts Discussion Paper prepared as part of the IGMS portion of the ROPR was received and released for public consultation by Regional Council. The Discussion Paper built upon the previous IGMS Discussion Papers and presented information on how the Region could accommodate population and employment growth to 2051 and included consideration of employment conversions with an initial assessment of the requests received through the ROPR process. Appendix C2 to the Discussion Paper contained information on the initial assessment of the conversion requests received.</p> <p>The request submitted for the Subject Lands was identified as Request 0-22 in Appendix C2. The initial assessment concluded that further analysis was required to determine a recommendation regarding the Subject Lands. An extract of the Region 's assessment is attached as Appendix 2.</p> <p>The initial conversion request provided a full description of the site context, the applicable policy context and a full assessment of the employment conversion based on the Region's conversion criteria found in Section 77.4 of the Regional Official Plan and the additional</p>	<p>More information on how this conversion meets the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p>

No.	Source	Submission	Response									
		<p>criteria provided in the Urban Structure Discussion Paper. We maintain that our assessment of the criteria fully supports and justifies the conversion of the Subject Lands.</p> <p>Further Analysis and Meeting with Regional Staff</p> <p>On April 26, 2021 we met with Regional staff to discuss the conversion and the further analysis to support the conversion. During the meeting we responded to the Region's comments with additional information as noted below. Several examples were provided of where the Region has specially supported strategic employment conversions for lands where current operating employment uses exist (i.e. Aldershot and Burlington GO Station MTSA) and the Region has justified significant land conversion by noting that the "removal of lands from the Regional Employment Area is requested in order to permit the development of an Area Specific Plan for strategic growth that includes a mix of uses". These lands also share the same peripheral locational context as the Subject Lands. The Town of Oakville's Neyagawa Urban Core is an approved Strategic Growth Node where a similar area study is to be undertaken. Conversion of the lands within it should be accommodated on the same planning basis and rationale.</p> <table border="1" data-bbox="453 748 1356 1409"> <thead> <tr> <th colspan="3" data-bbox="453 748 1356 776">Assessment O-22</th> </tr> <tr> <th data-bbox="453 776 758 803">Criteria</th> <th data-bbox="762 776 1062 803">Regional Comment</th> <th data-bbox="1066 776 1356 803">Response</th> </tr> </thead> <tbody> <tr> <td data-bbox="453 807 758 1409">Employment Land Supply</td> <td data-bbox="762 807 1062 1409"> <p>The Subject Lands currently function as part of the supply of lands that could accommodate certain types of employment uses in Halton. They are of a significant size, are vacant, are strategically located in relation to goods movement facilities, and are part of a contiguous Regional Employment Area identified south of Highway 407.</p> <p>As a result, and given their location in relation to the Local Urban Structure, further</p> </td> <td data-bbox="1066 807 1356 1409"> <p>The Subject Lands are located at a strategic location within the Town of Oakville. The Subject Lands have great potential to support increased densities and jobs through a mixed use designation within the planned Neyagawa Urban Core as approved through OPA 15. The lands are not part of an existing development employment area and as part of the existing planned area are at the terminus of the area and part of a key node to be redeveloped.</p> <p>The conversion will not adversely impact the</p> </td> </tr> </tbody> </table>	Assessment O-22			Criteria	Regional Comment	Response	Employment Land Supply	<p>The Subject Lands currently function as part of the supply of lands that could accommodate certain types of employment uses in Halton. They are of a significant size, are vacant, are strategically located in relation to goods movement facilities, and are part of a contiguous Regional Employment Area identified south of Highway 407.</p> <p>As a result, and given their location in relation to the Local Urban Structure, further</p>	<p>The Subject Lands are located at a strategic location within the Town of Oakville. The Subject Lands have great potential to support increased densities and jobs through a mixed use designation within the planned Neyagawa Urban Core as approved through OPA 15. The lands are not part of an existing development employment area and as part of the existing planned area are at the terminus of the area and part of a key node to be redeveloped.</p> <p>The conversion will not adversely impact the</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
Assessment O-22												
Criteria	Regional Comment	Response										
Employment Land Supply	<p>The Subject Lands currently function as part of the supply of lands that could accommodate certain types of employment uses in Halton. They are of a significant size, are vacant, are strategically located in relation to goods movement facilities, and are part of a contiguous Regional Employment Area identified south of Highway 407.</p> <p>As a result, and given their location in relation to the Local Urban Structure, further</p>	<p>The Subject Lands are located at a strategic location within the Town of Oakville. The Subject Lands have great potential to support increased densities and jobs through a mixed use designation within the planned Neyagawa Urban Core as approved through OPA 15. The lands are not part of an existing development employment area and as part of the existing planned area are at the terminus of the area and part of a key node to be redeveloped.</p> <p>The conversion will not adversely impact the</p>										


No.	Source	Submission		Response	
			<p>analysis is required to determine whether the conversion would have the potential to adversely impact the overall supply of employment lands or the ability to achieve employment targets by 2051.</p>	<p>overall supply of Regional employment lands or the ability to achieve employment targets by 2051 as the provision of a mix of uses at a much higher density will provide for more employment opportunities on the lands.</p>	
		<p>Demonstrated Need</p>	<p>A need for the conversion may be established based on the strategic location of the lands in the context of the Regional Urban Structure and/or Local Urban Structure given the location of the Subject Lands in relation to the Neyagawa Urban Core and the identification of a portion of the lands as a node for further study in the Town's urban structure.</p> <p>Further analysis is required to confirm the need for the conversion on the basis of its strategic location and strategic opportunity, including how the conversion contributes to the key strategic growth management objectives, as well as in relation to the considerations related to the overall supply of employment</p>	<p>The Town has clearly stated the importance and need for the conversion to meet future growth needs as approved through OPA 15. As part of a strategic mixed use node, the lands will meet key strategic growth management objectives as directed by the Town's approved urban structure and will not negatively impact the overall supply of employment lands.</p>	



No.	Source	Submission			Response
		<p data-bbox="468 313 663 367">Employment Area Viability</p>	<p data-bbox="768 256 974 310">lands as discussed above.</p> <p data-bbox="768 313 1041 724">The Subject Lands are not located at the periphery of the Regional Employment Area as it is currently delineated. The removal of the lands would not result in a logical boundary for the Regional Employment Area and would change a contiguous employment area into an isolated employment area to the west of the Subject Lands.</p> <p data-bbox="768 751 1035 1214">The removal of the lands would create an isolated Regional Employment Area, which could in turn impact the overall viability of the employment area over the long-term. Further analysis is required to determine the impacts to the viability of the Regional Employment Area, considered in relation to the land supply and need principles discussed above.</p>	<p data-bbox="1066 313 1325 639">The Subject Lands are located at the periphery of the Regional Employment Area. The conversion of the lands will not impact the remaining employment area to the east. The overall viability of the Regional Employment Area is not impacted by the conversion.</p>	
		<p data-bbox="468 1222 722 1247">General Considerations</p>	<p data-bbox="768 1222 1037 1300">No cross-jurisdictional issues were identified in the review of the request.</p> <p data-bbox="768 1328 1014 1406">Given the nature of the conversion and the location of the Subject</p>	<p data-bbox="1066 1222 1325 1382">The Subject Lands area located where services and infrastructure to accommodate the conversion will be provided.</p>	

No.	Source	Submission	Response			
		<table border="1" data-bbox="457 256 1360 586"> <tr> <td data-bbox="457 256 758 472">Lands, further analysis is required to ensure the conversion can be supported by existing or planned infrastructure and public service facilities.</td> <td data-bbox="758 256 1058 472">Further information on the Town's position can be provided through subsequent consultation.</td> <td data-bbox="1058 256 1360 472">The Town has provided clear support for the full conversion of the Subject Lands based on its report entitled Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021 ).</td> </tr> </table> <p data-bbox="457 618 1423 943">Town of Oakville Report - Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021) At the May 10, 2021 Oakville Planning and Development Committee, Town of Oakville staff presented a report as input into the Region's ROPA 48 process that addressed a number of matters including the importance of the Neyagawa Urban Core. In the report the Town noted the following: "Neyagawa Urban Core These lands are identified in the town's urban structure as a Node for Further Study as a mixed use area. Through the town's ongoing official plan review, a study will be undertaken of the Neyagawa Urban Core Area (NUC) to delineate a boundary and to determine an appropriate mix, scale and intensity for this SGA. Town staff anticipate that this study will be initiated in 04 2021. This study would also examine the potential role, support and connectivity of the NUC with a future 407 Transitway station at Neyagawa Boulevard and Highway 407.</p> <p data-bbox="457 976 1423 1382">Although the town will study all four quadrants of the NUC at the intersection of Neyagawa Boulevard and Burnhamthorpe Road West, the northeast and northwest quadrants are currently designated in the region's Employment Area overlay. Town Staff Opinion: Town staff is of the opinion that the region's Employment Area overlay should be removed from the NUC north of Burnhamthorpe Road West in order for the town's study to proceed More specifically: For the northeast quadrant, the lands extending eastward to line up approximately with the northerly extension of Carding Mill Trail; and For the northwest quadrant, the lands west of Neyagawa Boulevard should be removed, as well as the lands west of Fourth Line over to the limit of the Region's Natural Heritage System." Restated Request for Conversion In light of the Town's clear objectives as set out in their recent report, the Subject Lands should be supported as part of the conversion of employment lands within ROPA 48 as outlined in the Town's staff report. The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix, scale and intensity for the Secondary Growth Node inclusive of employment uses.</p>	Lands, further analysis is required to ensure the conversion can be supported by existing or planned infrastructure and public service facilities.	Further information on the Town's position can be provided through subsequent consultation.	The Town has provided clear support for the full conversion of the Subject Lands based on its report entitled Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021 ).	
Lands, further analysis is required to ensure the conversion can be supported by existing or planned infrastructure and public service facilities.	Further information on the Town's position can be provided through subsequent consultation.	The Town has provided clear support for the full conversion of the Subject Lands based on its report entitled Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (May 10, 2021 ).				

No.	Source	Submission	Response
		<p>We trust the above information provides the further analysis and support required by the Region to support the advancement of the full conversion of the Subject Lands as part of the ROPA 48 process. We thank the Region for providing the opportunity to comment further and would be pleased to provide any additional information or clarification of our request</p> <p>Dana Anderson, /VIA, FCIP, RPP Partner Cc /Mary /Mita1 · Dorham Holdings Curt Benson, Region of Halton Diane Childs, Town of Oakville Kirk Biggar, Town of Oakville</p>	

No.	Source	Submission	Response
		 <p><b>Figure 1</b> Location Map</p> <p>DATE: August 19, 2020    SCALE: Not to Scale</p> <p>PLANNING URBAN DESIGN &amp; LANDSCAPE ARCHITECTURE MHBC</p>	
62.	Dory Ainsworth on behalf of Westerkirk Capital Inc.	<p>MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") are retained by Westerkirk Capital Inc., who are the owners of the land located in north east quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands"). In light of the Town of Oakville's strategic local objectives as set out in their recent report on Regional Official Plan Amendment No. 48 ("ROPA 48") presented on May 10, 2021, the Subject Lands should be supported as part of the conversion of employment lands within ROPA 48 as outlined in the Town's staff report. The inclusion of</p>	Please see response for item No. 62.

No.	Source	Submission	Response
	E-mail dated June 11, 2021	<p>the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix scale and intensity for the Secondary Growth Node inclusive of employment uses.</p> <p>Please find attached our submission to staff on matters related to ROPA 48. We trust these matters will be considered and addressed and the appropriate revisions made to ROPA 48.</p> <p>Sincerely, MHBC</p> <p>May 27, 2021</p> <p>Dan Tovey, RPP, MCIP  Manager of Policy Planning  Region of Halton  1075 North Service Road West  Oakville, Ontario  L6M 2G2</p> <p>Dear Mr. Tovey</p> <p>RE: REGION OF HAL TON EMPLOYMENT CONVERSION NORTHEAST QUADRANT OF NEYAGAWA BOULEVARD AND BURNHAMTHORPE ROAD WEST, OAKVILLE - EMPLOYMENT CONVERSION REQUEST</p> <p>OUR FILE: 20262A</p> <p>MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") are retained by Westerkirk Capital Inc., the owners of the land located northeast quadrant of Neyagawa Boulevard and Burnhamthorpe Road West in the Town of Oakville (the "Subject Lands").</p> <p>The Subject Lands are approximately 18.8 hectares in size. A location map is provided in Figure 1. On August 24, 2020, we submitted a request to the Region in response to the Region's Integrated Growth Management Strategy ("IGMS") Urban Structure Discussion</p>	

No.	Source	Submission	Response
		<p>Paper dated June 2020, which was prepared as part of Regional Official Plan Review Process ("ROPR"). A copy of our initial submission is attached as Appendix 1.</p> <p>On February 17, 2021, the Growth Concepts Discussion Paper prepared as part of the IGMS portion of the ROPR was received and released for public consultation by Regional Council. The Discussion Paper built upon the previous IGMS Discussion Papers and presented information on how the Region could accommodate population and employment growth to 2051 and included consideration of employment conversions with an initial assessment of the requests received through the ROPR process. Appendix C2 to the Discussion Paper contained information on the initial assessment of the conversion requests received. The request submitted for the Subject Lands was identified as Request 0-02 in Appendix C2. The initial assessment concluded that the conversion should be supported and recommended that it be implemented through the Preferred Growth Concept. An extract of the Region's assessment is attached as Appendix 2.</p> <p>The initial conversion request provided a full description of the site context. In our initial request we noted that the total land area for the Subject Lands was 18.80 ha, approximately 5.7 ha being located within the Neyagawa Urban Core and the balance (13.1 ha) designated Employment District and Transitway. We had requested at that time that only 3.3 ha of the Employment District lands be converted to be consolidated for development with the lands designated as Neyagawa Urban Core to the west. Our request included a detailed assessment of the Region's Conversion Criteria from Section 77.4(4) of the Regional Official Plan. Regional Official Plan Amendment 48 ("ROPA 48") We understand the Region will be proceeding with a first phase of the IGMS work through ROPA 48 to advance strategic local planning priorities and needs related to urban structure. As such the Region released a draft of ROPA 48 on March 11, 2021.</p> <p>On March 22, 2021 we forwarded an email to the Region noting that the Subject Lands were part of the Town's study of the Neyagawa Urban Core Node which came out of the Town's Official Plan Amendment 15 ("OPA 15") approved by the Region. We noted that the Town should be able to secure the conversion of lands within that Node prior to their study and questioned why they could not be included in ROPA 48 which would then allow the Town to advance its important planning for growth for the area. The Region responded that the intent of ROPA 48 was to address a limited set of conversions that advance strategic planning objectives and support the Regional/ Local Urban Structures.</p> <p>The Region recognized that the Subject Lands were in the vicinity of a proposed Secondary Regional Node and the Town's Neyagawa Urban Core Area and stated that feedback on the appropriateness of advancing the conversion of the Subject Lands as</p>	

No.	Source	Submission	Response
		<p>part of ROPA 48 would be appreciated and considered as part of the public consultation process on ROPA 48. Town of Oakville Report- Regional Official Plan Review Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 (may 10, 2021)</p> <p>At the May 10, 2021 Oakville Planning and Development Committee, Town of Oakville staff presented a report as input into the Region's ROPA 48 process that addressed a number of matters including the importance of the Neyagawa Urban Core. In the report the Town noted the following: "Neyagawa Urban Core These lands are identified in the town's urban structure as a Node for Further Study as a mixed use area. Through the town's ongoing official plan review, a study will be undertaken of the Neyagawa Urban Core Area (NUC) to delineate a boundary and to determine an appropriate mix, scale and intensity for this SGA. Town staff anticipate that this study will be initiated in 04 2021. This study would also examine the potential role, support and connectivity of the NUC with a future 407 Transitway station at Neyagawa Boulevard and Highway 407. Although the town will study all four quadrants of the NUC at the intersection of Neyagawa Boulevard and Burnhamthorpe Road West, the northeast and northwest quadrants are currently designated in the region's Employment Area overlay.</p> <p>Town Staff Opinion:</p> <p>Town staff is of the opinion that the region's Employment Area overlay should be removed from the NUC north of Burnhamthorpe Road West in order for the town's study to proceed. More specifically: 2 For the northeast quadrant, the lands extending eastward to line up approximately with the northerly extension of Carding Mill Trail, and For the northwest quadrant, the lands west of Neyagawa Boulevard should be removed, as well as the lands west of Fourth Line over to the limit of the Region's Natural Heritage System." Updated Request In light of the Town's clear objectives, we fully support the inclusion of the Subject Lands as part of the conversion of employment lands within ROPA 48 and in their entirety as outlined in the staff report</p> <p>The inclusion of the lands in ROPA 48 will allow the Town to advance its strategic priorities to consider the Subject Lands in full as part of the Neyagawa Urban Core and to achieve an appropriate mix, scale and intensity for the Secondary Growth Node inclusive of employment uses. The following additional considerations justify the advancement of the Subject Lands for conversion in their entirety (18.Sha): The full conversion will facilitate the comprehensive development of the site as part of the Neyagawa Urban Core and the North Oakville East Secondary Plan.</p>	

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		<p>The lands are part of a Node that serves an important function to support the transition with mixed use, compact urban development; The conversion of the full site will also ensure more integrated and compatible land uses while still providing for employment opportunities through the mixed use Node; The conversion of the full site will not compromise the Region's or the Town's ability to meet the employment forecasts as the mixed use node policies can ensure a mix and density of jobs and residents is retained and in fact provide for a higher yield of jobs in the short term; The conversion of the full site can ensure the remaining employment area to the east is not negatively impacted through additional design and land use policies to address transition and ensure compatibility; and, The conversion of the full site will also allow for more compatible land uses to be integrated and comprehensively developed with the balance of the node to the west and south</p> <p>We trust the above information will be used by the Region to support the advancement of the full conversion of the Subject Lands as part of the ROPA 48 process We thank the Region for providing the opportunity to comment further and would be pleased to provide any additional information or clarification of our request.</p> <p>Partner</p> <p>Cc: Curt Benson, Region of Halton Diane Childs, Town of Oakville Kirk Biggar, Town of Oakville</p>	



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63.	Dory Ainsworth on behalf of Professional	<p>ATTACHED LETTER</p> <p>RE: Meeting Request to discuss the City of Burlington Urban Growth Centre</p>	

No.	Source	Submission	Response
	<p>Planners Group</p> <p>E-mail dated June 14, 2021</p>	<p>We currently represent 13 professional planners from 10 leading urban planning firm sin Ontario who are engaged in planning and development projects for both the public and private sector throughout Ontario. As professional planners (Registered Professional Planners in Ontario), we provide objective, professional planning advice and work with communities and our development clients to plan for and develop communities in conformity with Provincial policy, all of which is done in the public interest.</p> <p>Each of us have been or are currently engaged in planning matters in the City of Burlington. It is that capacity that we are requesting a meeting as soon as possible with you to express our serious concerns in relation to a request by the City of Burlington Council to remove the Urban Growth Centre (Downtown Burlington) from local and Regional Official Plans. We understand this change would require an amendment to A Place to Grow. We believe such a change would set a precedent for local municipalities facing growth pressures and local opposition to simply state that such provincially identified and planned centres have “done their job” as a rationale for what would be a decision contrary to Provincial and Regional policies, Provincial interests as well as the greater public interest.</p> <p>There is considerable history to the planning and development of Burlington’s Urban Growth Centre. Since its identification in the 2006 Growth Plan, Downtown Burlington has seen significant investment in its infrastructure, parks, schools, hospitals and community facilities. The Downtown remains well located and structured to accommodate new growth with existing and planned infrastructure. It is clearly reflected and supported as an Urban Growth Centre and has been since ROPA 38 was approved. The Region’s response to the City’s adopted Official Plan in 2018 through its statement of non-conformity did not raise any issue with the Downtown as the Urban Growth Centre or with any urban structure issues related to the Downtown in its planning context.</p> <p>As professional planners in this Province, we believe any decision to remove and relocate or even alter the boundary of the Urban Growth Centre would have a detrimental effect to the following, given the level of investment and detailed planning to date:</p> <ul style="list-style-type: none"> <li>• The available supply of housing in Downtown Burlington;</li> <li>• The sustainability and viability of businesses and employment in Downtown Burlington;</li> <li>• The supply of market and affordable ownership units as well as market and affordable purpose built rental units;</li> <li>• The ability to achieve sustainability objectives;</li> <li>• The ability to achieve increased transit use and transit oriented development;</li> <li>• The minimization of costs for housing in Downtown Burlington; and,</li> <li>• The ability to secure continued investment in future housing, employment and transit.</li> </ul>	<p>The Downtown Burlington Urban Growth Centre is not being removed, however, the Region, in consultation with the City, has adjusted the boundary in ROPA 48 to focus new growth around the Burlington GO station, an area served by provincial infrastructure investment in conformity with the Growth Plan, 2019 as amended. Section 2.2.3.1 of the Growth Plan identifies that the Urban Growth Centres are planned to accommodate population and growth which support investments in regional transit. Further, Section 5.2.2.1 provides the Minister of Municipal Affairs and Housing the ability to update the size and location of Urban Growth Centres. It is Regional staff opinion that the adjustment as identified in ROPA 48 would not require an amendment to the Growth Plan, 2019. This is confirmed by the June 15, 2021 announcement by the Minister that the City and the Region have the ability to adjust the boundary of the UGC to focus growth new provincial transit infrastructure investment at the Burlington GO station.</p> <p>Growth and development will still continue in the downtown. The City of Burlington’s Official Plan will guide development by the policy framework and vision established through the City’s scoped re-examination of the downtown and Official Plan policies. These policies support growth in the</p>

No.	Source	Submission	Response
		<p>The current planning status in the City of Burlington's Downtown is also of concern due to the delays with current planning projects that remain without approvals or certainty. Currently there are a significant number of units (over 1,700) that are either frozen in the City's recent interim Control By-law, or under appeal at the LPAT. A complete shift in planning policy could impact certainty around these applications and continued investment in the Downtown.</p> <p>The removal of the Downtown as the Urban Growth Centre in Burlington is not consistent with Provincial policy. As planners we are very concerned that the removal of the Urban Growth Centre will, in effect, close off the Downtown to many socio-economic groups due to the inability to develop more accessible and affordable units. Further limitation of choice, reduction in transit service and further restrictions on housing supply are not in the public interest especially in a walkable and accessible part of the City that is reflected by the Downtown. The request was not supported by any land use planning rationale, nor has there been any consultation or "collaboration" with the development community or planning consultants, prior to the request. Planning in the public interest should always remain objective to ensure the public interest is upheld.</p> <p>Any decision to remove, relocate or alter the boundary of an Urban Growth Centre without planning evidence and rationale would set an unprecedented reversal of Provincial Policy. Such a decision would also reflect mixed messages to investors in Downtown Burlington as well as other Urban Growth Centres and create economic instability at a time when economic certainty must be at the forefront of government decisions.</p> <p>We look forward to an opportunity to meet with you both to have an honest and informed discussion through which we can present our concerns and information.</p> <p>We appreciate your timely consideration of our request.</p> <p>Sincerely,</p> <p>Dana Anderson, MA, FCIP, RPP, Partner, MHBC Planning Limited</p>	<p>Downtown to 2031 that will respect the existing character.</p> <p>The Downtown Burlington Urban Growth Centre and MTSA Supplemental Discussion paper was released by the Region in October 2020 for the purposes of consultation. Section 3.2 of the Discussion paper presents the proposed Burlington UGC boundary adjustment options. These options are supported by an assessment of the options against the relevant Growth Plan guiding principles and Urban Growth Centre policies.</p> <p>Following the release of the Supplemental Discussion paper, the Region commenced public consultation which included two Public Information Centres, meetings with Regional and City advisory committees, and stakeholder meetings with the development community, interested residents and landowners. A meeting was held with the Professional Planners Group on February 20, 2021.</p>
64.	Tom Muir E-mail dated June 14, 2021	<p>June 14, 2021. To: Halton Regional Council From: Tom Muir, Burlington resident Subject: Statutory Meeting on ROPA 48.</p> <p>I wish to make the following written submission to the Statutory Public Meeting on ROPA 48. This submission is in 4 parts, with some overlap, so I beg your indulgence for any</p>	<p>Commentary in this response will not be provided on the site specific development application matters currently being deliberated through litigation as that is a separate process.</p> <p>The focus of ROPA 48 is to implement components of the Regional Urban</p>

No.	Source	Submission	Response
		<p>duplication. It was needed for fuller elaboration of several points of emphasis raised in my submission evidence and argument.</p> <p>I will be unable to attend in person or make a verbal submission, but wish to provide this written submission for the record of the proceedings of this process.</p> <p>Please note that this written submission is focused on the components of ROPA 48 that are dealing with the North Aldershot Planning zone. However, many of the points made on process, and the criticisms, comments and issues raised therein, can in fact be generalized to numerous aspects of the ROPA 48 as a whole.</p> <p>Please excuse me if I have not complied with the exact timing of submission, which I am not clear on. I thought it to be Monday June 14 before 5PM.</p> <p>Thank you Tom Muir 70 Townsend Ave Burlington.</p> <p>Submission of Tom Muir to the Halton Statutory Public Meeting: Proposed Amendment to the Regional Official Plan "ROPA 48: An Amendment to Define a Regional Urban Structure"</p> <p>Part 1</p> <p>The North Aldershot/Eagle Heights issue is not only a Regional issue, but is a city-wide and neighborhood issue as well. North Aldershot (NA) is a separate Planning Zone (like Urban and Rural) and has its own policies with very detailed zoning. The City has had a long history of OP and by-law planning policies specifically for North Aldershot. My experience in this dates back to 1993/94.</p> <p>It is the last remaining parcel of largely undeveloped land in Burlington, and if fully serviced, the last "greenfield". But it's not just any greenfield. It is a distinct mixed landscape, with deeply incised creeks and watercourses, and rolling slopes from the escarpment down to the flats of Plains Road.</p> <p>If you know the area, you know that it is unique and very special, even idyllic I would say. Over many years, public efforts, including the many agencies of the North Aldershot Inter-agency Review (NAIR), have recognized this distinctiveness, and expressed the goal and principles to keep it distinct, while still trying to allow some development form designed to co-exist, but not replace. I'm writing here because I think that special place is in grave danger from ever increasing demands for more development than we ever contemplated.</p>	<p>Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan for lands within the existing urban boundary. As North Aldershot is located outside the urban boundary it is not within the scope of this amendment. The North Aldershot review is being addressed through the broader ROPR process and is being considered in conjunction with the other ROPR theme areas including the Integrated Growth Management Strategy, Rural and Agricultural System, and Natural Heritage System. The North Aldershot Discussion Paper and Appendix J to the Growth Concepts Discussion Paper provide a review of the entire North Aldershot Area and do not get into specific property history. The review is focused on the Provincial policy framework in place today and what updates/changes need to be made to the ROP to be consistent with and conform to that framework as well as on soliciting feedback from the public on their vision for the future of North Aldershot. The feedback from this submission will be considered in the next phase of the ROPR which will include the development of policy directions for the North Aldershot Policy Area which will then be used as the basis for the development of later amendments to the ROP.</p> <p>Based on the results of the North Aldershot Policy Area Discussion Paper and technical analysis conducted for the Growth Concepts Discussion Paper under Appendix J, staff are recommending that lands within the North Aldershot Policy Area not be included within the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>The crux issue in the development proposals for NA, and specifically Eagle Heights, is density. As you can see, the wanted unit numbers in the applications have steadily increased as time went by, right up to 2019. There is a history in development proposals over 1962 to the present.</p> <p>In 1993/4 the Parkway Belt West Plan policies were in effect as the decision foundation. Under the umbrella of this Plan, at that time, the (NAIR) undertook a lengthy multi-agency and citizen group Land Use Concept exercise for NA. This Review was concurrent with an application for 1100 units from Paletta International Corporation (PIC). This application represented 2 landowners; PIC and Taylor.</p> <p>With the NAIR multi-party conclusions and recommendations that 232 units were acceptable, the City of Burlington chose this number to take back to the developer. The PIC appealed to the OMB.</p> <p>An (8) eight week OMB hearing took place in the spring of 1995 and another eight (8) weeks in 1996. In subsequent meetings, with no citizens present, the city planning/legal and the PIC planning/legal, negotiated a settlement to take to OMB for a Hearing. The settlement plan was approved by the OMB in October/December 1996.</p> <p>These Settlement negotiations between the parties in October/November 1995 resulted in a plan for 501 units in the Central Sector. The PIC lands included 363 units with a park block and a school block, while the former "Taylor" lands included 46 units. The remaining 92 residential units were permitted on areas owned by other landowners in the Central Sector.</p> <p>This was a very controversial settlement and the citizens, including myself, were left feeling betrayed. The basis and fact of this is documented, but beyond this space. The OMB approved this settlement in 1996. Then the never ending applications for revisions to increase the unit count began.</p> <p>On July 19, 2002, PIC and Taylor submitted Official Plan Amendment, Zoning By-law Amendment draft plan of subdivision applications to the City of Burlington. An application was made for residential development for a total of up to 665 (596 PIC, 69 Taylor) residential units.</p> <p>The owners appealed the applications to the Ontario Municipal Board (OMB) in October 2002 for lack of decision. This decision was appealed twice by City but both rulings went to the applicant.</p>	<p>The Discussion Paper and Appendix J identified a number of Provincial policy constraints limiting the eligibility of these lands for settlement boundary expansion. Additionally, consideration for water and wastewater opportunities and constraints (Appendix J1 to the Growth Concepts Discussion Paper) found that extension of municipal services to support residential development would be particularly challenging as compared to other potential growth areas due to topography and natural heritage constraints among other factors. The recommended settlement boundary expansion areas in Milton and Georgetown minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>In December 2010, PIC and Taylor submitted revised draft plans of subdivision to permit the development of 870 residential units (815 units on the PIC lands and 55 units on the Taylor lands). This 2010 application revision included 4, four story apartment condominium buildings in the Paletta lands.</p> <p>The 2010 proposal revision was subject to a public meeting, comment, and multi-agency staff refusal as inadequate.</p> <p>The present development application as of 2019 is the following, totaling 924 units.</p> <ul style="list-style-type: none"> <li>• The proposed development of the PIC property, a 97-hectare parcel on the north side of Flatt Road, is for 203 single-detached houses and 587 cluster houses (attached units) for a total of 790 units. The apartment buildings from 2010 are still part of this application.</li> <li>• The proposed development of a 9.6-hectare parcel on the south side of Flatt Road, is for 32 single-detached houses and 102 cluster houses for a total of 134 units.</li> <li>• The applications have been appealed to the Local Planning Appeal Tribunal by the applicants.</li> </ul> <p>This history is important for people to know and note as most people don't know this or are confused by the changing numbers. Also, as most important, only the 1996 unit counts are approved.</p> <p>None of the other amendment applications submitted has been moved into a Hearing at LPAT (OMB), either contested or negotiated settlement.</p> <p>What citizens want to see is a detailed, concrete, and replicable evidence trail that leads to the decision, or staff advice, about what density is defensible and can be recommended under current science and policy regimes. Agency and public concerns and comments number in the hundreds, and we want to see them answered explicitly.</p> <p>Part 2.</p> <p>In Part 1 of this discussion, I provided some context of the NA issue, and history and timeline of changes in the proposed development at Eagle Heights.</p> <p>Recall that this consists of two sets of development applications and two property ownership's: Paletta (PIC) and Taylor lands. PIC is applicant for both properties.</p> <p>There is one component of this history I left out, in part because to explain it adequately needed an overview of its own, and because it is such an important matter not well known to City residents.</p>	

No.	Source	Submission	Response
		<p>It is an open question as to what this matter, the Minutes of Settlement between PIC and the City that covers the Eagle Heights development in particular, means in terms of the Regional Official Plan Review outcome, and really, more generally, how we move ahead with process and decisions about Eagle Heights.</p> <p>Recall part of the timeline that is relevant to identifying where in the timeline history the Settlement took place.</p> <p>2007: Revised Applications: 870 units. Proposal not circulated. 2009: Minutes of Settlement: City and PIC entered into negotiations on several properties including Eagle Heights.</p> <p>2010: Revised Applications: 870 units. Studies submitted and applications were circulated.</p> <p>As indicated, in 2009, the City and PIC entered into negotiations pertaining to several properties in Burlington. In Ontario, citizens and developers have the right to appeal to the Ontario Municipal Board (OMB).</p> <p>According to a City presentation at a Ward One Semi-Annual Open House of Councillor Rick Craven, on April 11, 2012, the reasons why were summarized as follows.</p> <ul style="list-style-type: none"> <li>• PIC had numerous (20 –25) appeals to the OMB going back to the 1980s.</li> <li>• Appeals by PIC had become a financial burden.</li> <li>• Appeals had complicated the land use structure and caused uncertainty in the planning process of the City.</li> <li>• Had begun to affect the ability of the City to achieve important strategic economic objectives related to development of employment lands and remaining residential lands.</li> <li>• Why a legal agreement? – to hold both parties to their promises</li> <li>• Why did the discussions take place in secret?</li> <li>• In camera discussion can take place in certain circumstances, including litigation when the City is in court –the OMB is a court</li> <li>• Month-long discussion among planners and lawyers in early 2009. In June 2009 the minutes of settlement signed.</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The key problem that emerged was that the Minutes of Settlement never became widely known to the NA involved residents, were never distributed, or announced to residents at key meetings on NA, particularly a significant May 18, 2011 public meeting exclusively on the latest revisions to the Eagle Heights application of 2010. Furthermore, as my experience documented at the time, there was emergent resistance to making the Minutes public at other public meetings.</p> <p>It took until the April 12, 2012 meeting referenced above that there was an open disclosure that described the process.</p> <p>Part 3.</p> <p>From a reading of the entire Minutes of Settlement, I found the following sections and related correspondence, and without excluding other sections, these are of particular concern because they indicate to me that the City has already put itself in a prejudiced position by supporting the development proposal, and limiting its own capacity to question and modify independently.</p> <p>None of these sections has been mentioned to assembled citizens since the formal public consultation process began on May 18, 2011 at the neighborhood public meeting. Only the first one was disclosed to me, despite repeated discussion, and a meeting with the City on Sept. 9, all before I obtained the entire Minutes on September 21. Overall, I find this a shocking lack of good faith.</p> <p>I don't know how an honest review of the current application can be done when the City planning representatives in charge have already agreed in the Minutes to support the application without any current review that is visible. It has also agreed to modify its Official Plan policy to promote intensification everywhere in the City it seems, including all of North Aldershot, not just the Central Sector in which Eagle Heights exists.</p> <p>In further correspondence with the City in 2012, I received the following, including excerpts from the Minutes.</p> <p>"Please note that the Eagle Heights applications are still at the early stages of processing; however as part of the approved Minutes of Settlement between Paletta International Corporation (PIC) and the City of Burlington dated June 1, 2009, Council endorsed the following paragraph: (From Schedule D – Eagle Heights (pages 13 1nd 14: Section 1): "The City recognizes Eagle Heights as an approved residential development and as a required component of Burlington's future housing inventory. "An application has been made for a residential development for a total of up to 870 units. Given current provincial policies on intensification and the need to balance the scope of development and costs of</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



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

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

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

No.	Source	Submission	Response
		<p>the history and present development planning reality of the NA context was sorely missing.</p> <p>There was a ringing disconnect between the Policy Review results and this reality. They said they were not going to discuss single areas or developments. It was speculated that proposals could be cancelled or taken back, approved or not. I think it lacked a measure of credibility.</p> <p>The policy review section on Settlement Boundary Review Assessment said that none of the Growth Concepts include the expansion of the urban area in the North Aldershot Planning Area. Urban Expansion Assessment undertaken for North Aldershot considers the criteria of the Growth Plan for expansion and analysis of the 'most appropriate location.' This criteria was stated as not being met – urban expansion does not fit in NA, it's not judged appropriate.</p> <p>Other key components of this assessment include extent of the Regional Natural Heritage System and review of water and wastewater servicing. Much of NA is under some special provincial restrictive policy net, and about 50% is in the NHS. None of these components are supportive of NA development.</p> <p>From a reading of the entire Minutes of Settlement, I found the following sections and related correspondence, and without excluding other sections, these are of particular concern because they indicate to me that the City has already put itself in a prejudiced position by supporting the development proposal, and limiting its own capacity to question and modify independently.</p> <p>In further correspondence with the City in 2012, I received the following, including excerpts from the Minutes.</p> <p>"Please note that the Eagle Heights applications are still at the early stages of processing; however as part of the approved Minutes of Settlement between Paletta International Corporation (PIC) and the City of Burlington dated June 1, 2009, Council endorsed the following paragraph: (From Schedule D – Eagle Heights (pages 13 1nd 14: Section 1): "The City recognizes Eagle Heights as an approved residential development and as a required component of Burlington's future housing inventory. "An application has been made for a residential development for a total of up to 870 units. Given current provincial policies on intensification and the need to balance the scope of development and costs of services, the City supports an increase in density provided: 1) the development is confined to the land areas ("pods") as previously approved for development in Amendment No. 197 of the City of Burlington Official Plan and Regional OPA No. 2, and 2) the proposed development and the increased density comply with all applicable provincial law, policies or regulations."</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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

No.	Source	Submission	Response
65.	<p>Michael May on behalf of North Oakville Community Builders Inc.</p> <p>E-mail dated June 15, 2021</p>	<p>Hello,</p> <p>Please find comments regarding ROPA 48 on behalf of the North Oakville Community Builders Inc. attached.</p> <p>Should you have any questions, please don't hesitate to contact us.</p> <p>Kind Regards</p> <p>Alex Mior, B.URPI Senior Project Coordinator</p> <hr/> <p>ATTACHED LETTER</p> <p>Regional Municipality of Halton c/o Regional Clerk Graham Milne 1151 Bronte Road Oakville ON L6M 3L1 RE: ROPA 48</p> <p>I am writing to you on behalf of North Oakville Community Builders Inc. (NOCBI) who has been extensively engaged throughout the Regional Official Plan Review (ROPR) process by Halton Region. In addition to our submissions to the Region, throughout the ROPR process to date, we have identified several questions which merit consideration prior to proceeding to the adoption of ROPA 48.</p> <p>We would appreciate the opportunity to meet with Regional Staff to review and receive responses to the questions within this letter, prior to ROPA 48 proceeding to adoption.</p> <p>The following general points regarding ROPA 48, are as follows:</p> <ul style="list-style-type: none"> <li>• We question the role of the Region in planning for more localised nodes, such as Neyagawa in their Urban Structure. It is our opinion that this level of planning is more appropriate for the local municipalities.</li> <li>• The Oakville Uptown Core is identified as a Primary Regional Node, with specific population and employment ratios. On the Region's Urban Structure Map, it is shown schematically as occupying all four corners of the Dundas/Trafalgar intersection. In the North Oakville East Secondary Plan, the lands on the north side of Dundas are part of the Trafalgar Core and are distinct from the Uptown Core. Clarification is requested as to</li> </ul>	<p>Regional Official Plan Amendment (ROPA) No. 48 was approved by the Minister of Municipal Affairs and Housing on November 10, 2021 with a few modifications. For information please visit the Region's webpage <a href="#">here</a>.</p>

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		<p>what the Region defines as the Uptown Core, so that the landowners on the north side of Dundas are not ultimately faced with two set of policies. In the Region’s mapping, the Uptown Core is shown both within the built boundary and in the DGA, which may be confusing in terms of how development within the Uptown Core is considered with regards to intensification.</p> <ul style="list-style-type: none"> <li>• ROPA 48 provides population and employment target ratios for all Primary Regional Nodes, including the Hospital District, Palermo Village, and the Uptown Core. It is understood that the population and employment planned for these areas has been developed in conjunction with the local municipality. It is important that the additional growth be accommodated within the existing DGA, the Hospital District and Palermo prior to any consideration of changes to be made to approved plans along the Trafalgar Corridor.</li> </ul> <p>Furthermore, specific questions from the NOCBI consulting team’s review, include the below questions related to the associated IGMS and impact the adoption of ROPA 48:</p> <p><b>Population and Growth Management</b></p> <ol style="list-style-type: none"> <li>1. The Growth Plan considers the Schedule 3 Population forecasts as minimums which can be increased through the MCR process. What analysis has the Region done to determine that the Schedule 3 Forecasts are appropriate for the Region and should not be increased?</li> <li>2. The IGMS Growth Concepts Discussion Paper released in February 2021, cautions that: <p><i>[A]lthough the Evaluation Framework shows that Concept 3 would best achieve many of the measures under the various themes, the rate of intensification planned for under Concept 3 is 80% of all housing units being built within the Built-Up Area or existing DGA on an annual basis to 2051. An immediate and significant shift in the pattern of housing in Halton—one where family households would increasingly live-in apartment buildings—is required in order to achieve the housing mix under this Growth Concept. Council will need to carefully consider whether the scale of this shift is feasible given current market preferences and the Region’s objectives to retain the identity of local communities.</i></p> <p>This statement is true of all the concepts evaluated. Concept 3 is simply the most extreme in terms of deviation from the market. What analysis has the Region undertaken to ensure that the scale of the shift from the market under the concepts being considered is feasible? People have a choice where they live, and that choice is reflected in market demand. Should Halton prepare an additional scenario that assesses land needs based on the market-based housing scenario and conformity with the Growth Plan to assist in</p> </li> </ol>	<p>Regional staff note that details on the Preferred Growth Concept are available in the Preferred Growth Concept Report.</p> <p>Comments on the IGMS have been addressed in material related to Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through the Preferred Growth Concept report. More details are also available in the IGMS Policy Directions and will be in the future Regional Official Plan Amendment which is being proposed to implement the Preferred Growth Concept.</p>

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



No.	Source	Submission	Response
		<p>conducted to ensure that the growth concepts will not result in further housing price escalations and reduced affordability?</p> <p><b>Densification</b>  6. The term densification and its definition are not part of the Growth Plan policies. Could the Region indicate where it derived the concept of densification from and provide examples of other jurisdictions where this concept has been applied and how successful it has been?</p> <p>7. Densification should not be applied to existing planned communities within the current DGA and approved secondary plans should not be impacted. Confirmation should be obtained from the Region that this principle will be applied in the growth concepts.</p> <p><b>Status of the Trafalgar Corridor</b></p> <p>8. The IGMS Concepts Discussion Paper refers to the Trafalgar Corridor in Oakville and Milton as a Strategic Growth Area subject to densification. What analysis has been completed to determine how many additional apartment units could be accommodated within an approved secondary plan? Has there been an assessment of what the impact would be the emerging communities and the additional requirements for municipal, community and social services in this area?</p> <p><b>Impact of Covid 19.</b>  9. While we appreciate that the Region through the work completed by Strategy Corp. is attempting to gain an understanding of the significant changes due to Covid 19, several recent Studies by Statistics Canada suggests that a large number of employees will continue to work from home following Covid1.. Strategy Corp. appears to agree with this conclusion (p.30).</p> <p>The likely outcome will be a need for larger housing units to accommodate home offices and multiple residents working from home concurrently. This will cause a shift in demand from apartment units in general to ground related units. Given that the four concepts, are already deviating substantially from this demand scenario, how will the these changing housing preferences be accommodated when the growth concepts are heading in the other direction by restricting most of the new housing to apartments?</p> <p>We will be providing separate comments on the IGMS growth options prior to the due date at the end of July 2021 and any future reports under separate cover. We look forward to hearing back from the Region regarding these concerns to assist in our more fulsome comments.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>On behalf of the North Oakville Community Builders Inc., thank-you for your consideration.</p> <p>Mr. Michael May, P. Eng., General Manager Delta Urban Inc.</p>	
66.	<p>Agnieszka Pagowska</p> <p>E-mail dated June 16, 2021</p>	<p>Dear Honourable Members,</p> <p>I would like to address the architects of the proposed amendments to consider the serious and damaging consequences of losing yet more precious farmland and green space to urban development. In light of the ongoing pandemic and the results we have seen in our imported goods, food supply and the critical role poor air quality has made, we must ask ourselves if sacrificing vital resources for the sake of material wealth is what the people of this province need.</p> <p>The immediate monetary gains of a few must not trump the real needs of the greater population. At a time when food prices are skyrocketing globally we are facing the prospect of permanently sacrificing chunks of productive farmland and the natural areas that keep it so, to single family homes, giant warehouses and distribution centres for disposable consumables. Southern Ontario's climate is unique in Canada and can sustain so many of us. Please consider that currently you are the custodians if this land and are responsible for what will be passed on to future generations.</p> <p>Respectfully yours,</p> <p>Agnieszka Pagowska</p>	<p>The Preferred Growth Concept is based on several key planning principles, including ensuring that the majority of growth is directed to Strategic Growth Areas (SGAs), such as Nodes and Corridors, while limiting the need for settlement area boundary expansions. Another principle is the protection of agricultural lands and the Natural Heritage System.</p> <p>Recognizing that the Region and all four local municipalities have declared a Climate Emergency, a Climate change lens also underpins the Regional Official Plan Review (ROPR) work, including the Greenhouse Gas Emissions modelling as a part of the Integrated Growth Management Strategy and Preferred Growth Concept. For more information please see the '<i>Integrated Growth Management Strategy: Growth Concepts Comparative Greenhouse Gas Emissions Assessment</i>' available online here: <a href="https://www.halton.ca/getmedia/3c276ca5-635d-44ea-b65c-45add99c7915/LPS-Halton-Region-Comparative-GHG-Emissions-Assessment-Growth-Concepts.aspx">https://www.halton.ca/getmedia/3c276ca5-635d-44ea-b65c-45add99c7915/LPS-Halton-Region-Comparative-GHG-Emissions-Assessment-Growth-Concepts.aspx</a></p> <p>The Region continues to recognize the importance of farmland protection and the role of agricultural land in climate change mitigation and adaptation, including carbon sequestration. Halton Region has been and will continue working directly</p>


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			<p>with Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area.</p>
67.	<p>Draga Barbir and Associates on behalf of 2220243 Ontario Inc.</p> <p>E-mail dated June 16, 2021</p>	<p>Re: First Submission Letter for 8283 Esquesing Line, Milton</p> <p>Draft Amendment No. 48 to the Regional Plan - ROPA 48</p> <p>I am the land use planning consultant retained by 2220243 Ontario Inc., the owner of a parcel of land legally described as Part Lot 3, Concession 5, Town of Milton (the "Subject Lands"), known municipally as 8283 Esquesing Line. I have been retained to advise on Draft Amendment No. 48 to the Regional Plan (ROPA 48) to change the proposed mapping by including the entire parcel except its northwest corner into the "Future Strategic Employment Area".</p> <p>As a result of a brief review of the relevant materials including the Minutes of Settlement (attached and explained), we conclude again that the Subject Lands' urban area boundary should include the creek, the NHS Areas, and Agricultural Areas on all relevant maps which are part of ROPA 48.</p> <p>Property description:</p> <p>The Subject Lands are located on the east side of Esquesing Line, north of James Snow Parkway. The lands are in very close proximity to the 401 Industrial Business Park. The lands have a frontage of approximately 500 feet along Esquesing Line and a depth of approximately 1100 feet, and are 12 acres in area.</p> <p>Current Land Use Designations:</p> <ol style="list-style-type: none"> <li>1. In the Regional Official Plan on Map 5 (Regional Phasing), the subject property is shown as "Urban Area with Regional Phasing between 2021 and 2031".</li> <li>2. In the Town of Milton Official Plan, the Subject Lands are designated as "Agricultural Area" and "Greenland Area" (Schedule A – Land Use Plan).</li> </ol>	<p>Please see comments on October 15, 2020 submission provided earlier in a row above.</p>

No.	Source	Submission	Response
		<p>3. In the Town of Milton Phasing Plan, the subject property is in Phase 4 Lands – “Urban Expansion Area” – 2021 onwards.</p> <p>Current Zoning:</p> <p>In the Town of Milton Zoning By-Law 144-2003, approximately ninety percent of the subject property is zoned “A1 – Agricultural”, and the remaining portion of less than ten percent, located at the far back of the property, is zoned “GA – Greenlands” (Maps 11 and 12 attached).</p> <p>Issue Number 1</p> <p>In the Minutes of Settlement dated March 31, 2015, between the Regional Municipality of Halton and 2220243 Ontario Inc. (hereinafter referred to as “222”), in regard to the appeal of ROPA 38 identified by the Ontario Municipal Board as appeal No. PL111358, point number 3 states that: “The Parties agree that Halton Region has commenced the next statutory five-year review of the Plan in 2014 (the “Next Five-Year Review”). Part of the Next Five-Year Review will consider the allocation of additional Urban Area lands within Halton Region to respond to the additional numbers provided to Halton Region under Amendment 2 to the Growth Plan (June 2013). Halton Region agrees to consider the Subject Lands as part of the Next Five-Year Review without prejudice to 222’s withdrawal of the Appeal as a result of these Minutes.”</p> <p>Issue Number 2</p> <p>In the Town of Milton Zoning By-Law 144-2003, approximately ninety percent of the subject property is zoned “A1 – Agricultural”, and the remaining portion of Greenlands”. The front part of the Subject Lands is within “Phase 4 Lands” (year 2021–onwards) in the Town of Milton Phasing Plan: Urban Expansion Area.</p> <p>The proposed ROPA 48 Maps 1, 1c, 1h, and 3 show only the front portion of the lands as Urban or Employment Area and extend the Greenbelt Natural Heritage System deeper into the lands almost to the urban- or employment-area boundary. Inconsistency of the mapping is evident and should be further explored. For example, the proposed Map 3 shows almost no urban area for the Subject Lands. The proposed Map 1 shows a smaller urban area than agreed/designated in other plans and shows a wide Greenbelt NHS coming almost to the urban line.</p> <p>Further, Map 1C – Future Strategic Employment Areas – should show the part of the Subject Lands which is not within the urban area or the Greenbelt NHS area, as “Future Strategic Employment Area”. This would be in keeping with point number 3 of the Minutes of Settlement:</p>	

No.	Source	Submission	Response
		<p>Part of the Next Five-Year Review will consider the allocation of additional Urban Area lands within Halton Region to respond to the additional numbers provided to Halton Region under Amendment 2 to the Growth Plan (June 2013). Halton Region agrees to consider the Subject Lands as part of the Next Five-Year Review without prejudice to 222's withdrawal of the Appeal as a result of these Minutes.</p> <p>Regards,</p> <p>Draga Barbir, B.Sc. B.Arch. MCIP RPP</p>	
68.	<p>We Love Millcroft</p> <p>E-mail dated July 16, 2021</p>	<p>We Love Millcroft is a neighbourhood association which represents the residents of the Millcroft Community and Burlington. The main focus of our association is to maintain the existing Millcroft Golf Course lands as Major Parks and Open Space permanently.</p> <p>On behalf of our community, we have reviewed Halton's ROPA 38, ROPA 48, the ROPR presentations, the Strategic Business Plan, the Climate Discussion Paper and the Natural Heritage Discussion Paper to confirm the alignment of our goal. Additionally, we have reviewed the "Submission on the Land Use Planning Framework in Halton provided to the Review Panel for the proposed Milton Logistics Hub Project", (May 29, 2019). The highlights of these documents, together with our comments and conclusions follow.</p> <p>In the Regions words,</p> <p>"1. This Regional Official Plan, or commonly referred to as The Regional Plan, is adopted by the Council of the Regional Municipality of Halton to solidify decisions taken in the past and to give clear direction as to how physical development should take place in Halton to meet the current and future needs of its people. It is also intended to reflect their collective aims and aspirations, as to the character of the landscape and the quality of life to be preserved and fostered within Halton. Finally, the Plan clarifies and assists in the delivery of Regional services and responsibilities as set out in the Planning Act, the Municipal Act, and other pertinent Provincial legislation.</p> <p>2. This Plan outlines a long term vision for Halton's physical form and community character. To pursue that vision, it sets forth goals and objectives, describes an urban structure for accommodating growth, states the policies to be followed, and outlines the means for implementing the policies within its property tax base and other financial resources.</p> <p>3. Policies of this Plan indicate positions to which Regional Council is committed or which Council will work towards attaining. They also describe processes to be followed in</p>	<p>Comments are acknowledged. Please see below for a detailed response.</p>

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		<p>arriving at decisions, changes to be sought in Provincial legislation, and policy positions to be required in the Official Plans and Zoning By-laws of Burlington, Oakville, Milton and Halton Hills.”</p> <p>The Region of Halton Official Plan Amendment 38 received approval from the Province in 2011. This document provides a clear vision for the future growth and development of the Region including infrastructure and development to the year 2031.</p> <p>Section 5.3 provides Halton’s Planning Vision through the Official Plan advocating at the beginning of Part II (Basic Position, Halton’s Planning Vision) as a balanced approach to land use planning including protecting the natural environment. Section 25 of the ROP states: “Regional Council supports the concept of “sustainable development” meeting the needs of present and future generations.”</p> <p>The Region’s principles of sustainability include that:</p> <ul style="list-style-type: none"> <li>- natural resources are not being overused</li> <li>- natural environment is not degraded</li> <li>- this and future generations capacity to meet their physical, social and economic needs are not being compromised.</li> </ul> <p>The overall goal is to enhance the quality of life for all people of Halton today and into the future. It is stated that the emphasis of this core value is on “quality of life” and the focus is not only this but future generations.</p> <p>In section 26, the Region’s approach to and its position on Growth is</p> <p>“...In this regard, Halton will undertake the necessary steps to ensure that growth will be accommodated in a fashion that is orderly, manageable, yet sensitive to the natural environment, heritage and culture. To maintain Halton as a desirable and identifiable place for this and future generations, certain landscapes must be preserved permanently. This concept of “landscape permanence” represents Halton’s fundamental value in land use planning and will guide its decisions and actions on proposed land use changes accordingly.”</p> <p>The concept of “landscape permanence” is a proactive way of dealing with land use changes – advocating a gradual pace of incremental changes in the landscape over time such that Halton will remain recognizable and maintain its character. This approach of identifying categories of land uses and setting out clear objectives and policies to define planning expectations for each category to provide a comprehensive land use framework. The “zero-sum” framework means that a loss to an identified planned function represents a cumulative effect.</p>	

No.	Source	Submission	Response
		<p><b>Key Messages from the Community</b></p> <p>1) The importance and role of the natural environment for current and future generations quality of life. Millcroft Golf Club (MGC) continues to be identified in both the Region of Halton and City of Burlington's official plans as Major Parks and Open Space for this purpose.</p> <p>2) To maintain certain identifiable landscapes permanently. MGC is the identity of the Millcroft neighbourhood and was developed to provide a natural environment within our neighbourhood and City. Many current marketing programs for new development in North Burlington advertise the proximity to the Millcroft Golf Club. Adi in Alton and Branthaven in Millcroft are examples.</p> <p>3) The zero-sum equation for land use is critically important for residents of the City of Burlington (COB). If the Millcroft Golf Course were to be developed, this greenspace is gone forever.</p> <p>Highlights for City of Burlington from Adopted Regional Official Plan Amendment 48 Regional Nodes are defined as strategic growth areas which have a role in accommodating mixed-use intensification and supporting the regional transit network. Uptown Urban Center located at the corner of Appleby Line and Upper Middle Road is designated as a Primary Regional Node.</p> <p>Dundas Street and Appleby Line are designated as Higher Order Transit Corridors. Dundas Street connects Burlington to Hamilton to the west and Oakville to the east. Appleby Line has an interchange at Highway 407, QEW and is a transportation route to the Appleby GO Station, considered a Major Transit Station Area. The Region has engaged a consultant to study and minimize GHG emissions as part of the ROPA 48.</p> <p>Burlington residential housing growth going forward is limited to mixed use and higher density development. ROPA 48 does not include any new greenfield development within the current urban boundary.</p> <p>Growth targets for the City of Burlington will be achieved by densification/intensification.</p>	<p>Sections 115.3 and 115.4 of the Region's Official Plan (consolidated June 19, 2018) provides a list of the key features and components that create the Regional Natural Heritage System (RNHS) through a systems approach to protect and enhance the natural features and their functions. Regional Planning staff used a consistent application of natural heritage policies and definitions in the current ROP when evaluating the draft proposed 2019 RNHS mapping. In the current in-force and effect Regional Official Plan (consolidated June 19, 2018) portions of the Millcroft Golf Course are designated RNHS, and continue to remain so in the draft proposed 2019 RNHS mapping available on the Mapping Viewer on the project webpage <a href="#">here</a>.</p>

No.	Source	Submission	Response
		 <p><b>Key Messages from the Community</b></p> <p>Millcroft Neighbourhood is bordered by Dundas Street to the north, Appleby Line to the east and Upper Middle Road to the south. In addition to ROPA 48, the CN Rail line which, if approved, will result in more frequent trains and increased truck traffic along the east side of our neighbourhood. It is of note that the Region of Halton has launched a lawsuit to stop the CN Rail Hub based on environmental concerns. The proximity of our neighbourhood to the Rail line, two Higher Order Transit Corridors and the Uptown Urban Centre will result in significant GHG emissions, an important topic of the ROPA 48. MGC is an area of approximately 100 hectares of turf that is home to a significant, mature tree canopy. This is an extremely important mitigating factor for GHGs and must be taken seriously. This greenspace must be permanently protected for this and future generations.</p> <p>Submission on the Land Use Planning Framework in Halton, provided to the Review Panel for the Proposed Milton Logistics Hub Project (May 29, 2019) by Curt Benson. The Review Panel's interest in expert opinions highlights areas of concern that should be addressed by the Region of Halton.</p> <p>The Panel was interested in expertise related to</p> <ul style="list-style-type: none"> <li>- the magnitude, geographic extent, timing, frequency, duration, reversibility, and ecological and social context of the Project's anticipated adverse environmental effects</li> <li>- the predicted effectiveness of proposed mitigation measures</li> </ul> <p>The Review Panel also asked Halton Municipalities to provide expertise related to municipal interests and standards in water, natural heritage, transportation, agriculture, residential and employment matters.</p>	<p>Regional Official Plan Amendment (ROPA) No. 48 was approved with a few modifications by the Minister of Municipal Affairs and Housing on November 10, 2021. For more information on ROPA 48, please visit the webpage <a href="#">here</a>.</p> <p>The Integrated Growth Management Strategy, including the preparation of the Preferred Growth Concept, is based on key planning principles to ensure a balanced approach to growth and that complete communities with access to transit, as well as amenities such as parks and open space. More information on factors considered in the preparation of the Preferred Growth Concept is available in the Preferred Growth Concept Report.</p>



No.	Source	Submission	Response
		<p>The Regions response identified the importance of the land use planning framework in defining standards for managing and assessing growth and development in Halton.</p> <p>In this regard, the submission highlighted the following information to address:</p> <ul style="list-style-type: none"> <li>• the importance of the Regional Official Plan in the land use planning framework, including the significant process undertaken to define a comprehensive vision for Halton through Sustainable Halton;</li> <li>• Regional Council's long-standing interest in planning, growth management and the protection of natural and agricultural resources given Halton's context in the greater Toronto-Hamilton area;</li> <li>• The integrated nature of planning in Halton and the approach taken to ensure that growth only occurs in a coordinated and comprehensive fashion, and that growth includes infrastructure and financial plans to ensure the development pays its share of costs related to growth; and</li> <li>• The core values found throughout the Regional Official Plan of environmental protection, farmland preservation, proper management, coordination and financing of growth, the support for "complete" and healthy communities, and sharing of planning responsibilities with the local municipalities.</li> </ul> <p><b>Key Messages from the Community</b></p> <ul style="list-style-type: none"> <li>- integrated nature of planning to ensure growth only occurs in a coordinated and comprehensive fashion. MGC zoning as Major Parks and Open Space should not be compromised in any way.</li> <li>- core values found throughout the Regional Official Plan of environmental protection, support for complete and healthy communities. Millcroft, is a complete community and the MGC functions as a carbon sink to offset GHG emissions including from the adjacent CN Rail Line.</li> </ul> <p><b>Halton Region Strategic Business Plan 2019 – 2022</b></p> <p>The Strategic Business Plan provides a comprehensive review, examining the Region's interrelationship of growth, natural heritage systems, agricultural heritage systems and climate change.</p> <p>The purpose is to ensure that the necessary infrastructure and services are in place to maintain the high quality of life as the Region continues to grow. It addresses Environmental Sustainability and Climate Change by identifying related UN Global Sustainable Development Goals (SDGs).</p> <p>The five categories of the Strategic Business Plan are:</p>	<p>As mentioned earlier, in the current in-force and effect Regional Official Plan (consolidated June 19, 2018) portions of the Millcroft Golf Course are designated RNHS, and continue to remain so in the draft proposed 2019 RNHS mapping. It is important to note that parkland and open space planning are often led by the local municipalities. While the Region continues</p>

No.	Source	Submission	Response
		<div data-bbox="464 261 667 370"> <p><b>Planning and Growth Management</b></p> </div> <div data-bbox="688 261 1247 370"> <p>Ensuring that the necessary infrastructure and services are in place to maintain the high quality of life as the Region continues to grow.</p> </div> <div data-bbox="464 391 667 500"> <p><b>Transportation and Infrastructure</b></p> </div> <div data-bbox="688 391 1247 500"> <p>Investing and delivering on capital improvements that provide efficient and safe transportation options and maintain infrastructure in a state-of-good-repair.</p> </div> <div data-bbox="464 521 667 630"> <p><b>Community Well Being</b></p> </div> <div data-bbox="688 521 1247 630"> <p>Collaborating with partners to deliver the programs, services and supports that the community needs to be safe and healthy.</p> </div> <div data-bbox="464 651 667 760"> <p><b>Environmental Sustainability and Climate Change</b></p> </div> <div data-bbox="688 651 1247 760"> <p>Protecting and enhancing the natural environment and reducing our collective carbon footprint to mitigate the impacts of climate change.</p> </div> <div data-bbox="464 781 667 889"> <p><b>Effective Government</b></p> </div> <div data-bbox="688 781 1247 889"> <p>Transforming service delivery through innovation, technology and process improvements. Maintaining a strong financial position is critical for the future.</p> </div> <p>Within these categories, two are very applicable to our concerns for preserving the MGC</p> <p>1) Planning and Growth Management includes two actions that have specific interest  - Natural Heritage System and Review  - Climate Change mitigation and Adaptation</p> <p>2) Environmental Sustainability and Climate Change includes of interest to our goal  - Review the Region’s Greenland securement and Regional Forest programs, including opportunities for enhanced coordination with Conservation Halton</p> <p><b>Key Messages from the Community</b></p> <p>MGC plays an important role in stormwater management for our community and for downstream Burlington. Three watersheds, Sheldon Creek, Appleby Creek and Shoreacres Creek are impacted by the green infrastructure stormwater management system that is an integral part of the MGC design. The importance of this function resulted in OPA 117 (1986) and is supported by engineering reports. The establishment of this stormwater system before the current heightened concerns for flooding as a result of climate change are notable. The golf course currently has an extensive, mature, parkland</p>	<p>to strive for sound land use planning and climate change mitigation and adaptation through the Regional Official Plan Review, it is recommended that concerns related to parks and open space be directed to the local municipality.</p> <p>The Region continues to protect and preserve the Natural Heritage System (NHS) for the long-term to maintain landscape permanence. The climate change benefits of the NHS are recognized and will continue to be considered through the Climate Change and Natural Heritage themes of the Regional Official Plan Review (ROPR). As a part of the Natural Heritage component of the ROPR, consideration is being given to the creation of a Natural Heritage System Strategy which can serve as a basis for protecting the natural environment through tools like stewardship and community awareness.</p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region’s Strategic Business Plan 2019-2022 and and Council’s emergency declaration.</p>

No.	Source	Submission	Response
		<p>tree canopy which assists with GHG mitigation, flooding mitigation, a cooling effect and noise abatement. The entire MGC should be saved from the threat of development. We believe that a forest saved from development may qualify as a carbon offset for GHG emissions.</p> <p><b>Climate Change Discussion Paper (June 2020)</b></p> <p>Halton is not immune to global warming. Models presented through the Ontario Climate Change and Health Modelling Study (2018) predict that the following severe weather events will significantly increase in occurrences and frequency by the year 2050: heat waves (a heat wave being defined as 3 consecutive days exceeding 32°C), pollution, vector-borne diseases and extreme precipitation causing floods.</p> <p>A brief overview of some of the most impactful current and anticipated changes caused by global warming are:</p> <p>a) Weather Changes and Public Health Impacts</p> <p>Halton Region is seeing an increase in the frequency and severity of localized weather hazards, which represent weather events potentially harmful to individuals and property, such as extended heat waves, heavy rainfalls, wind and ice storms. Although some of these weather events are cyclical in nature such as storms with a 1% or less chance of occurring in a given year, data has shown that they are becoming more frequent and more severe as the planet becomes warmer. While the most visible impact of these severe weather events tends to be the trail of destruction and damage they leave behind, there has been an increased awareness of the growing emotional and mental health toll inflicted on individuals by severe weather events.</p> <p>For instance, in the aftermath of the 2014 Burlington flood, a great number of affected residents indicated that their stress and anxiety levels were much higher than before, with many experiencing breathing and sleeping difficulties directly attributed to their flood experience.</p> <p>b) Pressures on the Built Environment and Infrastructure</p> <p>Severe weather conditions such as windstorms and flash floods caused and/or amplified by climate change are increasingly putting pressure on the built environment and existing municipal infrastructure. Such extreme weather events have tested the drainage capacity and resilience of stormwater infrastructure. For instance, the Burlington flood of 2014, which resulted in the equivalent of nearly two months of rain in approximately eight hours, overwhelmed the stormwater management network, impacting many roads and highways and more than 3000 homes.</p> <p>c- Threats to the Natural Environment</p>	

No.	Source	Submission	Response
		<p>Natural environments provide habitat for wildlife including species-at-risk. They are instrumental in maintaining ecosystem services like clean air and water, as well as ensuring urban resilience to extreme weather events. In addition, these environments play an integral role in the global carbon cycle by sequestering carbon dioxide in both terrestrial and aquatic environments. GHG emission-driven warming is globally destabilizing these environments by accelerating the depletion of freshwaters, the degradation of soils and the loss of terrestrial and aquatic biodiversity. It is also contributing to the spread of invasive species and pest outbreaks. In Halton, and during the 2013 severe ice storm, major damage was sustained to the Region's tree canopy. The Town of Halton Hills was at the centre of the storm that deposited over 30 mm of ice over the Town's trees and caused unprecedented and long-lasting destruction to this major resource.</p> <p><b>Key messages from the community</b></p> <p>Are severe weather conditions putting pressure on the built environment and the existing municipal infrastructure or is the reverse true? Our community is clear that the MGC should be maintained as Major Parks and Open Space permanently to provide a balance in land use planning relative to the surrounding High Order Transportation Corridors, the CN rail line and Primary Regional Node. The most effective carbon sinks are the ones that are located near to the sources of GHGs. Protecting this natural environment is critical to Community Well Being as set out in the Strategic Business Plan.</p> <p><b>Natural Heritage Discussion Paper (June 2020)</b></p> <p>The Natural Heritage is central to the Planning Vision for the Region of Halton. Halton has been at the forefront of natural area planning since the 1980's.</p> <p>"A Natural Heritage System is defined in the NHS protection and enhancement as an important part of responding to climate change in terms of both adaptation and mitigation. The NHS provides for more resilient environments and can allow opportunities to reduce impacts of flooding and other risks associated with extreme weather events. NHS protection and enhancement can also play an important role in acting as a carbon sink to reduce green house gas emissions."</p> <p>Our review of this document notes two main concepts</p> <ol style="list-style-type: none"> <li>1. Sustainable Development – protecting the natural environment is a vital factor</li> <li>2. Landscape Permanence – although the Region will urbanize and change, certain landscapes must be preserved permanently.</li> </ol> <p>A Natural Heritage System (NHS) is defined in the PPS 2020 as:</p>	<p>The role of the natural environment in climate change mitigation and adaptation is recognized and continues to be considered as a part of the Regional Official Plan Review. Opportunities to strengthen policies related to climate</p>

No.	Source	Submission	Response
		<p>“...a system made up of natural heritage features and areas, and linkages intended to provide connectivity (at the regional or site level) and support natural processes which are necessary to maintain biological and geological diversity, natural functions, viable populations of indigenous species, and ecosystems. These systems can include natural heritage features and areas, federal and provincial parks and conservation reserves, other natural heritage features, lands that have been restored or have the potential to be restored to a natural state, areas that support hydrologic functions, and working landscapes that enable ecological functions to continue...”</p> <p>The Growth Plan 2019 suggests a similar approach to that of the Greenbelt Plan 2017.</p> <p>In this regard, Section 4.1 of the Growth Plan 2019 states in part the following:</p> <p>This Official Plan also provides for the identification and protection of a Natural Heritage System for the Greater Golden Horseshoe (GGH) outside of the Greenbelt Area and settlement areas, and applies protections similar to those in the Greenbelt Plan to provide consistent and long-term protection throughout the GGH. The goal of a Natural Heritage Strategy would be to provide a framework for initiatives to:</p> <ul style="list-style-type: none"> <li>• restore habitat and increase forest cover through restoration and stewardship;</li> <li>• promote natural heritage education and community awareness;</li> <li>• secure greenlands and their linkages;</li> <li>• explore opportunities to mitigate climate change; and</li> <li>• promote and protect the natural environment.</li> </ul> <p>Halton Region has existing programs that would fall under this strategy and help achieve, maintain, protect and enhance Halton’s NHS. These existing programs include Greenland Securement, State of NHS Reporting, Halton Region’s Tree By-law, Forest Management Plans, and strategies for natural heritage preservation and restoration for the Waterfront Parks Masterplans. Consideration should be given on how to incorporate policies in the ROP that would support the development of a Natural Heritage Strategy.</p> <p><b>Climate Change</b></p> <p>Halton’s NHS protection and enhancement is an important part of responding to climate change in terms of both adaptation and mitigation. The NHS provides for more resilient environments and can allow for opportunities to reduce impacts of flooding and other risks associated with the more frequent and severe weather events. NHS protection and enhancement can also play an important role in acting as a carbon sink to reduce green house gas emissions.</p> <p>Through the ROPR, there are opportunities to strengthen a number of natural heritage hazard lands and water resource goals, objectives and policies to better respond to</p>	<p>change and the natural environment will be addressed through the respective components of the ROPR, including draft policy directions related to natural hazards.</p> <p><b>Climate Change</b></p>

No.	Source	Submission	Response
		<p>climate change and address provincial conformity requirements. ROP policies should be enhanced to address climate change mitigation and adaptation measures, including the following:</p> <ul style="list-style-type: none"> <li>• Building on the existing research and literature to require studies such as Sub watershed studies to mitigate climate change and extreme weather impacts on NHS features;</li> <li>• Development of a Natural Heritage Strategy for Halton Region;</li> <li>• Preserve and restore biological diversity, water resources and natural features;</li> <li>• Explore ways to mitigate against climate change events and protect water resources using low impact development and green infrastructure approaches to stormwater management; and</li> <li>• Encouraging joint partnerships with local municipalities and conservation authorities to find opportunities to enhance and restore Halton's NHS to help</li> </ul> <p>Natural Hazards</p> <p>PPS 2020, Section 3.0 Protecting Public Health and Safety, has revised policies to indicate greater emphasis on avoidance as compared to mitigation of natural and human-made hazards. The PPS indicates that development should be directed away from areas where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards. The PPS also emphasizes reducing the potential for public cost or risk to Ontario's residents from natural or human-made hazards. Natural Hazards in the PPS include hazardous lands, flooding hazards, erosion hazards, dynamic beach hazards and wildland fire.</p> <p>The current ROP policies relating to Natural Hazards need to be strengthened and do not provide clear direction on Natural Hazard policy and mapping requirements for Local Municipalities. Consideration also needs to be given on how to include the revised PPS.</p> <p><b>Summary Message from the Community</b></p> <p>The Natural Heritage Discussion Paper and all the documents highlighted in this Review, lead us to the conclusion that there is a compelling case to protect the Millcroft Golf Course's vital natural environment permanently by designating it as Natural Heritage. This commitment by the Region will recognize a very early example (1980's) of green infrastructure that was established through the "creek-like" intermittent streams built into the fairways of the golf course. As a stormwater management system for the neighbourhood and downstream Burlington, it reduces flooding hazards during significant weather events. The golf course consists of greenlands and a mature, significant tree canopy which provide important mitigation features for GHG emissions in an area</p>	<p>The response to climate change through the ROPR is guided by changes to provincial plans and policies. Regional staff is recommending policy directions that address issues that have been considered in the ROPR.</p> <p>Policy Direction CC-1 provides the direction to comprehensively review the policy sections of each area of the entire ROP and look for all climate change challenges and opportunities. It will strengthen and enhance the Regional Official Plan's vision, goals, objectives, policies, and definitions so that the impacts of a changing climate are a key factor to consider in making decisions on growth and development and the protection of the Region's natural heritage, water resource, and agricultural systems.</p> <p>In addition, Policy Direction (CC-5) provides a recommendation to introduce new policies in the Regional Official Pan that encourage the local municipalities to introduce and/or enhance Green Development Standards for new developments. Further policies directions aim to introduce a supportive policy framework for local energy planning (CC-6), require enhanced stormwater management planning to assess the impacts of extreme weather events and incorporate appropriate Green Infrastructure and Low Impact Development solutions (CC-3), require the Region and its local municipalities to assess infrastructure risk and vulnerabilities and identify actions to address these challenges (CC-4), and other policy that integrates climate change</p>

No.	Source	Submission	Response
		designated for growth and major transportation corridors including Appleby Line, Dundas Street and the CN Rail Line and Uptown Burlington. Our Golf Course is a Carbon Sink.	<p>considerations in the Regional Official Plan.</p> <p>More policy direction and their fulsome details are available in the Policy Directions Report.</p>
69.	<p>Nancy Robertson on behalf of Chartwell Maple Grove Residents Association</p> <p>E-mail dated June 23, 2021</p>	<p>Good Morning Mr Carr, Mayor Burton, Ms Haslett-Theall and Mr Gittings,</p> <p>I am happy to provide the Chartwell Maple Grove Residents Association's comment on the Region's Official Plan Review. Kindly see the attached submission.</p> <p>Yours very sincerely,</p> <p>Nancy Robertson President, Chartwell Maple Grove Residents Association</p> <hr/> <p>ATTACHED LETTER</p> <p>To Whom it May Concern:</p> <p>On behalf of the Chartwell-Maple Grove Residents Association (CMGRA), thank you for the opportunity to provide feedback on the growth concepts developed as part of the integrated growth management plan. Established in 2009, CMGRA is a volunteer, non-profit residents' association in the Town of Oakville.</p> <p>We have reviewed the four themes and the eight key principles developed by the Region to evaluate the growth concepts and have summarized below our priority areas.</p> <ol style="list-style-type: none"> <li>1. Strategic Growth Areas <ol style="list-style-type: none"> <li>a. Hard urban boundaries should be maintained; that is, no expansion should be permitted to accommodate population and employment growth beyond the current settlement area.</li> <li>b. We support the highest rate of densification, primarily along growth nodes and corridors already identified in Livable Oakville.</li> <li>c. Growth should be managed with the goal of developing of healthy and complete communities.</li> <li>d. The residential character of established neighbourhoods should continue to be fostered.</li> </ol> </li> </ol>	<p><u>Strategic Growth Areas</u></p> <p>The Preferred Growth Concept generally directs a significant amount of growth to strategic growth areas, including around GO stations, and on planned higher order transit corridors.</p>


No.	Source	Submission	Response
		<p>2. Agriculture</p> <p>a. Prime agricultural land should be protected from urban expansion as part of an overall strategy to ensure food security.</p> <p>b. Policies should focus on ensuring that Halton’s agricultural community remains viable and prosperous.</p> <p>3. Natural Heritage System</p> <p>a. The natural heritage system should be protected from urban expansion in order to protect our natural environment and source water.</p> <p>4. Climate Change</p> <p>a. In keeping with the climate emergency declaration in 2019, policies should be developed to achieve the goal of becoming a net-zero carbon community.</p> <p>Thank you for your consideration of our submission. We welcome any questions you may have.</p> <p>Sincerely,</p> <p>Nancy Robertson President, Chartwell-Maple Grove Residents Association</p>	<p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. The Preferred Growth Concept directs growth to Regional Corridors, such as Trafalgar Road and Dundas Street to support transit. A key principle for the Preferred Growth Concept is achieving complete communities through intensification and “densification” in the sense that it concentrates development to areas within the existing approved urban area – to potential future intensification sites.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p> <p><u>Agriculture, Natural Heritage System, and Climate Change</u></p> <p>The Preferred Growth Concept seeks to minimize potential impacts on agricultural land and natural heritage system, while ensuring that climate change mitigation and adaptation. Recommendations on a Preferred Growth Concept will be informed by comprehensive set of technical studies including studies addressing climate change, natural heritage/water resources, and agricultural impact.</p>



No.	Source	Submission	Response
70.	<p>Fahim Umaid on behalf of the Muslim Association of Milton</p> <p>Email dated June 23, 2021</p>	<p>June 21, 2021  Chair Gary Carr and Halton Regional Council Regional Municipality of Halton  1151 Bronte Road  Oakville, ON L6M 3L1</p> <p>Dear Regional Chair Carr and Regional Council,</p> <p>The Muslim Association of Milton (MAM) is a community of approximately 12,600 local worshipers within the town of Milton. On behalf of MAM, I want to provide our perspective on the Region of Halton's Official Plan and the Growth Concepts being considered.</p> <p>We support the protection of the Greenbelt, natural heritage areas and prime agricultural land. Like many others, we want to ensure that Milton's growth is well managed, that our community is intensified with walkable, mixed use communities. However, we want to ensure that there is enough land zoned to develop and expand a variety of places of worship.</p> <p>For approximately 16 years, the Muslim community has actively worked to find and to purchase the land needed to build a masjid in Milton. Currently, we rent space at community centers, however it cannot accommodate the needs of our community. Many travel to other centers – for example, Brampton and Mississauga – in order to worship. As you can appreciate, our preference is to worship closer to home at a permanent place of worship that better reflects our faith. A masjid represents the nucleus of the Muslim family, faith and our community. A masjid of our own would provide Muslims in Milton the ability to offer prayers throughout the day as our faith requires.</p> <p>Finding land and space to create places of worship is already challenging. A recent Milton Places of Worship staff report found that:</p> <ul style="list-style-type: none"> <li>• 51% of the faith leaders do not have a location for their place of worship.</li> <li>• 71% of the respondents are looking for a site, and</li> <li>• Newer faith groups are in greater need of finding a location than established groups.</li> </ul> <p>We are very concerned that Regional Council will vote to restrict the ability of local municipalities to expand their boundaries and make it more difficult to create places of worship for Muslims and others.</p> <p>We have participated during the Visioning night in 2019, made presentations to Town councils on 2 different occasions, continuously interact with Town councilors, took part during Halton Region proposal for growth options on May 6, 2021 etc., We have also had pre consultation meeting with Halton Region and Town of Milton on Oct 6, 2020 regarding vacant land in the Employment zone corridor (5th line and Louis St. Laurent)</p>	<p>The Preferred Growth Concept generally directs a significant amount of growth to strategic growth areas, including around GO stations, and on planned higher order transit corridors.</p> <p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. It also directs growth (referred to as “densification” in the Growth Concepts Discussion Paper) – which is “intensification” in the sense that it concentrates development to areas within the existing approved urban area – to potential future intensification sites.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>On behalf of MAM, we are asking Regional Council to approve a Growth Concept that will ensure the Town can expand its urban boundary. This will ensure that in fast growing communities like Milton, faith groups will be able to build permanent places of worship.</p> <p>We would be pleased to talk to you about this and thank you for considering our concerns.</p> <p>Sincerely, Fahim Umaid Muslim Association of Milton</p>	
71.	<p>Richard B. Day</p> <p>Email dated June 24, 2021</p>	<p>June 23, 2021 VIA EMAIL Chairman Carr &amp; Councillors Region of Halton Dear Sirs/Mesdames:</p> <p>Re: Future Development for South Milton Area</p> <p>I have reviewed your well-written in-depth staff report regarding four possible options for future sustainable development in the south Milton area. I have also had the benefit of reading the Town of Milton's excellent brief in favour of an expanded Option 4, which I also support. Since I served as a local Councillor for this large area of the former Trafalgar Township for forty years, both on Oakville Council and then Milton Council, I thought some of my observations might be helpful. I know that I keep talking like I am still an elected official, but of course that is still the way I think after those forty years and why I am writing directly to you instead of to your staff or consultants. My wife and I own the home shown on the attached aerial photograph map where we raised four kids, and our son Robert still lives there.</p> <p>1) PRESERVING AGRICULTURE - This horse left the ban years ago. Representatives of the farming community warned us at Council many years ago that agriculture had lost its "critical mass" in our area. The business of farming had already become too small in our area to support seed suppliers, implement dealers, etc., etc., and all the land had been sold by farmers to developers who have it custom-farmed only to keep farm assessments and tax rates lower. The few small farmers who are left in the area cannot amortize or justify the enormous costs of farm equipment when they can no longer be sure that they will have enough land to farm from one year to the next. Also, custom farmers cannot afford to 'husband' the lands the way the lands should be cared for (crop rotation, fertilizers, pesticides, herbicides, tile drainage, fencing, etc., etc.).</p>	<p>The Preferred Growth Concept generally directs a significant amount of growth to strategic growth areas, including around GO stations, and on planned higher order transit corridors.</p> <p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. It also directs growth (referred to as "densification" in the Growth Concepts Discussion Paper) – which is "intensification" in the sense that it concentrates development to areas within the existing approved urban area – to potential future intensification sites.</p> <p>The Preferred Growth Concept is also informed by a comprehensive set of technical studies addressing:</p>

No.	Source	Submission	Response
		<p>2) LAND OWNERSHIP &amp; SERVICING- Some might argue that the question of who owns the land should be irrelevant to land use planning principles, but planning cannot be effective without financial considerations. Who better to finance the required infrastructure expense with private money than experienced and responsible developers like Remington, Mattamy, Fieldgate, etc., who already own the land and are ready to help? They also very well know what all the requirements from all three levels of government will be. Servicing housing here can be done very efficiently by hooking up to adjacent services already planned, and even under construction next door.</p> <p>3) FLOOD CONTROL -The recent class action case in Oakville has focussed a lot of attention on our storm water management. If it is eventually shown that our engineering consultants and other advisors have been lax in this area, new housing developments in our whole country will need to have better safeguards, and older areas may need to have engineering solutions implemented retroactively. I cannot believe that all that money we spent on channelization in Milton to retrofit the old town may not have been well spent. That huge expense crippled us at budget time for a lot of years.</p> <p>4) APARTMENTS OR BACKYARDS?-Building apartment condos is a seductive way to supply infilling and intensification and easily satisfy provincial population quotas, but from what I read in business newspapers, periodicals and my practice literature, the apartment market is flourishing largely because apartments are more affordable than ordinary homes. Young families are therefore forced to buy condo apartments to live in as staiter homes. However, young people are demanding houses, not apartments, and most older people are not downsizing to apartments and freeing up existing homes. In the current insane real estate market, those in government are ceaselessly criticized for not supplying more land to create a healthier housing supply for our children and their families. They want to own -not rent -their own homes. Also, ratepayers in existing neighbourhoods hate intensification or "densification" as John Challinor so aptly puts it. I remember when the concepts of sustainability, affordability and intensification first arrived and we approved a few subdivisions where a firetruck or plow had lots of trouble and delay getting in or out, and the sight triangles were impaired. How dense was that?</p> <p>5) NATURAL HERITAGE SYSTEMS AND PARKS-Option 4 seems to be the best way to link up and open up these trails for use by the public at no expense to the public. Recreational bike-riding will become a lot safer for riders from Oakville and Milton who are using our rural roads more and more.</p> <p>6) TRAFFIC -Also impairing the safety of those cyclists (and motorists) is the incredible increase in traffic on these narrow rural roads every year. When we committed to our present large-scale developments in north Oakville and south Milton, I believe we also committed ourselves to an Option 4 to cover the expense and upgrading of these roads. This traffic increase will eventually cause the local road system to become almost</p>	<ul style="list-style-type: none"> <li>• Climate change;</li> <li>• Water and wastewater infrastructure;</li> <li>• Transportation infrastructure;</li> <li>• Agricultural impact;</li> <li>• Natural heritage/water resources; and,</li> <li>• Financial impact.</li> </ul> <p>The Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through the Preferred Growth Concept which is proposed to be implemented in a future Regional Official Plan Amendment.</p>

No.	Source	Submission	Response
		<p>unworkable as large tracts of already approved lands are rapidly being built out. Development charges will help but the plans to connect James Snow Parkway and Neyagawa include the jaw-dropping cost of a bridge.</p> <p>Thank you for considering my observations.</p> <p>Respectfully submitted, Richard B. Day</p> 	
72.	<p>Andrew McCammon on behalf of Ontario Headwaters Institute</p> <p>E-mail dated June 24, 2021</p>	<p>RE: Municipal Comprehensive Review</p> <p>Dear Chair Carr, Council, and Planning Staff,</p> <p>The Ontario Headwaters Institute writes to ask you to ensure that your Municipal Comprehensive Review takes a high-level path to protect your region's terrestrial and aquatic integrity and not merely positions to satisfy the requirements of the Growth Plan, absent a lens for sustainable land use planning.</p> <p>Incorporated in Ontario, the Ontario Headwaters Institute is a federally registered charity. Originally focused on protecting headwater areas, where our watersheds start, supplementary letters patent issued in 2018 expanded our mandate to full watersheds, their natural heritage, and receiving waters such as the Great Lakes and Lake Simcoe.</p> <p>This was a natural evolution, keeping pace with the development of or changes over the last 15 years, particularly from 2005 to 2017, with respect to the Conservation Authorities Act, the Clean Water Act, the Provincial Policy Statement, the Greenbelt, the Lake Simcoe Protection Plan, and other initiatives. Also amongst these other initiatives is A Place to Grow: Growth Plan for the Greater Golden Horseshoe.</p>	<p>The Regional Official Plan includes existing policies that support the protection of water quality and sustainable use of water resources within Halton Region. Furthermore, sub-watershed planning is a requirement in support of area-specific planning or major growth areas within Halton Region. Through the ROPR, Policy Directions have been identified to updates the policies and mapping that will build on the existing comprehensive Regional Natural Heritage System policy framework. This includes a detailed review of current Regional Official Plan policies against the Provincial Policy Statement, 2020, related to the natural heritage system indicates strong alignment with provincial direction and the development of Subwatershed Study Guidelines. Finally, the inclusion of</p>

No.	Source	Submission	Response
		<p>While having a growth plan is an important tool to address increasing population and development, as well as infrastructure and other needs, it has become overly influential in bad planning policy and decision-making, over-riding the need to protect natural landscapes and water quality, among other impacts.</p> <p>As a result, we ask you to consider ways to assure conformity not only with the Growth Plan but with other key fundamentals to Ontario's future environment, social wellbeing, and economic vitality. We ask you to:</p> <p>1.) Ensure conformity in future land use planning to the following section of the Provincial Policy Statement:</p> <p>2.2 Water 2.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by: a) using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development.....</p> <p>2.) Ensure that local Land Need Assessments require a watershed or sub-watershed plan to be considered complete, ready for public comment, and to be presented for ratification by Council; and,</p> <p>3.) Recognize that most downstream areas of many of South-central Ontario's watersheds have been intensively developed, creating poor ecological conditions that include reduced and fragmented natural habitat as well as poor water quality and leaving headwater areas as de facto reservoirs of regional forests, wetlands, wildlife, and water quality &amp; quantity. As a result, we ask you to consider special protection for your headwaters areas, as development based on past protocols will probably be inadequate to prevent serious negative cumulative impact to the whole watershed.</p> <p>Please feel free to contact me at your convenience for further discussion.</p> <p>Sincerely,</p> <p>Andrew McCammon Executive Director</p>	<p>a Water Resource System as per the requirements of the Growth Plan (2020) for the long-term protection of surface and ground water features and their functions. Policies related to the Water Resource System will be included in the Stage 3 Phase 3 ROPA in 2023.</p>
73.	Carmen Jandu on	Dear Mr. Benson,	

No.	Source	Submission	Response
	<p>behalf of Oskar Group</p> <p>E-mail dated June 30, 2021</p>	<p>IBI Group has been retained by the Oskar Group to represent their interests for their land holdings in the Town of Milton. The land holdings are legally described as Part of Lots 14 and 15, Concession 1, Trafalgar in the Town of Milton, (the "Subject Lands"). The Subject Lands are approximately 72.9 ha (180.15 acres) and are located on the east side of Tremaine Road, south of Steeles Ave. West and north of Main Street. The lands are currently outside of the Town's Urban Boundary and are located within the Niagara Escarpment Plan Area.</p> <p>Weston Consulting was previously retained to submit a request for the removal of these lands from the Niagara Escarpment Plan during the 2017 Coordinated Planning Review for the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment and Places to Grow Plans. Correspondence received from the Niagara Escarpment Commission dated in January of 2017 stated that through an oversight the application for the Subject Lands was missed and was therefore not public consultation package. As a result, the NEC, the Town and the Region provided an analysis of the request in light of policies at that time, but no decision for the requested removal of the lands was determined by the Ministry of Natural Resources and Forestry ("MNRF") who had carriage of the application.</p> <p>My recent correspondence with Robert Pineo from the MNRF has confirmed that the application is still active and that the Ministry is continuing to process our clients request. More recently, our client is now proposing an alternative development proposal for the lands using an Agri-Hood concept. The Agri-hood concepts integrates agriculture into a residential neighbourhood with the objective of providing a focus on food production, rural recreation and agri-tourism.</p> <p>Given the open application at the Ministry level, the Town of Milton MCR process and the Region MCR process, we request that the Region consider the Subject Lands as a potential area for settlement area boundary expansion subject to the final decision of the NEC. The merits of our is detailed in our attached letter.</p> <p>We would be happy to initiate discussions with you and your staff in the near future to discuss these lands. We look forward to receiving a response to our request.</p> <p>Thank you kindly in advance,</p> <p>Carmen Jandu MCIP RPP Associate, Sr. Planner</p> <p><b>IBI GROUP</b> Suite 200, East Wing-360 James Street North Hamilton ON L8L 1H5 Canada tel +1 905 546 1010 ext 63106</p>	<p>Subject lands are within the Provincial Greenbelt Plan Area and are not eligible for inclusion in the Urban Area.</p>

No.	Source	Submission	Response
74.	<p>Alex Lisowsky on behalf of Cross of Life Lutheran Church</p> <p>E-mail dated July 2, 2021</p>	<p>Hi Owen,</p> <p>Thanks for meeting with us and for sending us the links and documents and for including section 77.4(1) of the ROP in your email that was very helpful. We would like to make an additional submission on how and where we believe that places of worship should be permitted. Please see the attached letter which contains our suggestions.</p> <p>Sincerely, Alex</p> <hr/> <p>ATTACHED LETTER</p> <p>June 30, 2021</p> <p>Dear Planning Team,</p> <p>We had submitted our first letter dated May 15, 2021 to ROPR@halton.ca and after our meeting with the ROPR team on June 22nd we have decided to make a second submission regarding policy adjustments on how and where we believe that places of worship should be permitted.</p> <p>The recent experience of many smaller congregations has been that space is hard to find and expensive. As a result, many places of worship are in employment areas, such as commercial units.</p> <p>Another solution that has worked well in other communities is to coordinate community centres and places of worship as jointly managed facilities.</p> <p>Planning and land use policies should reflect and encourage these types of solutions. If you would like to discuss this further, please feel free to contact us at the numbers below.</p> <p>Sincerely, Cross of Life Lutheran Church,</p> <p>Paul Keul, Treasurer 647-295-8194</p> <p>Stephen Allsopp, Secretary 416-275-6483</p>	<p>A meeting was held on June 22, 2021 to discuss the submission made on behalf of Cross of Life Lutheran Church.</p> <p>During the meeting a discussion took place regarding how places of worship are currently addressed in the Regional Official Plan (ROP), particularly within the Region's Employment Areas. Section 77.4(1) of the ROP prohibits non-employment uses within Employment Areas. Subsection 77.4(1)b permits exceptions to this prohibition for institutional uses subject to criteria and according to specific principles. These policies are pasted in below for your convenience however please see page 31 of the attached Regional Official Plan for the full Employment Area policy context.</p> <p>77.4 It is the policy of the Region to:</p> <p>(1) Prohibit residential and other non-employment uses including major retail uses in the Employment Areas except:</p> <p>a) to recognize uses permitted by specific policies of a Local Official Plan on December 16, 2009; or</p> <p>b) for institutional uses identified in a Local Official Plan, as a result of a detailed study that sets limits and criteria on such uses based on the following principles:</p> <p>[i] the use is of small scale and such uses collectively within an Employment Area shall not change the character of that Employment Area;</p> <p>[ii] the location and design of the use meet the Land Use Compatibility Guidelines under Section 143(10) of this Plan;</p> <p>[iii] the use is located at the periphery of the Employment Area; and</p>

No.	Source	Submission	Response
			<p>[iv] such uses do not collectively displace employment from the Employment Area to result in a shortfall in Employment Areas to meet the Local Municipality's employment forecast in Table 1 and Table 2a.</p> <p>Halton Region is currently undertaking a Regional Official Plan Review to ensure that the ROP continues to meet the needs of our community and that it conforms to updated Provincial Plans such as the Growth Plan. Section 2.2.5.7 of the Growth Plan requires municipalities to prohibit or limit sensitive land uses, such as institutional uses like places of worship, that are not ancillary to primary employment uses.</p> <p>The Regional Official Plan Review provides an opportunity to participate and make requests for urban boundary expansions as well as policy adjustments. Regional staff have documented and will consider your submission requesting urban boundary expansion. We would also welcome you to make submissions on how and where you believe that places of worship should be permitted.</p> <p>A discussion also took place regarding opportunity for a privately initiated Regional Official Plan Amendment. Should you wish to pursue an amendment to the ROP separately from the Regional Official Plan Review you may find information on our website at the below links helpful.</p> <p>General Process  <a href="https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Official-Plan-Amendment-Process">https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Official-Plan-Amendment-Process</a></p>



No.	Source	Submission	Response
			<p>Application Requirements  <a href="https://www.halton.ca/The-Region/Regional-Planning/Planning-Applications/Development-Application-Review">https://www.halton.ca/The-Region/Regional-Planning/Planning-Applications/Development-Application-Review</a></p> <p>Application Fees and Checklist  <a href="https://www.halton.ca/Repository/Community-Planning-Development-Application-Require">https://www.halton.ca/Repository/Community-Planning-Development-Application-Require</a></p> <p>Staff noted that it is a substantive process and that participation in the Regional Official Plan Review process would be the best approach at this time. However staff would be pleased to connect Cross of Life Lutheran Church with a member of the Region's Community Planning team for further discussion upon their request.</p>
75.	<p>Ted Robinson</p> <p>E-mail dated July 3, 2021</p>	<p>Ted &amp; Tracey Robinson  July 3, 2021</p> <p>To whom it may Concern on Halton hills council</p> <p>Our names are Ted &amp; Tracey Robinson. WE live at 8524 Ninth Line in Norval Halton Hills LOP 1K0</p> <p>We have owned the property fox 26 years.  We also live on the farm and are a member of the OFA.  We farm approx. 75 acres, some owned &amp; some rented in the area.</p> <p>We exclusively grow hay for Horse consumption. WE feed it to our own and boarded horses and sell some to other horse owners.</p> <p>It has come to our attention that there will be some upcoming hearings that will require your vote and I want to make you aware of our position on such votes. Apparently, we are part of a group of Farm owners known as "Whitebelt farmers". I take this to mean we are in an area currently zoned Whitebelt meaning our farms are eligible in the future for being zoned for development of some sort. I have been told that a vote will take place that may result in our farm being zoned effectively "permeant agriculture or greenbelt". We do not</p>	<p>To support the development of a Preferred Growth Concept, staff have been reaching out to our community to better understand how and where the community believes Halton should grow. The notification process was designed to reach as many residents and stakeholders as possible. Notification was provided by traditional media (newspapers) and postcards, as well as social media, email, and targeted cell phone ads. Staff provided email notifications to community associations and other community groups as widely as possible and local municipalities also assisted by forwarding notices to their stakeholder lists.</p> <p>Notices directed readers to our project webpage (<a href="http://www.halton.ca/ropr">www.halton.ca/ropr</a>) to learn more and share their views. On this page</p>

No.	Source	Submission	Response
		<p>support either of these. We do not believe the current region planners or future planers should be handcuffed by such restrictions. We ask you to reflect our positions in your vote.</p> <p>Recently it has come to my attention that there is an Official Plan review and my HRFA rep Frank Varga has sent me a copy of the plans from the Halton PIC of June 29th, 2021.</p> <p>We feel that the Whitebelt farmers have not been well represented in this process and I thank you now for allowing me to submit my position. I would also like to inform you that we have receive no notifications of these matters from Halton Region and request we be put on future mailing lists.</p> <p>After careful review I support either Option 1, 2, or 4. We do not support option 3A or 3B. This is our submission on the matter.</p> <p>We ask you to reflect our positions in your vote. Please feel free to contact us if you require further comment.</p> <p>Ted and Tracey Robinson</p>	<p>you will find discussion papers, mapping, as well as the opportunity to participate in our Growth Concepts Questionnaire. Also available are video and slide deck materials used in the six Growth Concepts virtual Public Information Centres where residents had the opportunity to discuss the Growth Concepts, ask questions, and share their views.</p> <p>Additionally, Halton Region has been and will continue working directly with the Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area. We continue to encourage your participation and that of other farmers in the ROPR process and appreciate and acknowledge your receipt of the letter.</p> <p>Email address (Robinsontnt2015@gmail.com) has been added to our ROPR notification list.</p>
76.	<p>Denise McClure</p> <p>Email dated July 4, 2021</p>	<p>Mr. Curt Benson, Director Planning Services.</p> <p>Dear Curt,</p> <p>My name is Denise M. McClure and my farm is located at 10330 Fifth Line Halton Hills. I have owned this property for 16 years.</p>	<p>To support the development of the Preferred Growth Concept, staff have been reaching out to our community to better understand how and where the community believes Halton should grow. The notification process was designed to reach as many residents and stakeholders as possible. Notification was provided by traditional media (newspapers) and</p>

No.	Source	Submission	Response
		<p>I am a member of the OFA. I cash crop with my husband 193 acres, some owned and some rented.</p> <p>Most, if not all the grains (corn, soybeans, and wheat) are shipped to JRI Port in Hamilton, for animal feed, ethanol or crushed for oil.</p> <p>I have no beef, dairy, poultry, vegetables, or fruit trees and consider cash cropping to be the only viable farm activity in this area.</p> <p>Recently it has come to my attention that there is an Official Plan review and my HFA rep Frank Varga sent me a copy of the plans from the Halton PIC of June 29<sup>th</sup>, 2021.</p> <p>I feel that the Wheatbelt farmers have not been well represented in this process and I thank you now for allowing me to submit my position.</p> <p>After careful review and studying all the information, I support either Concept 1, 2, or 4. I do not support Concept 3A or 3B. This is my submission on the matter.</p> <p>I highly respect you and your knowledge and know that you will make the correct decision on this issue for the betterment of all of us, here in Halton.</p> <p>I look forward to your response by email or if you wish to phone me at .</p> <p>Respectfully submitted.</p> <p>Denise M. McClure</p>	<p>postcards, as well as social media, email, and targeted cell phone ads. Staff provided email notifications to community associations and other community groups as widely as possible and local municipalities also assisted by forwarding notices to their stakeholder lists.</p> <p>Notices directed readers to our project webpage (<a href="http://www.halton.ca/ropr">www.halton.ca/ropr</a>) to learn more and share their views. You can also review video and slide deck materials used in our six Growth Concepts virtual Public Information Centres where residents had the opportunity to discuss the Growth Concepts, ask questions, and share their views.</p> <p>Additionally, Halton Region has been and will continue working directly with the Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area. We continue to encourage your participation and that of other farmers in the ROPR process and appreciate and acknowledge receipt of your submission.</p>
77.	Doug Wanless Email dated July 4, 2021	To whom it may concern on Halton Hills Council and The Region of Halton Please forward to the Mayor and all Councillors	To support the development of the Preferred Growth Concept, staff have been reaching out to our community to better understand how and where the community believes Halton should grow.

No.	Source	Submission	Response
		<p>Our two families have owned and operated the farm at 10208 and 10284 Trafalgar Road comprised of 184 acres for over 20 years as a cash crop farm. Both families live on the farm and are members of the OFA.</p> <p>It has come to our attention that there will be some upcoming Council meetings that will require your vote and I want to make you aware of our position on such votes.</p> <p>Apparently, we are part of a group of farm owners known as “Whitebelt farmers”. I take this to mean we are in an area currently zoned agriculture and outside of the Urban area, meaning our farms are eligible in the future for being zoned for development of some sort. I have been told that a proposal has been made that will take place that will effectively freeze our property or make it “permeant agriculture or greenbelt”.</p> <p>We do not support either of these. We do not believe the current region planners or future planners should be limited by such restrictions. We ask you to reflect our positions in your vote.</p> <p>Recently it has come to my attention that there is an Official Plan review and my HFA rep Frank Varga has sent me a copy of the plans from the Halton PIC of June 29th, 2021.</p> <p>We feel that the Whitebelt farmers have not been well represented in this process and I thank you now for allowing me to submit our position. I would also like to inform you that we have received no notifications of these matters from Halton Region or the Town of Halton Hills and request we be put on future mailing lists. (...@live.ca)</p> <p>Outside of the impact to our farms and livliehood I would like to know where other important community items like schools, churches, parks and even a future hospital will be located in our community if the area is frozen.</p> <p>After careful review We support options 1 or 4 as it gives the greatest number of options for controlled growth moving forward. We do not support option 3A or 3B. This is our submission on the matter.</p> <p>We ask you to reflect our positions in your vote. Please feel free to contact us at ...@live.ca if you require further comment.</p> <p>Ralph and Earlene Monkman</p> <p>Doug and Karen Wanless</p>	<p>The notification process was designed to reach as many residents and stakeholders as possible. Notification was provided by traditional media (newspapers) and postcards, as well as social media, email, and targeted cell phone ads. Staff provided email notifications to community associations and other community groups as widely as possible and local municipalities also assisted by forwarding notices to their stakeholder lists.</p> <p>Notices directed readers to our project webpage (<a href="http://www.halton.ca/ropr">www.halton.ca/ropr</a>) to learn more and share their views. You can also review video and slide deck materials used in our six Growth Concepts virtual Public Information Centres where residents had the opportunity to discuss the Growth Concepts, ask questions, and share their views.</p> <p>Additionally, Halton Region has been and will continue working directly with the Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area. We continue to encourage your participation and that of other farmers in the ROPR process and appreciate and acknowledge receipt of your submission.</p>

No.	Source	Submission	Response
78.	<p>Rev. Fraser Williamson</p> <p>Email dated July 5, 2021</p>	<p>Mr. Curt Benson Director Planning Services And Chief Planning Official HALTON REGION</p> <p>My name is Rev. Fraser Williamson, and I am writing on behalf of my family. Even though I live in and serve as a Village Councillor in Sundridge Ontario, I will one day inherit with my siblings: Jeff Williamson and Amy St. Jean, the properties at 10089 &amp; 10189 Fifth Line in Halton Hills. My late father: Ken Williamson and my mother Joyce Williamson have owned these owned these properties for 20 years.</p> <p>My brother Jeff also lives on the farm and am a member of the OFA. He cash-crops 220 acres, some owned &amp; some rented in the area.</p> <p>Most, if not all of the grains (feed corn, soybeans, and wheat) are shipped outside of the municipality.</p> <p>He does not have beef, dairy, poultry, vegetable of fruit trees and consider cash cropping to be the only viable farm activity in the area.</p> <p>Recently it has come to our attention that there is an Official Plan review and our HFA rep Frank Varga sent us a copy of the plans from the Halton PIC of June 29<sup>th</sup>, 2021.</p> <p>We feel that the Wheatbelt farmers have not been well represented in this process and We thank you now for allowing us to submit our position.</p> <p>After careful review we support either Option 1 2, or 4. we do not support option 3A or 3B. This is our submission on the matter.</p> <p>Some of the reasons for NOT supporting option 3 A and # B is as follows:</p> <ol style="list-style-type: none"> <li>1. Farming and Agriculture is a dying occupation in Halton Region because of all the impediments, roadblocks, red tape, restrictions and hurdles that are put in front of us each day.</li> <li>2. Moving farm equipment on the roads from one farm to another has become so unsafe because the Region and Town of Halton Hills do not cut or trim the trees back on their property, making us to have to drive over the centre line into oncoming traffic or stay in our own lane and damage our equipment.</li> </ol>	<p>To support the development of the Preferred Growth Concept, staff have been reaching out to our community to better understand how and where the community believes Halton should grow. The notification process was designed to reach as many residents and stakeholders as possible. Notification was provided by traditional media (newspapers) and postcards, as well as social media, email, and targeted cell phone ads. Staff provided email notifications to community associations and other community groups as widely as possible and local municipalities also assisted by forwarding notices to their stakeholder lists.</p> <p>Notices directed readers to our project webpage (<a href="http://www.halton.ca/ropr">www.halton.ca/ropr</a>) to learn more and share their views. You can also review video and slide deck materials used in our six Growth Concepts virtual Public Information Centres where residents had the opportunity to discuss the Growth Concepts, ask questions, and share their views.</p> <p>Additionally, Halton Region has been and will continue working directly with the Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area. We continue to encourage your participation and that of other farmers in</p>

No.	Source	Submission	Response
		<p>3. Another major concern the South Georgetown farmers are facing is the new "Truck Restriction" on Winston Churchill from the 10th Sideroad, down the hill to Hwy. #7. This was our route to Mississauga Rd North, to take our crops to the grain mill at 13639 Creditview Road. We now must go into Georgetown, take the steep hill around Glen Williams or go 5 miles further, down through Huttonville to Mississauga Rd. This is only one of the concessions local farmers have made to accommodate the new homeowners.</p> <p>4. When my parents owned a farm in the City of Brampton and as the surrounding population increased, my late father was harassed several times by impatient drivers when he was driving his tractor between farms. In one case a driver tossed a Tim Horton's coffee at him.</p> <p>5. There are NO support industries left in the Region to support agriculture. We now have to go as far away as Elmira and Mount Elgin, costing us \$100.00's of dollars more on added travel time costs just to get the service industry to our farm gate. The cost of farming is just TOO GREAT and, in the end, makes us uncompetitive. Please do not freeze us into an uncompetitive agriculture area.</p> <p>6. As an ordained minister, I am fully aware that we are called to be faithful stewards to the land, but operating a farm so close to an urban area has significant challenges. In addition to that the fuel used to transport our goods and have our equipment serviced at farther distances will increase the carbon footprint.</p> <p>7. Finally, one of my nephews, Matthew Williamson would like to continue farming, but it will not be profitable so close to an urban area. We as a family strongly support Option 1,2 or 4.</p> <p>We look forward to your response.</p> <p>Rev. Fraser Williamson B.A. M.Div</p> <p>On behalf of Joyce, Jeff, Matthew, Zachary Williamson, and Amy Williamson-St. Jean</p>	<p>the ROPR process and appreciate and acknowledge receipt of your submission.</p>
79.	<p>Steven Qi on behalf of 4103 Palladium Way</p> <p>E-mail dated July 5, 2021</p>	<p>On behalf of our client, 2669006 Ontario Inc. (Better Life Retirement Residence Inc.), who is the property owner of 4103 Palladium Way, City of Burlington ("subject land"), we are pleased to submit the following comments.</p> <p>We have reviewed the staff report dated July 7, 2021 (Report No. LPS60-21) and acknowledged that the proposed Employment Land Conversion Request for the subject land has been accepted and included as part of the ROPA 48. We appreciate all Councillors and staff's time and effort on working with us to allow this to happen. We will</p>	<p>Regional staff have recommended this employment conversion (4103 Palladium Way, B-18) be advanced through the Regional Official Plan Amendment No. 48.</p> <p>The initial assessment in the <a href="#">Growth Concepts Discussion Paper</a> concluded that further analysis was required to</p>

No.	Source	Submission	Response
		<p>continue to work with Regional and Municipal staff in an open and professional manner to ensure the proposed Long Term Care Facility and Retirement Home in a campus style development results in a positive contribution to the Regional Municipality of Halton and the City of Burlington.</p> <p>Sincerely,</p> <p>DESIGN PLAN SERVICES INC.</p> <p>Cc. Kimberley Harrison-McMillan, Director of Planning &amp; Development, Better Life Development Angelo Bentivegna, Ward 6 Councillor</p> <p>----</p> <p><b>Previous submission dated August 31, 2020</b></p> <p><b>Re:</b> 4103 Palladium Way, City of Burlington Part of Lot 10, Concession 1, North of Dundas Street Geographic Township of Nelson, City of Burlington, Regional Municipality of Halton Employment Area Conversion Request, 2669006 Ontario Inc. (Better Life Retirement Residence In</p> <p>On behalf of our client, we are pleased to submit herewith, a formal request to include "residential land use" in addition to the existing land use permissions, to permit a retirement home on the subject property. It is our understanding that the Region is currently working through an Official Plan Review to address the need to plan to 2041. As part of the review, the Region is evaluating requests to convert lands within Employment Areas to recognize or allow for non-employment uses such as residential, major retail or other mixed uses. We have reviewed the Employment Area Conversion Criteria and it is our opinion that the proposed conversion will meet the criteria, and the conversion should be granted, see Schedule "A" Employment Area Conversions Criteria Table for our complete review. This cover letter will provide general description of the subject land, surrounding land use and planning context of the subject site in the following sections.</p> <p><b>Subject Land Description</b> The legal description of the subject site is Part of Lot 10, Concession 1, North of Dundas Street (geographic Township of Nelson) City of Burlington, Regional Municipality of Halton. It is also municipally known as 4103 Palladium Way, located on the north/west side of Palladium Way, east of Walkers Line, and south and east of Highway 407 in the central east area of the Alton Community.</p>	<p>determine whether the conversion could be supported.</p> <p>On the basis of further analysis, conversion request B-18 (4103 Palladium Way) was supported and adopted by Regional Council through Regional Official Plan Amendment 48. The supporting rationale for these conversions is outlined in <a href="#">Report No. LPS60-21</a>, the recommendation report for the Regional Official Plan Amendment 48.</p> <p>More information on the final assessment is available in Appendix B of the Preferred Growth Report.</p>

No.	Source	Submission	Response
		<p>The land subject to this conversion request is approximately 1.48ha in size, with approximately 80.7m of frontage on Palladium Way and a depth of 156.5m on the southern property boundary. There are natural areas located directly north to the site, including a small watercourse (more commonly referred to as “Appleby Creek”). The subject land is currently vacant.</p> <p><b>Surrounding Land Uses</b></p> <p><b>North:</b></p> <ul style="list-style-type: none"> <li>• To the immediate north of this property is Appleby Creek, and its associated flooding and erosion hazards contained within its block created through the plan of subdivision for this area. This land is regulated by Conservation Halton, and a 7.5m buffer is required from the greatest creek hazard in this location. Based on the available information, the northern property boundary represents the limit of the creek hazard.</li> <li>• Beyond the Conservation Halton regulated land to the northwest is Highway 407.</li> <li>• Beyond the Conservation Halton regulated land to the northeast is 4131 Palladium Way, currently occupied by Neelands Group Limited, a commercial company that provides refrigeration and HVAC equipment supply, installation and service.</li> <li>• The north side of Palladium Way contains a range of businesses and institutional uses including places of worship, offices and storage facilities.</li> </ul> <p><b>South:</b></p> <ul style="list-style-type: none"> <li>• To the south of the subject site on the abutting property is 4085 Palladium Way, which is currently occupied by a Provincial Courthouse building and associated parking.</li> <li>• On the south-east corner of Palladium Way and Walkers Line is a commercial plaza containing a restaurant, medical offices, salon and fitness facilities</li> </ul> <p><b>East:</b></p> <p>The land east of the subject site, across Palladium Way, includes Palladium Park, Alton Village Public School and a residential neighbourhood consisting of single detached dwellings. There is a natural buffer between the subject site and these nearby uses due to the continuation of Appleby Creek as well as the Palladium Way right-of-way.</p> <p><b>West:</b></p> <p>The area west and south-west of the subject site (east of Highway 407; west and south of Walker’s Line) has recently been subdivided and is currently being developed. Palladium Way continues on the western side of Walker’s Line, with a similar zoning pattern as exists to the east of Walkers Line, where the subject land is located. In this area, the south and west side of Palladium Way is zoned for residential land use, and the north and west side of Palladium Way is zoned Business Corridor.</p> <p><b>Planning Context&amp; Existing Development Proposal</b></p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



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		<p>The Subject land is located within the 'Designated Greenfield Area' under the Growth Plan 2019. It is identified as being within the "Urban Area" and the "Employment Area" by the Halton Region Official Plan. The subject land is also identified as "Employment Lands" and "Business Corridor" by the City of Burlington Official Plan. The current zoning designation of the subject site is "BC1" (Business Corridor), which permits a range of employment uses.</p> <p>A Zoning By-law Amendment application has been submitted to the City of Burlington to permit a Long Term Care Facility with ancillary uses on the subject property. A "Long Term Care Facility", which is considered to be an Institutional Use, is a permitted use in the Employment Area designation of the City of Burlington Official Plan.</p> <p><b>Proposed Conversion</b></p> <p>The proposed conversion would be to permit a residential land use for a retirement home on the subject property along with all other permitted uses delineated in the City of Burlington Official Plan and the long term care facility currently proposed. Detailed design of any potential retirement home has not been undertaken, however, we would like to use this opportunity of the Official Plan Review to add the residential land use to the subject land to only permit a retirement home. The proposed retirement home land use will compliment the currently proposed Long Term Care Facility, and together could provide additional residential and employment opportunities for the City of Burlington and Halton Region, and to efficiently use the existing and planned infrastructure and public service facilities to create a compact and liveable community for the growing aging population. Please also note that the retirement home use is unlike other residential land uses, it does not only provide residential opportunities, but also generates employment opportunities that are associated with the retirement home use. It is our opinion that the proposed conversion is compatible with the surrounding residential, commercial, and institutional land uses which will not adversely impact the viability of adjacent lands and within employment area, and meets the general goals and objectives of the Provincial Policy Statement 2020, Growth Plan 2019, and Halton Region Official Plan.</p> <p>We would appreciate acknowledgement of receipt of this letter and the proposed conversion request. Should you have any questions or concerns please do not hesitate to contact the undersigned.</p> <p>Sincerely,  DESIGN PLAN SERVICES INC.  T.J. Cieciora, MSc MCIP RPP PRESIDENT</p>	

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		<p><b>SCENARIO B: Appendix B: Employment Area Conversion Criteria</b></p> <table border="1"> <thead> <tr> <th>Subject</th> <th>Request</th> <th>Assessment Consideration</th> <th>Policy</th> <th>Analysis</th> </tr> </thead> <tbody> <tr> <td>Employment Land Supply</td> <td> <p><b>Current Context:</b> Are there existing non-employment uses accommodated on the subject lands or specific concerns that hinder the lands from functioning as part of the supply of land required for employment purposes in the 2042 planning horizon?</p> <p><b>Local Context:</b> Is there a reasonable expectation that the subject lands could marginally or substantially accommodate a significant number of jobs following a conversion which would contribute to processing employment growth and meeting growth management targets in the 2042 planning horizon?</p> <p>The ability of new required for employment purposes in the 2042 planning horizon and the ability to restore Region 2042 employment targets will not be adversely affected by the proposed conversion?</p> </td> <td> <p><b>Strategic Goals/Issues:</b> Does the proposed conversion adversely threaten the supply of jobs in the subject area or other jobs in the region, including the supply of large parcels?</p> <p><b>Local Employment:</b> Will the proposed conversion have an overall adverse impact on the supply of employment lands and the ability of Region 2042 and the local municipalities to meet the employment forecast and the job/housing and service targets in the context of growing to 2042?</p> </td> <td> <p>The Province requires (a) 2.2.2.3 (b) 2.2.3 (b) 2.2.3 (b) of the Growth Plan and Section 77.4(1) of the Regional OP.</p> </td> <td> <p>The subject lands are currently vacant and there is no specific concern that hinder the lands from functioning as part of the supply of land required for employment purposes in the 2042 planning horizon.</p> </td> </tr> <tr> <td>Disseminated Issue</td> <td> <p>There is a demonstrated need for the proposed conversion in the area that is well-served by a strategic opportunity to grow the subject lands and/or other lands in the Region 2042, or on the basis that there are specific housing outcomes or concerns associated with the subject lands that make the lands an appropriate for employment uses.</p> </td> <td> <p><b>Strategic Goals/Issues:</b> The proposed conversion located within an area that falls part of the Region 2042 Strategic and Local Growth Objectives for the particular area, is the proposed conversion located within a strategic growth area such as a Major Transit Station Area or other identified node or transit?</p> <p><b>Local Employment:</b> Will the proposed conversion adverse development that supports the Region 2042 Strategic and Local Growth Objectives in the 2042 planning horizon by contributing to strategic growth management objectives such as accommodating employment growth and improvement plans, achieving job-to-housing targets within strategic growth areas, supporting the use of existing capacity and capacity, and providing opportunities for transit and affordable housing?</p> </td> <td> <p>The Province requires (a) 2.2.3 (b) 2.2.3 (b) of the Growth Plan and Section 77.4(1) of the Regional OP.</p> </td> <td> <p>The subject lands are located within the "Urban Area" and the "Employment Area" under the Region Official Plan. 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80.	<p>David Vrhovnik on behalf of John Zdunic</p> <p>E-mail dated July 6, 2021</p>	<p>Dear Mr. Benson,</p> <p>I am sending the attached letter on behalf of John Zdunic of Agram Farms. A long-time farmer in the Halton Hills area.</p> <p>David</p> <p>RE: ROPA 48 Farming in the Whitebelt</p> <p>Dear Mr. Benson,</p> <p>Recently, our Halton Federation of Agriculture Rep, Frank Varga sent us a copy of the Official Plan Review taking place and the minutes of the Halton public consultation meeting held on June 29th, 2021.</p>	<p>To support the development of the Preferred Growth Concept, staff have been reaching out to our community to better understand how and where the community believes Halton should grow. The notification process was designed to reach as many residents and stakeholders as possible. Notification was provided by traditional media (newspapers) and postcards, as well as social media, email, and targeted cell phone ads. Staff provided email notifications to community associations and other community groups as widely as possible and local</p>																									

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		<p>As an active farmer in the Halton Hills area since the late 1980's, we typically raise 60-100 cattle at a time along with 200-300 smaller animals such as lambs, goats and sheep. In addition, on the 400+ acres that we currently farm, we harvest hay and cash crops in the Whitebelt of South Georgetown. In addition to the already mentioned farming activities, we also operate a local garden centre in Oakville as well as a local abattoir/meat store in Georgetown to serve the local, but diminishing farming community in the area.</p> <p>We are extremely concerned that no individual is representing our concerns around farming constraints in the area and how they will become more difficult in the future.</p> <p>There are several issues that we face farming on a daily basis, including:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Difficulty moving farm equipment from field to field. Every year traffic seems to increase exponentially making it extremely difficult for our field equipment to move around in South Georgetown, especially along the Trafalgar corridor. This creates a safety hazard not only for us and our equipment but also the many commuters who are trying to use the road at the same time.</li> <li><input type="checkbox"/> Over the past few years', we've had our well run dry at our McPherson farm. We believe it had much to do with the construction of the new pipe along Trafalgar Road.</li> <li><input type="checkbox"/> The economies of raising beef in the area are ever diminishing, to the extent that we are now considering shutting down our cattle feedlot operation, since it's no longer profitable to be in the farming business.</li> <li><input type="checkbox"/> We are constantly struggling to find qualified talent to work at the farm and at our slaughterhouse, especially when it's only viable to operate the plant a couple days per week.</li> <li><input type="checkbox"/> As much as I'd love to see the farm continue to operate, there is unfortunately no one else to carry on the business. The trend of Land Developers buying up the land, having a third-party come in and do cash crop, which will ultimately end up on ships in the port of Hamilton destined for an overseas market, will become reality soon.</li> </ul> <p>The unfortunate reality is that it no longer makes viable sense to continue farming in the Whitebelt and therefore we support either ROPA plans 1, 2 or 4. We are NOT in support of options 3a or 3b.</p> <p>Sincerely,</p> <p>John Zdunic</p>	<p>municipalities also assisted by forwarding notices to their stakeholder lists.</p> <p>Notices directed readers to our project webpage (<a href="http://www.halton.ca/ropr">www.halton.ca/ropr</a>) to learn more and share their views. You can also review video and presentation materials used in our six Growth Concepts virtual Public Information Centres where residents had the opportunity to discuss the Growth Concepts, ask questions, and share their views.</p> <p>Additionally, Halton Region has been and will continue working directly with the Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area. We continue to encourage your participation and that of other farmers in the ROPR process and appreciate and acknowledge receipt of your letter.</p>

No.	Source	Submission	Response
81.	<p>Jacob Davis on behalf of 7201 5<sup>th</sup> Sideroad, Halton Hills</p> <p>E-mail dated July 7, 2021</p>	<p>Hi Christine,</p> <p>I hope that you enjoyed the long weekend. One of my clients reached out who owns land in Halton Hills close to 5 Side Rd, just North of Milton [at 7201 5<sup>th</sup> Sideroad].</p> <p>Their land is designated as future employment. This owner was told by a neighbor that they have until the 15<sup>th</sup> of July to let the Region know if they intend on developing their site.</p> <p>Is this true? And if so, can you please send me a link to where they can submit or connect me with the right person to discuss this with?</p> <p>Thank you! Jacob A. Davis CBRE Limited</p>	<p>Subject lands are currently identified as Future Strategic Employment Area. Based on the results of the technical analysis, staff are recommending that these lands not be included within the Preferred Growth Concept. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>
82.	<p>Don D. Rowntree (Inquiry)</p> <p>E-mail dated July 8, 2021</p>	<p>RE: ROPA 48 Farming in the Whitebelt</p> <p>Recently, our Halton Federation of Agriculture Rep, Frank Varga sent us a copy of the Official Plan Review taking place and the minutes of the Halton PC meeting on June 29, 2021.</p> <p>As active farmers, Don and Robin Rowntree, Via Pax ET Ltd., of livestock, hay and cash cropping in the Whitebelt of South Georgetown, we are concerned that no individual is representing us as to our concerns about farming constraints in the area and how they will become more difficult in the future.</p> <p><b>Livestock</b> Water for our 75 head of beef cattle is becoming more difficult to obtain. In the past 20 years, we have drilled 6 wells and today, only find one of those wells with a trickle of water. The water we do get is very salty and needs to be conditioned. This shortage of water, not only for us but for neighbouring farms, is due to the development of South Georgetown and the Region redirecting salt water runoff across our property into our water source. Supply veins for some of these wells can reach 1-2 miles, affecting our water table. We now purchase truckloads of water. Our days of maintaining our herd numbers or expanding are limited.</p> <p><b>Cropping</b> Via Pax's farming operation involves 300 acres that we own between 5 and 10 Sideroad and centered on the Ninth Line. In addition, we rent another 400 acres, growing Hay, Corn, Wheat and Soybeans for export. Farming in our area is becoming more difficult,</p>	<p>To support the development of the Preferred Growth Concept, staff have been reaching out to our community to better understand how and where the community believes Halton should grow. The notification process was designed to reach as many residents and stakeholders as possible. Notification was provided by traditional media (newspapers) and postcards, as well as social media, email, and targeted cell phone ads. Staff provided email notifications to community associations and other community groups as widely as possible and local municipalities also assisted by forwarding notices to their stakeholder lists.</p> <p>Notices directed readers to our project webpage (<a href="http://www.halton.ca/ropr">www.halton.ca/ropr</a>) to learn more and share their views. You can also review video and presentation materials used in our six Growth Concepts virtual Public Information Centres where residents had the opportunity to discuss</p>

No.	Source	Submission	Response
		<p>actually, unsafe, transporting equipment from farm to farm. Roads are narrow, with no shoulders. Local traffic has increased significantly.</p> <p>Another major concern the South Georgetown farmers are facing is the new "Truck Restriction" on Winston Churchill from the 10th Sideroad, down the hill to Hwy. #7. This was our route to Mississauga Rd North, to take our crops to the grain mill at 13639 Creditview Road. We now have to go into Georgetown, take the steep hill around Glen Williams or go 5 miles further, down through Huttonville to Mississauga Rd. This is only one of the concessions local farmers have made to accommodate the new home owners.</p> <p><b>Nutrient Application of Biosolids</b>  Biosolids is the politically correct term for sewage sludge that has been processed to reduce pathogens and is a very economical way to work with Halton Biosolids program to obtain fertilizer. These applications amount to over \$100.00/acre value of free fertilizer to participating farmers. The smell generated during this application creates tension amongst the non agriculture neighbours. Even though the local residents produced it, they are reluctant to accept it back. Via Pax and other farms in the area are as popular as a skunk at a garden party while these applications are being applied. Wanting to keep the farms in South Georgetown is about 30 years too late. We have no nearby suppliers/service, no water for livestock and major traffic constraints.</p> <p>Robin and I have no family members to continue farming. Selling the farms to someone for Agriculture is highly unlikely. Therefore, we need to allow the Whitelands in South Georgetown be included in the ROPA expansion of either Plan 1, 2, or 4. We DO NOT support option 3a or 3b.</p>	<p>the Growth Concepts, ask questions, and share their views.</p> <p>Additionally, Halton Region has been and will continue working directly with the Halton Region Federation of Agriculture (HRFA) which is the largest organization that represents farmers across the Region as well as with the Halton Region Agricultural Advisory Committee (HAAC). Information has been communicated through the HRFA newsletter as well as through email blasts to notify and engage as many from the agricultural sector as possible in addition to rural postcards which were sent to all residents in the rural area.</p>
83.	<p>Robyn Brown on behalf of SGLOG</p> <p>E-mail dated July 12, 2021</p>	<p>Dear Mr. Benson:</p> <p><b>SOUTH GEORGETOWN LANDOWNERS GROUP COMMENTS ON THE IGMS GROWTH CONCEPTS DISCUSSION PAPER</b></p> <p>IBI Group ("IBI") had been retained by the South Georgetown Landowners Group ("SGLOG") to assess the growth management and fiscal impact assessment of the Halton Region Official Plan Review Process ("ROPR") process. The SGLOG represents approximately 600 hectares of developable land (exclusive of the Regional NHS) immediately abutting the southern urban boundary of Georgetown between Trafalgar Road to the west, 9<sup>th</sup> Line to the east, 10<sup>th</sup> Sideroad to the north and 5<sup>th</sup> Sideroad to the south.</p> <p>On behalf of the SGLOG, IBI in conjunction with Glen Schnarr and Associates Inc., have provided written and oral comments/submissions to both the Region and the Town of</p>	<p>Majority of the subject lands were within the Primary Study Area for the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy. The remaining lands were also considered for potential settlement boundary expansion as a result of acknowledgement/commitments made in Minutes of Settlement for appeals to Regional Official Plan Amendment No. 38.</p>

No.	Source	Submission	Response
		<p>Halton Hills with respect to the ROPR. We thank staff for their work to date and look forward to ongoing dialogue as part of the Region's Integrated Growth Management Strategy ("IGMS") and the selection of the preferred growth scenario.</p> <p>Building off previous correspondence, the following summarizes our comments and concerns based on our assessment of the Region's Growth Concept Discussion Paper and the subsequent growth concepts provided by Regional/Local councils:</p> <ul style="list-style-type: none"> <li data-bbox="506 477 1409 721">□ Milton's "Halton Balanced" Concept most appropriately implements and conforms to the LNAM: Milton's "Halton Balanced" concept most appropriately implements the Land Needs Assessment Methodology ("LNAM") and provides a "market based supply to the extent possible" to conform to the policies of the Growth Plan. Based on this analysis, approximately 2,200 ha of Community Area and 1,000-15000 ha of Employment Area expansion will be required to accommodate future population and employment within the region to 2051. This identified urban expansion would require all of Milton's Whitebelt lands as well as additional urban expansion within the Town of Halton Hills.</li> <li data-bbox="506 753 1409 964">□ Urban Expansion will be required in Halton Hills to accommodate future population and employment growth: Based on the Town of Milton's "Halton Balanced" growth concept, urban expansion for both Community and Employment Areas will be required. The Whitebelt lands in the Town of Milton and the Town of Halton Hills represent the logical locations for future urban expansion within the Region. The quantum and location of these expansions need to be further refined through a full Land Needs Assessment ("LNA") and through the subsequent official plan reviews by the local municipalities.</li> <li data-bbox="506 997 1409 1159">□ SGLOG supports Halton Hills Planning Staff recommendation for urban expansion: The Region must employ a balanced approach to growth management which addresses both climate change and housing affordability/fiscal sustainability. The SGLOG supports the Town of Halton Hills Staff report (PD-2021-0045) which acknowledges that a future urban expansion is required.</li> <li data-bbox="506 1192 1409 1370">□ Fiscal Risks associated with Regional and local growth planning: Based on the limited details provided through the Region's evaluation criteria, the concepts which provide for urban expansion have a more favourable Regional financial impact due to higher assessment value growth. In employing a balanced approach to growth management, this factor must be considered in the evaluation of the concepts. Additional detailed analysis should be provided as part of the preferred growth scenario.</li> </ul>	<p>The subject lands are currently designated as Regional Natural Heritage System and Agricultural Area. Based on the results of the technical analysis, staff are recommending that a significant portion of these lands, including those lands generally located within Concessions 8, 9, 10, Part Lots 9 and 10, be included as Community Area within the Preferred Growth Concept. Please see Preferred Growth Concept mapping for additional detail.</p> <p>Furthermore, the PGC considers the Regional market demand for housing as outlined in the Land Needs Assessment Methodology, as well as all applicable policies and Schedule 3 forecasts as per the Growth Plan. For more details on the application of the LNAM and the justification for the quantum of land expansion, please see the <i>Land Needs Assessment</i> appendix in the <i>Preferred Growth Concept Report</i>.</p> <p>There has been some confusion regarding the term "densification." Please refer to the <i>Preferred Growth Concept Land Needs Assessment</i> for further clarification. Densification simply refers to intensification plus the additional apartments proposed in the DGA. This densification is entirely within the currently planned units for these areas, and no changes to secondary plans are required.</p> <p>The shifts in PPU are entirely related to demographic factors with a higher number of apartment units there will be an insufficient number of small households to occupy that portion of units and therefore the typical PPU in some unit types need to</p>

No.	Source	Submission	Response
		<p>To the extent that the aggressive densification options do not come to fruition, the fiscal position of the Region and area municipalities could be negatively impacted as significant infrastructure needs to be built and financed before this densification can occur.</p> <ul style="list-style-type: none"> <li data-bbox="506 396 1423 721">□ Insufficient supporting work on the Region’s ability to accommodate future intensification has been provided: Unattainable intensification in the built boundaries is not good planning. The Region’s work does not consider the unpredictability of an intensification land supply due to challenges surrounding land assembly, timing of development, servicing allocation and provision of the necessary community and social services. While we agree that municipalities must plan for intensification, the Region has not provided sufficient supporting documentation (i.e. an intensification supply assessment and strategy) to demonstrate that the future targets are a) achievable and b) expected to occur within the identified planning horizon. Insufficient assessment has been provided by the Region on the potential impacts on existing communities in Halton Region.</li> <li data-bbox="506 753 1423 883">□ Confusion surrounding densification: There is still confusion surrounding the Region’s concept of densification and the ability for planned/existing greenfield areas to accommodate additional high-density units. It is unclear how additional units can be accommodated without impacts on servicing, community facilities and transportation networks. Further explanation from the Region is required.</li> <li data-bbox="506 915 1423 1078">□ A full LNA must still be completed: Hemson has stated that a full LNA has not been completed for the Growth Concept Discussion Paper, but that one will be completed for the selection of the Preferred Concept. IBI Group requests that further details on persons per unit (“PPU”), breakdown by unit type, net to gross ratios, and greenfield/intensification land supply are provided in the future LNA to support the Region’s analysis.</li> <li data-bbox="506 1110 1423 1273">□ Regional Growth Concepts do not provide a Market Based Supply: The Region’s growth concepts dramatically shift away from the “market based supply” identified in the Hemson foundational work for the Growth Plan by redistributing a large number of ground related units to apartment units. It is IBI Group’s opinion that the Region’s adjustments go beyond “the extent possible” to maintain the market-based supply and risk non-conformity with the Growth Plan.</li> <li data-bbox="506 1305 1423 1403">□ The Region’s adjustments to the PPU assumptions risk undersupplying housing Region-wide: The Region’s PPU assumptions, in particular for high density residential, appear to change between concepts in order to align housing growth with population growth. The changing assumption in occupancy habits is not</li> </ul>	<p>be increased if the housing mix is to change.</p> <p>There is very little densification in Halton Hills. Areas described as accommodating densification in Oakville and Milton are within the current secondary plans which address the need for community services.</p> <p>The <i>Preferred Growth Concept</i> technical assessments and fiscal impact assessment address comments brought up regarding the Region’s servicing capacity for future intensification. For further details regarding the findings of these assessments, please see the technical appendices of the <i>Preferred Growth Concept Report</i>.</p> <hr/> <p>6.0</p> <p>Regarding upward pressures: long term land vacancy factors have been considered, as well as the recognition that many of the higher density areas in the Greenfield will not be built up by 2051.</p> <hr/> <p>6.1</p> <p>None of the scenarios can provide such a ground-related focused housing mix, while meeting the intensification targets of the Growth Plan.</p>

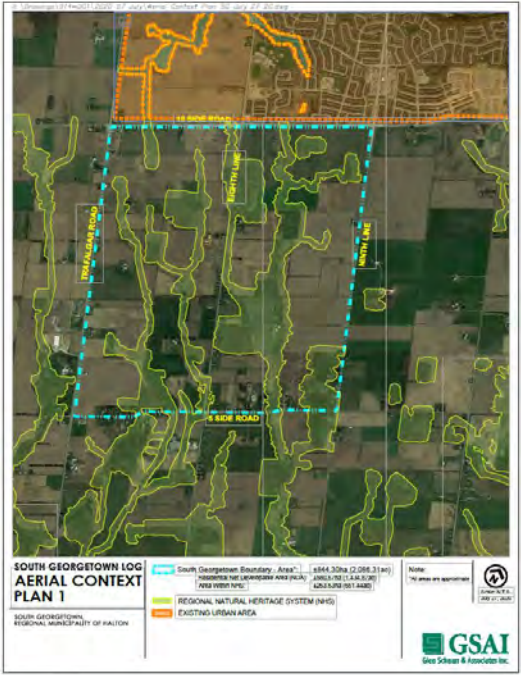
No.	Source	Submission	Response
		<p>based on market/demographic factors and risks understating the housing demand region-wide.</p> <ul style="list-style-type: none"> <li>□ Outstanding Comments: Various technical responses to our questions from our October 30, 2021 submission remain unanswered. These questions could have a fundamental impact on the LNA. Answers to these questions/comments should be provided prior to any approval/decision of the preferred growth scenario.</li> </ul> <p>Risk Assessment</p> <p>In reviewing the Region's growth management work to date, we are concerned that several of the concepts underestimate the quantum of land required to accommodate future growth and do not conform to the Growth Plan. Additionally, insufficient assessment has been provided by the Region on how the existing communities (e.g. Georgetown and Acton) can withstand the Region's proposed scale of densification in the existing urban area without impacts on servicing and community/recreational facilities. By underestimating the future land supply, the Region risks issues with housing affordability and housing choice which could impact the Region's ability to attract new residents, jobs and industries.</p> <p>We appreciate the opportunity to provide input into the Region's ongoing ROPR and we look forward to continuing to work with the Region throughout the process. Please do not hesitate to contact me to discuss any of the items above.</p> <p>Yours truly,</p> <p>IBI GROUP</p> <p>Robyn Brown</p> <p><b><u>Submission dated May 16, 2019</u></b></p> <p>Attention: Curt Benson, MCIP, RPP Director of Planning Services <b>Re: Halton Region Official Plan Review Regional Growth Scenarios – April 10, 2019 Workshop &amp; Presentation Formal Response from South Georgetown Landowners Group</b></p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) attended the Council Workshop and Presentation on April 10, 2019 presenting Regional Growth Scenarios to 2041 and we would like to</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

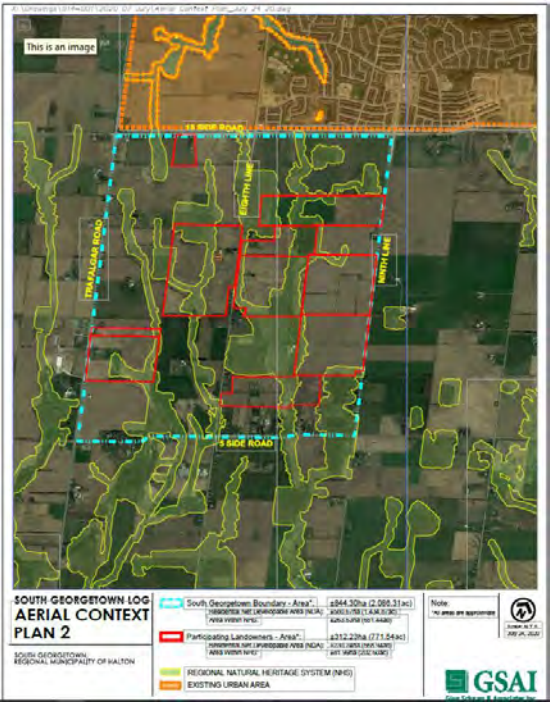


No.	Source	Submission	Response
		<p>provide comments on the Growth Scenarios presented. GSAI represents South Georgetown Landowners Group, owners of approximately 243 hectares (600 acres) of land in the Town of Halton Hills. The Landowner Group represents the 844 hectare (2,086 acre) area bounded by Trafalgar Road to the west, Ninth Line to the east, Fifth Side Road to the south and Tenth Side Road to the north. These lands are adjacent to the existing Georgetown Urban Area (see Aerial Context Plan enclosed). Our clients are desirous of the inclusion of their land into the 2041 Urban Area.</p> <p>We feel that the inclusion of our clients' lands into the Georgetown 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 residential uses, particularly when the Region has planned a major sanitary sewer trunk along Trafalgar Road, and a major watermain along Eighth Line, within the area that our clients represent. We request that you consider the inclusion of these lands as an Urban Area to accommodate Provincial growth targets to 2041.</p> <p>This proposed urban expansion area has the potential to create a comprehensively planned and complete community within the Town of Halton Hills, inclusive of a broad range of housing types, supporting retail (with new jobs), and community infrastructure, such as parks and schools. Our clients represent approximately 263 hectares (651 acres) of land within the Regional Natural Heritage System, which is 31% of the total land area represented by our clients. The inclusion of our clients' lands into the Georgetown 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.</p> <p>We look forward to the release of the discussion paper in May and to working with you on Halton Region's Growth Scenarios. Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,  GLEN SCHNARR &amp; ASSOCIATES INC.</p> <p>Colin Chung, MCIP, RPP Partner</p> <p><b><u>Submission dated July 30, 2020</u></b></p> <p>Attention: Curt Benson  Planning Director  Re: Halton Region Official Plan Review Discussion Papers</p>	

No.	Source	Submission	Response
		<p>Formal Response from The South Georgetown Landowner Group</p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) has reviewed the Regional Official Plan Review Discussion Papers and we would like to provide comments on behalf of the South Georgetown Landowner Group, who wish to advance the planning status of their lands. GSAI represents the South Georgetown Landowner Group who represent substantial ownership within the lands between Ninth Line and Trafalgar Road from Fifth Side Road to Tenth Side Road in the Town of Halton Hills (see Aerial Context Plans 1 &amp; 2 enclosed). The participation of owners in the group continues to grow and we anticipate a larger landowner group as the Region's process is advanced. Our clients are desirous of the inclusion of their land into the 2041 Urban Area.</p> <p>As background, when the Region last undertook the previous Municipal Comprehensive Review (MCR) process (ROPA 38), there was insufficient land budget to include our client's land into the 2031 Urban Area despite our client's interest in obtaining Urban Area status. Our client appealed ROPA 38 on the basis that the decision on urban expansion was flawed and did not adequately consider candidate sites for urban expansion. There was no hearing on this appeal, rather it went to Settlement whereby the parties agreed that the appropriate process to consider this option for Urban Area expansion would be during the next statutory five-year review of the Regional Official Plan (i.e. the current MCR process).</p> <p>During the last MCR process, extensive geotechnical work was completed on the South Georgetown lands to understand the nature of any potential aggregate resources in the area. We would like to remind the Region that as per previous correspondence between the Clay Brick Association of Canada, Halton Region and AMEC (see attached correspondence for reference), the geotechnical investigations on the South Georgetown lands determined the aggregate resource is weathered, poor quality and also covered and therefore not feasible for extraction. Furthermore,</p> <p>the poor quality, proximity to existing Halton Hills built boundary and overburden did not meet the Province's requirements of site selection and therefore should not have been designated as "Identified Mineral Resource Area" on Map 1F as part of the last Regional Official Plan update.</p> <p>In reviewing the Regional Urban Structure Discussion Paper and more notably Figure 29 - Potential Locations for new Community Area DGA, we note that proposed area "B" only seems to capture the northern portion of the South Georgetown lands. We recommend the candidate urban area be expanded to consider the entire 2000 acres of the South Georgetown lands, as agreed upon in the Minutes of Settlement (OMB Files: PL111358 and PL110857).</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>With respect to the proposed Amendment 1 changes to the Growth Plan, we ask that the Region continue to expedite the MCR process based on the current in-effect Growth Plan (2019) and we strongly recommend that the Region incorporate the 2051 forecasts into the current MCR process.</p> <p>Lastly, the COVID-19 pandemic raised awareness on impacts of community structure and development densities to social well-being and public health. The pandemic has also taught us the importance of social separation and parks for people's health and well-being and potential health risks associated with development densities. We understand from the Regional Urban Structure Discussion Paper that the Region is confident that the minimum density of 50 people and jobs per gross hectare that is prescribed in the Provincial Growth Plan can be achieved. We strongly recommend that the Region consider that people are seeking out lower density housing options, perhaps now more than ever, for public health reasons which is likely to persist.</p> <p>The inclusion of our clients' lands into the Georgetown Urban Area would be a natural and logical continuation of the existing Urban Area, and would be a cost-effective and servicing efficient expansion of urban development to accommodate future residential uses, particularly when the Region has planned a major sanitary sewer trunk along Trafalgar Road, and a major watermain along Eighth Line, within the area that our clients represent. The addition of these urban lands within Halton Hills will also contribute towards Halton Hills achieving the 50/50 (jobs/population) split as previously set out. We request that you consider the inclusion of these lands as an Urban Area to accommodate Provincial growth targets to 2041.</p> <p>Thank you for your considerations. We will be requesting the opportunity to meet with Regional staff to discuss this further once the public consultation period commences.</p> <p>Yours very truly,  GLEN SCHNARR &amp; ASSOCIATES INC.</p> <p>Colin Chung, MCIP, RPP Partner</p> <p>Cc: Gary Carr, Regional Chair Members of Regional Council Graham Milne, Regional Clerk</p>	

No.	Source	Submission	Response
		 <p><b>SOUTH GEORGETOWN LOG AERIAL CONTEXT PLAN 1</b></p> <p>South Georgetown Boundary Area: 1844.30ha (2,086.3 ac)    Includes the Landscape Area (LCA) and the Natural Heritage System (NHS)</p> <p>REGIONAL NATURAL HERITAGE SYSTEM (NHS)    EXISTING URBAN AREA</p> <p>Note: % areas are approximate</p> <p>GSAI    Geo Science &amp; Associates Inc.</p>	

No.	Source	Submission	Response
		 <p><b>Submission dated October 30, 2020</b></p> <p>Attention: Curt Benson, MCIP, RPP Director of Planning Services</p> <p><b>Re: South Georgetown Landowners Group Response Halton Region Municipal Comprehensive Review Regional Official Plan Review Discussion Papers and Integrated Growth Management Strategy (IGMS)</b></p> <p>1.0 Introduction</p> <p>This letter is submitted on behalf of the South Georgetown Landowners Group, owners of approximately 312 hectares (772 acres) of land in the Town of Halton Hills. The</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Landowner Group represents the 844 hectare (2,086 acre) area bounded by Trafalgar Road to the west, Ninth Line to the east, Fifth Side Road to the south and Tenth Side Road to the north. These lands are adjacent to the existing Georgetown Urban Area (see Aerial Context Plan enclosed). The SGLOG has retained a team of consultants to monitor and respond to the work created as part of the Regional Municipal Comprehensive Review (MCR). The consultants include IBI Group (Growth Management and Financial Analysis), Glen Schnarr and Associates (Planning), BA Group (Transportation) and Urbantech Consulting (Civil Engineering and Servicing). The Region is currently in Phase 2 of the Regional Official Plan review. Discussion Papers, five of which were released by the Region in July 2020, align with policy considerations that affect the SGLOG lands.</p> <p>The Region, as part of Phase 2 held Public Information Centres about the five themes under review. The consultant team, in addition to reviewing the material to date, attended several of the virtual Zoom open houses dealing with the Discussion Papers.</p> <p>The following letter contains comments and concerns regarding the work to date, the background assumptions and analysis which underpin the Integrated Growth Management Strategy (IGMS) Growth Scenarios: Halton Region to 2041 and the draft evaluation criteria.</p> <p>In addition, we are providing comments in relation to the most recent Provincial releases, including changes to the Provincial Policy Statement (PPS), the new Land Needs Assessment Methodology (LNAM), which is to be used to assess land needs as part of the MCR process, the revised Provincial Growth Plan and the extension of the planning horizon to 2051.</p> <p>We have outlined a series of questions at the end of each section with which we would like to engage the Region to gain a greater understanding of their growth management work, and to inform future analysis and submissions as part of the Regional Official Plan Review on behalf of the South Georgetown Landowners Group.</p> <p>In addition to this letter, this submission includes Comment Response Matrix on the Discussion Paper Questions prepared by Glen Schnarr &amp; Associates Inc., dated October 30, 2020 (Appendix A) and a Memorandum prepared by Urbantech Consulting titled "Urban Expansion Servicing Justification, South Georgetown Landowners Group Lands, in the Town of Halton Hills, Halton Region" dated October 27, 2020 (Appendix B).</p> <p>2.0 Executive Summary</p> <p>We have highlighted the following key issues/comments that are described in greater detail in the subsequent section of this letter:</p>	

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• We have concerns regarding the growth management work; specifically, the four scenarios which do not conform with recent provincial policy, including intensification targets and greenfield targets, new 2051 planning horizon year, nor do they conform to the recently released Land Needs Assessment Methodology (LNAM).</li> <li>• The Provincial Policy Statement requires that the Region “shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area.” The Halton growth management scenarios assume the same population and units, no matter the housing type. This in our opinion does not reflect the need to establish housing demand/need and an appropriate housing mix.</li> <li>• We are concerned that the IGMS’s focus on the 2031-2041 planning horizon does not provide a holistic growth management approach and does not conform to the Growth Plan requirements to plan to the 2051 horizon. The Region should look at the need across the entire planning horizon as part of the MCR, i.e. 2021 to 2051.</li> <li>• The background work in the Hemson Technical Report, which underpins the 2051 growth forecasts, assumes that 76% of housing growth in Halton Region will be ground related. The scenarios tested in the IGMS depart significantly from this assumption. It is our concern that the analysis does not meet tests and policy within recent Provincial documents including A Place to Grow (2020), the 2020 Provincial Policy Statement (PPS) and the LNAM.</li> <li>• The Region’s analysis assumes that the average household size will increase in the future in both ground-related and apartment units despite a decline over the last twenty years shortfall in housing and would not provide a market-based housing supply.</li> <li>• We are concerned that the four scenarios underestimate the quantum of land required to accommodate future growth. Three of the scenarios presented are based upon the 2017 Growth Plan, and as a result these three scenarios are clearly not in conformity with the updated 2019 version of the Growth Plan.</li> <li>• The discussion papers imply that each of the growth scenarios result in the same financial result for the Region, we do not believe sufficient analysis has been done to capital and operating costs to demonstrate that this is true.</li> <li>• There is a lack of clarity on how the evaluation criteria in Appendix C of the IGMS is going to be applied. More clarity on weighting and assumptions is needed.</li> <li>• 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.</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>There are costs to both existing and future residents that need to be considered when contemplating intensification.</p> <ul style="list-style-type: none"> <li>• MTSAs should be the key locations for intensification in the built boundary and the Regional Official Plan policies should require priority for development in MTSAs while continuing to support intensification opportunities elsewhere in the built boundary.</li> <li>• 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. Also, prioritize urban expansion to locations in closer proximity to existing and planned Provincial corridors. This achieves the Provincial policy on utilizing surplus capacity in existing services.</li> <li>• 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.</li> <li>• The Region should focus on programs over policies in curbing climate change. The Region has not weighed the benefits to setting programs over policies in curbing climate change. There is insufficient rationale/justification from Regional staff that ROP policy is the way to go in dealing with climate change.</li> </ul> <p>3.0 Regional MCR Discussion Papers  We have reviewed the four Discussion Papers relevant to our client's lands – Regional Urban Structure Discussion Paper (June, 2020), Rural and Agricultural System Discussion Paper (June, 2020), Natural Heritage System Discussion Paper (June, 2020) and Climate Change Discussion Paper (June, 2020). In addition to the summary points noted above, we have considered and responded to the Technical and General Discussion Paper Questions in a Comment Response Matrix which has been included as Appendix A.</p> <p>4.0 Integrated Growth Management Strategy (IGMS) &amp; Growth Scenarios</p> <p>Released in June 2019, the IGMS is intended to guide growth and development in the Region to 2041. This work considers a range of growth scenarios which would result in the need for between 0 and 1,000 hectares of additional land to accommodate growth to 2041.</p> <p>The Region has not yet incorporated the 2041 – 2051 growth forecasts into its growth management work, as such this discussion will focus on the 2031 – 2041 growth allocations and accommodation. We understand the Region will be reviewing its work in</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response																									
		<p>light of these extended horizons and changes to Provincial policies, including the new Land Needs Assessment Methodology (LNAM). We will be providing additional comments when the updated material is released.</p> <p>4.1 2031 – 2041 Growth Assumptions</p> <p>Building upon the Region’s previous growth management work to 2031, the Region has indicated that it anticipates the Region to grow by 180,000 people and over 66,000 units between 2031 and 2041. In order to accommodate this growth, they have created four scenarios, that not only allocate growth by urban structure (intensification v. designated greenfield area), but have also allocated the units to “ground-related” and “apartments” to accommodate the 180,000 new residents</p> <p>Growth Scenarios - Unit Breakdown</p> <table border="1" data-bbox="466 630 1142 743"> <thead> <tr> <th>Scenario</th> <th>Ground Related</th> <th>Apartments</th> <th>Total</th> <th>Population Growth</th> </tr> </thead> <tbody> <tr> <td>2031 - 2041 S1</td> <td>26,800</td> <td>39,500</td> <td>66,300</td> <td>180,000</td> </tr> <tr> <td>2031 - 2041 S2</td> <td>22,800</td> <td>43,500</td> <td>66,300</td> <td>180,000</td> </tr> <tr> <td>2031 - 2041 S3</td> <td>19,000</td> <td>47,300</td> <td>66,300</td> <td>180,000</td> </tr> <tr> <td>2031 - 2041 S4</td> <td>33,000</td> <td>33,300</td> <td>66,300</td> <td>180,000</td> </tr> </tbody> </table> <p><i>Halton Region to 2041 Table 16 p. 116</i></p> <p>In reviewing these assumptions, it is our view, that these scenarios do not appropriately consider persons per units (PPUs) which address population which can be accommodated in different housing unit types. Ground-related housing is known to attract larger households, and therefore accommodate more population. By shifting the growth to apartments, as is seen in Scenario 2 and 3, while maintaining the same total number of units, IBI Group believes that there would result in a shortfall in population. The Region of Halton has been seeing a slow decline in PPUs for both ground-related and apartment housing over the last twenty years. However, the Region’s forecast to 2041 indicates that they expect an increase in household sizes in both types of units in order to meet the intensification goals. These changes would, as the report acknowledges, “represent a significant change from current patterns and would require a shift in housing choices to be</p>	Scenario	Ground Related	Apartments	Total	Population Growth	2031 - 2041 S1	26,800	39,500	66,300	180,000	2031 - 2041 S2	22,800	43,500	66,300	180,000	2031 - 2041 S3	19,000	47,300	66,300	180,000	2031 - 2041 S4	33,000	33,300	66,300	180,000	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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		<p>made by these households" (p. 91). There is no statistical evidence that this will occur.</p> <p><b>Halton Region Persons per Unit by Housing Type</b></p> <table border="1" data-bbox="472 350 1255 781"> <thead> <tr> <th>Census Year</th> <th></th> <th>Ground Related</th> <th>Apartments</th> <th>All Units</th> </tr> </thead> <tbody> <tr> <td rowspan="7">Historic</td> <td>1986</td> <td>3.29</td> <td>1.86</td> <td>2.98</td> </tr> <tr> <td>1991</td> <td>3.19</td> <td>1.8</td> <td>2.9</td> </tr> <tr> <td>1996</td> <td>3.13</td> <td>1.76</td> <td>2.85</td> </tr> <tr> <td>2001</td> <td>3.04</td> <td>1.73</td> <td>2.78</td> </tr> <tr> <td>2006</td> <td>2.99</td> <td>1.74</td> <td>2.76</td> </tr> <tr> <td>2011</td> <td>3</td> <td>1.72</td> <td>2.77</td> </tr> <tr> <td>2016</td> <td>3.05</td> <td>1.74</td> <td>2.8</td> </tr> <tr> <td rowspan="3">Forecast (Scenario 2 for 2041)</td> <td>2021</td> <td>3.06</td> <td>1.76</td> <td>2.81</td> </tr> <tr> <td>2031</td> <td>3.1</td> <td>1.84</td> <td>2.77</td> </tr> <tr> <td>2041</td> <td>3.13</td> <td>1.98</td> <td>2.73</td> </tr> </tbody> </table> <p><i>Halton Region to 2041 P.91</i></p> <p>The Region of Halton's Development Charges Background Study (DCBS), reflects how low and high density developments accommodate significantly different populations. These projections are used to plan and fund infrastructure to support growth. It is clear that for this purpose, the Region, in particular for high-density developments, is assuming a continued decline in PPU's. This clearly does not align with the IGMS assumptions.</p> <p><b>PPUs 2017 - 2031 on New Growth</b></p> <table border="1" data-bbox="478 1081 911 1239"> <thead> <tr> <th>Dwelling Type</th> <th>PPU</th> </tr> </thead> <tbody> <tr> <td>Low Density</td> <td>3.52</td> </tr> <tr> <td>Medium Density</td> <td>2.66</td> </tr> <tr> <td>High Density</td> <td>1.58</td> </tr> </tbody> </table> <p><i>Halton DCBS Tables A-3a and A-3b</i></p> <p>Question for Halton Region Staff: • How does the Region reconcile the use of the same population allocation in different unit splits in the four scenarios?  • What analysis has the Region or its consultants completed to support the</p>	Census Year		Ground Related	Apartments	All Units	Historic	1986	3.29	1.86	2.98	1991	3.19	1.8	2.9	1996	3.13	1.76	2.85	2001	3.04	1.73	2.78	2006	2.99	1.74	2.76	2011	3	1.72	2.77	2016	3.05	1.74	2.8	Forecast (Scenario 2 for 2041)	2021	3.06	1.76	2.81	2031	3.1	1.84	2.77	2041	3.13	1.98	2.73	Dwelling Type	PPU	Low Density	3.52	Medium Density	2.66	High Density	1.58	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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		<p>assumption of increasing household PPUs in all dwelling types, and increased demand for apartments?</p> <ul style="list-style-type: none"> <li>• How does increasing the PPUs and assuming a shift in unit demand meet the provincial goals for a market based housing supply?</li> <li>• Why is the Region using different PPUs for growth management and infrastructure planning?</li> </ul> <p>In 2016, 81% of Halton Households were located in ground-related housing. Historical housing completions between 2006 and 2015 indicate that although there was a shift to medium density housing, low density housing is still the predominant form of housing in the Region. The housing forecast in the IGMS work requires “a significant change to housing patterns”. The change in the housing mix would also require a shift to family-oriented apartments to meet the higher intensification rates. This also requires that new ground related housing units would also be required to increase in PPUs from the current 3.4 to 3.7 PPU.</p> <p>All of the scenarios would require a significant shift in housing preferences in order to see the majority of new units being apartments.</p> <p><b>Summary of Unit Splits by Scenario 2031 - 2041</b></p> <table border="1" data-bbox="487 821 1199 984"> <thead> <tr> <th>Scenario</th> <th>Ground Related</th> <th>Apartment</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>40%</td> <td>60%</td> </tr> <tr> <td>2</td> <td>34%</td> <td>66%</td> </tr> <tr> <td>3</td> <td>29%</td> <td>71%</td> </tr> <tr> <td>4</td> <td>50%</td> <td>50%</td> </tr> </tbody> </table> <p>Questions for Halton Region Staff:</p> <ul style="list-style-type: none"> <li>• What is the rationale for the forecasted housing mix in the IGMS which shifts nearly half of the growth to Apartments? How will this accommodate the forecasted population?</li> <li>• How do these assumptions satisfy recently the released LNAM which suggests that the housing supply should be adequate to ensure “the provision of a market-based supply of housing to the extent possible”?</li> </ul> <p>The assumptions which underpin the Region’s work in the IGMS require significant intensification through apartment growth.</p> <p>4.2 Land Requirements</p>	Scenario	Ground Related	Apartment	1	40%	60%	2	34%	66%	3	29%	71%	4	50%	50%	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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		<p>The four scenarios result in very different land requirements, from 0 hectares to over 1,000 hectares of land to accommodate the 2041 growth. In scenarios 1 and 2, this is based on a density of 80 people and jobs per hectare and increasing intensification numbers.</p> <p><b>Community Land Need (developable ha)</b></p> <table border="1" data-bbox="457 407 1157 548"> <thead> <tr> <th></th> <th>Scenario 1</th> <th>Scenario 2</th> <th>Scenario 3</th> <th>Scenario 4</th> </tr> </thead> <tbody> <tr> <td>Units Allocated to new DGA</td> <td>9,700</td> <td>4,800</td> <td>0</td> <td>16,300</td> </tr> <tr> <td rowspan="3">P + J</td> <td>Population</td> <td>35,000</td> <td>17,500</td> <td>0</td> </tr> <tr> <td>Community Jobs</td> <td>5,200</td> <td>2,600</td> <td>0</td> </tr> <tr> <td>Total Persons plus jobs</td> <td>40,200</td> <td>20,100</td> <td>0</td> </tr> <tr> <td>Density (p+j/ha)</td> <td>80</td> <td>80</td> <td>80</td> <td>65</td> </tr> <tr> <td><b>Community Area Land Need</b></td> <td><b>503</b></td> <td><b>251</b></td> <td><b>-</b></td> <td><b>1,028</b></td> </tr> </tbody> </table> <p><i>Halton Region to 2041 Table 17 p. 118</i></p> <p>There are a number of assumptions which we take issue with:</p> <ul style="list-style-type: none"> <li>• In Appendix A2 - the report states that two-thirds of the greenfield housing unit growth from 2031 – 2041 can be accommodated in existing DGAs due to higher density and intensification targets.</li> <li>• Scenario 2 and 3 includes an assumption of “additional DGA apartments”.</li> <li>• Table 20 in Appendix A2 includes PPU’s for DGA Growth which varies in each scenario.</li> </ul> <p>Questions for Halton Region Staff:</p> <ul style="list-style-type: none"> <li>• How do the densities assumed for the DGA align with the current Provincial Policies, in particular DGA Densities in the revised Growth Plan?</li> <li>• What is the basis of the additional DGA apartments and how does this accommodate population growth? How does the Region justify the assumption of larger household sizes in apartments in the “New Additional DGA Apartments” category (Appendix A2 p. 9)?</li> <li>• What is the justification for using different PPU’s across the 2031-2041 planning horizon? How does this align with the DCBS?</li> <li>• What will be the impact of using the new LNAM on this analysis?</li> </ul> <p>4.3 Servicing Growth The IGMS assessment states that there are no substantial differences in infrastructure (water, wastewater and transportation) opportunities and constraint to 2041 between the original 8 scenarios.</p> <p>Questions/Comments for Halton Region Staff:</p> <ul style="list-style-type: none"> <li>• Is GO Transit capacity taken into account as it is for roads/water/sewer?</li> </ul>		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Units Allocated to new DGA	9,700	4,800	0	16,300	P + J	Population	35,000	17,500	0	Community Jobs	5,200	2,600	0	Total Persons plus jobs	40,200	20,100	0	Density (p+j/ha)	80	80	80	65	<b>Community Area Land Need</b>	<b>503</b>	<b>251</b>	<b>-</b>	<b>1,028</b>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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		<ul style="list-style-type: none"> <li>• Explain the weighting criteria and how it is applied.</li> <li>• Explain the difference between Theme 2.1.1 and 2.1.2.</li> <li>• Explain Theme 2.3, if there are no substantial differences in infrastructure opportunities and constraints to 2041 between the 8 scenarios.</li> <li>• Please expand on the statement “there are no substantial differences in infrastructure opportunities and constraints to 2041 when the eight growth scenarios are compared?” Is this specific to only capacity or does it include cost? We would expect Greenfield growth options located immediately adjacent to existing urban areas would be significantly more economical to provide water and wastewater servicing. We would expect No Greenfield growth options to be more expensive with the need to retrofit existing infrastructure with new infrastructure in infill locations. We acknowledge under Greenfield and No Greenfield growth scenarios that optimizing existing infrastructure excess capacity is equally important.</li> <li>• Does the analysis consider the large capital cost to expand and replace water and wastewater infrastructure within Built-Up Areas?</li> <li>• Does the analysis consider other methods of addressing constrained wastewater pipe networks capacities other than q-flow/Q-capacity was 0.85 or higher, suggesting replacement or twinning?</li> <li>• Does the water and wastewater capacity analysis consider the water conservation measures being implemented in new construction?</li> </ul> <p>4.4 Financial Analysis</p> <p>Chapter 11 of the IGMS addresses Servicing Growth in the post-2031 timeframe. Generally the consensus of the analysis was there were no significant differences in infrastructure opportunities and constraints or financial impact based on the growth scenarios.</p> <p>Questions/Comments for Halton Region Staff:</p> <ul style="list-style-type: none"> <li>• Does the analysis take into account capital/operating revenue and costs of Provincial services such as GO Transit? If not, Updated Financial Analysis should consider the overall cost to the entire Public Sector not just the Local and Regional government services.</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Financial Analysis is “based on the cumulative impact over the planning period from 2018-2041 and does not provide for annualized assessment of net financial impacts”.</li> <li>• Analysis should look at annual cash flow - suggest assessment and evaluation utilize a Net Present Value basis to take into account the differences in absorption of various types of development and upfronting of capital improvements.</li> <li>• Need to explain the basis of weighted assessment and updated analysis should factor in that assessment for new construction in the growth to 2051 may not necessarily reflect the assumption in the IGMS.</li> </ul> <p>4.5 Transportation Assessment</p> <p>There is some ambiguity in the screenline modeling results for Trafalgar Road north of Highway 401. The general planning for the region appears to show widening to 5 lanes, whereas some of the scenarios appear to maintain Trafalgar at 2 lanes.</p> <p>Potential Community Area Designated Growth Area (DGA) Growth Area B1 is a good candidate for growth from a transportation standpoint because of its:</p> <ul style="list-style-type: none"> <li>• Ability to expand upon a grid road network that supports distributed and connected neighbourhood access for multiple modes.</li> <li>• Proximity to Trafalgar Road and Eighth Line, which are already planned to be widened to accommodate growth between Georgetown and Milton. Development could be contemporaneous with planned road improvements that would complete the typical boundary road network for Area B. This is consistent with Measure 2.4.1 “Best opportunity for phasing and scheduling with other planned infrastructure projects”.</li> <li>• Proximity to the Transit Priority Corridor identified along Trafalgar Road and opportunities to connect into and support ridership along this corridor. This is consistent with Measure 4.2.1 “Locates new residential development closest to nodes and corridors”.</li> <li>• Centralized location relative to Georgetown and Milton and ability to provide connectivity to planned employment uses south of Georgetown and north of Milton.</li> </ul> <p>If the limits for Potential Community Area DGA Growth Area B were extended south, it would provide a natural extension of the arterial road network capacity improvements and road grid already in place between Georgetown and Milton and would support connections to planned employment areas. A natural southerly expansion of Growth Area B towards Highway 401 would take further advantage of the planned north-south transportation corridors linking Milton, Georgetown, Oakville, and Mississauga.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>5.0 Region of Halton MCR Evaluation Criteria</p> <p>In May 2020, the Region of Halton released the proposed Evaluation Framework, which had previously been circulated to each local municipal Council. The framework is intended as a qualitative evaluation tool focused on four themes. It is intended to guide the evaluation of the four Growth Concepts from the IGMS. The criteria were developed around land use policies and policy directions identified in the Provincial Policy Statement (PPS), the Growth Plan for the Greater Golden Horseshoe, 2019 (the Growth Plan) and the Regional Official Plan (ROP). It should be noted that subsequent to the release of the evaluation criteria, the Province revised the Growth Plan.</p> <p>The Region has provided the following themes:</p> <ul style="list-style-type: none"> <li>o Regional Urban System &amp; Local Urban Structure – which address Regional policy direction, addressing urban structure, employment land supply and complete and happy communities.</li> <li>o Infrastructure &amp; Financing – these are based on Provincial policy directions and address financial impact and the efficient use of infrastructure.</li> <li>o Agriculture, Environment &amp; Climate Change – these objectives and measures are also based on Provincial policy directions and address impacts on agricultural land base system, natural heritage protection, and climate change adaption and resiliency.</li> <li>o Growing the Economy &amp; Moving People and Goods – objectives and measures based on Provincial policy directions and addresses multi-modal transportation and transit-supportive densities, goods movement and employment areas.</li> </ul> <p>Questions/Comments for Halton Region Staff:</p> <ul style="list-style-type: none"> <li>• It is intended that local municipalities will review the growth scenarios in the IGMS and evaluate them to determine the Preferred Growth Concept for the Region?</li> <li>• How does the Region intend to apply the evaluation criteria? The Evaluation Criteria should explicitly score how each scenario meets the population and employment targets and takes advantage of existing and planned municipal and provincial infrastructure.</li> <li>• It is our position that the weighting and scoring system for evaluating the various scenarios must be transparent and easily understood and be developed prior to the finalization of the various scenarios to be evaluated and should be in greater detail than in Appendix C.</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

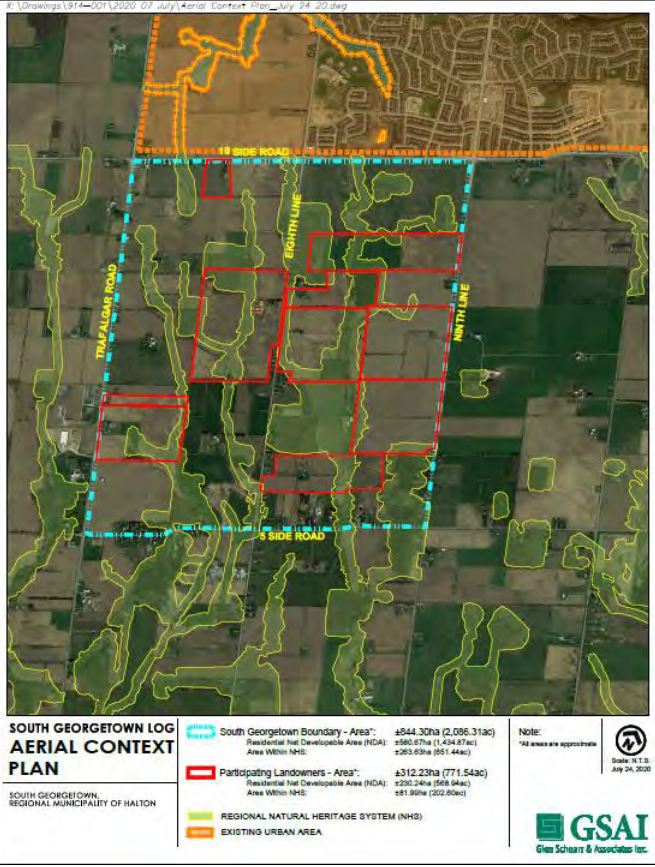












No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Financial impact should be done on an NPV basis to take into account the different absorption schedules and timing of capital improvements.</li> <li>• Theme 4.1.1 – Please consider adding to the end “and supports intensification of planned corridors”.</li> <li>• Theme 4.2.1 – Please consider removing “nodes”. Intensification at nodes is generally more critical for employment uses than residential uses. High degrees of transit use are possible on transit corridors for residential uses, but harder to achieve for employment uses. Employment uses are the ideal land use near nodes where transit and activity can be concentrated.</li> </ul> <p>6.0 Conformity with Recent Provincial Changes (LNAME, 2051 Forecasts &amp; Amendment 1, Provincial Policy Statement)</p> <p>The LNAME now provides a standard methodology for all upper- and single-tier municipalities to use in assessing the quantity of land needed to accommodate projected growth. The primary purpose of the LNAME is to provide a methodology to ensure “sufficient land is available to accommodate all housing market segments; avoid housing shortages; consider market demand...”. The forecasts in Schedule 3 which underpin the analysis are to be used as minimums, and the use of lower forecasts is not permitted in order to prevent housing shortfalls. Alternate growth scenarios are allowed, if the municipality can demonstrate the alternate number conform with policies of the Growth Plan. These alternate scenarios are forecasts which exceed existing Schedule 3 forecasts.</p> <p>Through the LNAME process, upper-tier municipalities must use the population forecast to create a forecast which results in “total housing need by dwelling type”. Adjustments can be made to the housing projection to ensure it provides a “market-based supply of housing”. If a higher intensification target is to be used, they must establish that the supply of units can be achieved. This ensures that unrealistic intensification targets are not used.</p> <p>If a municipality is unable to accommodate all forecasted growth for the Community Areas to 2051, and there needs to be a settlement boundary expansion, a gross density is applied to the unaccommodated dwellings by type and the Population Related Employment (PRE) and major office jobs to determine the lands needed. Municipalities may also, at the end of determining land need, make upward adjustments to the quantum of land due to land constraints, land vacancy, length of the planning process, economic and demographic considerations to determine any additional settlement boundary expansions. The LNAME will result in a total quantum of land needed. This will provide an input into the MCR process, which appropriate locations of settlement boundary expansion will be determined.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response
		<p>The Province has also recently amended the Provincial Policy Statement, 2020 (PPS) which sets the policy framework for land use planning in Ontario. The changes to the PPS arose, in part, due to the More Homes, More Choice; Ontario's Housing Supply Action Plan which came into effect May 1, 2020. Among other things, the underlying intent of the policy changes aim to increase the mix and supply of housing, reduce barriers and cost for development and provide greater certainty. There are new policies within the PPS which direct planning authorities to provide for a range and mix of housing options and densities to meet projected market-based and affordable housing needs. In our review of the Regional IGMS, it does not appear that the background analysis has appropriately addressed the policies of the PPS 2020.</p> <p>Questions/Comments for Region of Halton Staff:</p> <ul style="list-style-type: none"> <li>• How does the Region plan to incorporate the Schedule 3 numbers into the current analysis?</li> <li>• Has the Region considered a “market-based supply” of housing? How does the shift in units to apartments, and additional apartments in the DGA meet this test?</li> <li>• Has the Region established if there is an appropriate supply of intensification units to meet higher intensification targets?</li> <li>• What is the implication of the gross density on the land needs? Have PRE jobs been incorporated appropriately?</li> <li>• How have the other upward adjustments permitted in the new LNAM been incorporated?</li> <li>• Are the scenarios which feature higher DGA targets potentially going to impact the housing supply and/or ability to provide significant land to accommodate all housing segments?</li> <li>• How will the Region's work address PPS Policy 1.1.1 b) which requires “accommodating an appropriate affordable and market-based range and mix of residential types....”?</li> <li>• How will the Region's work address PPS Policy 1.4.3 which states that “Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected market-based and affordable housing needs of current and future residents of the regional market area...”?</li> </ul> <p>6.1 Halton 2051 Population and Employment Forecast</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response																																																
		<p>As part of the revised LNAM, and Amendment 1 of the Growth Plan, the Province, released forecasts to 2051 which were incorporated into Schedule 7 of the Growth Plan. The technical work carried out by Hemson Consulting, which was the basis for the 2051 forecasts, is one of the sources which municipalities may use when evaluating their land needs consistent with the LNAM. In the technical background work, Hemson has provided housing growth to 2051 by unit types. Although the Region is not mandated to follow this housing forecast, the technical work is one of the data sources available when the Region considers housing by dwelling type.</p> <p>The Region of Halton is anticipated to accommodate nearly 540,000 new residents between 2016 and 2051 (Reference Scenario). In the technical background work, the forecast has 75% of new units being “ground-related” (Singles/Semis, Rows, and Accessory Units) and 24% Apartments. Several of the scenarios within the IGMS have assumed very different unit splits to accommodate growth.</p> <p><b>Region of Halton Reference Residential Unit Growth</b></p> <table border="1" data-bbox="464 711 1188 906"> <thead> <tr> <th>Year</th> <th>Singles/Semis</th> <th>Rows</th> <th>Accessory Units</th> <th>Apartments</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>118,700</td> <td>29,700</td> <td>1,200</td> <td>29,500</td> <td>179,100</td> </tr> <tr> <td>2016</td> <td>124,500</td> <td>33,900</td> <td>1,200</td> <td>33,400</td> <td>193,000</td> </tr> <tr> <td>2021</td> <td>131,800</td> <td>39,600</td> <td>1,700</td> <td>40,000</td> <td>213,100</td> </tr> <tr> <td>2031</td> <td>159,400</td> <td>53,900</td> <td>2,400</td> <td>52,200</td> <td>267,900</td> </tr> <tr> <td>2041</td> <td>189,500</td> <td>68,600</td> <td>3,100</td> <td>65,600</td> <td>326,800</td> </tr> <tr> <td>2051</td> <td>219,300</td> <td>83,700</td> <td>4,100</td> <td>80,500</td> <td>387,600</td> </tr> <tr> <td>2016- 51</td> <td>94,800</td> <td>49,800</td> <td>2,900</td> <td>47,100</td> <td>194,600</td> </tr> </tbody> </table> <p style="text-align: center;">49%                      26%                      1%                      24%</p> <p><small>Greater Golden Horseshoe: Growth Forecasts to 2051 - Technical Report August 26, 2020 (Hemson Consulting)</small></p> <p>Questions/Comments for Region of Halton Staff:</p> <ul style="list-style-type: none"> <li>• The IGMS work carried out by Halton Region does not address key housing policy requirements as laid out in the 2020 PPS, A Place to Grow and the LNAM.</li> </ul> <p>6.2 Identified Potential Growth/Settlement Boundary Expansion Areas</p> <p>Chapter 7 of the IGMS identifies potential settlement area expansions, which focuses potential new DGA Areas in contiguous areas in proximity to Halton Hills and Milton. In total the IGMS has identified approximately 2,100 developable hectares for Community Areas, including 170 hectares in Agerton, which would be a change in land use requiring the Region’s approval of employment land conversion.</p> <p>We note that this 2,100 developable hectares, specifically FDGA Area “B” does not include our client’s lands in their entirety as candidate areas. Based on the analysis above, as well as the material appended, we believe all 2,000 acres of the South</p>	Year	Singles/Semis	Rows	Accessory Units	Apartments	Total	2011	118,700	29,700	1,200	29,500	179,100	2016	124,500	33,900	1,200	33,400	193,000	2021	131,800	39,600	1,700	40,000	213,100	2031	159,400	53,900	2,400	52,200	267,900	2041	189,500	68,600	3,100	65,600	326,800	2051	219,300	83,700	4,100	80,500	387,600	2016- 51	94,800	49,800	2,900	47,100	194,600	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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		<p>Georgetown Landowners Group are candidate areas for potential future urban expansion and as such should be equally considered as the Region evaluates future expansion lands.</p> <p>7.0 Natural Heritage</p> <p>The best approach to 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 concur with the comments from the Town of Halton Hills that the ultimate Regional Natural Heritage System should be sustainable, based on ground-truthing and completed environmental studies and research. Policy discussion should also consider opportunities to restore natural areas as a means of expanding the RNHS. Lastly, RNHS policies should demonstrate some flexibility in being applied as part of a context specific approach, avoiding a one size fits all framework.</p> <p>8.0 Conclusion</p> <p>In conclusion, we appreciate the opportunity to review the work the Region has completed to date as part of the Municipal Comprehensive Review, including the Discussion Papers and Integrated Growth Management Strategy. We anticipate future work to be done will address the Growth Plan 2020 as well as the updated Land Needs Assessment Methodology. We look forward to the release of the Growth Concepts and working with the Region further through the next stages of the Municipal Comprehensive Review process.</p> <p>By way of this letter and accompanying submission to Regional Clerk, we ask that our submission be received and recorded as a formal record for the upcoming November 18, 2020 Special Council meeting on the Region's MCR process.</p> <p>Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC. Colin Chung, MCIP, RPP Partner</p>	<p>Comments are acknowledged. Please see above for a detailed response. Additional responses to public and stakeholder submissions – including responses related to the Natural Heritage theme area -- can also be found in the Policy Directions Submission-Response charts.</p>

No.	Source	Submission	Response																								
		<p>cc: Chairman and Members of Regional Council Regional Clerk ATTACHMENTS: - Aerial Context Plan - Appendix A: Comment Response Matrix - Appendix B: Urbantech Memo</p>  <p><b>SOUTH GEORGETOWN LOG AERIAL CONTEXT PLAN</b></p> <table border="1"> <tr> <td></td> <td>South Georgetown Boundary - Area:</td> <td>±844.30ha (2,086.31ac)</td> </tr> <tr> <td></td> <td>Residential Not Developable Area (NDA):</td> <td>±580.67ha (1,434.87ac)</td> </tr> <tr> <td></td> <td>Area Within NHS:</td> <td>±263.69ha (651.44ac)</td> </tr> <tr> <td></td> <td>Participating Landowners - Area:</td> <td>±312.23ha (771.54ac)</td> </tr> <tr> <td></td> <td>Residential Not Developable Area (NDA):</td> <td>±220.24ha (546.94ac)</td> </tr> <tr> <td></td> <td>Area Within NHS:</td> <td>±81.99ha (202.69ac)</td> </tr> <tr> <td></td> <td>REGIONAL NATURAL HERITAGE SYSTEM (NHS)</td> <td></td> </tr> <tr> <td></td> <td>EXISTING URBAN AREA</td> <td></td> </tr> </table> <p><b>South Georgetown</b> REGIONAL MUNICIPALITY OF HALTON</p> <p><b>GSAI</b> Glen Scheer &amp; Associates Inc.</p> <p>Note: *All areas are approximate</p> <p>Scale: N.T.S. July 24, 2020</p>		South Georgetown Boundary - Area:	±844.30ha (2,086.31ac)		Residential Not Developable Area (NDA):	±580.67ha (1,434.87ac)		Area Within NHS:	±263.69ha (651.44ac)		Participating Landowners - Area:	±312.23ha (771.54ac)		Residential Not Developable Area (NDA):	±220.24ha (546.94ac)		Area Within NHS:	±81.99ha (202.69ac)		REGIONAL NATURAL HERITAGE SYSTEM (NHS)			EXISTING URBAN AREA		
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**Submission dated August 5, 2021**

No.	Source	Submission	Response
		<p>Mr. Curt Benson  Manager of Community Planning  Regional Municipality of Halton  1151 Bronte Rd.  Oakville, ON  L6M 3L1</p> <p>Dear Mr. Benson:</p> <p><b>SOUTH GEORGETOWN LANDOWNERS GROUP COMMENTS ON THE TOWN OF MILTON LAND NEEDS ASSESSMENT FOR THE "HALTON BALANCED" GROWTH CONCEPT</b></p> <p>IBI Group ("IBI") has been retained by the South Georgetown Landowners Group ("SGLOG") to assess the growth management and fiscal impact assessment of the Halton Region Official Plan Review ("ROPR") process. The SGLOG represents approximately 600 hectares of developable land (exclusive of the Regional NHS) immediately abutting the southern urban boundary of Georgetown between Trafalgar Road to the west, 9th Line to the east, 10th Sideroad to the north and 5th Sideroad to the south.</p> <p>As part of our retainer, IBI Group completed a technical assessment of the Land Needs Assessment completed by Malone Given Parsons ("MGP"), for the Town of Milton's "Halton Balanced" Growth Concept. The following summarizes the findings of our assessment in relation to the Province's Land Needs Assessment Methodology ("LNA"), the Region's Integrated Growth Management Study ("IGMS") work to date, and the Greater Golden Horseshoe: Growth Forecasts to 2051 by Hemson Consulting, which underpins the Schedule 3 growth forecasts.</p> <p><b>IBI Group's Opinion:</b></p> <ul style="list-style-type: none"> <li>• Of all growth concepts, MGP's approach most appropriately implements and conforms to the Community Area Land Needs Assessment by establishing a market-based supply of housing demand while achieving the Growth Plan requirements for intensification (minimum 50%) and greenfield density (minimum 50 people + jobs per hectare)</li> <li>• By not fully implementing the LNA through the Growth Concepts for the IGMS, the Region risks underestimating housing demand, and in doing so, creating a constrained housing mix and supply, exacerbating housing affordability issues, limiting future potential for economic and employment opportunities and impacting the fiscal sustainability of the Region and its area municipalities.</li> <li>• Prior to the creation of the preferred land use concept, the Region should re-evaluate and update the technical components of the Growth Concepts to align with the LNA. This will ensure that the preferred scenario will be based on a market-based supply that conforms to the Growth Plan.</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p><b>The Town of Milton's work for the "Halton Balanced" growth concept most appropriately implements the LNAM</b></p> <p>On June 21, 2021, Town of Milton Planning Staff, with technical assistance from MGP, presented the "Halton Balanced" growth concept to Milton Town Council. This alternative scenario modified the Region's "Growth Concept 4" to conform to the requirements of the LNAM, the Growth Plan and the Council Adopted 2051 Vision for Milton. Based on the assessment, the Town concluded that an additional 2,200 hectares of Community Area land and 1,100-1,500 hectares of Employment Area land were required to meet the 2051 Regional Growth Forecasts.</p> <p>To inform Staff's position, MGP's Land Needs Assessment ("MGP LNA") provided the required technical background to identify the demand for future Community Area lands in the Region in accordance with the Provincial LNAM. The following provides an overview of IBI Group's assessment of the MGP LNA:</p> <ul style="list-style-type: none"> <li>• <b>Component 1 – Population Growth:</b> MGP's population growth is based on the 2016 Census and the forecasts from Schedule 3 of the Growth Plan. MGP applies a non-household population factor and a net under coverage rate to the population to establish the total population in 2016 and 2051. This is an accepted approach.</li> <li>• <b>Component 2 – Housing Need:</b> MGP's housing forecast and housing mix by unit type are based on the Halton Region population forecast from the 2020 Hemson Technical Report for the Growth Plan. To achieve the required Growth Plan directive for a market-based supply and achieve the required intensification and greenfield density targets, MGP revised the 2051 Growth Plan unit mix which resulted in a housing mix of 36% singles/semis, 35% rows and 29% apartments. It is IBI Group's opinion that the adjustments are reasonable and only change the housing mix to the extent possible to meet the market based supply while at the same time achieving Growth Plan conformity.</li> </ul> <p><i>Table 2: MGP Housing Forecast vs. Market Based Forecast (2021-2051)</i></p> <table border="1" data-bbox="520 820 1144 950"> <thead> <tr> <th></th> <th>Single/Semi</th> <th>Row</th> <th>Apartment</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Hemson Forecast Unit Growth (16-51)</td> <td>98,285</td> <td>49,885</td> <td>48,450</td> <td>194,620</td> </tr> <tr> <td>Growth Mix (%)</td> <td>49%</td> <td>26%</td> <td>25%</td> <td>100%</td> </tr> <tr> <td>MGP Revised Unit Growth (16-51)</td> <td>66,985</td> <td>66,385</td> <td>53,850</td> <td>187,220</td> </tr> <tr> <td>Growth Mix (%)</td> <td>36%</td> <td>35%</td> <td>29%</td> <td>100%</td> </tr> <tr> <td>Change</td> <td>-29,300</td> <td>16,500</td> <td>5,400</td> <td>-7,400</td> </tr> <tr> <td>Change (%)</td> <td>-14%</td> <td>10%</td> <td>4%</td> <td></td> </tr> </tbody> </table> <p>MGP used the 2017-2031 PPU rates from the Region's development charges background study (2017) to align the forecasted housing mix with the forecasted population. These rates, which are based on historic trends and forecasted unit counts/demographics, are more appropriate than the Region's policy based rates.</p> <ul style="list-style-type: none"> <li>• <b>Component 3 – Housing Need Allocation:</b> MGP deemed the Region's allocation of 335,000 residents to Milton as appropriate.</li> <li>• <b>Component 4 – Housing Supply Potential by Policy Area:</b> MGP allocates the housing forecast, by unit type, to the Built-up Area ("BUA"), Designated Greenfield Area ("DGA"), and Rural Area based on Growth Plan intensification targets. An intensification target of 40% was used between 2016 and 2022 and a target of 50% is used between 2023 and 2051. A 0.5% allocation of units is attributed to the Rural Area.</li> </ul> <p>MGP's assessment resulted in a demand for 95,883 units in the DGA. Overall, IBI believes that MGP's methodology is appropriate.</p>		Single/Semi	Row	Apartment	Total	Hemson Forecast Unit Growth (16-51)	98,285	49,885	48,450	194,620	Growth Mix (%)	49%	26%	25%	100%	MGP Revised Unit Growth (16-51)	66,985	66,385	53,850	187,220	Growth Mix (%)	36%	35%	29%	100%	Change	-29,300	16,500	5,400	-7,400	Change (%)	-14%	10%	4%		<p>Comments are acknowledged. Please see above for a detailed response.</p>
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		<p data-bbox="514 272 905 289"><i>Table 3: MGP Housing Demand by Policy Area (2016-2051)</i></p> <table border="1" data-bbox="514 297 1119 423"> <thead> <tr> <th></th> <th>Single/Semi</th> <th>Row</th> <th>Apt</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Total Distribution</td> <td>66,985</td> <td>66,384</td> <td>53,850</td> <td>187,219</td> </tr> <tr> <td>BUA Demand</td> <td>4,520</td> <td>36,160</td> <td>49,720</td> <td>90,400</td> </tr> <tr> <td>DGA Demand</td> <td>61,529</td> <td>30,224</td> <td>4,130</td> <td>95,883</td> </tr> <tr> <td>Rural Demand</td> <td>936</td> <td>0</td> <td>0</td> <td>936</td> </tr> <tr> <td>DGA Unit Mix (%)</td> <td>64.2%</td> <td>31.5%</td> <td>4.3%</td> <td>100.0%</td> </tr> </tbody> </table> <ul data-bbox="485 443 1129 621" style="list-style-type: none"> <li>• <b>Component 5 – Community Area Jobs:</b> MGP uses a Community Area job rate of 1 job per 6 people, which appears to be based on the rate from the 2018 LNA methodology. This rate generally aligns with Hemson’s IGMS assumptions which establishes a rate of 1 job for every 5 residents region-wide. This is an acceptable approach.</li> <li>• <b>Component 6 – Need for Additional Land and Greenfield Density:</b> For the purposes of this review, IBI Group has assumed that MGP’s supply data is up-to-date and accurate. In total, MGP estimates that there are nearly 83,000 potential units within the Existing DGA. Of this supply, over 75% of the units are ground related (singles, semis and rows).</li> </ul> <p data-bbox="514 641 1119 716">The MGP analysis identifies a new DGA unit requirement for 31,074 singles and semis, which would require a Community Area land expansion of 2,220 hectares. The existing DGA land supply for rows and apartments can accommodate the projected unit growth to 2051.</p> <p data-bbox="514 735 1119 792">Overall, MGP calculated the DGA (existing and new) to be 59.6 people and jobs per hectare. This includes a new DGA density of 54.5 people and jobs per hectare, which is above the minimum DGA densities as set forth in the Growth Plan.</p> <p data-bbox="457 810 1119 922">Based on the available information, it is our opinion that MGP’s approach appropriately implements and conforms to the components of the LNA with respect to Community Area lands by ensuring the provision of a market-based supply of housing to the extent possible. The MGP LNA achieves the Growth Plan requirements for intensification (minimum 50%) and greenfield density (minimum 50 people + jobs/hectare) and properly addresses technical variables such as PPU assumptions and a market based housing mix.</p> <p data-bbox="457 930 1119 1026">It should be noted MGP did not undertake any planning or policy analysis to determine the optimal distribution of growth between the municipalities in Halton. Additionally, limited details on the Employment Area land needs were provided in the technical background analysis. Further assessment for the appropriate allocation of future Community Area lands and the Employment Area land need is required.</p> <p data-bbox="457 1050 1119 1071"><b>The Region’s IGMS does not provide for a “market-based supply to the extent possible”</b></p> <p data-bbox="457 1079 1119 1175">As per our previous correspondence on the Region’s IGMS work<sup>1</sup>, IBI Group believes that the Region’s Growth Concepts do not adequately assess market-based supply to meet the housing needs of current and future residents. By diverting away from the market based supply in the Growth Concepts, the Region risks underpinning the preferred growth concept with inaccurate information, which could impact municipal finances, housing supply and housing choice.</p> <p data-bbox="457 1209 905 1226"><sup>1</sup> Previous IBI Group correspondence dated July 12, 2021 and October 28, 2020</p>		Single/Semi	Row	Apt	Total	Total Distribution	66,985	66,384	53,850	187,219	BUA Demand	4,520	36,160	49,720	90,400	DGA Demand	61,529	30,224	4,130	95,883	Rural Demand	936	0	0	936	DGA Unit Mix (%)	64.2%	31.5%	4.3%	100.0%	<p data-bbox="1438 560 1885 613">Comments are acknowledged. Please see above for a detailed response.</p>
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		<p>Hemson's "Greater Golden Horseshoe: Growth Forecasts to 2051 (Aug 26, 2020)", provides the baseline for a market-based supply as outlined in the "Reference Scenario. This approach is confirmed by Hemson in their supporting background work for the Region's IGMS<sup>2</sup>.</p> <p><i>Table 1: Halton Region Housing Forecast – Region vs. Market Based Forecast (2021-2051)</i></p> <table border="1" data-bbox="466 367 1184 553"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Total Units (21-51)</th> <th colspan="2">Halton Growth Scenario</th> <th colspan="2">Hemson Market Based Forecast</th> <th colspan="2">Difference</th> </tr> <tr> <th>Ground Related</th> <th>Apartment</th> <th>Ground Related</th> <th>Apartment</th> <th>Ground Related</th> <th>Apartment</th> </tr> </thead> <tbody> <tr> <td>Concept 1 (60% Intensification)</td> <td>174,050</td> <td>78,300 45.0%</td> <td>95,800 55.0%</td> <td>130,700 75.3%</td> <td>42,800 24.7%</td> <td>-52,400</td> <td>53,000</td> </tr> <tr> <td>Concept 2 (70% Intensification)</td> <td>174,050</td> <td>67,300 38.7%</td> <td>106,700 61.3%</td> <td>130,700 75.3%</td> <td>42,800 24.7%</td> <td>-63,400</td> <td>63,900</td> </tr> <tr> <td>Concept 3a &amp; 3b (80% Intensification)</td> <td>174,050</td> <td>55,800 32.1%</td> <td>118,200 67.9%</td> <td>130,700 75.3%</td> <td>42,800 24.7%</td> <td>-74,900</td> <td>75,400</td> </tr> <tr> <td>Concept 4 (50% Intensification)</td> <td>174,050</td> <td>89,100 51.2%</td> <td>84,900 48.8%</td> <td>130,700 75.3%</td> <td>42,800 24.7%</td> <td>-41,600</td> <td>42,100</td> </tr> </tbody> </table> <p>As illustrated in Table 1, the Region's growth concepts dramatically shift from the "market based" approach, redistributing a large number of ground related units to apartment. It is IBI Group's opinion that the Region's adjustments go beyond "the extent possible" to maintain the market-based supply and risk non-conformity with the Growth Plan.</p> <p>In addition to this apparent departure from the market-based supply, IBI Group reiterates our concerns with the Region's IGMS work:</p> <ul style="list-style-type: none"> <li>• <b>PPU Assumptions:</b> the Region's PPU assumptions, in particular for high density residential, change between concepts to achieve the population forecast. This approach is not based on historic market/demographic trends and risks understating the housing demand region-wide in the event that additional rental and family-sized units are not produced over the planning horizon as planned.</li> <li>• <b>Insufficient data on intensification supply:</b> the Region has not demonstrated that there is sufficient land, servicing or community services/facilities to accommodate their intensification goals which requires a shift from ground related housing to apartment units, all to be accommodated in the built up areas. Without sufficient opportunities to accommodate the future intensification targets, the Region risks missing their growth targets, which will impact housing mix/choice, affordability and the municipal finances of the Region and area municipalities.</li> <li>• <b>A full LNA has not been completed:</b> while Hemson has stated that a full LNA will be completed for the Preferred Growth Concept, IBI believes that the work that underpins the growth scenario should align with the Land Needs Assessment Methodology, and that more fulsome assessments of the risks and impacts of each scenario, including financial should be completed.</li> </ul> <p><b>Risk Assessment</b></p> <p>In reviewing the Region's growth management work to date, we are concerned that several of the concepts underestimate the quantum of land required to accommodate future growth and do not conform to the Growth Plan. The LNAM was created by the Province to provide a standardized approach for the determination of future land needs based on forecasted growth.</p> <p><sup>2</sup> Appendix B: Land Needs Assessment and Municipal Allocation, February 2021, Regional Official Plan Review IGMS Growth Concepts Discussion Paper. Completed by Hemson Consulting (Page 8)</p>		Total Units (21-51)	Halton Growth Scenario		Hemson Market Based Forecast		Difference		Ground Related	Apartment	Ground Related	Apartment	Ground Related	Apartment	Concept 1 (60% Intensification)	174,050	78,300 45.0%	95,800 55.0%	130,700 75.3%	42,800 24.7%	-52,400	53,000	Concept 2 (70% Intensification)	174,050	67,300 38.7%	106,700 61.3%	130,700 75.3%	42,800 24.7%	-63,400	63,900	Concept 3a & 3b (80% Intensification)	174,050	55,800 32.1%	118,200 67.9%	130,700 75.3%	42,800 24.7%	-74,900	75,400	Concept 4 (50% Intensification)	174,050	89,100 51.2%	84,900 48.8%	130,700 75.3%	42,800 24.7%	-41,600	42,100	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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No.	Source	Submission	Response
		<p>By not implementing the LNAM properly, the Region risks constraining housing mix and supply, exacerbating housing affordability issues, limiting future potential for economic and employment opportunities and impacting the fiscal sustainability of the Region and it's area municipalities.</p> <p>What is clear from the limited fiscal analysis that was provided is that for those concepts that favour lower and medium density residential development, the net fiscal impact is clearly better than those concepts that emphasize higher density solutions. Further relying on the unsubstantiated higher rates of forecasted absorption for high density development in Halton compared to historical market rates, the Region and the area municipalities risk creating serious operating and capital fiscal shortfalls.</p> <p>We appreciate the opportunity to provide input into the Region's ongoing ROPR and we look forward to continuing to work with the Region throughout the process. Please do not hesitate to contact IBI Group to discuss any of the items above.</p> <p>Yours truly,  <b>IBI GROUP</b></p> <p>Robyn Brown, MA, MPI, PLE  Director, Sr. Practice Lead – Planning</p> <p>Matthew Heather, B.ES  Planner</p> <p>Cc: Steve Burke, Senior Planner</p>	
84.	Linda Castiglione  E-mail dated July 13, 2021	July 13, 2021 The Halton Regional Centre 115 Bronte Road Oakville, ON, L6M 3L1 Sent by Email Attention: ROPR Department Dear ROPR Representatives: RE: Regional Official Plan Review: Halton Growth Concepts	<p>Based on the results of the North Aldershot Policy Area Discussion Paper and technical analysis conducted for the Growth Concepts Discussion Paper under Appendix J, staff are recommending that lands within the North Aldershot Policy Area not be included within the Preferred Growth Concept.</p> <p>The Discussion Paper and Appendix J identified a number of Provincial policy constraints limiting the eligibility of these lands for settlement boundary expansion. Additionally, consideration for water and wastewater opportunities and constraints (Appendix J1 to the Growth Concepts Discussion Paper) found that extension of municipal services to support residential development would be particularly challenging as compared to other potential growth areas due topography and natural</p>

No.	Source	Submission	Response
		<p>We have been interested in selling the remaining parcel of land for many many years however, in each due diligence stage of the potential purchases, the potential purchasers have received negative feedback from the City of Burlington and from the Region of Halton which has unfortunately deterred them from purchasing the property and in turn prohibited us from the selling the parcel of land. The property taxes that have accumulated on this parcel of land over the years has been a significant amount for us.</p> <p>We understand that currently the Region of Halton has prepared studies and is not proposing any further growth in Burlington and more specifically in the North Aldershot area. We have read the discussion paper, spoken with City of Burlington planners, and have had a meeting with the Region of Halton to discuss the North Aldershot growth concept. We have also obtained the opinion from two independent planners over the last 12 years. We have also participated in PIC calls and are informed of the direction that the Region is interested in heading.</p> <p>The Region has indicated that it is seeking community involvement and is open to the opinions and “invaluable” feedback of residents and landowners and we trust that our letter will provide you with some new insights in order to modify the direction of the North Aldershot policy area and Urban Expansion Assessment.</p> <p>We are hereby objecting to the proposed growth plan and specifically the North Aldershot Discussion Paper. Our position is that North Aldershot (or a portion) should be designated as an Urban Development area for the reasons set forth below and we are respectfully requesting that you consider this letter in your decision.</p> <p>As you know, the Regional Official Plan is a lengthy document, well over 600 pages, and we understand and acknowledge that a great deal of time and effort has been put forth in the studies and the assessment of the Halton area.</p> <p>The Growth Concepts were evaluated using the following four themes and we will provide summarized reasons to support how these themes and the Growth Concepts meet the policy objectives to also apply to North Aldershot (specifically the southern section of North Aldershot).</p> <p><b>Four Themes</b>  <b>Agriculture, Environment and Climate Change</b></p> <p>Currently no agriculture is being farmed on 103 Panin Road and in many parts of North Aldershot therefore, no farming would be lost in this area.</p> <p>We also acknowledge that certain parts of land such as ravines must be maintained and protected, however, we believe there are areas that can support much needed residential</p>	<p>heritage constraints among other factors. The recommended settlement boundary expansion areas in Milton and Georgetown minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>



No.	Source	Submission	Response
		<p><b>Growing the Economy and Moving People and Goods</b> North Aldershot fits perfectly into this criterion and checks all these boxes.</p> <p>The southern most area of the North Aldershot quadrant is directly adjacent to the highway 403, one of, if not, the most major highway corridors in Ontario for the movement of people and goods.</p> <p>North Aldershot and specifically the southern part of North Aldershot, is adjacent and walking distance to the go station which was built to accommodate the direct movement of people and goods.</p> <p><b>Regional Urban System and Local Urban Structure</b></p> <p>North Aldershot fits the criteria for Urban System. Designating it as rural goes against the true functioning character of the lands. North Aldershot has a sustainable transportation system and this is a key mitigating factor in the reduction of GHG emissions from vehicles. It further reduces auto dependence given its close proximity to the go station and highway corridor. Meeting these two criteria are a vital factor in the design of an urban structure as it serves to not only meet the needs of growth however it does so in an environmentally sustainable way.</p> <p>Further, it is designed for the pedestrian in mind given the close proximity to employment and local schools, fire stations and grocery stores.</p> <p><b>Conclusion and Summary</b></p> <p>The above summary provides clear rationale and reasoning to support North Aldershot being included in the Regional Growth Concept plan as a higher density urban area. We will also be filing a Notice Of Objection disputing the North Aldershot Plan Review and will provide further details to support our rationale. Our concern is that as landowners, our rights are being infringed upon as we have been prevented from selling our land for the last 20 years to developers that want to enhance the area. Please consider the fairness to landowners who have incurred land purchase costs, annual maintenance fees and property taxes. It is not fair that we purchased the land from the City, pay property taxes each year and now must maintain it in its current state. These decisions have failed to value the opinion of landowners. On the call it was emphasized that the voices of those who provide feedback will be considered and we are hopeful that you will amend the North Aldershot decision and incorporate our developmental lands into the urban boundary.</p> <p>If you have any questions or would like to discuss any of the above comments, please contact us.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p> <p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Sincerely, Castiglione/Morgante Families (103 Panin Road, Burlington Landowners)</p>	
85.	<p>Alison Quigg on behalf of 2518 Lower Base Line</p> <p>E-mail dated July 13, 2021</p>	<p>Dear Mr Benson:</p> <p>Comments on Halton Region Growth Concepts: 2518 Lower Base Line, Milton</p> <p>IBI Group are the planning consultants representing 1206446 Ontario Inc. for their property located at 2518 Lower Base Line in the Town of Milton, Region of Halton, herein referred to as the “subject site”. IBI Group is pleased to submit the following Urban Boundary Expansion Justification Report for the subject site as part of the Region of Halton’s call to comments on the Growth Concepts, which forms part of the Municipal Comprehensive Review process.</p> <p>The Justification Report addresses how the subject site is positioned to be a logical, strategic and optimal site for inclusion in the urban boundary for Employment Areas and how this inclusion supports Regional objectives of the Integrated Growth Management Strategy (“IGMS”) through each of the four themes of the Evaluation Framework.</p> <p>Based on our analysis, IBI Group has come to the conclusion that there are several strong arguments to support the inclusion of the subject site in the urban boundary for Employment Areas. The inclusion of 2518 Lower Base Line into the urban boundary expansion for Employment Areas will assist the Region of Halton and Town of Milton in meeting their employment land needs and would provide the Region and Town with strategic employment sites in proximity to a major goods movement facility to allow the Town and Region proactively position the area to realize economic development opportunities. Inclusion of the subject site within the urban boundary also supports the Town of Milton’s Council Endorsed Modified Growth Concept, which proposes that all of Milton/s White Belt lands be brought into the Settlement Area in order to fulfill employment growth projections.</p> <p>We look forward to continuing to work with the Region of Halton, Town of Milton, and all other relevant agencies, stakeholders , and the public with respect to the subject site’s inclusion in the urban boundary.</p> <p>Please do not hesitate to contact the undersigned should you require clarification or any further information.</p> <p>Yours truly,</p>	<p>The majority of the subject lands which are outside of the Provincial Greenbelt Plan Area are currently identified as Future Strategic Employment Area. Based on the results of the technical analysis, staff are recommending that these lands not be included within the Preferred Growth Concept. The lands are currently designated as Regional Natural Heritage System, Agricultural Area, are partially within the Provincial Greenbelt Plan Area and are not contiguous with the Urban Area. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people. In addition, plans for enhanced freight rail infrastructure in the area have created uncertainty and could limit potential urban uses or cause delays in the development of lands in the area.</p>

No.	Source	Submission	Response
		IBI Group	
86.	<p>Emma Barron on behalf of Mattamy Homes and Remington Group</p> <p>E-mail dated July 13, 2021</p>	<p>Section 1.0 – Introduction</p> <p>This submission is provided on behalf of Mattamy Homes and The Remington Group Inc. Both companies have extensively contributed to the building of complete communities throughout the Region to date and own land in all four of the Region’s municipalities. We also build a full range of housing types from low-density to high density apartments as well as planning and delivering a wide range of jobs from logistics warehousing through to office. Based on this, we take a holistic approach when reviewing the proposed Growth Concepts.</p> <p>The Region has proposed five Growth Concepts based on their Land Needs Assessment work completed to date that contemplate a range of scenarios on how population and employment growth will be accommodated in the Region and whether the Region will require a settlement boundary expansion. The amount of new Designated Greenfield Area ranges from a no settlement boundary expansion growth scenario under Growth Concept 3B to 3,300 hectares of new Designated Greenfield Area in Concept 4.</p> <p>The purpose of this submission is to contribute to the Integrated Growth Management Strategy (IGMS) discussion on the proposed Growth Concepts in order to ensure that the Preferred Growth Concept contemplates a balanced approach to future growth and compliments the long-range vision of the Region and its respective communities.</p> <p>A balanced approach should include the following priorities and objectives:</p> <ol style="list-style-type: none"> <li>1. Address housing supply and affordability by supporting a market-based choice in housing;</li> <li>2. Protect and enhance the Region’s Natural Heritage System;</li> <li>3. Support growth that will contribute to reducing the impacts of Climate Change, preserve Agricultural Land and support a local food supply;</li> <li>4. Protect and promote job creation and a diversified economy;</li> <li>5. Deliver community uses such as parks, community centres, schools, hospitals and places of worship;</li> <li>6. Balance the impact of growth on stable neighbourhoods and planned communities while planning for appropriate densities in intensification areas such as Major Transit Station Areas (MTSAs), nodes and corridors;</li> <li>7. Make efficient use of existing and planned Regional infrastructure; and,</li> <li>8. Consider the local context and vision by acknowledging that the four local municipalities are at different stages of their community build-out.</li> </ol> <p>Section 2.1 - Housing Choice and Affordability</p>	<p>There has been some confusion regarding the term “densification.” Please refer to the <i>Preferred Growth Concept Land Needs Assessment</i> for further clarification. Densification simply refers to intensification plus the additional apartments proposed in the DGA. This densification is entirely within the currently planned units for these areas, and no changes to secondary plans are required.</p> <p>The <i>Preferred Growth Concept</i> technical assessments and climate change assessment address comments brought up regarding sustainability. For further details regarding the findings of this assessment, please see the technical appendices of the <i>Preferred Growth Concept Report</i>.</p> <p>Re: planned growth to 2031. The Growth Plan and the LNA Methodology requires us to take a 2021 perspective on expected growth and development. Based on that, the HUSP are not yet fully developed and the Sustainable Halton have not yet begun development. Growth for the 2020s is slower than in the current Official Plan and there is less Greenfield development due to the higher intensification rate. All of which means that Greenfield land will last well into the 2030s.</p> <p>The Preferred Growth Concept shifts significant future employment from Employment Land Employment into Major Office Employment directed to Strategic Growth Areas and existing employment areas to foster mixed-use, transit supportive communities.</p>

No.	Source	Submission	Response
		<p>Recent updates to the Provincial Policy Statement (PPS) and A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) have extended the planning horizon for municipalities in order to ensure that housing supply is not constrained by deficiencies in land availability. The Growth Plan now requires that municipalities plan for population and employment growth to 2051. The PPS and Growth Plan also require that municipalities provide a market-based supply of housing. In Halton Region, the market is driven by young families and first-time homebuyers who continue to show a strong preference for grade related housing.</p> <p>As forecasted by the August 2020 Hemson Technical Report prepared for the Ministry of Municipal Affairs and Housing Growth Plan update, the estimated unit mix based on market demand for the Region of Halton is 77% ground related units and 23% apartments. The five Growth Concepts presented by the Region deviate significantly from the forecasted unit mix (refer to Figure 1 on page 12 for a more detailed comparison). For example, concept 3A and 3B propose a unit mix of 32% ground related units and 68% apartment units. It is our position that the unprecedented shift from ground related units to apartment units has repercussions on the Region's ability to achieve complete communities:</p> <ol style="list-style-type: none"> <li>1. Firstly, the rate of apartment housing completions in the Region would have to dramatically increase. To achieve the apartment growth contemplated in the Growth Concepts an increase in apartment unit completions between 175% to 283% to 2051 would need to be realized. Table 2 on page 14 provides a further breakdown of the number of apartment units that would need to be built under each Growth Concept.</li> <li>2. Additionally, home-buyer preference would need to shift. Some discussion on the Growth Concepts has focused on a possible shift in home-buyer preference towards apartments based on affordability (i.e. the notion that apartment units are more affordable for families than ground related units). However, it is important to note that apartment units are only intrinsically more affordable because they are smaller; increasing the size of an apartment unit to accommodate families also increases cost. Figure 2 on page 15 provides an overview of the cost comparison between a 1,750 square foot 3 bedroom townhouse and a 1,200 square foot 3 bedroom apartment unit in Milton. It concludes that a 3 bedroom townhouse is more affordable. This raises a number of questions including – will families choose to live in an apartment unit if a comparably sized ground related unit is more affordable?</li> <li>3. Planning for a balanced mix of housing is essential. Overly relying on apartment units to accommodate growth results in the following risks:</li> </ol>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>A. Increased upward pressure on housing affordability resulting from artificially restricting the supply of ground related units.</p> <p>B. Losing population and associated jobs to neighbouring municipalities who offer more affordable ground related options. This possibility was highlighted in StrategyCorp's April 21, 2021 presentation to Regional Council. StrategyCorp noted that a diverse population is essential for attracting new businesses and creating complete communities.</p> <p>C. Growth forecasts may not be realized due to a reliance on significant levels of redevelopment required to accommodate apartment growth, which relies on an unpredictable land supply resulting from land assembly challenges. Additionally, it is not clear if the Region has contemplated how community uses associated with intensification development (i.e. parks, schools, hospitals, places of worship and community centres) would be accommodated in these areas. As noted above, without population growth the Region also risks losing jobs.</p> <p>D. Unrealized growth (i.e. a shortfall in ground related units that is not met by demand for apartments) has impacts on municipal revenues such as capital funding deficits resulting from spending based on growth forecasts that are not met and shortfalls in Development Charge revenues in the magnitude of hundreds of millions of dollars. It will also impact the Region's Allocation Program funding model as apartment units and infill are not subject to front-end financing of infrastructure.</p> <p>Section 2.2 - Job Growth and a Diversified Economy</p> <p>The Region's Growth Concepts focus on shift in the Region's economy from manufacturing and warehousing to a mixed use, more compact employment built form. While these forms should be encouraged, the importance of manufacturing, logistics and warehousing (Employment Land Employment – ELE) should not be underestimated. The current vacancy rate for ELE is around 1% whereas the vacancy rate for a balanced industrial market is around 4-5%. Restricting the expansion of the settlement boundary will result in exacerbated shortages of ELE, pushing users outside of the Region, resulting in lost jobs and tax revenue. Employment lands, as identified in ROPA 38 as Future Strategic Employment Areas, and further located within Provincially Significant Employment Zones (PSEZs), should be included within the Region's urban boundary in order for the Region to remain competitive in attracting employers and jobs.</p> <p>Section 2.3 - Impact to Existing and Planned Neighbourhoods</p> <p>One of the differentiating factors between each of the Growth Concepts is the level of densification under each scenario. The term densification is unique to the Region's IGMS work and is not contained in provincial policy. It is our understanding that the term</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response
		<p>Densification refers to the amount of growth that will be accommodated in existing Designated Greenfield Areas. The use of this term, and lack of specific information on where densification is to be applied within Designated Greenfield Areas, has raised many questions. An exhaustive list of questions is provided on page 21, which highlights the uncertainty of how the concept of Densification will be implemented and its affects on existing and planned communities in the Region.</p> <p>The emphasis on development within the Region’s Built Up Area under each of the Growth Concepts will have the largest impacts on existing and stable neighbourhoods within the Town of Milton and the Town of Halton Hills. Milton and Halton Hills are at different growth maturities compared to Oakville and Burlington and do not have the same opportunities to accommodate substantial intensification on available land around transit corridors and MTSAs. Additionally, the Built Up Areas of Oakville and Burlington are 3-4 times larger than the Built Up Areas of Milton and Halton Hills. In order to avoid adverse impacts on existing and stable neighbourhoods, the distribution of intensification growth should be based on the local context and should not be a one size fits all approach for each of the local municipalities.</p> <p>A shift from ground related units to apartment units also requires a larger annual property tax rate increase. As summarized in Figure 6 on page 24, Growth Concept 3A would require Regional taxpayers to fund \$290 million more per year in additional operating costs than Growth Concept 4.</p> <p>Section 3.0 – Sustainability</p> <p>Climate change is an important and key consideration for Halton’s future growth. We believe that greenfield land development and construction can and will play a role in climate change objectives based on the following reasons:</p> <ul style="list-style-type: none"> <li>• The National Building Code and Ontario Building Code are targeting Net Zero Energy Ready homes for all new housing by 2030; which will include all urban boundary expansion lands being discussed today.</li> <li>• Mattamy and Remington are leaders in innovation and sustainability. Mattamy today builds every home in the GTA to Energy Star standards which are 15-20% more energy efficient and are currently constructing three mid-rise blocks in Oakville with geothermal heating and cooling systems.</li> <li>• Remington also builds homes to Energy Star equivalent standards.</li> <li>• Remington’s Downtown Markham site is powered by the Markham District Energy plant with the overall system supplying energy for more than 12 million sq.ft. of building</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>connections, generating 11.5MW of power for the local grid and producing enough power for 15,000 Markham Centre condominium units.</p> <ul style="list-style-type: none"> <li>• Planning for new greenfield has changed significantly over the past 10 years with our communities based on the principles of a 15-minute neighbourhood; compact and walkable communities, with densities of 65ppl+jobs/ha or higher, protection and enhancement of natural heritage features, transit supportive, cycling friendly, community uses including parks and schools, and a wide range of housing and employment opportunities.</li> <li>• Emerging sustainable technologies (i.e. EV, solar readiness, advancements in Low Impact Development) will make communities of the future more sustainable.</li> <li>• Advancements in energy reduction for ground related product (i.e. geothermal technology and district energy systems) will contribute to reduced GHG emissions.</li> <li>• Government policies and targets are in place that will assist in shifting consumer behaviour and actions to meet net zero by 2050.</li> <li>• As detailed in subsection 3.1.4, the last two points were not included as part of the Comparative Greenhouse Gas Emissions Assessment prepared by Sustainability Solutions Group on behalf of the Region to evaluate the differences in GHG emissions between the proposed Growth Concepts. The inclusion of these two components in the analysis would have the affect of reducing the difference in GHG emissions between concept 3A and 4.</li> </ul> <p>With respect to preserving local food supply, it is important to evaluate the impact of the proposed settlement area boundary expansions under each of the Growth Concepts from a broader provincial food system perspective. It is also important to evaluate the current challenges farms within potential settlement boundary expansion areas face due to their proximity to urban uses that impede their viability (please refer to section 3.1.6 for further detail).</p> <p>Growth Concept 4 retains 91% of the Region's Prime Agricultural Lands that exist today. Coupled with the opportunities for new greenfield developments to support urban farming and advances in compact food production technology, we believe that the settlement boundary expansions proposed under the Region's Growth Concepts will have minimal impact on the broader provincial food supply system.</p> <p>None of the settlement area expansions proposed under the Region's Growth Concepts constitute sprawl. This is based on that fact that the rate of population growth over the next 30 years far out paces the rate of proposed settlement boundary expansion,</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

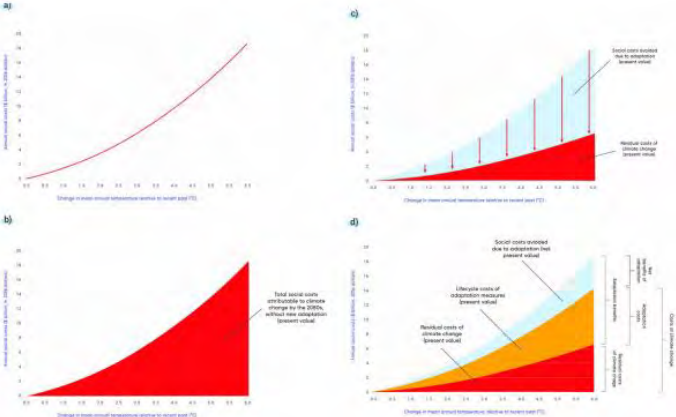
No.	Source	Submission	Response
		<p>greenfield development is being built at densities that support compact and walkable communities (as highlighted above), and that the majority of lands identified by the Region as potential areas suitable for settlement area boundary expansions can be serviced by existing or planned Regional infrastructure.</p> <p>Section 4.0 - Growth Plan Conformity</p> <p>The Land Needs Assessment (LNA) Methodology is a key component of the Growth Plan that municipalities are required to follow in order to ensure conformity. It requires that an appropriate amount of land be determined to accommodate for all housing segments, avoid housing shortages, consider market demand and plan for all infrastructure that is needed to meet the complete communities objectives of the Growth Plan. The Region's five Growth Concepts do not conform with this methodology due to the significant shift from the marketbased housing demand with an unprecedented development of apartment units being required. We have provided a detailed summary of the key components of the LNA methodology that are not addressed in Section 4 of this submission.</p> <p>Section 5.0 - Conclusion</p> <p>The Municipal Comprehensive Review (MCR) is a complex process with the outcomes having lasting impacts on the identity of the respective municipalities within the Region. Each municipality has its own unique context and vision for how it should grow to 2051 and we believe the decisions of the local Councils should be respected and built into the Preferred Growth Concept by the Region. Although there appears to be a significant range in Council positions we believe when assessed in their entirety these positions can be combined to create a well balanced and complete community for Halton Region.</p> <p>It is our respectful submission that a hybrid concept should be developed that provides for the following:</p> <ul style="list-style-type: none"> <li>• Promotes additional density and job opportunities within the existing built boundary through intensification. Good development in the right locations; considering impacts to stable neighbourhoods and local context and supported by transit while maximizing existing infrastructure is prudent place making.</li> <li>• Oakville and Burlington should focus on development of their MTSAs and intensification and densification of their nodes and corridors. As these communities are mostly planned and built today, they are in a great position to incorporate higher densities into their large built-up areas and provide the necessary transit and community services that are required to make these complete communities.</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Milton should be allowed to continue to grow and be able to properly plan out extensions to their existing communities with their Modified Growth Concept 4 – “Halton Balanced”, consistent with Milton Council’s stated objective, as outlined in Milton staff report DS- 055-21. This will allow for a balanced approach to growth and the ability to meet housing demand and attract key employment opportunities to create complete communities.</li> <li>• Halton Hills can achieve balanced growth through a modest expansion providing approximately 900 ha (400ha of community lands and 500ha of employment lands) of new greenfield area, consistent with Halton Hills staff report PD-2021-0045, to account for continued economic development, a new hospital and associated uses, new community parks as well as housing choice.</li> </ul> <p>We believe this hybrid approach meets many of the objectives of the Region;</p> <ul style="list-style-type: none"> <li>• It will still require a significant shift to apartments but will also provide housing choice and affordability that will continue to attract families to Halton Region,</li> <li>• It will develop key nodes and corridors within the Region making them more transit supportive;</li> <li>• It will allow for development of key community services like hospitals, places of worship and community parks;</li> <li>• It will allow for incorporation of emerging sustainable building practices in new greenfield areas including addressing some key elements of climate change and carbon emissions;</li> <li>• It will allow for continued economic development with shovel ready land supply for new businesses and jobs; and,</li> <li>• It will account for the local context and vision of each individual community.</li> </ul> <p>Overall, we believe our hybrid concept will create a balanced complete community for the future of Halton Region.</p> <p><b>Note:</b> Additional detailed information was provided in subsequent pages of the submission, but not included here for brevity purposes.</p>	
87.	Kim Bradshaw	July 14, 2021 Mr. Steven Burke Senior Planner Legislative & Planning Service	Thank you for comments on Halton Region’s Integrated Growth Management Strategy. Comments from Sustainable Milton has been review and are reflected

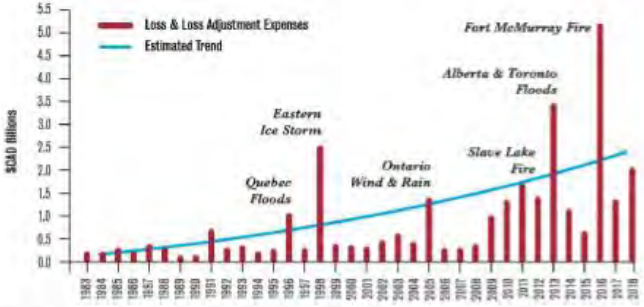
No.	Source	Submission	Response
	E-mail dated July 14, 2021	<p>Halton Region 1151 Bronte Road Oakville, Ontario, L6M 3L1</p> <p>Response from Sustainable Milton on the Region of Halton Growth Management Strategy Options.</p> <p>Introduction:</p> <p>Sustainable Milton is a grassroots advocacy group whose members share a common concern about the continuation of unsustainable growth in Halton Region. We believe that as the Region makes this plan for the next 30 years of growth, it is imperative that all the decisions and policies be made with a view to MINIMIZING climate impacts in the present and focus on realistic planning to ensure future resilience.</p> <p>Sustainable Milton's position on development in general is captured in the following 11 statements:</p> <ol style="list-style-type: none"> <li>1. Reduce GHG emissions: We all have to get to a fossil free future and zero GHG emissions.</li> <li>2. Protect our Natural Heritage: We want to be good stewards of our natural environment. We want to ensure it is in good health for future generations.</li> <li>3. Provide Public transportation: Implement a zero-emissions public transportation system and reduce reliance on personal vehicles.</li> <li>4. Promote local farming: Ensure the viability of farmland and work towards sustainable food production for Halton.</li> <li>5. Increase the tree canopy of the town of Milton to 50% or 60%: Tree planting provides shading, aids to mitigate flooding, reduces the urban heat island effect, sequesters carbon, increases biodiversity, improves health outcomes and provides aesthetic benefits for our people.</li> <li>6. Bring jobs to Milton: New employment uses should demonstrate value in the number of full-time jobs that will result.</li> <li>7. Promote a wide mix of uses within new built areas/subdivisions.</li> <li>8. Promote walkability within all areas of the town of Milton, new and existing: Can you walk from your house to the dentist or grocery store within 15 minutes?</li> </ol>	<p>in the Preferred Growth Concept. Climate change is an important consideration in every growth management decision as urban structure locks in energy use and related emissions for decades to come.</p> <p>The Preferred Growth Concept that is being recommended through the Regional Official Plan Review addresses climate change mitigation objectives through energy and emission reductions by planning for complete communities and a compact urban form. It has a planned mix of land uses and a mix of housing type, tenure, and affordability to encourage the workforce to live within the community. It supports existing and planned transit, by directing development to strategic growth areas including those around GO stations and other planned higher order transit corridors. Halton's local municipalities play an important role in helping to address these objectives by undertaking the detailed land use planning to ensure that these strategic growth areas are planned to be compact, mixed use, energy efficient, and transit supportive, complete communities.</p> <p>The Preferred Growth Concept addresses climate change adaptation objectives by minimizing the amount of new urban land to be designated, thus limiting the loss of agricultural land in Halton Region and in Halton's local municipalities and also limiting urban development impacts on the Natural Heritage System.</p> <p>The GHG Emissions Assessment for the Preferred Growth Concept shows that the Preferred Growth Concept produces fewer emissions than the "business-as-usual"</p>

No.	Source	Submission	Response
		<p>9. Promote increased density within the existing built boundary: Increase the number of people living / working in the existing built boundary.</p> <p>10. Stop Sprawl: Build higher and initiate higher density regulations in the zoning by-laws.</p> <p>11. Implement and promote green development standards.</p> <p>Growth Options Review:</p> <p>Specifically regarding the growth options, we fully recognize the challenge of meeting the Provincial growth targets for residents and jobs.</p> <p>We do not agree with the long range (30 year) planning horizon in a time where the social context, technology and climate change are likely to cause significant changes to our lives.</p> <p>The growth target for employment cannot be implemented in the absence of controls on how many jobs per hectare must be delivered by any specific development plan. Whereas the residential developers do work with the density targets established by the Municipality, the same process does not occur with employment uses of development. The lack of required density (jobs per hectare) in employment lands creates an open-ended land use allocation model for employment uses. This runs contrary to the desired densification of built-up areas, particularly where low-rise, low-occupancy employment uses are prevalent.</p> <p>In the context of energy efficiency and low-carbon policies, suburban models of development are outdated and unsustainable. The Region's own climate change lens review supports this statement.</p> <p>Prime Agricultural Lands in Halton:</p> <p>It is the stated intention of the Provincial Growth Plan for the Greater Golden Horseshoe to protect the prime agricultural land base:</p> <p>"The Provincial Policy Statement requires prime agricultural areas to be protected and designated".</p> <p>As stated in the GGH Growth Plan: "The GGH is home to some of Canada's most important and productive farmland, which is a finite, non-renewable resource. The region's fertile soil, favourable climate, and access to water make it significant on both a national and international scale. This Plan provides for the identification and protection of the Agricultural System in the GGH. The Agricultural System includes a continuous and productive land base, comprised of prime agricultural areas, including specialty crop</p>	<p>scenario for Halton Region. Guiding development according to the Preferred Growth Concept thus contributes to the Region's GHG emissions reduction commitments under its Climate Change Emergency declaration.</p>

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		<p>areas, and rural lands, as well as a complementary agri-food network that together enable the agri-food sector to thrive. Many farms within the Agricultural System also contain important natural heritage and hydrologic features, and farmers play a vital role in their stewardship. Protecting the Agricultural System will support the viability of the agricultural sector as the region grows. Prime agricultural areas, including specialty crop areas, will be designated in accordance with mapping identified by the province and these areas will be protected for long-term use for agriculture”.</p> <p>It is our opinion that the Region is required to protect the prime agricultural areas which have been identified in the province’s land base.</p> <p>Flood Management:</p> <p>The lack of capacity of Halton’s built infrastructure to manage extreme weather events, in particular stormwater management, has come under scrutiny in the recent past. An ongoing lawsuit (Banfi vs Town of Oakville, Conservation Halton, Region of Halton, Town of Milton) is expecting the municipalities to better consider the flood capacity required within the downstream communities. There are significant watersheds and headwaters within the region, which combine to form significant risk of floods.</p> <p>With the increase of hard surfaces, inherent in new development, comes the increased likelihood of significant flooding. More hard surfaces mean more surface run-off. Without adequate outlets or storage for the run-off volumes being experienced, overland flooding does and will continue to occur.</p> <p>Below is link to a report, prepared by the Intact Centre on Climate Adaptation at the University of Waterloo, that identifies ways to mitigate the expected costs of flooding in our existing communities.</p> <p><a href="https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2019/01/Weathering-the-Storm.pdf">https://www.intactcentreclimateadaptation.ca/wp-content/uploads/2019/01/Weathering-the-Storm.pdf</a></p> <p>A brief video, authored by “Unflood Ontario,” makes the point: <a href="https://youtu.be/bR8w4sX3-nw">https://youtu.be/bR8w4sX3-nw</a></p> <p>It is imperative that the maximum possible amount of pervious land be maintained (or expanded) within the region to mitigate the flood risk that exists now and in the future.</p> <p>The Cost of Climate Change:</p> <p>The most expensive way for growth to occur is to ignore future risks. The inevitable costs of insurance claims and risk-adaptation that will undoubtedly occur in the future, must be factored into development costs. The downstream costs of legal action by developers who</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>have gambled on the value of future lands for development should also not be underestimated.</p> <p>“The financially prudent way to proceed is to calculate the cost of those future risks, whether losses, and or stranded assets, and use those calculations to justify our current actions to mitigate the increasing effects of a warming climate, and of extreme weather events.”</p> <p>The following graphs from Canada’s Climate Change Adaptation Platform’s latest report<sup>5</sup> tell us that we need to address the issue of flood management through our land use planning policies, and the least invasive way to do that is to retain as much farmland and unpaved surfaces as possible.</p>  <p>The graphs illustrate the economic impact of climate change on flood damage. Graph (a) shows that as the change in mean annual precipitation increases, the total social costs rise exponentially. Graph (b) shows that total social costs are attributable to climate change in the 2070s, without any adaptation measures. Graph (c) shows that social costs increase due to adaptation that is not optimal, with a red area representing residual costs of climate change and a blue area representing avoided costs. Graph (d) shows that social costs increase due to adaptation that is not optimal, with a red area representing residual costs of climate change, a yellow area representing avoided costs, and a blue area representing avoided costs. The legend in graph (d) includes: Residual costs of climate change (Residual Costs), Avoided costs of climate change (Avoided Costs), and Social costs increased due to adaptation that is not optimal (Social Costs).</p>	



No.	Source	Submission	Response
		<p data-bbox="489 277 825 293"><b>Figure 1: Catastrophic Insured Losses in Canada (1983–2018)</b></p>  <p data-bbox="489 646 1129 678"><i>Source: IBC Loss Book, PCS CIRAQ, Swiss Re Munich Re IP Deloitte. Values in 2018 CAD; some losses are unreported by region and per-capita trends are estimated.</i></p> <p data-bbox="453 703 905 727"><b>The Cost of Development to the Taxpayer:</b></p> <p data-bbox="453 760 1388 894">The lifecycle and operational costs of development have not historically been calculated into growth management plans, nor into the development charges that the municipalities receive to pay for that infrastructure. In addition, the cost of climate change, both future adaptation costs, social costs, and health costs, are not measured in the financial calculations of new development.</p> <p data-bbox="453 927 1398 1084">Indeed, the cost of development, even outside of the catastrophic outcomes, has been shown to be borne by the taxpayer. The cost to the taxpayer of maintaining infrastructure over the long term is not reflected in development charges, and the long-term cost should be factored in to the decision-making for our future.<sup>6</sup> Developers should be obligated to pay for the real cost impact of their business, and the taxpayer should not be shouldering those costs.</p> <p data-bbox="453 1117 1398 1279">If the Region and the municipalities insist on ignoring those costs, then they should recognize that the downstream cost to the taxpayer is their doing. As the Region is preparing for 30 years of growth, it makes sense to address those real impacts and future costs now, as the development industry cannot be charged retroactively. Any development that occurs without the need for supportive new infrastructure should be incentivized, or the opposing development penalized.</p> <p data-bbox="453 1312 898 1336"><b>The Mandate to Reach Net Zero by 2050:</b></p> <p data-bbox="453 1369 1398 1417">The government of Canada has committed to meeting a countrywide standard of net zero emissions by 2050, which is the planning horizon of this planning exercise.</p>	<p data-bbox="1440 699 1885 748">Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>Simply put, we ALL have to achieve Net-zero emissions by 2050.</p> <p>It has been clearly shown in numerous reports, including Climate Reality's 2020 National Climate League Report, that the GHG emissions in Halton Region have steadily increased since the Paris Agreement in December 2015. According to statistics gather by The Atmospheric Fund (TAF), Halton has the highest emissions profile of any GGH (greater golden horseshoe) municipality. In 2017, we hit 3.8 tCO2 equivalent per capita, with 50% of that amount coming from buildings8.</p> <p>In view of the legal obligation to meet Canada's target, it would be irresponsible to ignore the region's shared responsibilities. Although the overall emissions of Canada, and Ontario in particular, have been reduced since 20059, Halton's emissions profile continues to rise as a result of continued suburban development.</p> <p>Every detached house emits approximately 6 times as much heat through the building envelope as the equivalent volume in an apartment (Simple math, I haven't published it yet!). Each house currently being built is heated with a gas-fired furnace. Retrofits are possible; however, they represent a significant cost to homeowners in the future. Although the buildings meet the minimum standards of the Ontario building code, they are by no means capable of supporting a passive/net-zero energy goal. While the performance of the buildings themselves are not within the purview of the regional official plan, it is nonetheless the region's responsibility to minimize the energy usage of our built environment by sustainable land use planning policies. More compact communities and avoidance of single story uses, with at-grade parking and low occupancies, should be pursued. This will require minimizing the amount of land used for new development, and incentivizing the intensification of the existing built boundary.</p> <p>Furthermore, it has been repeatedly shown that suburban development simply is not "sustainable". We reject any further permissions to develop sprawl in Halton Region.</p> <p>Public Transportation system</p> <p>Although it is inevitable that personal vehicles will no longer use fossil fuels by the target date, one of the opportunities that is inherent in the densification of Halton's built communities is that public transportation will become more viable as population densities increase. The provision of an electrified public transportation system within communities and between municipalities is an important aspect of our shared sustainable future. The social benefits of a public transportation system are significant. The benefits to the land use plans are obvious: less roadways and parking areas required as car ownership reduces. The heat island effect of reduced black tar roadways and reduced expanses of black tar roofing will in itself bring an improvement in the microclimate of the built-up areas.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Land Needs Assessment</p> <p>There has been much speculation about the amount of land needed to meet the provincial targets for residents and jobs.</p> <p>The truth is that all the studies have underlying assumptions to support the author's particular point of view. If we cannot predict how our society will change over the next 3 decades, it does not make sense to approve a plan which will have to change later. If, however, you are obligated to make such a plan, then the wise strategy would be to minimize the downstream risk by minimizing the amount of land being allocated at this time. This strategy points to the option with the least amount of new development land to be allocated; leaving that undeveloped land with the potential for future consideration.</p> <p>A study by Neptis foundation has demonstrated that the land which has been designated in previous growth management plans has not been developed at the rate anticipated. This leads to the conclusion that in order to meet the growth targets for 2051, the Region must review what previously designated land still remains to be taken up, and cause that land to be developed before any new areas are released for development.</p> <p>Furthermore, the region's own calculations confirm that there is enough land within the currently designated built boundary to meet the provincial growth targets. Even if this growth strategy requires more effort, it is our opinion that the effort will be necessary to show that the region takes its responsibilities seriously to address climate change, and plan with a sustainable lens.</p> <p>Conclusion:</p> <p>Based on these arguments, it is our opinion that the ONLY viable option for the Region's Growth Management Strategy is to prevent any further expansion of the urban boundaries. We urge you to pursue the sustainable option.</p> <p>On behalf of Sustainable Milton,</p> <p>Marina Huissoon, OAA, MRUP, MRAIC, LEED AP</p>	
88.	Andrew Hannaford on behalf of Milton Phase 4 (MP4) West	<p>July 14, 2021  Curt Benson, RPP, MCIP  Director of Planning Services  Regional Municipality of Halton  1151 Bronte Road  Oakville, ON  L6M 3L1</p>	<p>There has been some confusion regarding the term "densification." Please refer to the <i>Preferred Growth Concept Land Needs Assessment</i> for further clarification. Densification simply refers to intensification plus the additional apartments proposed in the DGA. This</p>

No.	Source	Submission	Response
	<p>Landowners Group</p> <p>E-mail dated July 14, 2021</p>	<p>Dear: Mr. Benson:</p> <p>RE: Response to the Region of Halton Integrated Growth Management Strategy Growth Concepts Discussion Paper Milton Phase 4 Landowners Group, Britannia Secondary Plan Area, Milton OUR FILE: 18186A</p> <p>MHBC Planning is part of a team of consultants retained by the Milton Phase 4 (MP4W) West Landowners Group who have extensive land holdings in the Milton Phase 4 Urban Expansion Area, also known as the Britannia Secondary Plan Area in the Town of Milton. The Britannia Secondary Plan Area is located within the Urban Area of the Town of Milton and represents approximately 900 hectares of developable land.</p> <p>Background</p> <p>The MP4W group and its consulting team have been engaged in Halton Region's Integrated Growth Management Strategy (IGMS) process since its initiation in June 2019. On October 30, 2020, we provided comments on behalf of the MP4W group in collaboration with their consulting team on the 5 discussion papers.</p> <p>Following the release of the Integrated Growth Management Strategy (IGMS) – Growth Concepts Discussion Paper in February 2021, we prepared a submission on behalf of the MP4W group to the Region with a list of initial questions on the Growth Concepts Discussion Paper. The purpose of the initial submission was to obtain clarification in relation to a number of matters in order to provide an informed submission on the Region's Growth Management Discussion Paper and the proposed growth options by the commenting deadline of July 15, 2021. The MP4W consulting team also had an opportunity to meet with Regional planning staff and their consultants on June 11, 2021 to discuss the questions and seek clarification on a number of matters. We have also had an opportunity to participate in the Region's Public Information Centre meetings on May 6th, 2021 in Milton and the Region wide PIC held on June 29, 2021.</p> <p>Population and Employment Projections</p> <p>In Section 4 of the IGMS Growth Concepts Discussion Paper, February 2021, the first subsection heading is "Region Must Plan to Accommodate the New Schedule 3 Forecast". The entire growth management process has been structured around the population and employment forecasts contained in Schedule 3 of the Growth Plan.</p> <p>Comment: This statement is inaccurate and the implications of this statement on the entire IGMS process are significant. The Growth Plan policies clearly indicate that the</p>	<p>densification is entirely within the currently planned units for these areas, and no changes to secondary plans are required.</p> <p>The <i>Preferred Growth Concept</i> technical assessments and fiscal impact assessment address comments brought up regarding the Region's servicing capacity for future intensification. For further details regarding the findings of these assessments, please see the technical appendices of the <i>Preferred Growth Concept Report</i>.</p> <p>Re: planned growth to 2031. The Growth Plan and the LNA Methodology requires us to take a 2021 perspective on expected growth and development. Based on that, the HUSP are not yet fully developed and the Sustainable Halton have not yet begun development. Growth for the 2020s is slower than in the current Official Plan and there is less Greenfield development due to the higher intensification rate. All of which means that Greenfield land will last well into the 2030s.</p>

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		<p>Schedule 3 forecasts are to be treated as minimums that may be increased through a comprehensive review by an upper or single tier municipality. This has never been raised as part of the process and neither the Region's staff or its consultants have made an attempt to analyze whether the forecasts are appropriate for Halton or its local municipalities. Before any scenario can even be considered, the Region needs to assess whether the Provincial forecasts are appropriate, which should be done through consultation with the four local municipalities, as well as through a detailed economic analysis.</p> <p>Growth Concepts</p> <p>The IGMS Growth Concepts Discussion Paper describes the formation and evaluation of four Growth Concepts based on local plans and priorities and how elements of these concepts will be used to develop a Preferred Growth Concept to accommodate population and jobs within the Region to 2051. The Discussion Paper also provides an evaluation of the concepts. A fifth concept was introduced through a Council resolution on March 24, 2021 (known as concept 3B). We understand that concept 3B was considered by staff in a report to Regional Council on April 21, 2021. which identified concerns regarding whether or not it was achievable. Staff confirmed and clarified to us during our meeting that concept 3B would not be evaluated through the detailed evaluation framework similar to the other 4 concepts and no further analysis of concept 3B would be undertaken unless directed by Council.</p> <p>The Town of Milton's June 21, 2021 report DS-055-21, "Milton's Response to the Growth Concepts Discussion Paper" provides an additional growth concept for the Region's consideration entitled "Halton Balanced Growth Concept" which is a modified concept 4. This proposed balanced growth concept incorporates the results of the Town of Milton's Land Base Analysis and key assumptions to conform to the Growth Plan, including a housing mix that is adjusted to be market based to the extent possible while achieving the minimum intensification target.</p> <p>Comment: We agree that concept 3B is highly problematic and should not be further assessed. It would create impacts on the supply of employment land, economic development and job creation within the Region which would negatively impact the development of communities including the Britannia Secondary Plan Area. We also believe the Town of Milton's balanced approach, which we understand was supported by Milton Council, represents an appropriate approach based on the Town's Land Base Analysis and should be considered by the Region in its development of the preferred growth option.</p> <p>Densification</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>All four concepts provide for the minimum required level of intensification (50%) as required by the Growth Plan. The key differences between the options is related to densification and urban boundary expansion. The concept of densification was an area for which we sought clarification in our initial questions. This was not a concept we were familiar with as it is not defined under current Provincial policy or a requirement in the Growth Plan.</p> <p>Densification was described as providing intensification within the Designated Greenfield Areas (DGAs) and not just the built up areas. One of the key differences between the growth concepts appears to be the amount of densification through which growth is to be allocated. Concept 1, 2 and 3 provide for 60%, 70% and 80% densification respectively, with no densification provided in Concept 4.</p> <p>It was also confirmed that densification was more of a “directive” and consideration rather than a requirement and there would be no change or impact to existing or approved plans or those underway. The allocation of growth through densification was stated to be focused in Major Transit Station Areas (MTSAs) and Strategic Growth Areas as defined in existing DGAs. Densification would, according to the Region’s consultants and staff, not apply to the Britannia Secondary Plan.</p> <p>Comment: While the opportunity for additional growth in DGAs, as they evolve is important, there needs to be certainty and clarity on how Secondary Plans currently underway will not be subject to additional growth allocation which would have a significant impact not only on how they are planned but on the ability to provide for complete communities and adequate services and facilities to accommodate the planned people and jobs. Confirmation that Secondary Plans currently in the planning process and being planned in accordance with ROPA 38 for growth to 2031 will not be impacted, is required. Can the Region please provide this certainty in writing as a response to our submission when it brings forward its next report in the fall?</p> <p>Planned Growth to 2031  In the evaluation of the growth concepts in the IGMS Discussion Paper there is variation in how growth is evaluated based on planned and approved growth under ROPA 38 (to 2031), the built boundary and DGAs and as is required to be accommodated to 2051. It is not clear, given the variations in growth periods what the baseline growth number or starting point is for the IGMS. It appears that the planned growth to 2031 is not included in the base number and is somehow being assumed to be provided to accommodate growth to 2051 which we questioned and sought clarification on during our meeting with staff. Staff clarified that they are going to fix some of the growth period references to provide consistency. However, the starting point for growth consideration is where we are today. They noted as an example the Boyne Secondary Plan area should have been built out by now, but it has not, and the growth expected under ROPA 38 is lower than anticipated.</p>	

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		<p>The higher level of intensification now required under the Growth Plan has also changed the dynamic for 2021 to 2031. Past allocated growth is not being “borrowed” but it is assumed it will last longer. Staff also confirmed they will not be breaking down growth by decades as part of the preferred concept. More detail is to come with the preferred concept.</p> <p>Comment: There needs to be certainty on how the planned areas yet to be achieved between now and 2031 are going to be addressed in the preferred concept and confirmation that these areas are not being “borrowed”. The Region should confirm this in their response to our comments in the next report.</p> <p>Market Based Housing</p> <p>The PPS and Growth Plan require that municipalities undertake a market-based approach to growth management planning. The PPS, states:</p> <p>1.1.1 Healthy, liveable and safe communities are sustained by: b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, etc).</p> <p>1.7.1 Long-term economic prosperity should be supported by: b) encouraging residential uses to respond to dynamic market-based needs and provide necessary housing supply and range of housing options for a diverse workforce.</p> <p>The Growth Plan states in its vision for the Greater Golden Horseshoe (GGH):</p> <p>“The GGH will have sufficient housing supply that reflects market demand and what is needed in local communities.”</p> <p>The Plan also states the importance of optimizing the urban land supply “while providing flexibility for local decision-makers to respond to housing need and market demand.”</p> <p>We understand the Growth Concepts were formulated using the province’s updated Land Needs Assessment Methodology. Halton Region is required to use the methodology to assess and determine the quantity of land required to accommodate forecasted growth. A key consideration in the methodology is ensuring market-based housing in relation to long-term growth is addressed to the best extent possible. This requirement by the Province was introduced to ensure that the GGH is planned to deliver a housing supply that reflects market demand based on local context.</p> <p>The market analysis in the Discussion Paper appears to be completely out of context with current market based housing supply and demand and recent growth trends. The concepts, with the exception of Concept 4, appear to significantly shift the form of market housing to be provided based on the levels of intensification/densification, from grade</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response																																								
		<p>related housing to apartments. The levels of higher density development, mostly apartments, would be unprecedented within the Region as confirmed by historical data. It is not clear how the Growth Plan requirement to consider market based housing to the extent possible has been considered.</p> <p>Staff noted that the question for consideration by Regional Council is the degree to which they can implement intensification which exceeds the minimum 50%. Even the minimum of 50% is a big shift in the market and less than 50% is non-negotiable.</p> <p>Milton's Market Based Needs</p> <p>On May 3, 2021, the Town of Milton Development Services' staff provided Town Council with report DS-028-21, "Halton Region Official Plan Review – Milton's Response to the Growth Concepts Discussion Paper." In this report, staff translated Halton Region's 2031 to 2051 population projections into household growth counts by area type, specific to Milton, as follows:</p> <table border="1" data-bbox="464 695 1184 894"> <thead> <tr> <th colspan="5" data-bbox="464 695 1184 716">DS-028-21 excerpt: Where is Growth Proposed in Milton 2031-2051?</th> </tr> <tr> <th colspan="5" data-bbox="464 716 1184 737">Household Growth</th> </tr> <tr> <th data-bbox="464 737 606 758">Growth Concept</th> <th data-bbox="606 737 749 758">1</th> <th data-bbox="749 737 892 758">2</th> <th data-bbox="892 737 1035 758">3</th> <th data-bbox="1035 737 1184 758">4</th> </tr> </thead> <tbody> <tr> <td data-bbox="464 758 606 779">Built Up Area</td> <td data-bbox="606 758 749 779">20,400</td> <td data-bbox="749 758 892 779">21,000</td> <td data-bbox="892 758 1035 779">21,700</td> <td data-bbox="1035 758 1184 779">20,400</td> </tr> <tr> <td data-bbox="464 779 606 800">Existing DGA</td> <td data-bbox="606 779 749 800">28,000</td> <td data-bbox="749 779 892 800">30,200</td> <td data-bbox="892 779 1035 800">30,800</td> <td data-bbox="1035 779 1184 800">27,900</td> </tr> <tr> <td data-bbox="464 800 606 854">Additional High Density Units in Existing DGA</td> <td data-bbox="606 800 749 854">4,700</td> <td data-bbox="749 800 892 854">7,400</td> <td data-bbox="892 800 1035 854">12,900</td> <td data-bbox="1035 800 1184 854">1,200</td> </tr> <tr> <td data-bbox="464 854 606 875">New DGA</td> <td data-bbox="606 854 749 875">12,100</td> <td data-bbox="749 854 892 875">6,500</td> <td data-bbox="892 854 1035 875">0</td> <td data-bbox="1035 854 1184 875">13,600</td> </tr> <tr> <td data-bbox="464 875 606 894"><b>Total</b></td> <td data-bbox="606 875 749 894"><b>65,200</b></td> <td data-bbox="749 875 892 894"><b>65,100</b></td> <td data-bbox="892 875 1035 894"><b>65,400</b></td> <td data-bbox="1035 875 1184 894"><b>63,100</b></td> </tr> </tbody> </table> <p data-bbox="464 894 735 915"><i>Source: Town of Milton, Report DS-028-21</i></p> <p>The MP4W lands within the Britannia Secondary Plan, are "existing Designated Greenfield Area" lands in ROPA 38. These lands have been planned and approved to accommodate growth under ROPA 38 through a Secondary Plan process currently underway in the Town of Milton. Milton staff also assessed market demand and determined that it will remain high for grade-related dwelling units, rather than apartment units.</p> <p>Report DS-055-21, also identifies the percentage splits of grade-related and apartment dwelling units for each of the four growth concepts as follows:</p>	DS-028-21 excerpt: Where is Growth Proposed in Milton 2031-2051?					Household Growth					Growth Concept	1	2	3	4	Built Up Area	20,400	21,000	21,700	20,400	Existing DGA	28,000	30,200	30,800	27,900	Additional High Density Units in Existing DGA	4,700	7,400	12,900	1,200	New DGA	12,100	6,500	0	13,600	<b>Total</b>	<b>65,200</b>	<b>65,100</b>	<b>65,400</b>	<b>63,100</b>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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		<div data-bbox="457 256 1178 678" data-label="Figure"> <table border="1"> <caption>Halton Region 2031 to 2051 Growth Concepts by Housing Type: Grade-related vs Apartment</caption> <thead> <tr> <th>Concept</th> <th>Grade-related (%)</th> <th>Apartments (%)</th> </tr> </thead> <tbody> <tr> <td>Concept 1</td> <td>45</td> <td>55</td> </tr> <tr> <td>Concept 2</td> <td>40</td> <td>60</td> </tr> <tr> <td>Concept 3</td> <td>32</td> <td>68</td> </tr> <tr> <td>Concept 4</td> <td>50</td> <td>50</td> </tr> </tbody> </table> </div> <p data-bbox="457 678 800 703">Source: Town of Milton, Report DS-055-21</p> <p data-bbox="457 711 1381 873">Concept 3 provides for 32% grade-related and 68% apartment unit provision to the year 2051. The Town of Milton, in Report DS-055-21, indicated that staff retained an independent consultant to assess market-based demand for housing throughout Halton Region from 2021 to 2051. The results indicate that the percentage splits for housing typology should be 50% singles/semis, 25% townhomes and 25% apartments/other as indicated in the chart below (reference: DS028-21).</p> <div data-bbox="457 899 1226 1349" data-label="Figure"> <table border="1"> <caption>Region-Wide Market-Based Forecast: 2021-2051</caption> <thead> <tr> <th>Housing Typology</th> <th>Percentage (%)</th> </tr> </thead> <tbody> <tr> <td>Singles/Semis</td> <td>50</td> </tr> <tr> <td>Townhomes</td> <td>25</td> </tr> <tr> <td>Apartments/Other</td> <td>25</td> </tr> </tbody> </table> </div>	Concept	Grade-related (%)	Apartments (%)	Concept 1	45	55	Concept 2	40	60	Concept 3	32	68	Concept 4	50	50	Housing Typology	Percentage (%)	Singles/Semis	50	Townhomes	25	Apartments/Other	25	
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No.	Source	Submission	Response
		<p>that a balanced approach, that does consider market based housing to the extent possible, is somehow negative and does not achieve environmental objectives. The assessments also convey that housing choice needs to be solely driven by policy. The idea that if people don't choose to live in apartments then they can choose to live in another municipality where growth is planned to provide for choice risks pushing families outside of Halton Region. This policy shift is likely to negatively impact GHG emissions with longer commutes, and risks jobs moving outside of Halton Region to align with where the workforce is choosing to live. The significant shift to apartments is unrealistic and risks creating a shortfall of housing supply.</p> <p>There is no question that the Growth Plan has been an integral part of shifting planning for growth away from continuous expansion for lower density development to provide for more "urban" and compact communities. It is not intended, however, to not provide balance and choice. In fact, many of Milton's DGAs are providing for higher levels of density than older neighbourhoods in the built up areas of the Region where change is often highly resisted. There appears to be a false narrative about balance of choice and the provision of market based housing as being negative. A balanced approach can and does achieve the Growth Plan objectives.</p> <p>One Size Does Not Fit All</p> <p>The Growth Plan clearly states:</p> <p>"To support the achievement of complete communities, this Plan establishes minimum intensification and density targets that recognize the diversity of communities across the GGH. Some larger urban centres, such as Toronto, have already met some of the minimum targets established in this Plan, while other communities are growing and intensifying at a different pace that reflects their local context."</p> <p>This principle of the Growth Plan must be considered in the determination of a growth concept that respects the different local contexts of the four area municipalities and where they are at in terms of their evolution as "urban" cities and towns. Assuming all areas should provide an equal share of apartments as the new form of growth is problematic and all four municipalities are, as noted, at different stages of urban transformation. It is not clear why higher levels of intensification cannot be provided in those municipalities that have evolved to full build out. The concepts also do not identify how the distribution of intensification will occur within each municipality.</p> <p>Halton Region's approach to "Integrated Growth Management" planning appears to be based on "planning by numbers" rather than differentiating between the four lower-tier municipalities in terms of their stage of growth in the evolution from being suburban to urban. The Phase One Directions report from the Region specifically noted that "given the</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>significant provincial investments in higher order transit over the coming years, coupled with evolving local intensification strategies and shrinking supplies of greenfield lands in Burlington and Oakville, there is potential for the Region to consider alternative intensification rates across the Region". This does not appear to have been given consideration.</p> <p>The Town of Milton's staff report DS028-21 also states that each local municipality has a unique role to play in the overall population and employment growth within the Region. And that these unique roles should be differentiated by local growth objectives and stage of growth. The Town identifies their stage of growth as being in an 'adolescent stage' which has been endorsed by the Town of Milton Council through their three municipalities:</p> <p>Similar:</p> <ul style="list-style-type: none"> <li>• Milton may accommodate medium/high density forms of housing through future intensification (i.e. townhouses, apartments);</li> <li>• Milton supports and has plans to attract new employment forms (such as transit-supportive, mixed-use communities);</li> </ul> <p>Different:</p> <ul style="list-style-type: none"> <li>• Milton has the capacity to accommodate wider range of market demands by providing low and medium density housing forms (i.e. singles, semis, townhouses); and</li> <li>• Milton can accommodate large-scale stand-alone industrial buildings for wholesale trade, transportation/warehousing).</li> </ul> <p>Applying a 'one size fits all' approach to long term growth management, does not recognize the unique stage of growth in Milton or the ability of Milton's DGAs to continue to achieve a well balanced mix of housing types as well as achieving and exceeding DGA density targets. In fact, the highest in the Region. Milton is not 'built out' as noted in ROPA 38 which identifies the DGAs surrounding Milton. Milton is focused on implementing ROPA 38's policies, including the Britannia Secondary Plan in a comprehensive way. However, no consideration has been given in the Region's process for Milton to provide any supplemental consideration of its local priorities and context (e.g. Burlington MTSA and UGC changes).</p> <p>Comment: Each municipality should be provided with the ability to implement its growth based on local context and market-based housing needs. This should be further considered when determining any preferred growth concept. The preferred growth concept must be balanced and must be grounded in the reality of being implementable and achievable communities. Historical growth by housing type should also be considered</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>by municipalities to assist in the preparation of growth projections to ensure that planned growth is grounded in an achievable reality.</p> <p>Economic Assessment of the Housing Market</p> <p>The IGMS Growth Concepts Discussion Report provides a framework for evaluating each of the concepts using four themes:</p> <ul style="list-style-type: none"> <li>• Theme 1: Regional Urban Structure &amp; Local Urban Structure</li> <li>• Theme 2: Infrastructure &amp; Financing</li> <li>• Theme 3: Agriculture, Environment &amp; Climate Change</li> <li>• Theme 4: Growing the Economy and Moving People and Goods</li> </ul> <p>The only theme that touches upon the economy is the fourth theme, which is related primarily to the movement of goods and people and planning for employment.</p> <p>Comment: Nowhere do the criteria address the economic consequences of each option in terms of impact on housing prices, housing affordability, matching future housing to the needs of the future workforce, and what the impact of the wrong housing mix may have on the overall economy of the Region. There is no question that constraining the supply of ground related housing will cause the price of detached, semi-detached and potentially townhomes to increase, causing a further strain on housing affordability in the Region. At the same time, on a per square foot basis, the cost of providing high-rise apartments is substantially more expensive than ground related housing. While small and micro apartment units may be less expensive to construct than single family and semi-detached homes, the cost advantage is lost very quickly if the units are increased in size to accommodate families.</p> <p>The Region commissioned Strategy Corp to undertake a study entitled “Planning for Change: An Analysis of COVID-19’s Acceleration of Economic Trends in Halton Region”. The study noted that the Region has a higher proportion of family households than most other parts of Ontario owing to the “family attributes” of the Region. The report cited a lack of available detached and semi-detached single-family dwellings in Halton.</p> <p>A presentation to Regional Council in April 2021, it was stated that “Demographic trends are still positive in Halton as it continues to attract families and workers of all types for a diverse property tax base. However, as previously stated, should home prices continue their trajectory, many families will be priced out”. The consultants also acknowledged that the “the historical pull of the Region may decrease due to a confluence of less affordable real estate and increased density”. While the consultants suggested that this “is an expected result of becoming a metropolis and may help attract younger residents needed to sustain a retiring population”, there has been no attempt to understand the relationship</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>between intensification/densification and the reduced pull of the Region. Most importantly, the key to housing affordability is to ensure a housing supply that is in balance with housing needs. None of the assessment criteria examine the fundamental impact of adjusting the future housing supply to meet broader policy objectives.</p> <p>Greenhouse Gas Emissions and Climate Change</p> <p>There appears to be several questions around the modelling and data used to assess the growth concepts in relation to greenhouse gas emissions and impacts. We understand a more detailed scientific study is to be undertaken in the next phase of the IGMS. It will be important to ensure any additional study or modelling incorporates appropriate assumptions and relevant data.</p> <p>Infrastructure Assessment</p> <p>The initial evaluation of the concepts in relation to the impacts on water and waste water infrastructure as well as transportation infrastructure did not identify any unique or specific deficiencies. No growth concept stands out more than another from a technical or capital cost perspective. There is also little variation in tax impacts.</p> <p>Comment: It is not understood how all four concepts are more or less equal from an infrastructure (water and wastewater) assessment. Intensification and densification locations as identified within existing service areas will have a significant financial impact to service. This is based on the undersized existing infrastructure (stormwater management ponds, water and wastewater infrastructure) that would require twinning or replacement along built-up corridors (right-of-ways) with significant infrastructure (utilities, water mains, sewers, etc.) that make replacement or twinning very onerous to accommodate the increased densities. Strategic urban expansion areas that are within upcoming areas for development and planned Regional infrastructure expansion projects, could be significantly less expensive to provide the necessary services. These considerations do not appear to be included in the infrastructure analysis to date.</p> <p>Financial Impact</p> <p>The February Discussion Paper notes that at both the Regional and local levels, although the fiscal impacts are similar across all four concepts, the concepts with a higher share of low density housing have more favorable impacts due to a higher value assessment base.</p> <p>Comment: It should also be added that the slower absorption of high density housing – which was also inferred by Strategy Corp. - would further impact the tax implications of the highest density concepts. The supporting analysis shows annual property tax</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

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		<p>increases ranging from 2.19% to 3.97% at the local level and from 2.42% to 2.56% at the Regional level for the concepts to 2051 – excluding inflation. Including even a modest 2.0% inflation rate, these annual property tax increases would amount to between about 4% to 6%. Are Regional and local Councils willing to support a concept requiring these annual property tax increases, which are unprecedented in recent years and will this impact be conveyed to Council as part of the preferred growth concept?</p> <p>Natural Heritage System</p> <p>All of the Growth Concepts are noted to avoid the Region’s Natural Heritage System. While an assessment of the Natural Heritage System will be a key factor in the consideration of the preferred concept, there is no recognition of the enhancements that are made through DGA development in relation to the Natural Heritage System. This should be incorporated into the preferred growth concept consideration.</p> <p>Appendix H, Natural Heritage System and Water Resources Assessment, February 2021, completed a high-level NHS screening assessment that compared the four growth concepts against each other using largely a series of measurement metrics (e.g. NHS areas, perimeters, edge to area ratios, watercourse lengths, etc.). The assessment formed the basis for conclusions on concept comparisons and which concepts ‘achieve more’ or ‘achieve less’, or ‘achieve best’ or ‘achieve least’ the various metrics. The report notes that this evaluation is, “...intended to support a decision-making framework for Settlement Area Expansion identified through that Growth Concept Discussion Paper.” It also notes that, “Further assessment of the NHS and Water Resources will be used to develop the draft preferred growth concept and support the determination of the final preferred growth concept for Council’s consideration.”</p> <p>Comment: It is not clear how this high-level assessment will be used in the selection of a preferred growth concept, or the scope of the further assessment to be completed. The current assessment was necessarily done at a screening level, however, a more in-depth review of NHS matters associated with each concept could result in differing conclusions when specific management and mitigation measures are considered. For example, higher watercourse lengths may not be a negative. In many developing areas, improvements are made to watercourses that provide substantial benefits to the environment. Further, it is not clear if the review of potential NHS fragmentation considered management strategies that could mitigate fragmentation concerns and enhance NHS functions. Also, the assessment presented in Appendix H did not comment on the large areas of agricultural lands not constrained by high and medium constraints in the NHS in each concept or the benefits of bringing large NHS areas into public ownership.</p>	

No.	Source	Submission	Response
		<p>We suggest that these matters be addressed in the further assessment being completed in support of a preferred growth concept and that more supporting documentation be provided at that time for public consultation.</p> <p>Stakeholder Engagement</p> <p>Halton Region’s Phase One Directions Report (Appendix C), outlined the Communication Plan for the Regional Official Plan Review process. One critical statement that should be noted is, “Regional and Local Municipal staff suggested obtaining input from stakeholders earlier in the review process, and strengthening existing partnerships with them, as they are primary users of the ROP.” Stakeholder Groups were defined as:</p> <p>Stakeholders Groups and Organizations – Provide regional or local expertise, knowledge and input from both the private sector perspective (i.e. Halton development industry) and from a cross-section of non-governmental organization (NGOs) stakeholders during key milestones of the ROPR.</p> <p>The Communication Plan attempted to steer the Region in more innovative approaches to public engagement through the use of new tools. The recommendations were to combine traditional approaches with more innovative approaches and on-line tactics such as interactive web and mapping tools. This was never implemented by the Region nor undertaken ‘in collaboration with Local Municipalities.’</p> <p>Another recommendation made in the Communication Plan regarding stakeholder engagement was as follows:</p> <p>Stakeholder Workshops – Targeted discussions with stakeholders should also be considered throughout Phases 2 and 3 in an effort to introduce the ROPR process, build relationships and obtain input at key points during the review process.</p> <p>It is not clear if the targeted discussions with stakeholders are the one on one meetings which while appreciated were late in the process and in a reactionary format – not one that solicited expertise on growth and development.</p> <p>There appears to have been a significant shift in stakeholder engagement during the IGMS process compared to that which was provided through the ROPA 38 exercise. In the Spring of 2020 the following shift in direction was noted:</p> <p>LPS44-20 – May 20, 2020</p> <p>Upon Regional Council endorsement of the recommendations of Report No. LPS41-19, including the Evaluation Framework, staff will begin its work in implementing the</p>	

No.	Source	Submission	Response
		<p>recommended activities as outlined above. There will be no engagement activities on the specific Growth Concepts until Council provides staff authorization to initiate the engagement program. The public engagement program will be revisited as necessary to address the current Covid-19 pandemic restrictions, while ensuring meaningful public engagement opportunities are provided. A future report to Regional Council outlining evaluated Growth Concepts is planned to be tabled in Fall 2020.</p> <p>Several of the on-line surveys contained “response bias” questions which were not neutral and the results are now conveyed as representative of informed community direction as recently communicated during the Region wide PIC where it was conveyed that the majority of people who participated in the PICs support Concept 3B. In many of the sessions there were many participants who conveyed that developers should not be able to provide comments in public forums as they are biased. Developers play an important role in building complete communities and have valuable insight into impacts when implementing the growth concepts. Participating in public forums by all stakeholders allows for a better understanding of all viewpoints, especially when considering issues like the growth concepts that encompass many competing and sometimes conflicting priorities.</p> <p>The on-line Public Information Centre’s public questions were also not documented in a formal manner and in one staff report regarding “Community Consultation” and input, stakeholder and public participants were deemed to provide comments in an effort to meet legislative requirements.’</p> <p>LPS05-21 – Feb 27, 2021</p> <p>THAT Regional Council direct staff to release the “Regional Official Plan Review Initial Consultation Summary” attached to Report No. LPS05-21 to all participants in the consultation and to post publicly as a means of confirming initial comments on the Regional Official Plan Review Discussion Papers to date. The defined commenting windows for the Discussion Papers are now closed.</p> <p>The lack of comment documentation and language used in staff reports suggests that the public consultation completed to date has been purely a logistical exercise to only meet the minimum legislative requirements, rather than to constructively impact the results of the studies.</p> <p>We appreciate the opportunity to comment on the Region’s Integrated Growth Management Concepts Discussion Paper on behalf of the MP4W group. We concur with the Town of Milton’s report and recommendation for a balanced, Milton appropriate approach which is grounded in the market based needs of Milton and reflects Milton’s urban context.</p>	



No.	Source	Submission	Response
		<p>Based on our comments, we would appreciate a written response to the specific questions and requests for clarification as well as consideration of our comments in the next phase of the IGMS process.</p> <p>Sincerely,</p> <p>MHBC</p>	
89.	<p>Paula Tenuta on behalf of BILD</p> <p>E-mail dated July 14, 2021</p>	<p>July 14, 2021 Curt Benson, RPP Director of Planning Services, Chief Planning Official Regional Municipality of Halton 1151 Bronte Road Oakville, Ontario L6M 3L1 Sent via email to curt.benson@halton.ca RE: Halton Region Growth Concepts Discussion Paper Regional Official Plan Review</p> <hr/> <p>The Building Industry and Land Development Association (BILD) and our Halton Chapter have been intently following Regional and municipal discussions related to the Regions Growth Concepts Discussion Paper as part of the Regional Official Plan Review (ROPR). We appreciate the opportunity to contribute to this dialogue, and as interested and effected stakeholders, we respectfully submit the following comments for your consideration in advance of the continuation of this work and future discussions.</p> <p>Our intention is to discuss our comprehensive examination of issues and recommendations to policy makers that are guided by the recognition that growth objectives, housing supply, affordability and choice must be balanced with broader social, economic and environmental issues and protections.</p> <p>Prior to addressing our sentiments, we felt it imperative to acknowledge all of the hard work that has been undertaken by the Region in preparing the Growth Concepts as part of the Municipal Comprehensive Review (MCR) and Integrated Growth Management Strategy (IGMS) processes. We hope that our comments will be received constructively, as it is within these lenses that we have approached our thoughts on the proposed Growth Concepts in order to ensure that the Preferred Growth Concept contemplates a balanced approach to future growth and compliments the long-range vision of the Region and its respective local municipalities.</p> <p>Growth Plan Conformity and Local Planning Objectives</p>	<p>Thank you for your comments regarding the <i>Growth Concepts Discussion Paper</i>. We have continued to integrate feedback into the preparation of the <i>Preferred Growth Concept</i> and look forward to receiving comment and feedback on the <i>Preferred Growth Concept Report</i>.</p>

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		<p>As mandated by A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020) (Growth Plan), municipalities in the Greater Golden Horseshoe (GGH) are required to accommodate population and growth to 2051. As outlined in Schedule 3 of the Growth Plan, the Province requires that Halton Region accommodate a minimum of 1,100,000 people and 500,000 jobs by 2051. For the Region, this translates to the accommodation of 470,000 people, 174,000 dwelling units, and 220,000 jobs between 2021 and 2051.</p> <p>With input and direction from lower-tier municipalities on local growth priorities and objectives, the Region was to undertake a Land Needs Assessment (LNA) that evaluates the amount of land required to accommodate population and employment growth in each municipality to 2051, and whether a settlement boundary expansion would be needed.</p> <p>As the Region is aware, the LNA Methodology is a critical component of the Growth Plan that municipalities are required to follow in order to ensure conformity. This exercise ensures that the appropriate amount of land be determined to accommodate all housing segments, avoid housing shortages, consider market demand and plan for all infrastructure that is needed to meet the objectives of complete communities as set out in the Growth Plan.</p> <p>To date, the Region has released five Growth Concepts for consideration that do cover a range of potential growth opportunities, but none of which conform to the LNA methodology. The main inconsistency is that the Region has not accounted for market demand to the fullest extent possible. Instead, the Growth Concepts presented rely on a policy-based approach that depend on a significant shift in demand of apartments. This is especially apparent in Growth Concepts 3A/3B. Contributing to the deviation from market-demand is the Region's LNA reliance on fluctuating Persons Per Unit (PPU) assumptions for apartments across the proposed concepts. The PPU numbers used in the LNA are also higher than the PPUs used in the Region's Development Charges Background Report. This assumes that more people will be living in apartment units and represents a shift from market-based housing demand. Furthermore, using a higher, fluctuating PPU will not generate the population growth forecasted between 2031 and 2051.</p> <p>Additionally, the Province's LNA methodology requires that municipal LNAs provide a breakdown of population growth by housing type (singles, semis, rows and apartment) and apply a contingency factor to their calculations. It appears that these steps have not been included in the Region's LNA work completed to date. It is also important to note that it appears existing/base year households (i.e. growth planned to 2031 under ROPA 38) are being used to accommodate forecasted growth between 2031 to 2051. The concern is that if the Region uses planned growth allocated to 2031 in order to accommodate growth between 2031 and 2051, the cumulative forecasted growth for Halton will not be accommodated.</p>	<p>Comments are acknowledged. Please see above for a response.</p>

No.	Source	Submission	Response
		<p>The completion of the MCR process will have lasting impacts on the individual identity of the municipalities within the Region so it is critical that this is created and executed correctly. The City of Burlington and the Towns of Milton, Halton Hills and Oakville have their own respective visions and context for how they should grow over the next 30 years. To avoid the current path of a one-size-fits-all approach, BILD believes that it is critical for the Region to respect the positions of the local Councils and must build their visions into the Preferred Growth Concept.</p> <p>Taking this into consideration, BILD respectfully recommends that the Region undertake a more balanced approach to future growth with the help of its local area municipalities to ensure that appropriate land be determined to accommodate each municipality's vision for growth, provided that the local four municipalities are at different stages of their community build-out.</p> <p>Engagement with the Industry</p> <p>As noted above, BILD appreciates the amount of work that the Region has undertaken in preparing the proposed Growth Concepts, which have generated valuable public dialogue and feedback. However, BILD is concerned with the limited engagement conducted by the Region with the development industry</p> <p>As an example of a best practice, York Region has established a Technical Working Group with the industry in order to provide for scheduled discussions on the LNA Methodology and ROPR process. The purpose of this working group is to allow for the industry and the Region to constructively and proactively discuss the process in advance, during, and post each strategic stage of this work.</p> <p>Provided that our members have extensively contributed to the building of complete communities in Halton Region, we feel it imperative to recommend that the Region create a strategic engagement plan to allow for more constructive and purposeful discussions with the industry.</p> <p>As your community building partner, BILD is happy to assist in facilitating the creation of this engagement plan following the same approach that we have used in neighbouring Regions.</p> <p>In the interim we have the following questions:</p> <ul style="list-style-type: none"> <li>• How will the industry's recommendations be considered once all comments are received?</li> <li>• How does the Region foresee the proactive involvement of the development industry moving forward?</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="453 282 888 306">Housing Affordability and Choice to 2051</p> <p data-bbox="453 339 1402 526">BILD and its' Halton Chapter members are committed to improving housing affordability and choice for the province's new home purchasers and renovation customers by positively impacting and upholding provincial legislation, regulation and policies that affect the industry and the residents of the GTA and province. The GTA is the fastest growing region in North America with its population increasing by 2.6 million, or almost 37 percent, from 7 million in 2019 to over 9.5 million by 2046 and our members are proud to be a part of building complete and balanced communities to support this growth.</p> <p data-bbox="453 558 1402 802">We have reviewed the IGMS Growth Concepts prepared for Halton Region and have a number of concerns with the approach that has been undertaken. Our concerns are derived from the proposed five Growth Scenarios and the Region's ability to function as a complete community with balanced growth. As previously mentioned, instead of following a market-based approach as directed by the Provincial LNA Methodology, the Region has proposed a policy-based approach that will not provide for a range and mix of housing types that best meets the housing demand in the Region. The results of this shift, is a disproportionate amount of apartment units being planned in the Region through the IGMS.</p> <p data-bbox="453 834 1402 997">Through the release of the five IGMS Growth Concepts, its estimated that between 49%-68% (equating to 85,000-118,000 units) of the new housing forecast in the Region over 2021-2051 would be apartment units. To successfully accomplish the projections of this forecasting, the pace of construction in Halton Region over the next 30 years would need to be 3.5-to-6-times higher than experienced over the previous 30 years; which saw roughly 19,400 completions.</p> <p data-bbox="453 1029 1402 1354">According to a study conducted by Altus, there is little evidence presented to suggest that the market for apartment dwellings in Halton Region will grow enough to warrant the amount of apartments in the Region's forecast. The Region's own consultant in an August 2020 report, underpinning the Growth Plan population forecasts, estimated demand for apartments units over the 2016-2051 period as being 47,100, or less than half of the amount included in the IGMS scenarios. It is critical for the Region to consider that for most families, apartment units, particularly larger apartment units with 2 or 3-bedrooms are maybe less practical and more expensive than similarly sized ground-related units - such as townhouses or semi-detached units. As an example, the average price for a 3-bedroom apartment as of 2020, ranges from \$758,000 in Milton to \$1,681,300 in Oakville. In accordance with this, of the actively marketed developments in Halton Region, just 3% of housing units are 3-bedroom units (or larger).</p>	<p data-bbox="1438 282 1885 331">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>For ground-related units, the current forecasts as presented in the proposed Growth Concepts would result in a shortfall of 41,000 to 75,000 ground-related housing units relative to demand. Provided that the majority of home-purchasers in Halton Region are young families aged 25-44 and children aged 0-14, the Region is not providing an adequate range of housing to meet housing demand.</p> <p>Providing a range of houses to allow for consumer choice is critical, as is understanding and following through with market demand. It is imperative for the Region to understand the desire of its residents related to housing choice, and not to dictate this choice based on policies that don't reflect this market demand.</p> <p>Planning for a balanced mix of housing is essential to the success of the Region because when faced with the choice of similarly priced ground-related housing in outlying municipalities or apartment units in Halton, young families may choose to seek housing in other municipalities that better suits their needs at equal or lower prices. The potential exodus from Halton Region in search of more affordable family-oriented housing will have an impact on the Region's ability to attract employment opportunities and businesses.</p> <p>Job Creation and Economic Growth to 2051</p> <p>A critical component of building complete communities is the assurance of job creation and economic growth in the Region. Each of the first four Growth Concepts within the IGMS would see a significant amount of employment land brought into the Region's urban boundary. Though with the addition of the fifth concept, 3B, Halton would see no urban boundary expansion for employment uses. If the Region were not to expand its urban boundary for employment land employment (ELE), the lack of new employment land would significantly contribute to the already existing shortages of industrial space in the GTA, where the industrial vacancy rates are currently below 1.0% across Ontario, and is roughly 40-50 million square feet short of a 'balanced market'. To secure a balanced market, the Region would need to see an increase in the vacancy by 4%.</p> <p>According to Altus, if the Region does not expand the urban boundary for ELE it would effectively eliminate between 26,000 and 32,700 job opportunities within the Region and cost the Region and its local municipalities between \$101 million and \$126 million in net new property tax revenues per year.</p> <p>Halton is in a unique geography when we consider the employment discussion. With its location and prime access to major 400 series highways, the Region provides an attractive option for new non-residential investment that can include higher density job generators, like large scale advanced manufacturing uses.</p> <p>Currently, this investment cannot be accommodated within existing employment lands or through intensification. The Region's economy cannot be underestimated, without job</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>creation or economic assurance people will chose to live, work and play outside of the Region. Therefore, in order to ensure economic growth in the Region, BILD does not support any approach that involves no urban boundary expansion for employment uses.</p> <p>Sustainable Growth to 2051</p> <p>BILD members remain committed to the delivery of sustainable communities and environmentally conscious development. We collectively agree that climate change is an important and key consideration for Halton Region’s future growth and must be addressed when considering any urban boundary expansions.</p> <p>By 2030, the National Building Code and Ontario Building Code are targeting Net Zero Energy ready homes and will apply to new developments within the 2031-2051 planning horizon. In order for climate change to be looked at holistically, and to ensure that planning policies in Halton do not result in unintended negative impacts to the overall climate change targets for Canada and the Province, BILD welcomes and recommends future discussions with our members who are industry leaders in the implementation of sustainable communities.</p> <p>Urban Sprawl We would like to take this opportunity to correct the narrative that expansions of the settlement boundary constitutes as sprawl. We are concerned that under each of the proposed Growth Concepts the term sprawl is repetitively referenced when describing the settlement boundary expansions proposed by the Region. Sprawl is defined by uncontrolled growth of an urban area, which none of the settlement area expansions propose under the Region’s Growth Concepts. BILD members proudly contribute to complete communities that emphasize walkability, protect and enhance environmental features, are transit supportive, contribute to housing choice and employment opportunities and incorporate community services.</p> <p>***</p> <p>Our industry and its members are essential partners with all levels of government in the planning, development and building of complete communities and the required infrastructure to meet the needs of the rapidly and inevitably growing population in the GTA. We take this role very seriously as we work toward responsible planning and development of communities. We are committed to being a part of this significant discussion, with due respect for all participants and intentions.</p> <p>BILD also continues to support and be a significant part of balanced public policy initiatives that support housing supply and choice, and employment opportunities that</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>contribute to the vitality of this region and its' citizens that are proud to call Ontario and Halton Region home.</p> <p>As critical stakeholders, our members look forward to continued dialogue.</p> <p>Sincerely,</p> <p>Victoria Mortelliti Paula Tenuta Planner, Policy &amp; Government Relations SVP, Policy &amp; Government Relations</p>	
90.	<p>Paul Lowes on behalf of Agerton New Urban Ltd. Landowner Group</p> <p>E-mail dated July 14, 2021</p>	<p>VIA EMAIL Curt Benson, Director of Planning Services Regional Municipality of Halton Planning Services 1151 Bronte Road Oakville, Ontario L6M 3L1</p> <p>Re: Regional Official Plan Review IGMS Discussion Paper - Agerton New Urban Ltd. Group Comments</p> <p>SGL Planning &amp; Design is the planning consultant to the Agerton New Urban Ltd., a Landowners Group in Milton. Agerton New Urban Ltd. is comprised of a group of landowners who own approximately 240 hectares of land in the Agerton Secondary Plan Area. The Agerton Secondary Plan Area is located along Trafalgar Road between Highway 401 and Derry Road. The Town of Milton has undertaken a considerable amount of work in preparation of a draft secondary plan for the Agerton area. Central to the Agerton area is a proposed new GO Station at Trafalgar Road on the Milton line. Town Council endorsed the Secondary Plan in March 2019 but cannot adopt it due to the need for conversion of employment lands to mixed use through the Region's Municipal Comprehensive Review (MCR) process.</p> <p>We have been asked to provide comments, on behalf of the landowners group, on the IGMS Discussion Papers. Prior to submitting our comments, we have several questions that require clarification so that we can provide informed comments.</p> <p>1) What does "Densification" mean specifically in terms of the %'s in each of the options. Does it mean that intensification in the Built-up Area (BUA) is held constant in all 4 options but the amount of "densification" in the BUA increases from 0 in Concept 4 to 30% in Concept 3?</p>	<p>Comments are acknowledged. Please see responses below:</p> <p>#2/3 – The units in the DGA as of 2021 is estimated to be 33,500. The vacant supply of this area is 147,000, of which nearly 95,000 are apartments.</p> <p>#4 – The Preferred Growth Concept shows a land need of 15,500 ground-related units beyond the current capacity.</p> <p>#5 -- The percentages are the share of total housing unit growth in the Region which are the additional DGA apartments.</p> <p>#6 – No development is anticipated in the hydro corridor.</p> <p>#7 – No. As noted with Question 4, there is an enormous supply potential without approaching the high end of the range.</p> <p>#10 – None, as required. The change of unit type directly follows from growth plan policy.</p> <p>#13 – The Preferred Growth Concept is now based on four unit types, of which apartments are in accordance with the Census definition. There is also a category for accessory units which would include</p>

No.	Source	Submission	Response
		<p>2) What is the capacity in units of the built portion of the current Designated Greenfield Area (DGA)?</p> <p>3) What is the capacity in units of the un-built portion of the current DGA?</p> <p>4) What is the specific increase in units by type in the current DGA over and above the current capacity for each concept?</p> <p>5) The footnote to Figure 12 on page 56 states that densification approximates the share of apartments in the mix of housing growth and provides a % increase in the Concepts 1, 2, 3 and 4 of 10%, 17%, 24% and 2.5% of units as DGA densification. It is unclear what these percentages mean. Are they the total share of apartments that will be allocated to the DGA or is it the % of the total units in the DGA that will be apartments?</p> <p>6) Why have the options in figures 17 to 20 show Potential New Employment Areas in the hydro corridor bisecting the Agerton Secondary Plan Area and the Greenbelt /NHS in other locations?</p> <p>7) Why do all options show an MTSA only on the west side of Trafalgar Road in the Agerton Secondary Plan when the configuration of the MTSA was not undertaken in ROPPA 48 and is left for the Town of Milton to provide further input to the boundaries?</p> <p>8) What is the significance of the Nodes and Corridors identification along Trafalgar Road through the Agerton Secondary Plan Area? Does it suggest that the lands along Trafalgar Road are to be mixed use?</p> <p>9) What is the total apartment unit share in terms of percentage of unit types in the DGA in each of the Concepts?</p> <p>10) What market research has been conducted to support the notion that the same consumer looking to purchase a ground related dwelling under various options will just as likely purchase an apartment under option 3?</p> <p>11) The Growth Outlook Report prepared by Hemson in 2020 to support the 2020 Growth Plan amendment highlighted that based on market demand the split for apartments vs. ground related units is generally 25% vs. 75%, respectively. Has the Region undertaken a risk assessment analysis to determine the impacts of deviating substantially from market-based demand (i.e., shortfall of units, impacts to the Region's current infrastructure funding model of front-ending DC payments (the allocation program), DC revenues, demographic shifts, etc.)?</p>	<p>secondary suites, garden suites, and laneway housing.</p> <p>#14 – Densification is merely a descriptor for apartments in the DGA that are in excess of the small proportion we would typically expect. The location of this densification is where apartments are currently planned in the DGA.</p> <p>#15 – No area is being replanned.</p> <p>#17 – In the PGC, there are complete tables on DGA density in new and existing areas which address this.</p> <p>#18 – The housing mix contains more ground-oriented units than the two denser of the growth concepts.</p> <p>#19 – New home sales in the Region of Halton and others parts of the GTA have trended towards a greater portion of apartment type unit sales. Further all of the lasting effects of the COVID-19 pandemic have yet to be known.</p> <p>#20 – Yes, and one of the reasons that the additional apartments are considered in the DGA are the challenges in accommodating all high density growth in the existing BUA in Halton.</p> <p>#21 – For the PGC, the intensification rate in the BUA is 45% and 65 ppj/ha in the new DGA.</p>





No.	Source	Submission	Response
		<p>12) Affordability is a significant concern for families looking to move to Halton Region. Has the Region reviewed market affordability of 2/3 bedroom apartments for families? What impact does the policy shift to apartments have on affordability of other housing forms that have traditionally drawn families to Halton?</p> <p>13) What constitutes “apartments” in the densification assumptions – i.e., does it include stacked townhouse, back-to-back townhouse, secondary suites, low-rise apartments?</p> <p>14) Can the Region be more specific with regards to where the concept of Densification will apply in the DGA? We have heard from the Region that densities within existing DGA Secondary Plan areas will not be impacted. If this is the case, where will Densification occur, what work has been done to determine where the densification will occur and have these areas been mapped?</p> <p>15) What areas of each municipality will be replanned to accommodate densification? Has the feasibility of achieving these densification rates been tested?</p> <p>16) What major transit initiatives are planned to support the proposed population / job growth in the Designated Greenfield Area through densification?</p> <p>17) The report discusses a consistent DGA density, but how does the densification rate in each concept change the overall DGA density in the existing DGA and the 2031-2051 DGA?</p> <p>18) How has the PPS and Growth Plan requirement for providing for an appropriate range and mix of housing options and densities to meet projected market-based housing market been reflected in the Concepts?</p> <p>19) How has the COVID pandemic and the resulting shift in housing preferences been considered in the Concepts?</p> <p>20) The Concepts appear to keep the intensification target constant. Why is there a focus on densification of the DGA rather than intensification of the Strategic Growth Areas in the BUA?</p> <p>21) What are the proposed BUA intensification targets and DGA density targets for each municipality under each of the Concepts?</p> <p>22) What is the total area of Prime Agricultural Lands in Halton? What % is being removed under Concepts 1 – 4? What impact does this have on local food supply?</p>	

No.	Source	Submission	Response
		<p>Thank you for the opportunity to preliminary comments and questions on the IGMS Discussion Paper. We request a meeting with Region staff to discuss our questions so that we can provide a more fulsome response to the IGMS Discussion Paper.</p> <p>Yours very truly,</p> <p>SGL PLANNING &amp; DESIGN INC.</p> <p>Paul Lowes, MES, MCIP, RPP Principal</p>	
91.	Sarah Knoll on behalf of New Horizon Development Group (NHDG) E-mail dated July 14, 2021	<p><b>RE: Region of Halton Official Plan Review/City of Burlington Official Plan Review North Aldershot Policy Area – BRIDGEVIEW JUNCTION PRECINCT</b></p> <p>GSP Group Inc., on behalf of New Horizon Development Group (NHDG), is pleased to provide our fourth formal input to the Regional Official Plan and City Official Plan Reviews. Previous submissions were provided on September 18, 2019, January 20, 2020, and December 16, 2020. This submission incorporates additional information relating to the appropriateness of incorporating the western most portion of North Aldershot Policy Area (NAPA) into the urban boundary through the Official Plan Review at the Region of Halton and the City of Burlington.</p> <p>We continue to maintain the position that lands within the NAPA should be reviewed as separate and distinct sections. Specifically, there is merit in including the named Bridgeview Junction Precinct (BJP), comprising a portion of the western sector, within the Urban Area.</p> <p>The Provincial Policy Statement allows for a planning authority to expand a settlement area boundary only at the time of a comprehensive review when certain criteria are met.</p> <p>BJP has a mix of urban land uses (permitted and developed) utilizing municipal services and infrastructure, typical of land uses within a settlement area.</p> <p>BJP has an open OMB (now OLT) Case No. MM150009 which requires supporting studies to request all areas in the BJP to be within the servicing overlay. A summary of the servicing and transportation studies are included and demonstrate that infrastructure is suitable over the long term and financially viable, while protecting public health and safety, and the natural environment.</p> <p>NHDG also has an active OLT Case No. PL210040 appealing the land use policies, maps and schedules of the new Burlington Official Plan applicable to NAPA as they do not conform to the current Provincial Policy framework, specifically growth management, while affording protection to natural heritage features.</p>	<p>Based on the results of the North Aldershot Policy Area Discussion Paper and technical analysis conducted for the Growth Concepts Discussion Paper under Appendix J, staff are recommending that these lands not be included within the Preferred Growth Concept. The Discussion Paper and Appendix J identified a number of Provincial policy constraints limiting the eligibility of these lands for settlement boundary expansion. Additionally, consideration for water and wastewater opportunities and constraints (Appendix J1 to the Growth Concepts Discussion Paper) found that extension of municipal services to support residential development would be particularly challenging as compared to other potential growth areas due topography and natural heritage constraints among other factors. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>Through the Regional Official Plan review, the BJP should be reviewed distinctly from the remaining North Aldershot Policy Area and all existing serviced lands within the BJP should be incorporated into the urban boundary. Now is the time to include these lands within the urban boundary and allow for appropriate redevelopment on underutilized lands that are afforded the privilege of being connected to the current urban boundary, a direct relation to the provincial highway and beyond, and land use permissions that contribute to a complete, sustainable community, while minimizing any negative impacts on natural or agricultural areas. BJP is an area provided with an existing municipal road network, existing servicing and existing uses typical of lands within the urban boundary.</p> <p>Expanding on our previous submissions regarding the settlement area boundary expansion request to include BJP within the Urban Area, we offer the attached submission and supporting documentation. This document provides a thorough snapshot of the reasons why a decision to advance the independent review of BJP from the remainder of NAPA is a straightforward, positive choice for the Region of Halton and the City of Burlington. This document emphasizes that BJP is poised to be a response to climate change by enshrining sustainable policy measures within guiding policy documents.</p> <p>Included within this submission are the following documents:</p> <ul style="list-style-type: none"> <li>• Bridgeview Junction: ROPR Request for Consideration, July 2021</li> <li>• MTE memo – Re: Functional Servicing Concept for the Bridgeview Community, May 28, 2021</li> <li>• MTE memo – Re: Bridgeview Community Water and Wastewater Servicing, May 28, 2021</li> <li>• MTE memo – Re: Potential Phasing for Bridgeview Community Water and Wastewater Servicing, July 12, 2021</li> <li>• C3 Water memo – Re: Bridgeview Development Lands – Letter of Opinion, July 8, 2021</li> <li>• R.J. Burnside Report – Master Transportation Study, Executive Summary excerpt, October 2018</li> </ul> <p>Should you have any questions, or require any additional information, please do not hesitate to contact Sarah Knoll at ___ or by email at sknoll@gspgroup.ca.</p> <p>Yours Truly, GSP GROUP</p> <p>Chris Pidgeon MCIP, RPP Principal Planner Sarah Knoll, BES, MCIP, RPP Senior Planner</p>	

No.	Source	Submission	Response
		<p>Cc: Mr. J. Paikin, New Horizon Development Group  Region of Halton, Mr. Curt Benson Director, Planning Services and Chief Planning Official  Region of Halton, Mr. Dan Tovey Manager, Policy Planning  City of Burlington, Ms. Leah Smith, Manager, Policy and Research  City of Burlington, Planning Committee Clerk</p>	
92.	<p>Hanieh Alyassin on behalf of 8469 and 8493 Trafalgar Road</p> <p>E-mail dated July 15, 2021  Updated August 3, 2021  Additional comments August 12, 2021 (via email)</p>	<p>Hi Steven and Dan,</p> <p>Please find the attached request for including subject properties, 8469 and 8493 Trafalgar Road, Town of Halton Hills into the Urban Boundary Expansion Area.</p> <p>We would be open to future discussions regarding this matter. If you have any questions/concerns, or if any further information is required, please contact me or Katie Pandey _ Associate Planner who is copied on this message.</p> <p>Thank you,</p> <p>HANIEH ALYASSIN  PLANNER</p> <hr/> <p>ATTACHED LETTER</p> <p>Dear Sir,  Re: Request for Consideration - Urban Boundary Expansion Region of Halton Official Plan Review 8469 and 8493 Trafalgar Road, Town of Halton Hills</p> <p>Weston Consulting has been retained by the owner of the property municipally addressed as 8469, and 8493 Trafalgar Road in the Town of Halton Hills, Regional Municipality of Halton (herein referred to as the 'subject lands') to prepare a planning letter in support of inclusion of the subject lands into the Urban Expansion Boundary.</p> <p>The subject lands are located on the east side of Trafalgar Road, west side of Eighth Line in the Town of Halton Hills. The subject lands have double-frontages along Trafalgar Road, and Eighth Line. The subject lands have an approximate area of 78.04 hectares (192.84 acres) (See Figure 1, below).</p>	<p>Based on the results of the technical analysis, the subject properties are proposed to be included in the Preferred Growth Concept as Employment Area. Those lands adjacent to Campbellville Road are within the Provincial Greenbelt Plan Area and are not eligible for inclusion in the Urban Area.</p>

No.	Source	Submission	Response
		 <p data-bbox="638 784 953 808"><b>Figure 1: Subject Lands Boundary</b></p> <p data-bbox="453 821 1398 956">The subject lands are located in proximity (20-minute walk) of soft infrastructure such as shopping store, school, place of worship, community center, and recreational golf course. In our planning opinion the subject lands are underutilized, and offer an appropriate opportunity of being included in Urban boundary through Regional Official Plan Review process (see Figure 2).</p>	


No.	Source	Submission	Response						
		 <p data-bbox="499 954 970 976"><b>Figure 2: 20-minute walk radius from subject lands</b></p> <p data-bbox="453 1008 982 1062">Policy conformity chart: A summary of planning policies is provided below:</p> <table border="1" data-bbox="453 1065 1356 1369"> <thead> <tr> <th colspan="2" data-bbox="453 1065 1356 1089">Provincial Policies</th> </tr> </thead> <tbody> <tr> <td data-bbox="453 1092 905 1312">Provincial Policy Statement 2020</td> <td data-bbox="909 1092 1356 1312">o As per the Section 1.1.3.8 of the Provincial Policy Statement, the expansion of Settlement Area boundary is permitted in Prime Agricultural Area through a comprehensive review when the lands do not comprise Specialty Crop Area. Analysis: The subject lands are not within Specialty Crop Area.</td> </tr> <tr> <td data-bbox="453 1315 905 1369">Greenbelt Plan 2017</td> <td data-bbox="909 1315 1356 1369">The subject lands are located outside of the Greenbelt Plan Area.</td> </tr> </tbody> </table>	Provincial Policies		Provincial Policy Statement 2020	o As per the Section 1.1.3.8 of the Provincial Policy Statement, the expansion of Settlement Area boundary is permitted in Prime Agricultural Area through a comprehensive review when the lands do not comprise Specialty Crop Area. Analysis: The subject lands are not within Specialty Crop Area.	Greenbelt Plan 2017	The subject lands are located outside of the Greenbelt Plan Area.	<p data-bbox="1436 1109 1885 1162">Comments are acknowledged. Please see above for a detailed response.</p>
Provincial Policies									
Provincial Policy Statement 2020	o As per the Section 1.1.3.8 of the Provincial Policy Statement, the expansion of Settlement Area boundary is permitted in Prime Agricultural Area through a comprehensive review when the lands do not comprise Specialty Crop Area. Analysis: The subject lands are not within Specialty Crop Area.								
Greenbelt Plan 2017	The subject lands are located outside of the Greenbelt Plan Area.								

No.	Source	Submission		Response
		Niagara Escarpment Plan 2017	The subject lands are located outside of the Niagara Escarpment Plan.	
		Growth Plan 2017	As per Sections 3 (e) of the Growth Plan, “where the need for a settlement area boundary expansion has been justified, the feasibility of boundary expansion is determined by: • the proposed would not negatively impact the water resource system”. Analysis: The subject lands do not impact the water resource system, the watershed identified on the lands is a drainage ditch used for farming purpose. Section 3 (h) of the Growth Plan states that “expansion into the specialty crop area is prohibited”. Analysis: The subject lands does not comprise of the specialty crop area. Section 3 (j) of the Growth Plan states that “the expansion should meet the requirements of Greenbelt and Niagara Escarpment plans”. Analysis: The subject lands are located outside the Greenbelt and Niagara Escarpment Area.	
		Conservation Authority Regulations		
		Halton Region Conservation Area	Subject lands are partially located into Halton Region Conservation regulated area. Analysis: The Natural Heritage Desktop Evaluation, prepared by LGL Limited, dated July 12, 2021 submitted as Appendix A demonstrates that the subject lands do not comprise of any provincially significant natural heritage features. Further detailed Natural Heritage Evaluation report if required will be submitted to the Regional Planning staff.	
		Upper Tier Municipal Policy		
		Region of Halton Official Plan (2018 Office Consolidated)	The subject lands are located within the “Agricultural Area” and “Regional Natural Heritage system” of the Region of Halton Official Plan. Analysis: The	

No.	Source	Submission		Response
			subject lands do not comprise of prime specialty crop area. There are no Provincially Significant Wetlands (PSWs), Areas of Natural or Scientific Interest (ANSIs) or Environmentally Sensitive Areas (ESAs) located on or adjacent to the property.	
		Permitted Uses	Agricultural Area permitted uses: • All types, sizes and intensities of agricultural operations; • normal farm practices; • Dwelling(s) accessory to an agricultural operation; • Single detached dwelling on existing lots, unless the lot is identified as Agricultural Purposes Only (APO) in the Local Official Plans and/or Zoning By-laws, and • Home occupations and cottage industries with a gross floor area not exceeding 100 sq m or 25 per cent of the residential living area.	
		Lower Tier Municipal Policy		
		Town of Halton Hills Official Plan (2019 Office Consolidation)	Majority of the subject lands are designated as “Agricultural Area” and small portions of the lands are designated as “Greenland A” and “Greenland B” within the Town of Halton Hills Official Plan.	
		Permitted Uses	Agricultural Area permitted uses: • Single-detached dwellings on existing lots; • Accessory Residential uses on farm properties; • Home occupations and cottage industries • Home industries located on a commercial farm • Existing public uses; • Residential care facilities excluding Treatment Centres Greenland A permitted uses: • Existing agricultural operations; • Passive non-motorized recreational uses, such as nature viewing and pedestrian trail activities; • Essential transportation and utility facilities, and more. Greenland B	




No.	Source	Submission		Response
			permitted uses: • Existing agricultural operayions; • Single-detached dwellings on existing lots; • Home occupations and cottage industries, and • Small-scale public uses.	
		Zoning By-law 2010-0050	The subject lands are zoned as "Agricultural: A" with some portions zoned as "Environmental Protection 1: EP1" and "Environmental Protection 2: EP2" within the Town's Zoning By-Law.	
		Permitted Uses	Uses permitted in Agricultural zone: • Agricultural Uses, Animal Clinics, Art Galleries, Cottage industries, Group Homes, Home Occupation, Home industries in an Accessory Building, Single-detached Dwellings, and more. Uses permitted in Environmental Protection Area zone: • EP1: Agricultural Uses, and Conservation Uses. • EP2: Single-detached Dwellings, Private Home Daycare, Home Occupations; Cottage industries, Agricultural Uses, and Conservation Uses.	
		Transportation		
		Roadway Classification	Trafalgar Road: Major Arterial Analysis: The subject lands are located along major arterial road and has potential of being included in the urban boundary.	
		Inclusion of adjacent lands to the south in the Urban Expansion boundary vs. The Subject lands		
		The lands abutting the subject lands to the south comprises of dense woodlands. We note that these lands have been included in the Urban Area boundary as shown on the "Concept 3" of the "Integrated Growth Management Strategy, dated Feb 2021" (see Figure 3). While subject lands which is of flat topography and devoid of any significant Natural Heritage features, are excluded from Urban Expansion Area.		

No.	Source	Submission	Response
		 <p data-bbox="491 597 863 651"><b>Woodlot lands included into Urban Area</b></p> <p data-bbox="583 743 1241 764"><b>Figure 3: Inclusion of adjacent woodlands lands into Urban Area.</b></p> <p data-bbox="453 792 1398 846">Inclusion of adjacent Prime Agricultural Area lands in the expansion as Employment Area vs. The Subject lands</p> <p data-bbox="453 873 1398 1062">The lands to the south-east of subject lands are designated as Employment Area in the Regional Official Plan. Those lands are identified as the Prime Agricultural Area as shown on Map 1E (Agricultural System and Settlement Areas map) of the Regional Official Plan. Whereas, the subject land being of same designation as Prime Agricultural Area is being excluded from Urban Boundary (see Figure 4). In our planning opinion, the inclusion of subject lands into Urban Expansion boundary would not negatively impact the availability of farm land in the region as subject lands are devoid of any specialty crop area.</p>	<p data-bbox="1436 889 1885 943">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="850 261 1213 347">INCLUSION OF ADJACENT PRIME AGRICULTURAL AREA IN URBAN AREA AND FUTURE STRATEGIC EMPLOYMENT AREA</p> <p data-bbox="514 732 814 850"> <b>Settlement Areas</b>  Urban Area  Hamlet  Rural Clusters as defined in Local Official Plans </p> <p data-bbox="667 732 814 813"> <b>Agricultural System</b>  Prime Agricultural Areas  Agricultural System outside Prime Agricultural Areas </p> <p data-bbox="472 862 1213 899"> <b>Figure 4: Subject lands vs. adjacent lands inclusion in Urban Expansion boundary and Future Strategic Employment Area</b> </p> <p data-bbox="451 922 695 948">NHE Result Summary:</p> <p data-bbox="451 976 1367 1084"> Natural Heritage Due Diligence Screening report prepared by LGL Limited, dated July 2021, states that there are few natural heritage features on the site that may pose constraints to development; however, by applying appropriate buffer and setbacks, the redevelopment would be achievable. Further, we would like to note that </p> <ul data-bbox="451 1117 1402 1386" style="list-style-type: none"> <li>• The watercourse identified in the middle of the subject lands (shown on figure 3 of NHE study) is a drainage ditch used for the farming purpose and does not have any active spring, as confirmed by the owner and our site visit.</li> <li>• Wooded Area identified on the north-west of the site (shown on figure 2 of NHE study) is actually a hedgerow that includes invasive shrubs such as Buckthorn, as confirmed by the owner and our site visit.</li> <li>• Wooded Area identified in the middle of the subject lands by NHE includes only two (2) rows of the trees with sod in between them, as confirmed by the owner and our site visit.</li> </ul>	<p data-bbox="1438 976 1885 1024">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>The limits of appropriate setbacks and buffer will be further confirmed later by detailed NHE and staking of natural features by team of surveyor, ecologist and conservation authority staff.</p> <p>CONCLUSION:</p> <ul style="list-style-type: none"> <li>• The subject lands have a dual frontage on Trafalgar Road and Eighth Line.</li> <li>• The subject lands are located along major arterial road.</li> <li>• The subject lands are located in close proximity to the community and recreational facilities.</li> <li>• The subject lands are not within Specialty Crop Area.</li> <li>• The subject lands are fairly flat.</li> <li>• The subject lands do not comprise of any significant dense woodlots.</li> <li>• The watercourse on the subject lands is a farming drainage ditch.</li> <li>• Adjacent lands located on south east of the subject property having the same designation as Prime agricultural Areas are included in urban boundary as the Employment areas.</li> <li>• Adjacent lands located on south of the subject property comprising of dense woodlots are included in the Urban Areas.</li> </ul> <p>With reasons stated above, in our planning opinion, the request for inclusion of the subject land in the urban expansion boundary is appropriate and represents efficient use of underutilized land.</p> <p>We request to be notified of any future reports and meetings and will continue to monitor the Regional Plan Review process. Thank you for the opportunity to provide this letter, we would be open to future discussions regarding this matter.</p> <p>If you have any questions or concerns, please contact Katie Pandey at ext. 335, or Hanieh Alyassin at ext. 337.</p> <p>Yours truly, Weston Consulting</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>APPENDIX A</p> <p>1.0 INTRODUCTION</p> <p>LGL Limited (LGL) was retained to carry out a Natural Heritage Due Diligence Screening to identify the potential natural heritage constraints related to the property located at 8471 in Halton Hills, Ontario. The property is 78.04 ha in size and is located between Trafalgar Road and 8th Line North, north of Steeles Avenue. The Screening has been requested to support an application to bring the property into the urban expansion area under regional phasing in 2021.</p> <p>The purpose of this Screening is to provide an understanding of the development potential for the property and to provide a summary of natural heritage constraints and opportunities, as well as potential environmental requirements for further study. The Screening is based entirely on secondary source information and air photo interpretation; no field investigations were performed to validate information. No consultation with the municipality or regulatory agencies was performed. The location of the property is shown in Figure 1.</p> <p>2.0 EXISTING LAND USE</p> <p>The majority of the property is currently farmed and supports several single family detached residences and buildings related to farming operations. Woodlands are located in the northeast and wetlands are located in the northwest portions of the property, respectively. Several tributaries of the Middle East Branch of Sixteen Mile Creek cross the property in several locations.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p data-bbox="451 909 655 933">Figure 1: Key Plan</p> <p data-bbox="451 966 1291 1047">Adjacent land uses include agricultural fields, woodlands, wetlands, the Hornby Glen Golf Course and several small businesses. The Toronto Premium Outlet Mall is located on the south side of Steeles Avenue at Trafalgar Road.</p> <p data-bbox="451 1071 850 1128"><b>3.0 MUNICIPAL DESIGNATIONS</b> <b>3.1 HALTON HILLS OFFICIAL PLAN</b></p> <p data-bbox="451 1153 1291 1372">The property is designated as an ‘Agricultural Area’ in the Halton Hills Official Plan (2020). The Middle East Branch of Sixteen Mile Creek is designated ‘Greenlands A’ and the Hornby Swamp Wetland Complex located on the northwest portion of the property is designated ‘Greenlands B.’ The natural heritage feature located on the northeast portion of the property is not identified in Schedule A1 (Land Use Plan) or Schedule A2 (Greenbelt Plan) of the Halton Hills Official Plan; however, it is identified as a ‘Woodland (0.5 ha or greater)’ in Appendix X1A (Environment Natural Areas).</p>	

No.	Source	Submission	Response
		<p>3.2 COMPREHENSIVE ZONING BYLAW 2010-0050</p> <p>The property is zoned as 'Agricultural A' with the Middle East Branch of Sixteen Mile Creek zoned as 'Environmental Protection 1' and the Hornby Swamp Wetland Complex zoned as 'Environmental Protection 2' in Schedule A1 - Rural Lands of the Comprehensive Zoning Bylaw 2010-0050 (Halton Hills 2010).</p> <p>3.3 HALTON REGION OFFICIAL PLAN</p> <p>The property is designated an 'Agricultural Area' in the Halton Region Official Plan (2018). Woodlands, wetlands and watercourses occurring on the property are designated as 'Key Features' of the Regional Natural Heritage System.</p> <p>3.4 NIAGARA ESCARPMENT PLAN</p> <p>The property is located outside of the Niagara Escarpment Plan area.</p> <p>3.5 GREENBELT PLAN</p> <p>The property is located outside of the Greenbelt Plan area.</p> <p>3.6 ONTARIO REGULATION 162/06</p> <p>The Middle East Branch of Sixteen Mile Creek and several of the 1st and 2nd order tributaries are regulated by Conservation Halton under Ontario Regulation 162/06. The Hornby Swamp Wetland Complex is also regulated under Ontario Regulation 162/06.</p> <p>4.0 NATURAL HERITAGE FEATURES</p> <p>The property is located mostly within the Middle East Branch of Sixteen Mile Creek sub-watershed, although the southeast corner of the property is located within the East Branch of Sixteen Mile Creek sub-watershed. The Sixteen Mile Creek watershed falls under the jurisdiction of Conservation Halton (CH). The Middle East Branch of Sixteen Mile Creek crosses the property from north to south and includes a number of 1st and 2nd order headwater drainage features. The Middle East Branch of Sixteen Mile Creek has a well-defined stream channel and directly supports a coldwater fish community. The 1st and 2nd order headwater drainage features have no defined channel and are best characterized as agricultural swales which support indirect fish habitat based on air photo interpretation. These headwater drainage features occur in the southcentral and northwestern portions of the property. A headwater drainage study would be required to confirm the status of these 1st and 2nd order headwater drainage features.</p>	

No.	Source	Submission	Response
		<p>A locally significant wetland, the Hornby Swamp Wetland Complex, is located in the northwest portion of the property. This wetland is comprised of meadow marsh, deciduous swamp and mixed swamp vegetation communities.</p> <p>The natural heritage feature located in the northeast portion of the property is comprised of meadow marsh and deciduous swamp vegetation communities, but has not been classified as an unevaluated wetland or included in the Hornby Swamp Wetland Complex. Two other natural heritage features occur on the property – a hedgerow and tree plantings associated with the residence. Neither of these two natural heritage features are anticipated to meet criteria for ‘significant woodlands’ or ‘key natural heritage features.’</p> <p>Woodland and wetland features are located immediately adjacent to the property to the north, south, east and west. Potential setbacks/buffers associated with these features located on adjacent lands may result in development constraints on the subject property.</p> <p>There are no Provincially Significant Wetlands (PSWs), Areas of Natural or Scientific Interest (ANSIs) or Environmentally Sensitive Areas (ESAs) located on or adjacent to the property.</p> <p>The surficial soils on the property are beveled till plains as part of the Peel Plain physiographic region. The topography is fairly flat across the property.</p> <p>A review of the MNRF’s Natural Heritage Information Centre (2021) mapping shows the presence of several species at risk within the four, 1 km grid squares covering the subject property including: Bobolink (Threatened); Eastern Meadowlark (Threatened); Eastern Wood-pewee (Special Concern); Midland Painted Turtle (Special Concern); Snapping Turtle (Special Concern) and Rustypatched Bumble Bee (Endangered). No habitat for threatened or endangered species has been identified on the subject property, although no targeted field surveys for species at risk have been performed.</p> <p>A review of aquatic species at risk mapping (2021) was completed within 1 km of the property. It was determined that no aquatic species at risk are present.</p> <p>The location of natural heritage features located on and adjacent to the property is presented in Figure 2 (attached to letter).</p> <p><b>5.0 BUFFERS AND SETBACKS</b></p> <p>The following setbacks will likely apply to natural heritage features located on the property based on a review of provincial, regional, municipal and conservation</p>	



No.	Source	Submission	Response
		<p>authority policies:</p> <ul style="list-style-type: none"> <li>• 30 m from either bank of coldwater streams that directly support fish habitat (likely applies to the Middle East Branch of Sixteen Mile Creek);</li> <li>• Appropriate buffers, if any, for 1st and 2nd order headwater drainage features will need to be determined through a Headwater Drainage Feature Analysis; however, the two 1st order tributaries located on the Wetland Complex, will be captured in the 30 m buffer for this wetland;</li> <li>• 15 m from the staked top of bank for major valleys/watercourses (applies to Sixteen Mile Creek and its tributaries);</li> <li>• 30 m from provincially significant wetlands and wetlands greater than two hectares in size (likely applies to the Hornby Swamp Wetland Complex) and 15 m from the limit of a wetlands less than 2 hectares in size; and,</li> <li>• 10 m from the dripline of significant woodlands outside of Greenbelt Plan and Niagara Escarpment Plan areas.</li> </ul> <p>Based on the presence of natural heritage features located on and adjacent to the property, an Environmental Impact Study (EIS), or equivalent, will be required to support a development application in accordance with the following policies:</p> <ul style="list-style-type: none"> <li>• Provincial Policy Statement (Government of Ontario 2020);</li> <li>• Environmental Impact Assessment Guideline (Halton Region 2020);</li> <li>• Halton Hills Official Plan (Halton Hills 2020);</li> <li>• Halton Hills Comprehensive Zoning Bylaw 2010-0050 (Halton Hills 2010);</li> </ul> <p>and,</p> <ul style="list-style-type: none"> <li>• Policies and Guidelines for the Administration of Ontario Regulation 162/06 and Land Use Policy Document (Conservation Halton 2006).</li> </ul> <p>The preliminary screening of the property for natural heritage features, with anticipated buffers/setbacks is presented in Figure 3 (attached to letter). These natural heritage features and anticipated buffers/setbacks should be considered as development constraints on the property, with the balance of the property offering development opportunities, subject to further investigation. The limits of natural heritage features and appropriate buffers/setbacks will be confirmed during preparation of the EIS, or equivalent. A headwater drainage study should also be prepared for the 1st and 2nd order headwater drainage features located on the property in accordance with the Evaluation, Classification and Management of Headwater Features Guidelines (CVC and TRCA 2014).</p> <p>6.0 SUMMARY</p>	

No.	Source	Submission	Response
		<p>This Natural Heritage Due Diligence Screening is an initial step in the land development process and does not constitute a Natural Heritage Assessment or Environmental Impact Study. While LGL has made every effort to ensure the accuracy of the information contained in this Screening, additional information may become available through field investigations, new data sources or consultation with municipalities and regulatory agencies, that could change the results of this Screening.</p> <p>Based on the knowledge collected to date, natural heritage features are located on and adjacent to the property that will need to be assessed in greater detail through preparation of an EIS, or equivalent. Prior to completing an EIS, a Terms of Reference (ToR) should be prepared and submitted to the Town and Conservation Halton for review and endorsement to confirm the scope and level of detail of the study.</p> <p>Thank you for the opportunity to complete this Natural Heritage Due Diligence Screening. Please feel free to contact me if you have any questions or require further clarification.</p> <p>Yours sincerely,</p> <p>LGL Limited environmental research associates</p> <p>Grant N. Kauffman, M.E.S. Vice President, Ontario Region Senior Planning Ecologist</p> <p>Attachments.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p><b>AUGUST 3, 2021 UPDATED</b></p> <p>Attn: Steve Burke</p>	

No.	Source	Submission	Response				
		<p>Senior Planner, Halton Region Dear Sir, Re: Request for Consideration – Inclusion of the subject lands in Future Employment Area</p> <p>Region of Halton Official Plan Review 8469 and 8493 Trafalgar Road, Town of Halton Hills Dear Sir,</p> <p>Re: Request for Consideration – Inclusion of the subject lands in Future Employment Area Region of Halton Official Plan Review 8469 and 8493 Trafalgar Road, Town of Halton Hills</p> <p>Further to our meeting on July 27, 2021, please find additional information in support of the inclusion of subject lands in the Future Employment Area. Kindly include this letter as a continuation of the previous letter prepared for the above-noted properties dated July 15, 2021 prepared by Weston Consulting, authored by Katie Pandey.</p> <p>A. Site Context w.r.t. inclusion in Employment Area</p> <ul style="list-style-type: none"> <li>• The subject lands are located in close proximity to Highway 401 and 407 and the employment area.</li> <li>• Further lands have frontage to two arterial roads. Taking into consideration the site context, in our planning opinion, the subject lands would be more suitable for non-agricultural uses vs agricultural use.</li> </ul> <p>B. Additional Analysis of Policy conformity chart:</p> <p>A summary of additional planning policies is provided below:</p> <table border="1" data-bbox="457 1024 1360 1409"> <thead> <tr> <th colspan="2" data-bbox="457 1024 1360 1052">Provincial Policies</th> </tr> </thead> <tbody> <tr> <td data-bbox="457 1052 909 1409">Provincial Policy Statement 2020</td> <td data-bbox="913 1052 1360 1409"> <p>As per Section 2.1.5 of the Provincial Policy Statement (PPS), Development and site alteration shall not be permitted in:</p> <p>a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;</p> <p>b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;</p> </td> </tr> </tbody> </table>	Provincial Policies		Provincial Policy Statement 2020	<p>As per Section 2.1.5 of the Provincial Policy Statement (PPS), Development and site alteration shall not be permitted in:</p> <p>a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;</p> <p>b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
Provincial Policies							
Provincial Policy Statement 2020	<p>As per Section 2.1.5 of the Provincial Policy Statement (PPS), Development and site alteration shall not be permitted in:</p> <p>a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;</p> <p>b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River)1;</p>						

No.	Source	Submission	Response
		<p>c) significant valleylands in Ecoregions 6E and 7E (excluding islands in LakeHuron and the St. Marys River)1;</p> <p>d) significant wildlife habitat;</p> <p>e) significant areas of natural and scientific interest; and</p> <p>f) coastal wetlands in Ecoregions 5E, 6E, and 7E1 that are not subject to policy 2.1.4(b) unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.</p> <p>Analysis:</p> <ul style="list-style-type: none"> <li>• The subject lands are not within Significant Groundwater Recharge Area (SGRA) nor Water Resource Protection Area;</li> <li>• The subject lands are not within Identified Mineral Resource Area; and,</li> <li>• The wooded area in subject lands is a hedgerow that includes invasive shrubs such as Buckthorn</li> </ul> <p>Sections 3.1 of the PPS states that "Development shall generally be directed, in accordance with guidance developed by the Province (as amended from time to time), to areas outside of:</p> <p>a) hazardous lands adjacent to the shorelines of the Great Lakes - St. Lawrence River System and large inland lakes which are</p>	

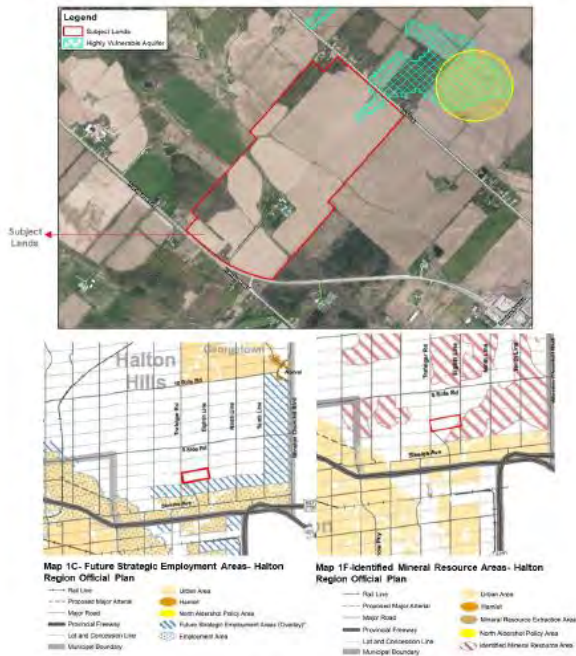
No.	Source	Submission		Response
			<p>impacted by flooding hazards, erosion hazards and/or dynamic beach hazards;</p> <p>b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and</p> <p>c) hazardous sites". Analysis: The subject lands are outside of Natural Hazardous Area.</p>	
		Growth Plan 2017	<p>As per Sections 2.2.8.3 (e) of the Growth Plan, "where the need for a settlement area boundary expansion has been justified, the feasibility of boundary expansion is determined by:</p> <ul style="list-style-type: none"> <li>• key hydrologic areas and the Natural Heritage System for the Growth Plan should be avoided where possible".</li> </ul> <p>Additionally, they should be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the water resource system, including the quality and quantity of water (Growth Plan s. 2.2.8.3(d)).</p> <p>Analysis: The subject lands are not within key hydrologic areas and do not include any water resource area. Sections 2.2.8.3 (f) of the Growth Plan states that "prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the upper</p>	


No.	Source	Submission	Response
		<p>or single-tier municipality will be evaluated, prioritized, and determined based on avoiding, minimizing, and mitigating the impact on the Agricultural System and in accordance with the following:</p> <ul style="list-style-type: none"> <li>i. expansion into specialty crop areas is prohibited;</li> <li>ii. reasonable alternatives that avoid prime agricultural areas are evaluated; and</li> <li>iii. where prime agricultural areas cannot be avoided, lower priority agricultural lands are used".</li> </ul> <p>Analysis:</p> <ul style="list-style-type: none"> <li>• Although the subject lands are within Prime Agricultural Area, the adjacent lands to the southeast, municipally addressed as 8250 Eighth Line, with the same designation are included in Urban Area and Future Employment Area.</li> <li>• We also note that the adjacent land to the southeast, 8250 Eighth Line, was formerly used as a dairy/cash crop farm. This property also has the same soil profile as the subject lands. Section 2.2.8.3 (g) of the Growth Plan states that "the settlement area to be expanded is in compliance with the minimum distance separation formulae".</li> </ul> <p>Analysis: There is currently no livestock on subject lands.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<div data-bbox="457 256 905 943" style="border: 1px solid black; height: 423px; width: 213px;"></div> <p data-bbox="915 256 1413 586">The subject lands ceased to function as a dairy operation in 2000 and since then there has been no cattle nor any other farm livestock on the subject lands. Since 2000, the dairy barn has been used for storage purposes (The letter of undertaking regarding the absence of livestock on the subject lands and undertaking that no future operation of livestock will be conducted on the subject lands is provided as Appendix 'A').</p> <p data-bbox="915 613 1413 943">Section 2.2.8.3 (j) of the Growth Plan states that “the proposed expansion would meet any applicable requirements of the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment, and Lake Simcoe Protection Plans and any applicable source protection plan”. Analysis: The subject lands are outside of the aforementioned Authority Areas and do not pose any adverse impact on the natural environment.</p> <p data-bbox="457 971 1413 1024"><b>C. COMPARATIVE ANALYSIS OF SUBJECT LANDS VS. ADJACENT LANDS W.R.T. INCLUSION IN EMPLOYMENT AREA</b></p> <p data-bbox="457 1052 1413 1081">Comparative Analysis of Subject Lands vs. Adjacent Southeast Lands</p> <p data-bbox="457 1109 1413 1219">The lands to the southeast of subject lands are within Identified Mineral Resource Area as shown on the Mineral Resource Map of the Regional Official Plan, and are also within the Highly Vulnerable Aquifer area (HVA) of Halton Region Source Protection Plan (see Figure 1).</p> <p data-bbox="457 1247 1413 1409">We note that the southeast lands are included in the Future Employment Area, even though the Growth Plan clearly states that “lands including key hydrologic areas and the Natural Heritage System for the Growth Plan should be avoided “(Section 2.2.8.3 (e)). Although the small northwest portion of the subject lands includes HVA, however, it is very small as compared to adjacent southeast lands. Also, with proper mitigation measures such as full municipal servicing of the development, avoidance of deep</p>	<p data-bbox="1438 943 1898 997">Comments are acknowledged. Please see above for a detailed response.</p>







No.	Source	Submission	Response
		<p>excavations, maintaining the water balance on the site, low impact development (LID), and other stormwater management measures, a threat to HVA can be completely avoided.</p> <p>We also note that the property to the south-east of the subject lands, municipally addressed as 8250 Eighth Line has been included in the Urban Area of IGMS concept three map; however, the subject lands with the same land-use designation, same soil profile, and the same agricultural background are excluded from Urban Area or Future Employment Area of the same. Growth Plan further states that “expansion should not impact mineral aggregate areas” (Section 2.2.9.3 (c)). The adjacent lands on the southeast are within identified Mineral Resource Area, whereas, the subject lands are devoid of it.</p> <p>Conclusion:</p> <p>Consequently, the comparison of subject lands with adjacent south-east lands indicates that the subject lands would be more appropriate for future potential development purposes vs the southeast adjacent lands.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

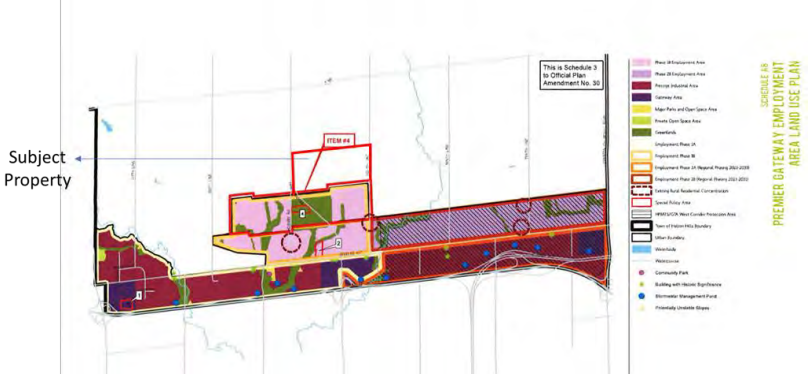
No.	Source	Submission	Response
		 <p data-bbox="451 1036 1243 1068"><b>D. Comparative Analysis of Subject Lands vs. Adjacent South-West Lands</b></p> <p data-bbox="451 1092 1407 1258">The adjacent lands on the southwest of subject lands include Natural Heritage System Key feature as shown on “Key Features within the Greenbelt and Regional Natural Heritage Systems” and “Proposed Agricultural System” Maps of Natural Heritage Discussion Paper. This is evident from our site visit on June 29, 2021, that the adjacent southwest lands comprise of dense woodlots as shown in Figure 2. With noted features of the neighboring southwest land, development could be a major concern here.</p> <p data-bbox="451 1287 1354 1339">In our planning opinion, it would be more appropriate and rational for the Region to include the subject lands having flat topography and devoid of any dense woodlot, as</p>	<p data-bbox="1438 1133 1890 1185">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>shown in Figure 2, in the Future Employment Area vs. the adjacent southwest lands.</p>  <p><b>Proposed Agricultural System</b></p> <ul style="list-style-type: none"> <li>Urban / Hamlet</li> <li>NHS Key</li> <li>Mineral Resource Extraction Area</li> <li>Prime Agricultural Area</li> <li>Rural Land Area</li> </ul> <p><b>Figure 2: Subject Lands vs. Adjacent Lands Inclusion in Urban Expansion Boundary</b></p>	
		<p>E. NHE Results Analysis:</p> <p>Natural Heritage Due Diligence Screening report prepared by LGL Limited, dated July 2021, states that there are few natural heritage features on the site; however, with proper buffer and mitigation measure, lands could be redeveloped. Our site visit and Google aerial images confirm that the NHE features are not significant and would not pose a</p>	

No.	Source	Submission	Response
		<p>threat to the potential development of subject lands (See Figures 3 and 4).</p>  <p>Figure 3: Natural Heritage Study Map for the Subject Lands</p>	

No.	Source	Submission	Response
		<p style="text-align: right;">8</p> <div style="display: flex; flex-direction: column; align-items: flex-start;"> <div style="margin-bottom: 10px;">  <p>① Wooded Area on the north-west of the site is a hedgerow that includes invasive shrubs such as Buckthorn.</p> </div> <div style="margin-bottom: 10px;">  <p>② Wooded Area in the middle of the subject lands is two (2) rows of the trees with sod in between them .</p> </div> <div style="margin-bottom: 10px;">  <p>③ The watercourse in the south-east of the subject lands is a drainage ditch used for the farming purpose.</p> </div> <div>  <p>④ The watercourse extending from woodlands on the north-west corner of the subject lands is a drainage ditch.</p> </div> </div> <p style="text-align: center;">Figure 4: Google Aerial Images for Natural Heritage features on the Subject Lands</p> <p><b>CONCLUSION:</b></p> <p>Following are the reasons that make the subject lands more suitable to be included in the Future Employment Area:</p> <ul style="list-style-type: none"> <li>• Proximity to highway 401 and 407.</li> <li>• Located in the adjacency of Future Employment Area.</li> <li>• Proximity to the community and recreational facilities.</li> </ul>	

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Have frontage along two arterial roads.</li> <li>• Passes the test of Growth Plan for Urban Area Boundary Expansion: <ul style="list-style-type: none"> <li>o Absence of any Major Key Hydrologic Areas on the site.</li> <li>o Not within Mineral Aggregated Area.</li> <li>o Conforms to Minimum Distance Separation policies.</li> <li>o Absence of any significant NHF which would act as a constrain to the development\</li> <li>o Not within the Specialty Crop Area.</li> </ul> </li> <li>• More developable as compared to the adjacent southeast and southwest lands.</li> <li>• The Town of Halton Hills is not a major agriculture community anymore.</li> <li>• Regional Official Plan agricultural mapping indicates discrepancy to the existing farming operation.</li> </ul> <p>With the reasons stated above, in our planning opinion, the request for inclusion of the subject land in the Employment Area is appropriate and represents an efficient use of the underutilized lands. We request to be notified of any future reports and meetings and will continue to monitor the Regional Plan Review process. Thank you for the opportunity to provide this letter, we would be open to future discussions regarding this matter.</p> <p>If you have any questions or concerns, please contact Katie Pandey at ext. 335, or Hanieh Alyassin at ext. 337.</p> <p>Yours truly,</p> <p>Weston Consulting</p> <p>----</p> <p><b>AUGUST 12, 2021</b></p> <p>Hi Steven,</p> <p>During our investigation on Inclusion of 8469, and 8493 Trafalgar Road in the Employment Area, we also noticed the following:</p> <p>The Town of Halton Hills initiated OPA No. 30 that proposes to designate up to 75 hectares of additional land for Employment Uses to be added to the Town's Urban Area</p>	

No.	Source	Submission	Response
		<p>adjacent to the Phase 1B Premier Gateway Employment Area (pink in color). These lands are being added to replace the shortfall of employment lands within the Town as a result of lands being lost to corridor protection for GTA West/HPBATS.</p> <p>As shown on schedule A8 of the same attached document, the subject lands abut Phase 1B Employment Area to the North and as demonstrated in our earlier letter that lands on the south are not very conducive for redevelopment because of the presence of natural features ( dense woodlots). With the reasons mentioned on previously provided letters, we would request to replace the south abutting lands with the subject land for future employment use. Kindly append this email as part of our submission.</p>  <p>Kind Regards,  <b>HANIEH ALYASSIN</b>  <b>PLANNER</b></p>	
93.	Michelle Diplock on behalf of West End Home Builders' Association	<p>West End Home Builder's Association   Submission on Halton Growth Concepts</p> <p>The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Halton Region. The WE HBA represents approximately 300 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. The residential construction industry employed over 25,300 people, paying \$1.7 billion in wages, and contributed over \$3.0 billion in investment value within Halton Region in 2020.</p>	<p>Regional staff acknowledge WEBHA's comments.</p> <p>The Preferred Growth Concept generally directs a significant amount of growth to strategic growth areas, including around GO stations, and on planned higher order transit corridors.</p>

No.	Source	Submission	Response
	E-mail dated July 15, 2021	<p>The West End Home Builders' Association (WE HBA) appreciates the opportunity to provide feedback on the Region of Halton's proposed Growth Concepts. As a key partner to the Region in the delivery of new housing supply and building complete communities, WE HBA wishes to ensure we can effectively work together toward the goal of providing for a full range of housing choices at prices and rents people can afford.</p> <p>WE HBA appreciates the opportunity to participate in the consultation process for Halton Region's Integrated Growth Management Strategy and are looking forward to engaging more with Regional Staff and Council throughout the implementation process. The WE HBA is a strong supporter of the policies and targets established in A Place to Grow, which are intended "to ensure that municipalities have the land base and the infrastructure to accommodate growth now and into the future". The implementation of the provincial Housing Supply Action Plan and the Growth Plan will help support a return to a properly functioning housing market under which our member companies can provide a range of housing supply options and choice for the rapidly growing population of the Greater Golden Horseshoe. The WE HBA recognizes that the volume of growth Halton Region is experiencing brings both challenges and opportunities, and we are pleased to provide our organization's feedback as part of this process.</p> <p>General Comments</p> <p>The WE HBA is pleased to see that Halton Region is engaging a broad evaluation framework of the various growth scenarios including the regional urban system and local urban structures, infrastructure and financing, agriculture, environment and climate change, and growing the economy and moving people and goods. As part of this evaluation framework, the WE HBA would also like to see an emphasis on housing affordability and providing a range of diverse housing options. This should form a key part of the evaluation framework as it was an important theme heard throughout consultation events and public information centres hosted by Regional Staff. Additionally, WE HBA wishes to emphasize that local municipalities are at different stages in their growth and development, and as such a 'one size fits all' approach is not recommended. Further to this, the WE HBA recommends that Halton Region clearly communicate the impacts that adjusting intensification and densification rates will have on existing communities and local municipalities. This can help ensure residents are fully informed early in the process about how their communities will evolve and grow to accommodate the significant growth pressures our region is facing.</p> <p>Concept 1: 60% Densification, Moderate Greenfield Expansion</p> <p>Should Halton region adopt a densification rate of 60% with a Moderate Greenfield Expansion, WE HBA cautions that even with moderate greenfield expansion, local municipalities will need to streamline the public policy framework through which our</p>	<p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. It also directs growth (referred to as "densification" in the Growth Concepts Discussion Paper) – which is "intensification" in the sense that it concentrates development to areas within the existing approved urban area – to potential future intensification sites.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>



No.	Source	Submission	Response
		<p>members bring intensification projects forward. In the context of today's housing crisis and the growth pressures facing Halton Region it is absolutely critical that a municipal framework for facilitating intensification through appropriate pre-zoning and quickly bringing new housing supply online is implemented. Additionally, WE HBA would recommend that the benefits of well-planned greenfield expansion are communicated clearly to residents.</p> <p>Concept 2: 70% Densification, Limited Greenfield Expansion</p> <p>Similar to Concept 1, the WE HBA wishes to emphasize that should the region pursue this option, the existing municipal policy framework for intensification will need to be re-examined. This is especially important as one of Halton's greatest economic assets (providing affordable, family friendly homes) is disappearing as home prices rapidly increase. Higher rates of intensification would need to be accomplished, though this will alter the community's perception of the predominant urban form across the Region. The high percentage (20%) of greenfield communities that may need to be replanned is also of concern to our membership. WE HBA notes that initial planning exercises for greenfield communities have undergone take many years through a multi-layered planning approvals process in which approvals are earned through a public process. Altering past planning exercises with affected communities and development proponents whom have earned approvals may facilitate a lack of trust in the planning process. Further to this, any replanning of communities must be done carefully to ensure the economic viability of planned and future development.</p> <p>Concept 3 A: 80% Densification, Employment Area Only Greenfield Expansion</p> <p>Should the Region adopt concept 3A, the WE HBA has significant concerns about how the replanning of greenfield communities will be done, as well as the need for sensitivity around planned employment land conversions. These two issues would need to be very carefully addressed to avoid unintended circumstances such as the loss of employment or residential intensification opportunities. The planned high-density forms of living would require a major shift in mindset from Halton Region residents in terms of accepting intensification in their communities and expectations for new home buyers as the range of housing opportunities available in the marketplace would need to shift dramatically. This concept will require significant social and societal change. Finally, should Halton Region adopt Concept 3A, the Region would need to complete significant work with regards to attracting and retaining young workers and talent to sustain Halton's economy. This could be difficult as many young workers are already choosing to leave Halton Region for more affordable ground-oriented housing that meets their family needs in other jurisdictions.</p> <p>Concept 3 B: 80% Densification, No Greenfield Expansion</p>	

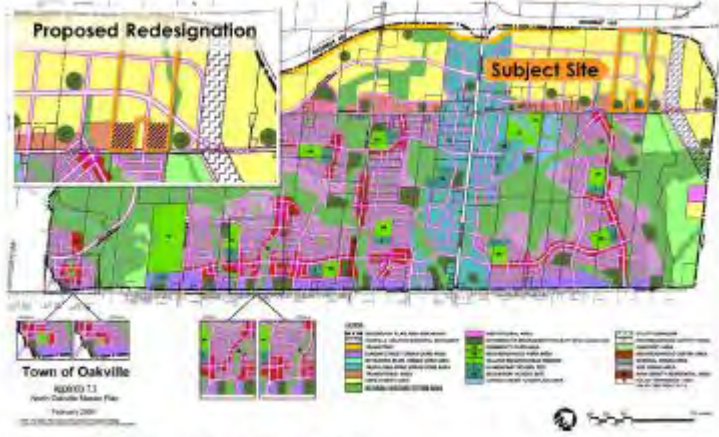
No.	Source	Submission	Response
		<p>The WE HBA has significant concerns that should Halton Region adopt Concept 3B: 80% densification with no greenfield expansion, there will be significant risk to Halton Region's economy, especially with the assumption of high intensification rates for both employment and residential uses. The social impacts of such a scenario would be severe, and consultation with residents and businesses would need to be carefully considered. The difficulty of achieving intensification rates for both employment and residential intensification should not be underestimated. While it may look mathematically possible to accommodate growth in this manner, these policies will have significant impacts on the viability for accommodating both residents and jobs in Halton Region. As this scenario acknowledges, a significant loss of local jobs is possible, and there is an already established trend of Ontario residents "driving until they qualify for a mortgage" to jurisdictions with more affordable housing options.</p> <p>Concept 4: 50% Intensification, Greatest Greenfield Expansion</p> <p>Should Halton Region adopt Concept 4, this scenario still focuses a significant amount of intensification in high density forms throughout the region. From the options presented, Concept 4 provides the most balanced approach to adding new housing units to the region. It is important to recognize that planning for an intensification rate of 50% necessitates strong communication with existing residents about how their communities will evolve over the planning horizon. WE HBA notes that many of our members have spent the last number of years building medium and high density intensification projects, but still encounter political challenges to development within areas designated for growth.</p> <p>Conclusion</p> <p>Planning for growth presents both opportunities and challenges. As such, it is important that these trade-offs are communicated clearly to all residents and business owners. In particular, Halton should focus strong communication on the merits of well-planned greenfield development, as well as the benefits of intensification to existing communities. Increasing the rate of intensification is not a simple task and will require other public policy adjustments beyond the Official Plan itself. All proposed growth concepts represent a need for updated zoning and increased as-of-right building permissions throughout most of the region.</p> <p>Above all, the WE HBA wishes to emphasize that Halton Region make realistic and achievable plans to accommodate growth in our communities, with a mind for economic pressures, especially in terms of available and affordable market housing in our community. While the WE HBA appreciates Halton Region's aspiration for change, should the goal not be widely accepted by members of the public, growth may not occur as planned. WE HBA would like to emphasize that planning for a higher rate of intensification significantly outside of market demand is unlikely to result in built intensification. If the</p>	

No.	Source	Submission	Response
		<p>planned outcome is not achieved, the Region may find itself having put infrastructure into the ground without realizing the planned units. This could result in a higher tax burden for existing residents. Our membership is pleased to partner with Halton Region to ensure the right balance of residential units is delivered and ensure the Region grows in a sustainable, environmentally conscious, socially responsible, and economically viable way. Halton Region's approach to growth should be practical, realistic, and achievable, while balancing a wide range of needs.</p> <p>Sincerely,</p> <p>Mike Collins-Williams, MCIP, RPP Chief Executive Officer West End Home Builders' Association</p>	
94.	<p>Angelo Morgante</p> <p>E-mail dated July 15, 2021</p>	<p>Re: Official Plan – 103 Panin Road, Burlington</p> <p>I have reviewed the City's proposed official plan and found that our lands located at 103 Panin Road in the area of the westbound 403 on ramp is still outside the urban boundary. We expected our lands to be included in the urban area. We do apologize for our discovering this issue so late in the process. We would request that our lands be located within the urban boundary. Our lands are designated for estate type lots; in the new official plan we are designated infill residential. Also, in Bylaw 2020, we are zoned HRNA1 which reinforces the lots sizes as designated in the New Official Plan. We note there is an H on our lands, which is basically a holding zone. This H is usually placed on lands for several reasons: land assembly, servicing issues, etc. None of these H related issues are relevant to our lands. The reasons I feel we should be included in the urban area are the following.</p> <ol style="list-style-type: none"> <li>1 – Our parcel is in close proximity to a major mobility hub (the Aldershot Go Station). The City of Burlington, as you are aware, is intensifying all areas around mobility hubs.</li> <li>2 – We are adjacent to one of the 400 series highways (403).</li> <li>3 – The city has actually constructed a westbound ramp (interchange) to the 403 on lands formerly owned by our group.</li> <li>4 - Waterdown Road has been widened, all road widenings have been taken.</li> <li>5 - There is a 300 mm diameter watermain on Waterdown Road, with the actual water reservoir to the north of our lands. Therefore, there should be more water pressure to handle our lands.</li> </ol>	<p>Based on the results of the North Aldershot Policy Area Discussion Paper and technical analysis conducted for the Growth Concepts Discussion Paper under Appendix J, staff are recommending that these lands not be included within the Preferred Growth Concept. The Discussion Paper and Appendix J identified a number of Provincial policy constraints limiting the eligibility of these lands for settlement boundary expansion. Additionally, consideration for water and wastewater opportunities and constraints (Appendix J1 to the Growth Concepts Discussion Paper) found that extension of municipal services to support residential development would be particularly challenging as compared to other potential growth areas due topography and natural heritage constraints among other factors. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better</p>

No.	Source	Submission	Response
		<p>6 – There is also a 200 mm diameter sanitary sewer in front of our lands</p> <p>7 – Normally, lands are kept out of the Urban Area if services do not exist, which is not the case with our lands.</p> <p>8 – Waterdown Road is designated as a Rural Major Arterial Road with multi pathways. We feel the designation Rural is incorrect because most, if not all the traffic is from Waterdown and areas north of Waterdown. People travelling along Highway 5 from Oakville, Mississauga, etc. use Waterdown Road as a shortcut to the 403 Hamilton, Toronto or Aldershot.</p> <p>9- The road, as stated in the New Official Plan, serves inter regional traffic travel demands, thereby inferring a greater demand than that of a rural road.</p> <p>We trust the above information is sufficient to include 103 Panin Road in the Urban Area of the City’s Official Plan.</p>	<p>support the movement of goods and people.</p>
95.	<p>Victoria Rodrigues on behalf of Valentina Farms Limited</p> <p>E-mail dated July 15, 2021</p>	<p>Dear Regional Chair and Members of Council,</p> <p>RE: Region of Halton Official Plan Review – Integrated Growth Management Strategy; Growth Concept</p> <p>I am the director, President, Secretary and Treasurer of Valentina Farms Limited (“Valentina”). Valentina owns approximately 400 acres of land west of Trafalgar Road between 10<sup>th</sup> Side Road and 15<sup>th</sup> Side Road.</p> <p>I thank the Region staff for the work completed to date on the Growth Concepts.</p> <p>Given the significant population growth planned for Halton Region over the next 30 years (over 479,000 people), I believe Concept 1 presented by the Region provides the most flexibility and ability to provide a range of housing choice for the long term.</p> <p>As discussed in the Halton Hills Staff Report PD-2021-0045 and letters from Mr. Bailey, Halton Healthcare and Mr. Harris, Commissioner of Recreation and Parks – Town of Halton Hills, Halton Hills is in need of additional lands to accommodate necessary community infrastructure including the redevelopment of the Georgetown Hospital and associated uses and community parkland. These land intensive uses cannot be accommodated within Halton Hills existing boundary. Development of these much-needed</p>	<p>The Preferred Growth Concept generally directs a significant amount of growth to strategic growth areas, including around GO stations, and on planned higher order transit corridors.</p> <p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. It also directs growth (referred to as “densification” in the Growth Concepts Discussion Paper) – which is “intensification” in the sense that it concentrates development to areas within the existing approved urban area – to potential future intensification sites.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan</p>

No.	Source	Submission	Response
		<p>community services can be integrated into a strategically planned community incorporating live, work and play.</p> <p>Concept 1 in the Region's work provides a mix of housing choice addressing market demand, but also requires intensification and densification beyond the minimum targets set out in the Provincial Growth Plan. It requires a significant shift to apartments when compared to the existing housing stock and market based projections, but also provides a balance of economic growth with shovel-ready employment lands and ground-related housing that is in high demand for families wanting to live in Halton Region. Based on this, I believe that Concept 1 represents good planning for the future of Halton Region.</p> <p>On the basis of the foregoing, I wish to inform Council that I do not oppose Concept 1.</p> <p>Yours truly,</p> <p>Henry Parasol Director, President, Secretary and Treasurer Valentina Farms Limited</p>	<p>Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>
96.	<p>Brandon Petter on behalf of UrbanMetrics</p> <p>E-mail dated July 15, 2021</p>	<p>Good Morning,</p> <p>Please see the attached cover letter and report( produced by urbanMetrics) regarding UrbanSolutions' response to the initial assessment of the Employment Lands Conversion Request for the subject lands legally described as Lot 8, Concession 2 N.D.S, Geographic Township of Trafalgar, Country of Halton (Burnhamthorpe Road East O-15).</p> <p>Feel free to contact either myself or Matt Johnston (copied) if you have any questions or comments with our submission.</p> <p>Thanks,</p> <p>Brandon Petter, BA (Hons), MPlan Planner</p> <hr/> <p>ATTACHED LETTER</p> <p>Dear Mr. Longo, RE: North Oakville – Employment Area Conversion Review (Town of Oakville, Ontario)</p> <p>urbanMetrics Inc. is pleased to submit this Employment Area Conversion Review in support of the re-designation of a portion of Part of Lot 8, Concession 2 N.D.S located</p>	<p>Regional staff have recommended retaining these subject lands within the Regional Employment Area.</p> <p>An updated submission was provided to the Region on July 15, 2021. The submission provided supplementary information in relation to the Region's initial assessment.</p> <p>No additional information was provided that would result in a change to the recommendation in Regional staff's initial assessment. As a result, and based on a final review of the request, Regional staff recommendation that the conversion not be supported.</p> <p>More information on how this conversion does not meet the principles of the Region's employment conversion assessment criteria is available in</p>



No.	Source	Submission	Response
		<p>north of Burnhamthorpe Road in the North Oakville Secondary Plan Area from “Employment Area” to “Transitional Area”. This review represents the initial phase of the Employment Area Conversion process, which would ultimately require the completion of a more extensive Employment Area Conversion Study in support of your application.</p> <p>This initial phase will in a general sense address the suitability of these lands as a mixed-use area- compared to their current designation which permits more traditional employment uses-based on current market trends in Oakville, and the locational characteristics of the property. More importantly, in this first phase we have addressed how the proposed conversion meets the conversion criteria contained in the Growth Plan, and the current in-force Region of Halton and Oakville Official Plans.</p> <p>We do note that the Region is currently developing specific conversion criteria that are expected to be released in mid-summer. Once these criteria are available, we will address these criteria through an addendum to this initial review. Based on the analysis contained in this report, it is our professional opinion that re-designation of the subject site is appropriate in light of its relationship to adjacent land uses, the locational and access characteristics of the property, and current market trends, in terms of the type of businesses that are being attracted to Oakville. Also, the proposed conversion meets the Provincial, Regional, and Town of Oakville conversion criteria.</p> <p>It has been a pleasure conducting this study on behalf of T.L.M.P.T Ontario Ltd and we look forward to discussing our results.</p> <p>Yours truly,</p> <p>Douglas R. Annand, CMC, PLE Partner</p> <p>-----</p> <p>1.1 Background</p> <p>urbanMetrics inc. (“urbanMetrics”) has been retained by T.L.M.P.T Ontario Ltd to undertake the initial phase of an Employment Area Conversion Review as input to the Region of Halton’s ongoing Municipal Comprehensive Review. This report is intended to support ongoing discussions concerning the conversion of lands currently designated “Employment Area” to “Transitional Area” that are located north of Burnhamthorpe Road, in the North Oakville Secondary Plan Area. Specifically, the subject site (Part of Lot 8, Concession 2 N.D.S) is located on the northern boundary of the Town of Oakville in the new community of Joshua’s Meadows. The portion of the subject site proposed for re-designation to Transitional Area is approximately 15 acres.</p>	<p>Appendix B of the Preferred Growth Concept Report.</p>



No.	Source	Submission	Response
		<p data-bbox="464 293 814 313">Figure 1-1: North Oakville Master Plan (2008).</p>  <p data-bbox="464 768 846 787">SOURCE: Town of Oakville, North Oakville Master Plan, 2008.</p> <p data-bbox="453 802 1409 1157">As noted above the subject site is located in the North Oakville Secondary Plan Area (Amendment No. 198, 2008). The lands south of the subject site are primarily used for agricultural purposes and are proposed to develop into a residential community. The Transitional Area that extends along the majority of the north side of Burnhamthorpe Road East, just west of the subject site provides a buffer between the proposed low-density residential uses to the south and the potential employment uses fronting onto Highway 407 to the north. Without this Transitional Area on the north side of Burnhamthorpe, less compatible employment uses, such as manufacturing, waste processing and distribution could potentially locate close to the residential uses to the south. Uses permitted in Employment Areas that abut a Transitional Area include light industrial, offices and service establishments, whereas Transitional Areas allow for a mix of service/retail, institutional and residential uses, representing an appropriate transition between residential and potentially more noxious employment uses.</p> <p data-bbox="453 1187 1398 1295">The proposed conversion is consistent with the adjacent land use pattern to the west of the site, whereby the southern parcels fronting onto the north side of Burnhamthorpe Road East are designated Transitional Area and the lands fronting onto Highway 407 are designated Employment Area.</p> <p data-bbox="453 1325 590 1349"><b>1.2 Purpose</b></p> <p data-bbox="453 1352 1377 1406">The purpose of this initial phase Employment Area Conversion Review has been to determine if the proposed re-designation of the southern portion of the subject site from</p>	


No.	Source	Submission	Response
		<p>Employment Area to Transitional Area is consistent with the conversion criteria outlined in Provincial, Region of Halton and Town of Oakville policies and reflects market trends related to employment growth in Oakville, regional and municipal strategic objectives, and the locational characteristics of the subject site.</p> <p>1.3 Approach The following describes the major work steps that have been undertaken by urbanMetrics in preparing this Employment Area Impact Review.</p> <p>1) Site and Location Assessment</p> <p>We have visited the subject site and surrounding lands to assess whether the conversion as proposed would be compatible with existing, proposed or potential employment and non-employment uses in the vicinity of the site. In particular, we have assessed the subject site's access to highway, road and transit facilities, as well as its marketability for the currently permitted uses compared to those that would form part of a potential mixed-use development.</p> <p>2) Policy Framework Review</p> <p>We have reviewed the Provincial Policy Statement, the Growth Plan, the Halton Region Official Plan, relevant policies of the Town of Oakville Official Plan, and other relevant policy documents to assess the consistency of the proposed development with the existing and potential future policy framework. In particular, we have assessed whether the subject proposal meets the conversion criteria set-out in the Growth Plan, the Halton Region Official Plan, and the Oakville Official Plan. We note that Halton Region is developing supplementary conversion tests, which are anticipated to be completed by mid-summer. Once these criteria are available, we will supplement this initial review with an assessment as to whether the proposed conversion meets these additional tests. In addition, we have also reviewed the Halton Region and Town of Oakville's economic development objectives.</p> <p>3) Examination of Historical Employment and Real Estate Trends</p> <p>Where available, we have examined high-level historical employment and real estate trends using time-series data from a variety of sources, including the Halton Region, the Town of Oakville, the Census of Canada and CoStar Realty Data. This data has been used to evaluate the likely prospects for development of the subject site with various types of uses, including: traditional manufacturing, warehousing, offices, or retail/service uses that could locate on the lands under the existing land use designation versus the proposed land use designation.</p>	<p>Comments are acknowledged. Please see above for a response.</p>



No.	Source	Submission	Response
		<p>The following sections of this report present the results of our analysis and summarize our detailed research findings.</p> <p>2.0 Site Context</p> <p>Key Findings</p> <ul style="list-style-type: none"> <li>• The subject site is currently used for agricultural purposes, as is the majority of the area immediately surrounding the property.</li> <li>• There are a limited number of commercial and institutional uses located along Burnhamthorpe Road East, but this area is largely rural in nature. There is a tennis club and driving range located directly across from the subject site, and a religious institution to the west.</li> <li>• The area around the subject site is anticipated to change significantly as the North Oakville Master Plan (2009) is built out. Residential uses are proposed south of Burnhamthorpe Road, and Burnhamthorpe Road is proposed to widen to support intensification of the area. The proposed conversion of the southern portion of the subject site located north of Burnhamthorpe Road to Transitional Area represents the logical extension of this area in an easterly direction. Also, the uses permitted in the Transitional Area would be compatible with the proposed residential communities to the south, as well as the existing religious institution to the west.</li> </ul> <p>2.1 Site Characteristics</p> <p>The subject site is located at the northeast boundary of the Town of Oakville. The northern boundary of the subject site fronts onto Highway 407 and the southern boundary fronts onto Burnhamthorpe Road East. To the east and west, there are primarily agricultural uses with a religious institution to the west. The subject site is anticipated to change significantly as the North Oakville East Secondary Plan vision is built out. Currently, this is a greenfield area with agricultural uses and a limited number of commercial uses.</p> <ul style="list-style-type: none"> <li>• To the east is a property reserved for a utility corridor, beyond which is an agricultural parcel (also designated Employment Area) and Highway 403. On the eastern side of Highway 403 in Mississauga there is a mix of commercial uses (e.g. Costco), industrial uses (e.g. Honeywell Aerospace), institutional uses (e.g. the Loyola Catholic Secondary School) and a residential community (the Lisgar Neighbourhood).</li> <li>• To the south there are agricultural lands (designated Residential) extending south to Dundas Street East where there is an existing residential area (the Iroquois Ridge</li> </ul>	

No.	Source	Submission	Response
		<p>North/Joshua Creek neighbourhood). The Joshua Creek tennis club and driving range is located across from the subject site on the south side of Burnhamthorpe Road East.</p> <ul style="list-style-type: none"> <li>• To the west are greenfield agricultural lands. There is a GO carpool lot/park and ride at Trafalgar Road just south of Highway 407 with GO bus service along Highway 407 (bus 461 and 472). There is a religious institution (Ontario Zoroastrian Community Foundation) on the western parcel adjacent to the subject site.</li> <li>• To the north there are agricultural lands in Milton on the northern side of Highway 407. The Trafalgar Transformer Station is located on the west side of Highway 403 and north of Highway 407.</li> </ul> <p><b>Figure 2-1: Site Context</b></p>  <p>SOURCE: Google Maps; urbanMetrics Inc.</p> <p><b>Figure 2-2: Images of Surrounding Land Uses</b></p>  <p>SOURCE: urbanMetrics inc, May 2019.</p> <p><b>2.2 Site Accessibility</b></p>	

No.	Source	Submission	Response
		<p>The subject site is accessible from Burnhamthorpe Road East, a Regional collector road that is proposed to be widened.<sup>3</sup> Additionally, a four lane regional east/west road is proposed to pass through the centre of the subject site, as illustrated in Figure 2-4, on the north side of the lands that are the subject of the conversion. This regional road will form a logical separator between the proposed Transitional Area to the south and the Designated Employment Area to the north.</p> <p><b>Figure 2-3: Images of Transportation Near Subject Site</b></p>  <p><i>GO Carpool Station</i>                      <i>Burnhamthorpe Road Looking East</i></p> <p>SOURCE: urbanMetrics inc, May 2019.</p> <p><b>Figure 2-4: 2031 Transportation Plan</b></p>  <p>SOURCE: Region of Halton, Sustainable Halton Water and Wastewater Master Plan Preferred Wastewater Servicing Strategy, Aecom, September 2011.</p> <p>Highway 407 is accessible from an interchange west of the subject site at Trafalgar Road (2.9km) and north at Britannia Road (6.4km). Highway 403 is accessible to the south at Dundas Street East (3.4km), east at Winston Churchill Boulevard (3.7km), or by using Highway 407. With the limited direct access of the subject site to these major 400 series</p>	

No.	Source	Submission	Response
		<p>highways this is not a preferred site for many types of manufacturing and distribution facilities because there is not direct access to Highway 403 and the most accessible Highway, the 407, is tolled, which creates a significant limitation for truck travel.</p> <p>Figure 2-5: Vacant Employment Land Supply with Major Highway Access</p>  <p>SOURCE: Dillon Consulting, Employment and Commercial Review, Employment Report, March, 7, 2016.</p> <p>As illustrated in Figure 2-5 above, the Town of Oakville Employment and Commercial Review Employment Report prepared by Dillon Consulting found that the subject site is within a preferred location for office development because of the high visibility. By contrast and as already mentioned, the area near the subject site is not as feasible for manufacturing, warehousing and distribution.</p> <p>Oakville Transit does not currently provide service to the subject site; although transit routes are proposed as part of the build out along Burnhamthorpe Road and the new internal roads. Buses are currently available at the Uptown Core (Trafalgar Road and Dundas Street East).<sup>4</sup> There is also a GO carpooling lot and bus station at Trafalgar Road, just south of Highway 407. There are no cycling routes directly serving the subject site. There is a multi-use trail along Dundas Street East to the south. Like the transit routes, cycleways are proposed as part of the build out of this area.</p> <p>The build out of the subject site as a Transitional Area will result in a residential and employment generating community with a diversity of transportation options, including transit and cycleways.</p> <p>2.3 Servicing</p> <p>There is a servicing plan in place for the subject site through the Halton Region Water and Wastewater Master Plan (September 2011). A sub-trunk sewer is approved on a future</p>	

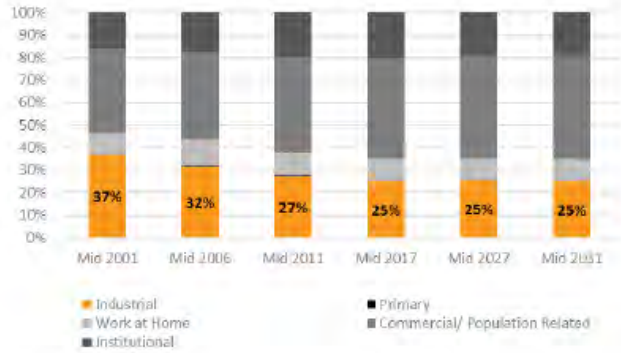
No.	Source	Submission	Response
		<p>road south of subject site and there is an existing watermain on Burnhamthorpe Road. As a result, infrastructure exists that will permit development to occur on the subject site.</p> <p><b>Figure 2-6: Wastewater Servicing</b></p>  <p><b>Existing Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Wastewater Pumping Station</li> <li>● Wastewater Treatment Plant</li> <li>— Wastewater Main</li> <li>- - - Wastewater Forcemain</li> </ul> <p><b>Previously Approved Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Wastewater Pumping Station</li> <li>● Wastewater Treatment Plant</li> <li>— Wastewater Main</li> <li>— Distribution/Collection Boundary Wastewater Main</li> </ul> <p><b>Proposed/Upgrade Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Wastewater Pumping Station</li> <li>● Wastewater Treatment Plant</li> <li>— Proposed Alignment - Wastewater Main</li> <li>- - - Wastewater Forcemain</li> </ul> <p><b>Funded Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Wastewater Pumping Station</li> <li>● Wastewater Treatment Plant</li> <li>— Wastewater Main</li> <li>- - - Wastewater Forcemain</li> <li>■ WWTDP Drainage Area</li> </ul> <p>SOURCE: Region of Halton, Sustainable Halton Water and Wastewater Master Plan Preferred Wastewater Servicing Strategy, Aecom, September 2011.</p> <p><b>Figure 2-7: Water Servicing</b></p>  <p><b>Existing Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Water Pumping Station</li> <li>○ Water Tank</li> <li>● Water Storage</li> <li>● Water Treatment Plant</li> <li>● Water Purification Plant</li> <li>● Water Distribution Plant</li> <li>● Existing Water Tower</li> <li>— Existing Watermain</li> </ul> <p><b>Proposed/Upgrade Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Water Pumping Station</li> <li>○ Water Tank</li> <li>● Water Purification Plant</li> <li>● Water Storage</li> <li>— Watermain</li> <li>— Distribution/Collection Boundary Watermain</li> </ul> <p><b>Previously Approved Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Water Pumping Station</li> <li>○ Water Tank</li> <li>● Water Purification Plant</li> <li>● Water Storage</li> </ul> <p><b>Funded Infrastructure</b></p> <ul style="list-style-type: none"> <li>▲ Water Pumping Station</li> <li>○ Water Tank</li> <li>● Water Purification Plant</li> <li>● Water Storage</li> </ul> <p><b>Existing Interregional Infrastructure</b></p> <ul style="list-style-type: none"> <li>— Existing Interregional Infrastructure</li> <li>— Existing Interregional Infrastructure</li> <li>— Existing Interregional Infrastructure</li> </ul> <p><b>Existing Under Water Distribution Service Area Boundary</b></p> <ul style="list-style-type: none"> <li>— Existing Under Water Distribution Service Area Boundary</li> </ul> <p><b>Water Pressure Zones</b></p> <ul style="list-style-type: none"> <li>— Water Pressure Zones</li> </ul> <p><b>Proposed Under Water Distribution Area</b></p> <ul style="list-style-type: none"> <li>— Proposed Under Water Distribution Area</li> </ul> <p>SOURCE: Region of Halton, Sustainable Halton Water and Wastewater Master Plan Preferred Wastewater Servicing Strategy, Aecom, September 2011.</p>	

No.	Source	Submission	Response
		<p>The proposed re-designation of the southern portion of the subject site to Transitional Area is compatible with the future build out of the area, as well as existing land uses like the religious institution to the west.</p> <p>2.0 Economic Trends Key Findings</p> <ul style="list-style-type: none"> <li>• The Town of Oakville is continuing to focus on employment growth in the professional services, life sciences, advanced manufacturing, and digital media, information communications technology and film. All of the above sectors—with the exception of advanced manufacturing—have experienced growth over the last 10 years.</li> <li>• The Town of Oakville already has a higher concentration of jobs in the educational services, health care and social services sectors compared to the Toronto CMA. Compared to Halton Region, there is a higher concentration of financial and insurance, real estate, and professional, scientific and technical services jobs in Oakville.<sup>5</sup></li> <li>• Employment lands in the Town of Oakville support a greater diversity of employment types compared to other Halton Region municipalities. For example, only 47% of employment on employment lands is found in industrial uses, compared to 74% in Milton, 71% in Halton Hills and 51% in Burlington.<sup>6</sup></li> <li>• There are two active developments adjacent to the subject site, a religious institution to the west and a residential subdivision to the south. These are sensitive land uses that would benefit from proximity to a Transitional Area with compatible land uses, instead of traditional employment uses.</li> <li>• As outlined in the Draft Economic Development Strategy (2019), office tenants and other employment uses are increasingly attracted to mixed use locations with nearby amenities. The re-designation of the southern portion of the subject site to Transitional Area would allow for a greater diversity of uses, and the creation of complete community.</li> </ul> <p>3.1 Economic Development Objectives</p> <p>Both Halton Region and the Town of Oakville are focusing employment growth on office uses in key sectors like professional services, life sciences and information communications technology.</p> <p>Halton Economic Development Strategy (2012-2021)</p> <p>The Halton Region Vision Economic Development visit is:</p>	

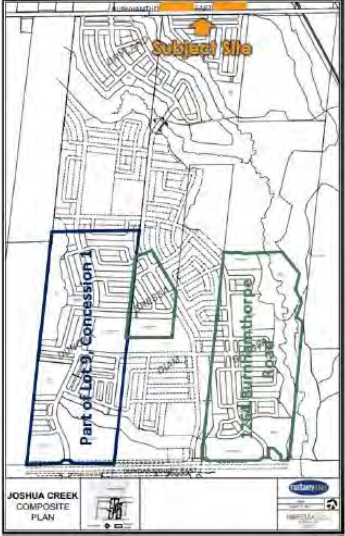
No.	Source	Submission	Response
		<p>By 2021, Halton will be a preferred location for innovative businesses and entrepreneurs who need highly skilled talent, quality infrastructure and a positive business environment in order to contribute to sustainable regional economic prosperity.</p> <p>The Region has established key pillars to guide economic development work. There is a focus on attracting high density employment, with a focus on office and export-oriented uses. There are also eight targeted sectors, which overlap with the Town of Oakville target sectors (shown in bold below).</p> <p>7. Continue to support the sector-based economic development strategies of Burlington, Halton Hills, Milton and Oakville, particularly those focused on attracting and retaining higher-density employment uses with job quality attributes that match Halton's highly skilled labour force.</p> <p>8. Develop and implement a broad-based investment attraction action plan that supports local economic development strategies, with an emphasis on office and export-oriented users, and ensure that the action plan is applicable for both foreign direct investment and corporate relocations within the Greater Toronto and Hamilton Area (GTAH).</p> <p>d) Develop, in consultation with the Local Municipalities and in conjunction with the planned business attraction events noted above an initial lead generation list of expanding companies in five of the Region's eight target sectors for investment attraction, namely:</p> <ol style="list-style-type: none"> <li>1. Advanced manufacturing</li> <li>2. Professional and technical services</li> <li>3. Finance and insurance</li> <li>4. Business support services</li> <li>5. Information communications technology</li> <li>6. Life sciences and biotechnology</li> <li>7. Digital media</li> <li>8. Cleantech</li> </ol> <p>to allow for in-person, electronic and/or print follow-up by GTMA, Halton and the Local Municipalities (Halton Ec Dev, develop info in 2012)</p> <p>Oakville Draft Economic Development Strategy (2019-2024)  The 2019 Economic Development Strategy focused on four targeted sectors:</p> <ol style="list-style-type: none"> <li>a) Professional services,</li> <li>b) Life sciences,</li> <li>c) Advanced manufacturing, and</li> <li>d) Digital media, information communications technology (ICT) and film.</li> </ol>	

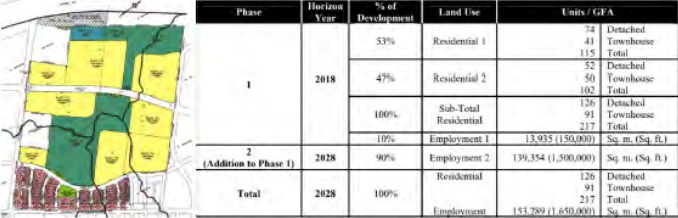
No.	Source	Submission	Response																																				
		<p>All of the above sectors—with the exception of advanced manufacturing—have grown.<sup>7</sup> The number of advanced manufacturing businesses has actually declined by 18% between 2009 and 2018, but the key sectors noted above remain a focus of the draft 2019 Strategy.</p> <p>The 2019 Oakville draft Economic Development Strategy vision is to be the best place to work in Canada, with the following goals:</p> <ul style="list-style-type: none"> <li>• Goal 1: Attracting New Investment &amp; Jobs</li> <li>• Goal 2: Growing the Local Economy</li> <li>• Goal 3: Vibrant Commercial Districts</li> </ul> <p>The draft 2019 strategy outlines that the focus of employment growth over the previous ten years has been in office development, and going forward mixed-use development will be an even greater focus for employment growth, which is consistent with the type of uses that will locate in Transitional Areas, including the subject site.</p> <p>3.2 Market Trends</p> <p>Compared to other Halton Region Municipalities, the Town of Oakville has a greater diversity of uses on employment lands and a lower proportion of industrial uses on employment lands, as illustrated in Figure 3-1.</p> <p><b>Figure 3-1: Employment on Employment Lands by Major Sector, 2014</b></p> <table border="1"> <caption>Data for Figure 3-1: Employment on Employment Lands by Major Sector, 2014</caption> <thead> <tr> <th>Municipality</th> <th>Industrial (%)</th> <th>Office (%)</th> <th>Retail/Personal Services (%)</th> <th>Institutional (%)</th> <th>Other (%)</th> </tr> </thead> <tbody> <tr> <td>Burlington</td> <td>31%</td> <td>~28%</td> <td>~15%</td> <td>~10%</td> <td>~16%</td> </tr> <tr> <td>Halton Hills</td> <td>71%</td> <td>~15%</td> <td>~10%</td> <td>~2%</td> <td>~2%</td> </tr> <tr> <td>Milton</td> <td>74%</td> <td>~10%</td> <td>~10%</td> <td>~2%</td> <td>~4%</td> </tr> <tr> <td>Oakville</td> <td>47%</td> <td>~28%</td> <td>~10%</td> <td>~10%</td> <td>~5%</td> </tr> <tr> <td>Halton Region</td> <td>53%</td> <td>~25%</td> <td>~10%</td> <td>~5%</td> <td>~7%</td> </tr> </tbody> </table> <p>The Town of Oakville employment forecast anticipates that industrial jobs will continue to play a less prominent role in the distribution of job, with the largest job growth being in the</p>	Municipality	Industrial (%)	Office (%)	Retail/Personal Services (%)	Institutional (%)	Other (%)	Burlington	31%	~28%	~15%	~10%	~16%	Halton Hills	71%	~15%	~10%	~2%	~2%	Milton	74%	~10%	~10%	~2%	~4%	Oakville	47%	~28%	~10%	~10%	~5%	Halton Region	53%	~25%	~10%	~5%	~7%	
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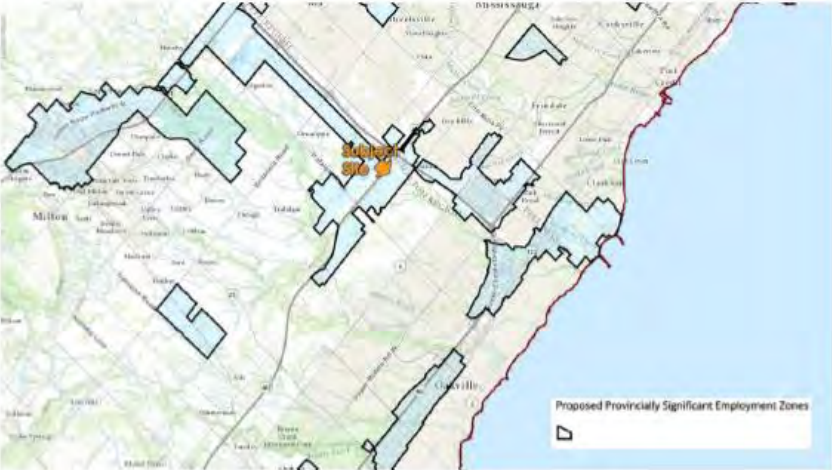
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		<p>commercial/population related sector. Re-designation of a portion of the subject site to Transitional Area will facilitate the delivery of this type of employment growth.</p> <p><b>Figure 3-2: Oakville Employment Forecast, 2031</b></p>  <table border="1" data-bbox="485 397 1102 747"> <caption>Figure 3-2: Oakville Employment Forecast, 2031</caption> <thead> <tr> <th>Year</th> <th>Industrial (%)</th> <th>Work at Home (%)</th> <th>Institutional (%)</th> <th>Primary (%)</th> <th>Commercial/Population Related (%)</th> </tr> </thead> <tbody> <tr> <td>Mid 2001</td> <td>37%</td> <td>~10%</td> <td>~10%</td> <td>~15%</td> <td>~28%</td> </tr> <tr> <td>Mid 2006</td> <td>32%</td> <td>~10%</td> <td>~10%</td> <td>~15%</td> <td>~29%</td> </tr> <tr> <td>Mid 2011</td> <td>27%</td> <td>~10%</td> <td>~10%</td> <td>~15%</td> <td>~38%</td> </tr> <tr> <td>Mid 2017</td> <td>25%</td> <td>~10%</td> <td>~10%</td> <td>~15%</td> <td>~40%</td> </tr> <tr> <td>Mid 2027</td> <td>25%</td> <td>~10%</td> <td>~10%</td> <td>~15%</td> <td>~40%</td> </tr> <tr> <td>Mid 2031</td> <td>25%</td> <td>~10%</td> <td>~10%</td> <td>~15%</td> <td>~40%</td> </tr> </tbody> </table> <p>SOURCE: Town of Oakville, Development Charge Background Study, December 22, 2017.</p> <p>Re-designation of a portion of the subject site would support a larger diversity of uses adjacent to the Employment Area to the north. Conversion of the subject site supports the location of higher intensity office and population related uses, rather than the traditional types of industrial employment that have been in decline, and typically locate in Employment Areas.</p> <p><b>3.3 Development Applications</b></p> <p>As summarized in Appendix C, more than 80% of the total development projects identified in Oakville are primarily residential in nature. Notwithstanding this obvious emphasis on residential uses, however, it is also important to note that a range of other employment-focused projects are also proposed. In particular, our research identified a healthy mix of additional office, industrial, retail/service commercial, hotel and institutional type projects. Adjacent to the subject site there is an application for a religious institution and applications for residential developments.</p> <p>1187 Burnhamthorpe Road East, immediately west of the subject site, as an active site plan application for a place of worship. The Planning Justification Study for 1187 Burnhamthorpe Road East states that there are long term plans for an expansion of this institutional use to include seniors' residences and medical offices for members of the congregation and local residents.</p>	Year	Industrial (%)	Work at Home (%)	Institutional (%)	Primary (%)	Commercial/Population Related (%)	Mid 2001	37%	~10%	~10%	~15%	~28%	Mid 2006	32%	~10%	~10%	~15%	~29%	Mid 2011	27%	~10%	~10%	~15%	~38%	Mid 2017	25%	~10%	~10%	~15%	~40%	Mid 2027	25%	~10%	~10%	~15%	~40%	Mid 2031	25%	~10%	~10%	~15%	~40%	
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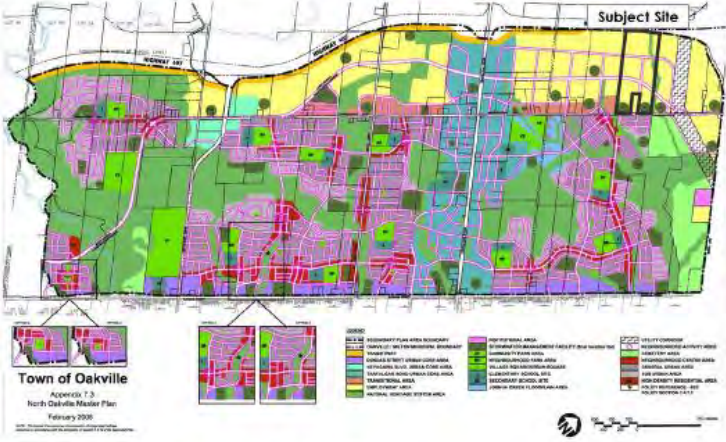
No.	Source	Submission	Response
		<p data-bbox="457 256 621 277">Figure 3-3: Site Plan, 2017</p> <p data-bbox="457 703 1402 837">South of Burnhamthorpe Road there are a number of residential applications. Build-out of this area is currently occurring along Dundas Street East, with future phases moving north. At 1264 Burnhamthorpe Road, south of subject site, there is a draft plan of subdivision to create 370 residential units.<sup>8</sup> Also in this area (Part of Lot 9, Concession 1) is a draft plan of subdivision for 595 units.<sup>9</sup></p>	<p data-bbox="1438 313 1885 367">Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p data-bbox="457 261 793 277">Figure 3-4: Residential Development Near Subject Site</p>  <p data-bbox="457 833 716 849">SOURCE: Korsiak Urban Planning, August 17, 2017.</p> <p data-bbox="457 862 1409 997">Compatibility with adjacent land uses is an important consideration for future uses on the subject site. Heavy industrial uses would not be appropriate located adjacent to a religious institution and across from the residential uses planned for south of Burnhamthorpe. Therefore, a Transitional Area on the southern portion of the subject site would be compatible with these sensitive land uses.</p> <p data-bbox="457 1024 1409 1273">This proposed development of the subject site as a Transitional Area is very similar to another active development application at Burnhamthorpe Road East and Sixth Line (Part of Lots 14 &amp; 15, Concession 2, North of Dundas St., at 199 Burnhamthorpe Road), approximately 2.5 kilometres southwest of the subject site. This proposal includes 217 units (singles and towns) and 85 acres (35 hectares) of employment land. The Employment Area portion of the property is planned to accommodate 1.65 million square feet of floor area of light industrial, office and service uses. A similar development concept on the subject site could actually result in a greater number of employees being generated, than would be the case if the entire site remained as Employment Area.</p>	

No.	Source	Submission	Response																																		
		<p data-bbox="468 264 842 282">Figure 3-5: 199 Burnhamthorpe Road Example Concept</p>  <table border="1" data-bbox="663 293 1142 509"> <thead> <tr> <th>Phase</th> <th>Horizon Year</th> <th>% of Development</th> <th>Land Use</th> <th>Units / GFA</th> </tr> </thead> <tbody> <tr> <td rowspan="3">1</td> <td rowspan="3">2018</td> <td>53%</td> <td>Residential 1</td> <td>74 Detached 41 Townhouse 115 Total</td> </tr> <tr> <td>47%</td> <td>Residential 2</td> <td>52 Detached 50 Townhouse 102 Total</td> </tr> <tr> <td>100%</td> <td>Sub-Total Residential</td> <td>126 Detached 91 Townhouse 217 Total</td> </tr> <tr> <td>2</td> <td rowspan="2">2028 (Addition to Phase 1)</td> <td>10%</td> <td>Employment 1</td> <td>13,935 (1,500,000) Sq. m. (Sq. ft.)</td> </tr> <tr> <td>90%</td> <td>Employment 2</td> <td>139,354 (1,500,000) Sq. m. (Sq. ft.)</td> </tr> <tr> <td>Total</td> <td>2028</td> <td>100%</td> <td>Residential</td> <td>126 Detached 91 Townhouse 217 Total</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Employment</td> <td>153,289 (1,650,000) Sq. m. (Sq. ft.)</td> </tr> </tbody> </table> <p data-bbox="468 521 1031 539">SOURCE: KLM Planning Partners Inc; Transportation Impact Study for Star Oak Developments Limited.</p> <p data-bbox="453 557 825 581">4.0 Land Use Planning Framework</p> <p data-bbox="453 610 594 634">Key Findings</p> <ul data-bbox="453 667 1402 1159" style="list-style-type: none"> <li>• The subject site is located within a potential though unapproved Provincially Significant Employment Zone, and is designated Employment Area in the Halton Regional Official Plan and the North Oakville East Secondary Plan.</li> <li>• The timing of this Employment Area Conversion Request is appropriate because the Halton Region Municipal Comprehensive Review is currently underway.</li> <li>• The proposed conversion of 15 acres of the subject site from Employment Area to Transitional Area is a minor site specific conversion that will maintain the majority of the subject site as a large parcel of employment land. There are both land use compatibility and economic reasons for conversion of the southern portion of the subject site.</li> <li>• The conversion is consistent with the Growth Plan and Halton Regional Official Plan criteria. There is demand for complete communities with commercial, residential and institutional uses near places of work. The proposal would achieve this objective while still meeting the employment growth targets through the location of office and light industrial uses on the majority of the subject site, and population related employment on the portion of the site re-designated as Transitional Area.</li> </ul> <p data-bbox="453 1190 669 1214">4.1 Land Use Policy</p> <p data-bbox="453 1245 1283 1295">The subject site is designated Employment Area by multiple policy documents, summarized below:</p> <p data-bbox="453 1300 789 1325">Figure 4-1: Land Use Summary</p> <p data-bbox="453 1356 716 1406">Policy Growth Plan (May 2019)</p>	Phase	Horizon Year	% of Development	Land Use	Units / GFA	1	2018	53%	Residential 1	74 Detached 41 Townhouse 115 Total	47%	Residential 2	52 Detached 50 Townhouse 102 Total	100%	Sub-Total Residential	126 Detached 91 Townhouse 217 Total	2	2028 (Addition to Phase 1)	10%	Employment 1	13,935 (1,500,000) Sq. m. (Sq. ft.)	90%	Employment 2	139,354 (1,500,000) Sq. m. (Sq. ft.)	Total	2028	100%	Residential	126 Detached 91 Townhouse 217 Total				Employment	153,289 (1,650,000) Sq. m. (Sq. ft.)	
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No.	Source	Submission	Response
		<p>Halton Regional Official Plan (1995, 2018) Employment Area</p> <p>Land Use Proposed Provincially Significant Employment Zones Urban Area, Employment Area North Oakville East Secondary Plan (2008)</p> <p>Provincially Significant Employment Zones</p> <p>Provincially significant employment zones are areas that provide for stable, reliable employment across the Region. On May 2nd, 2019 the proposed framework for provincially significant employment zones was adopted following a comment period in early 2019. During the comment period adjustments were made to the proposed mapping of these zones, and although the official comment period is now closed requests to review the zones are still permitted, through consultations with Regional and Municipal staff.</p> <p>Official Plan (2019) policies concerning Provincially Significant Employment Zones are detailed below.</p> <p>Provincially Significant Employment Zones</p> <p>Areas defined by the Minister in consultation with affected municipalities for the purpose of long-term planning for job creation and economic development. Provincially significant employment zones can consist of employment areas as well as mixed-use areas that contain a significant number of jobs.</p> <p>2.2.5 Employment</p> <p>12. The Minister may identify provincially significant employment zones and may provide specific direction for planning in those areas to be implemented through appropriate official plan policies and designations and economic development strategies.</p> <p>5.2.2 Supplementary Direction</p> <p>3. The Province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.</p> <p>The subject site is within the 401/407 Meadowvale proposed Provincially Significant Employment Zone. These lands can be converted through a Municipal Comprehensive</p>	

No.	Source	Submission	Response
		<p>Review (MCR). A MCR is underway and the timing of this conversion proposal is therefore consistent with the above policy.</p> <p><b>Figure 4-2: Proposed Provincially Significant Employment Zones</b></p>  <p>SOURCE: Ministry of Municipal Affairs, Proposed Provincially Significant Employment Zones</p> <p>Halton Regional Official Plan (1995, 2018)</p> <p>The subject site is within the Urban Area and designated Employment Area under the Halton Regional Official Plan (1995, 2018).</p> <p>Employment Areas</p> <p>77.1 The objectives of the Employment Areas are:</p> <p>(1) To ensure the availability of sufficient land for employment to accommodate forecasted growth to support Halton's and its Local Municipalities' economic competitiveness.</p> <p>(2) To provide, in conjunction with those employment uses within the residential and mixed-use areas of the communities, opportunities for a fully-diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses.</p>	

No.	Source	Submission	Response
		<p>(3) To locate Employment Areas in the vicinity of existing major highway interchanges and rail yards, where appropriate, within the Urban Area.</p> <p>The proposed Transitional Area would help to achieve the policy of a “fully-diversified economic base” in Employment Areas by allowing a greater diversity of land uses, particularly on lands that we consider as less desirable for traditional manufacturing or distribution type uses.</p> <p>North Oakville Master Plan (2008)</p> <p>The subject site is designated Employment Area by the North Oakville Master Plan (2009), and two stormwater management ponds are currently proposed on lands located in the southern portion of the subject site. However, these stormwater management ponds are preliminary, with the precise locations and sizes subject to more detailed design. The land use pattern along the majority of Burnhamthorpe Road is characterized by future residential areas to the south of Burnhamthorpe Road, a Transitional Area to the north of Burnhamthorpe Road and an Employment Area fronting onto Highway 407. The proposed re-designation of the southern portion of the subject site is consistent with this surrounding land use pattern, and is a logical extension of the Transitional Area located on the north side of Burnhamthorpe Road East.</p> <p><b>Figure 4-3: North Oakville Master Plan (2008)</b></p>  <p><b>Town of Oakville</b> Appendix 7.3 North Oakville Master Plan February 2008</p> <p>SOURCE: Town of Oakville, North Oakville Master Plan, 2008.</p>	

No.	Source	Submission	Response
		<p>Employment Areas are intended for more intensive uses. Heavier industrial uses are permitting in Employment Areas that do not abut a Residential or Transitional Area (Policy 7.6.8.2). Employment Areas abutting Transitional Areas and other sensitive uses<sup>10</sup> permit light industrial uses, offices and service uses. With residential uses proposed south of the subject site conversion of the southern portion to a non industrial type of development is more appropriate.</p> <p>Transitional Areas allow for a greater diversity of uses adjacent to Employment Areas. Permitted uses include: service/retail, institutional and residential uses.</p> <p>7.6.9 TRANSITIONAL AREA 7.6.9.1 Purpose</p> <p>The intent of the Transitional Area designation on Figure NOE2 is to provide for an interface and buffer between the more intensive concentration of industrial, office and service employment uses located in the Employment District designation, and adjacent residential uses.</p> <p>Transitional Areas permit employment generating uses including: home businesses, convenience retail, personal services, other business activity and institutional uses. See Appendix B for a summary of all Employment Area and Transitional Area policies.</p> <p>4.2 Potential Employment The re-designation of 15 acres of the subject site from Employment Area to Transitional Area will not impact the Halton Region's ability to accommodate employment growth. As discussed, the types of employment that are anticipated on the subject site are higher density uses, including office and flex space, rather than traditional land extensive industrial uses.</p> <p>According to the Integrated Growth Management Strategy Growth Scenarios Report (2019), North Oakville is anticipated to develop with a combination of low-density industrial uses and higher-density employment uses. Traditional employment uses with lower employment densities, including manufacturing and other industrial uses, are anticipated to locate along Highway 401 in Halton Hills. This is further confirmed in the Employment and Commercial Review (2016), which states that North Oakville Employment District East is anticipated to develop in a similar fashion to the City of Mississauga Western Business Park urbanMetrics has assessed the employment density potential on the subject site using three hypothetical development scenarios with a combination of residential, industrial, flex and office uses, as illustrated in Figure 4-4. We have estimated that there is the potential to deliver between 1,220 and 2,940 jobs on the subject site at built out, compared to a total 1,100 jobs that would be delivered exclusively through traditional industrial uses. These development scenarios illustrate the long-term</p>	



No.	Source	Submission	Response																																																																																				
		<p data-bbox="451 256 1398 367">potential for employment growth, with the expected development anticipated on the subject site. Given amount of employment on both the subject site and the broader North Oakville employment lands, it is anticipated that built out would occur slowly, as predicted in the Integrated Growth Management Strategy Growth Scenarios Report (2019).</p> <p data-bbox="472 404 991 423">Figure 4-4: Estimated Employment at Built-out for Development Scenarios</p> <table border="1" data-bbox="472 435 1171 873"> <thead> <tr> <th></th> <th>Area<sup>6</sup></th> <th>Density</th> <th>Scale</th> <th>Employment Density</th> <th>Employees</th> </tr> </thead> <tbody> <tr> <td><b>Traditional Industrial<sup>1</sup></b></td> <td><b>87 Ac.</b></td> <td><b>0.35 FSI</b></td> <td><b>1,320,000 Sq Ft</b></td> <td><b>1,200 sq ft / employee</b></td> <td><b>1,100</b></td> </tr> <tr> <td colspan="5"><b>Development Scenarios</b></td> <td><b>1,220 to 2,940</b></td> </tr> <tr> <td><b>Mixed Industrial and Flex</b></td> <td><b>87 Ac.</b></td> <td></td> <td></td> <td></td> <td><b>1,220</b></td> </tr> <tr> <td>Residential (Work From Home)<sup>3</sup></td> <td>15 Ac.</td> <td>15 units / acre</td> <td>725 Population</td> <td>4.7% of population</td> <td>30</td> </tr> <tr> <td>Traditional Industrial</td> <td>36 Ac.</td> <td>0.35 FSI</td> <td>546,000 Sq Ft</td> <td>1,200 sq ft / employee</td> <td>460</td> </tr> <tr> <td>Flex</td> <td>36 Ac.</td> <td>0.35 FSI</td> <td>546,000 Sq Ft</td> <td>750 sq ft / employee</td> <td>730</td> </tr> <tr> <td><b>Flex<sup>2</sup></b></td> <td><b>87 Ac.</b></td> <td></td> <td></td> <td></td> <td><b>1,480</b></td> </tr> <tr> <td>Residential (Work From Home)<sup>3</sup></td> <td>15 Ac.</td> <td>15 units / acre</td> <td>725 Population</td> <td>4.7% of population</td> <td>30</td> </tr> <tr> <td>Flex</td> <td>72 Ac.</td> <td>0.35 FSI</td> <td>1,091,000 Sq Ft</td> <td>750 sq ft / employee</td> <td>1,450</td> </tr> <tr> <td><b>Mixed Office and Flex<sup>2</sup></b></td> <td><b>87 Ac.</b></td> <td></td> <td></td> <td></td> <td><b>2,940</b></td> </tr> <tr> <td>Residential (Work From Home)<sup>3</sup></td> <td>15 Ac.</td> <td>15 units / acre</td> <td>725 Population</td> <td>4.7% of population</td> <td>30</td> </tr> <tr> <td>Flex<sup>4</sup></td> <td>36 Ac.</td> <td>0.35 FSI</td> <td>546,000 Sq Ft</td> <td>750 sq ft / employee</td> <td>730</td> </tr> <tr> <td>Office<sup>5</sup></td> <td>36 Ac.</td> <td>0.35 FSI</td> <td>546,000 Sq Ft</td> <td>250 sq ft / employee</td> <td>2,180</td> </tr> </tbody> </table> <p data-bbox="472 898 1171 1019"> <sup>1</sup> Based on Integrated Growth Management Strategy Growth Scenarios: Halton Region 2041, June 19, 2019.  <sup>2</sup> Based on a hypothetical development.  <sup>3</sup> Based on Integrated Growth Management Strategy Growth Scenarios: Halton Region 2041, June 19, 2019 and an adjacent develop  <sup>4</sup> Based on comparable employment areas using CoStar Realty and Employment Surveys.  <sup>5</sup> Based on Hemson, Sustainable Halton, Land Supply Analysis, November 2007.  <sup>6</sup> Total area excludes the right-of-way </p> <p data-bbox="451 1032 1352 1138"> <b>4.3 Conversion Criteria</b>  The Provincial Policy Statement, the Growth Plan (2019), Halton Region Official Plan (1995, 2018) and Livable Oakville Official Plan (2009, 2017) all contain conversion criteria, detailed below. </p> <p data-bbox="451 1167 816 1195"> <b>Provincial Policy Statement (PPS)</b> </p> <p data-bbox="451 1224 1398 1360"> Section 1.3.2 of the PPS relates specifically to Employment Areas, which are defined as “those areas designated in an official plan for clusters of business and economic activities including, but not limited to: manufacturing, warehousing, offices, and associated retail and ancillary retail facilities.” Policy 1.3.2.2 addresses the conversion of employment lands and states: </p>		Area <sup>6</sup>	Density	Scale	Employment Density	Employees	<b>Traditional Industrial<sup>1</sup></b>	<b>87 Ac.</b>	<b>0.35 FSI</b>	<b>1,320,000 Sq Ft</b>	<b>1,200 sq ft / employee</b>	<b>1,100</b>	<b>Development Scenarios</b>					<b>1,220 to 2,940</b>	<b>Mixed Industrial and Flex</b>	<b>87 Ac.</b>				<b>1,220</b>	Residential (Work From Home) <sup>3</sup>	15 Ac.	15 units / acre	725 Population	4.7% of population	30	Traditional Industrial	36 Ac.	0.35 FSI	546,000 Sq Ft	1,200 sq ft / employee	460	Flex	36 Ac.	0.35 FSI	546,000 Sq Ft	750 sq ft / employee	730	<b>Flex<sup>2</sup></b>	<b>87 Ac.</b>				<b>1,480</b>	Residential (Work From Home) <sup>3</sup>	15 Ac.	15 units / acre	725 Population	4.7% of population	30	Flex	72 Ac.	0.35 FSI	1,091,000 Sq Ft	750 sq ft / employee	1,450	<b>Mixed Office and Flex<sup>2</sup></b>	<b>87 Ac.</b>				<b>2,940</b>	Residential (Work From Home) <sup>3</sup>	15 Ac.	15 units / acre	725 Population	4.7% of population	30	Flex <sup>4</sup>	36 Ac.	0.35 FSI	546,000 Sq Ft	750 sq ft / employee	730	Office <sup>5</sup>	36 Ac.	0.35 FSI	546,000 Sq Ft	250 sq ft / employee	2,180	
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No.	Source	Submission	Response
		<p>Planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.</p> <p>SUBJECT SITE:</p> <p>It is our opinion that the proposed re-designation of the southern portion of the subject site to Transitional Area promotes a more efficient and intensive land-use development pattern than the current land uses identified in the North Oakville Master Plan (2009). Higher intensity employment uses, such as offices, institutional and other population related employment uses will provide local employment opportunities for future residents in the community located south of Burnhamthorpe Road East, as well as those living on the subject site.</p> <p>Growth Plan for the Greater Golden Horseshoe (Growth Plan) As of May 2, 2019, an update to the Growth Plan was released, A Place to Grow: Growth Plan for the Greater Golden Horseshoe. Section 2.2.5 of the Growth Plan relates specifically to employment and the promotion of economic development and competitiveness. Policy 2.2.5.1 states:</p> <p>Economic development and competitiveness in the GGH will be promoted by:</p> <ul style="list-style-type: none"> <li>a) making more efficient use of existing employment areas and vacant and underutilized employment lands and increasing employment densities;</li> <li>b) ensuring the availability of sufficient land, in appropriate locations, for a variety of employment to accommodate forecasted employment growth to the horizon of this Plan;</li> <li>c) planning to better connect areas with high employment densities to transit; and</li> <li>d) integrating and aligning land use planning and economic development goals and strategies to retain and attract investment and employment.</li> </ul> <p>SUBJECT SITE: The proposed re-designation of the subject site will result in a higher intensity form of development in comparison to the land-extensive industrial uses, such as warehousing and distribution, which are in decline in the Region and in Oakville. The introduction of commercial/institutional and/or residential uses will result in a more efficient use of the lands. A focus on office space over traditional industrial uses will result in increased employment densities that will assist the Region and the Town in reaching the forecasted employment growth as set-out in the Growth Plan.</p>	

No.	Source	Submission	Response
		<p>Policy 2.2.5.9 of the Growth Plan outlines the conversion criteria for lands within an employment area. We note that Halton Region is developing a refined set of criteria through its ongoing Municipal Comprehensive Review, which will be considered as the next phase of our review.</p> <p>The conversion of lands within employment areas or prime employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that: ...</p> <p><b>SUBJECT SITE:</b> This is the appropriate time in seeking the conversion as the Region of Halton is currently carrying out a municipal comprehensive review. The Region is the approval authority charged with permitting or declining applications for conversion.</p> <p>a) there is a need for the conversion.</p> <p><b>SUBJECT SITE:</b> The Sustainable Halton Land Supply Analysis (2007) found that there is limited demand for more employment land in the Region and a much larger demand for residential land.<sup>14</sup> By increasing the number of residents and jobs that are accommodated on the subject site beyond what would be generated from traditional employment uses, the subject site will support the population and employment targets for North Oakville and the broader region.</p> <p>b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated.</p> <p><b>SUBJECT SITE:</b> The market demand for the type of development that historically has located on employment lands (e.g., manufacturing and warehousing) is declining, as are the number of employees generated by these traditional development types. Historically, similar greenfield lands attracted businesses in the goods producing sectors of the economy; however, these sectors of the economy are in decline with current demand shifting to the service producing sectors both at the Regional and Town level. The subject lands are strategically located to attract the type of employment uses consistent with current market trends, which will result in higher employment accommodation on a per hectare basis.</p> <p>Consequently, less employment land will be required over the horizon of the current Growth Plan to accommodate the traditional type of employment uses that historically have located on employment lands, and with the development of a greater amount of</p>	

No.	Source	Submission	Response
		<p>employment intensive businesses the Region and the Town will be better able to meet their employment targets.</p> <p>c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan.</p> <p><b>SUBJECT SITE:</b>  North Oakville has 533 hectares of vacant land (73% of the vacant land in Oakville). The portion of the subject site proposed for re-designation is 15 acres (6 hectares), representing 0.8% of the existing supply of vacant land in Oakville and 1% of the supply in North Oakville. In 2007, the Sustainable Halton Land Supply Analysis found that the regional demand for residential land was greater than the employment land demand for accommodating growth to 2031.15 The mixed-use concept being proposed for the subject site increases the amount of employment that can be accommodated on the subject site, while also providing for an opportunity for residential development, and creation of a complete community.</p> <p>d) the proposed uses would not adversely affect the overall viability of the employment area or prime employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.</p> <p><b>SUBJECT SITE:</b>  The mix of uses allowed in Transitional Areas will support higher density employment and assist the Region in achieving the intensification and density targets in the Regional Official Plan. Future employment uses in the area and in fact the proposed Transitional Area, will provide a better buffer between the employment uses on the northern portion of the subject site and the residential uses located south of Burnhamthorpe Road East.</p> <p>e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.</p> <p><b>SUBJECT SITE:</b>  There is a servicing and transportation plan in place to guide infrastructure development in North Oakville. Additionally, Transitional Areas permit a diversity of uses that have the potential of adding public service facilities on the subject site.</p> <p>Halton Region Official Plan</p> <p>The Halton Region Official Plan (1995, 2018) has been approved by the Minister of Municipal Affairs and Housing.</p>	

No.	Source	Submission	Response
		<p>77.4 It is the policy of the Region to:</p> <p>(4) Require Local Municipalities to prohibit the conversion of lands within the Employment Areas to non-employment uses including major retail uses unless through a municipal comprehensive review where it has been demonstrated that:</p> <p>a) there is a need for the conversion;</p> <p>b) the conversion will not compromise the Region's or Local Municipality's ability to meet the employment forecast in Table 1 and Table 2a;</p> <p>c) the conversion will not adversely affect the overall viability of the Employment Area, and achievement of the intensification and density targets of Table 2 and other policies of this Plan;</p> <p>d) there is existing or planned infrastructure to accommodate the proposed conversion;</p> <p>e) the lands are not required for employment purposes over the long term;</p> <p>f) cross-jurisdictional issues have been considered; and</p> <p>g) all Regional policies and requirements, financial or otherwise, have been met.</p> <p>SUBJECT SITE:</p> <p>As these conversion criteria are similar to those outlined in the Growth Plan addressing these criteria has been dealt with above. However, we do note that the forecast for employment growth in the Town of Oakville reflects the historical trend of a decline in industrial related employment and a growth in office employment. As a result, the long-term need for employment lands in Oakville and Halton is reduced due to the expected higher density employment growth. Additionally, urbanMetrics is not aware of any cross-jurisdictional issues that impact the development of the subject site as proposed.</p> <p>The Town of Oakville's Official Plan conversion criteria are constant with the Halton Region's criteria, and therefore dealt with above.</p> <p>5.0 Conclusions</p> <p>Based on the analysis outlined in the previous sections of this report it is our professional opinion that the re-designation of the southern portion of the subject site from Employment Area to Transitional Area can be supported based on employment growth trends in Oakville and Halton Region, the characteristics of the subject site and its relationship to surrounding land uses, the Town and Region's Economic Development</p>	

No.	Source	Submission	Response
		<p>policies, and the fact that in our opinion the conversion meets the conversion criteria laid out in the PPS, the Growth Plan and the Oakville and Halton Official Plans. In summary, this conversion can be supported based on the following factors:</p> <ul style="list-style-type: none"> <li>• <b>Compatibility:</b> The proposed re-designation of the southern portion of the subject site to Transitional Area extends the land use pattern along Burnhamthorpe Road East and is compatible with the designated Residential land south of Burnhamthorpe Road and the Employment Area fronting onto Highway 407.</li> <li>• <b>Accessibility:</b> The subject site is a desirable location for higher intensity office, institutional and population related employment uses, rather than low employment density manufacturing, warehouse or distribution uses, as Highway 403 is not immediately accessible, and Highway 407 as a toll highway has limited attraction for these types of uses.</li> <li>• <b>Visibility and Marketability:</b> The northern portion of the subject site would remain attractive to light industrial and office uses. In fact, these uses would benefit from a mix of uses on the southern portion of the site, including residential and other population related employment uses that would link local residents to nearby employment opportunities.</li> <li>• <b>Stabilization and Protection:</b> The proposed re-designation of the southern portion of the subject site will not have a destabilizing impact on surrounding land uses. In fact, conversion of the southern portion of the site will provide a better buffer between the employment area to the north and the residential area located south of Burnhamthorpe Road East. In fact, the Transitional Area may make the Employment Area more attractive for many companies.</li> </ul> <p>In addition to the above market and location considerations, the proposed re-designation also achieves the intent of the Growth Plan conversion tests.</p> <p>a) there is a need for the conversion</p> <p>The Sustainable Halton Land Supply Analysis (2007) found that there is a limited demand for more employment land in the Region and a much greater demand for residential land.<sup>16</sup> By increasing the number of residents and jobs that are accommodated on the subject site beyond what would be generated from traditional employment uses, the subject site will help achieve the population and employment targets for North Oakville and the broader region.</p> <p>b) the lands are not required over the horizon of this Plan for the employment purposes for which they are designated</p>	

No.	Source	Submission	Response
		<p>The subject lands are strategically located to attract the type of employment uses consistent with current market trends, which will result in achieving higher employment densities on a per hectare basis. Consequently, less employment land will be required over the horizon of the current Growth Plan to accommodate the traditional type of employment uses that historically have located on employment lands, and with the development of a greater amount of employment intensive businesses the Region and the Town will be better able to meet their employment targets.</p> <p>c) the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan</p> <p>The mixed-use concept being proposed for the subject site increases the amount of employment that can be accommodated on the subject site, while also providing for an opportunity for residential development. In addition, with the more limited demand for the more traditional uses that historically locate in designated Employment Areas, less employment land will be required in Oakville and Halton Region.</p> <p>d) the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan</p> <p>The mix of uses allowed in Transitional Areas will support higher density employment and assist the Region in achieving the intensification and density targets in the Regional Official Plan. Future employment uses in the area will not be affected and in fact the proposed Transitional Area will provide an effective buffer between the Employment Area located to the north and the residential area located south of Burnhamthorpe Road East.</p> <p>e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses</p> <p>There is a servicing and transportation plan in place to guide infrastructure development in North Oakville. Additionally, Transitional Areas permit a diversity of uses that have the potential of adding public service facilities to the subject site.</p> <p>The proposed re-designation of 15 acres of the southern portion of the subject site from Employment Area to Transitional Area in our professional opinion supports the North Oakville vision of an urban community with a range of employment opportunities located along Highway 407.</p> <p>This is a minor, site specific conversion that is appropriate both from a site compatibility perspective as well as for market economic reasons. In addition, we believe that this conversion meets all the conversion criteria set out in the Growth Plan and the Official Plans of the Town of Oakville and the Region of Halton.</p>	

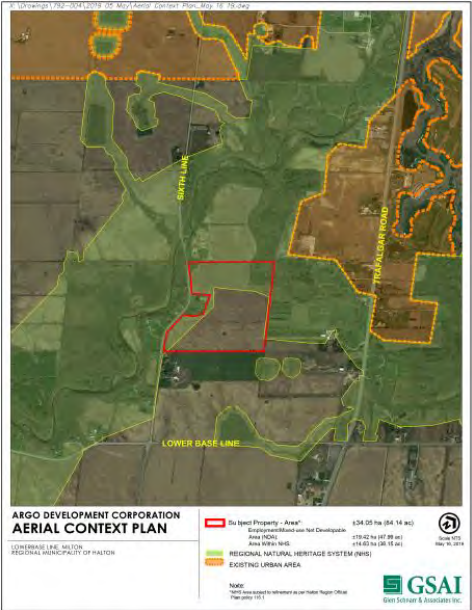
No.	Source	Submission	Response
97.	<p>Leslie Barbetta</p> <p>E-mail dated July 15, 2021</p>	<p>To Whom It May Concern</p> <p>I attended the Growth Concept PIC Meeting for Burlington have attempted to glean as much information &amp; understanding as possible so that I could provide some sound feedback. Based on the volume of information and difficulty navigating through all the documentation, my comments today are based more on my personal perspective than some of the ROPR &amp; Amendment specifics, so I apologize in advance if I am speaking out of context.</p> <p>While I do not support any one Growth Concept, I would prefer one that maintains our Greenfield and limits development. If I understand correctly, the preferred model of most residents is Concept 3b, which protects green space, however it does pave the way - no pun intended - for densification or intensification (whichever is the right term) of existing urban areas, which comes with its own set of repercussions. Those of who have dealt with the consequences of overdevelopment do NOT want to see more development. However, it is inevitable that there will be concessions, regardless of which model is carried. With that said, I ask you to consider my comments below when planning our Region's future and reaching your conclusions:</p> <p>1) First and foremost, let's consider the environmental impacts of ANY type of growth. It truly disheartens me to see trees, wildlife habitats and plantings destroyed solely for the sake of development. Stormwater management needs to consist of more than just a stormwater pond. Let's pay more attention to green infrastructure, including rain gardens, permeable pavement features, and greening up our public and private spaces to improve the absorption &amp; flow of stormwater. The impacts of development in other parts of the Region are felt by those of us living closer to the lake. Let's ensure we have flooding mitigation measures in place before allowing anything to happen upstream. Expansion of the greenfield to allow for development also means more mouths to feed but less farmland to grow that food. Reference: <a href="https://greeninfrastructureontario.org">https://greeninfrastructureontario.org</a></p> <p>2) On the subject of the environment &amp; wildlife, mandate bird-friendly glass on ALL new buildings, and consider providing some sort of subsidy (perhaps via corporate sponsorship) to install bird-strike prevention measures on existing glass of high-rises. Reference: <a href="https://www.burlingtongreen.org/speak-up/help-protect-local-birds-with-bird-friendly-hamilton-burlington/">https://www.burlingtongreen.org/speak-up/help-protect-local-birds-with-bird-friendly-hamilton-burlington/</a></p> <p>3) Move away from the idea of high-rise/high-density housing and focus on medium- or low-rise/high density solutions. In a pandemic/post-pandemic world, high-rises seem like an impractical building model, i.e. 37 storey tower in Burlington... ridiculous, even if it is permitted; who wants to cram into an elevator again or hike up a few dozen flights of</p>	<p>The Preferred Growth Concept generally directs a significant amount of growth to strategic growth areas, including around GO stations, and on planned higher order transit corridors.</p> <p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. It also directs growth (referred to as "densification" in the Growth Concepts Discussion Paper) – which is "intensification" in the sense that it concentrates development to areas within the existing approved urban area – to potential future intensification sites.</p> <p>Comments regarding the environment and wildlife have been noted and will be considered through the next phase of the Regional Official Plan Review. To note, the Preferred Growth Concept is also informed by a series of comprehensive s set of technical studies addressing:</p> <ul style="list-style-type: none"> <li>• climate change;</li> <li>• water and wastewater infrastructure;</li> <li>• transportation infrastructure;</li> <li>• agricultural impact;</li> <li>• natural heritage/water resources; and,</li> <li>• financial impact.</li> </ul> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional</p>



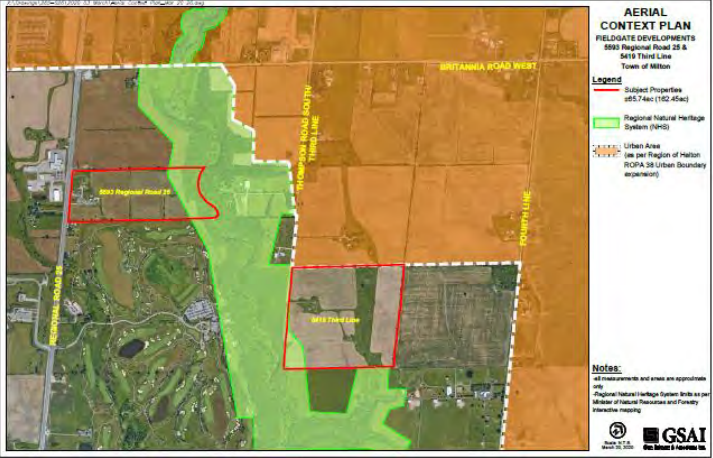
No.	Source	Submission	Response
		<p>stairs in order to avoid a crowd? We should reduce the reliance on elevators and bring people back down to earth to foster a connection to the outside world. Reference: Low-Rise High Density Model: <a href="https://www.brighton-society.org.uk/tall-buildings-debate/">https://www.brighton-society.org.uk/tall-buildings-debate/</a></p> <p>When we moved to south Burlington 15 years ago, we loved the small cottage style homes surrounded by trees. Those homes are quickly being replaced by ones more than 5x the original size. As these homes get bigger, and towers get taller, society spends less time engaging with others in their community and more time indoors. Outsourcing workers to maintain these homes has become commonplace, and more and more people turn to online services to have meals or goods delivered (even more so during Covid). The need for these services is not going away, but it's turning us into closet communities. If you have not already seen the documentary "The Great Disconnect", I encourage all members of Regional Council and Planning Department (and all City/Regional staff for that matter) to do so. I attended a virtual screening hosted by the City of Burlington a few months ago, where the idea of our community well-being as an important contributor to our overall health was discussed. There were many important takeaways which should be considered when planning for healthy communities. Reference: <a href="https://thegreatdisconnectfilm.com">https://thegreatdisconnectfilm.com</a></p> <p>Where the remaining opportunities exist to develop new low-rise residential communities, consider the "pocket neighbourhood" concept... small homes, suited to a wide range of needs, i.e. young families, those needing accessible living space, and independent seniors/retirees wishing to downsize. The use of front porches and having a shared, central common space creates a sense of community. These communities, as well as the Tiny Home model, would also appeal to those who adopt eco-conscious or minimalist lifestyles. And while not considered pocket neighbourhoods, some nice examples of building around a central green space are Lake Pointe Park in Stoney Creek, and on a much smaller scale, Victoria Park in Milton (I'm sure there are others, but those are the ones that come to mind) Reference: <a href="https://www.pocket-neighborhoods.net">https://www.pocket-neighborhoods.net</a></p> <p>These are just some of my thoughts on planning for the future of Halton. We are fortunate to live in such a biodiverse region, and we are all stewards of this land, so it is our collective job to protect it, first and foremost. Growth &amp; development are inevitable, but it must be done in a way that is respectful, inclusive, and minimizes any impact to existing residents &amp; our environment. Please look for creative solutions to our challenges, and continue to provide opportunities for engagement.</p> <p>Respectfully,</p>	<p>Official Plan Amendment, including the Preferred Growth Concept.</p>

No.	Source	Submission	Response
		Leslie Barbetta	
98.	<p>Jennifer Staden on behalf of Argo</p> <p>E-mail dated July 15, 2021</p>	<p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Argo Development Corporation, owner of approximately 34 hectares (84 acres) of land in the Town of Milton, just outside of the existing Milton Urban Area (see Aerial Context Plan enclosed). Our client's lands are designated "Future Strategic Employment Area" in the current Regional Official Plan and are within Provincially Significant Employment Zone 18 (Halton, Peel). As stated previously, in correspondence to the Region dated May 24, 2019, September 28, 2020 and during a virtual meeting with Regional staff on April 29, 2021, our clients are desirous of the inclusion of their land into the 2051 Urban Area, for employment and mixed-use purposes.</p> <p>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 Pan 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.</p> <p>Specifically we agree with Town of Milton staff on the following points:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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".</li> </ul>	<p>To note, a portion of the subject lands are identified as Future Strategic Employment Area. Based on the results of the technical analysis, staff are recommending that these lands not be included within the Preferred Growth Concept. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• 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.</li>   <li>• 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.</li>   <li>• 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.</li>   <li>• 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.</li>   <li>• The “Halton Balanced” concept has strong regard for the Town of Milton adopted 2051 Vision and Town Structure previously endorsed by Milton Council.</li> </ul> <p>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.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p>	

No.	Source	Submission	Response
			
99.	<p>Jennifer Staden on behalf of Fieldgate Developments re: 5593 Reg Road 25 &amp; 5419 Third Line</p> <p>E-mail dated July 15, 2021</p>	<p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Fieldgate Developments, owner of approximately 65.74 hectares (162.45 acres) of land in the Town of Milton, adjacent to the existing Milton Urban Area (see Aerial Context Plan enclosed). As stated previously, in correspondence to the Region dated March 25, 2020, August 14, 2020, and March 30, 2021 and during virtual meetings with Regional staff on April 22, 2021 and May 19, 2021 our clients are desirous of the inclusion of their land into the 2051 Urban Area.</p> <p>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 Pan 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.</p>	<p>Please see response to March 25, 2020 submission above in a Row 7 of this chart.</p>

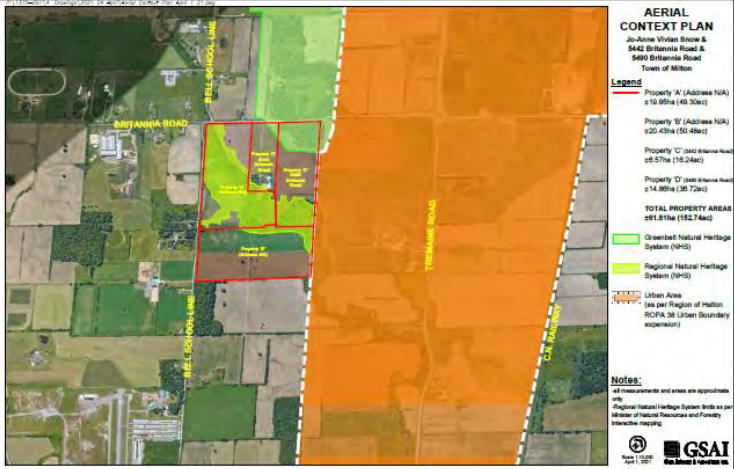
No.	Source	Submission	Response
		<p>Specifically we agree with Town of Milton staff on the following points:</p> <ul style="list-style-type: none"> <li>• Staff has significant concerns with the methodology undertaken by the Region to assess the various concepts. It is critical that these issues be addressed 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.</li> <li>• 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”.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>	

No.	Source	Submission	Response
		<p>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.</p> <ul style="list-style-type: none"> <li>The “Halton Balanced” concept has strong regard for the Town of Milton adopted 2051 Vision and Town Structure previously endorsed by Milton Council. Fieldgate Developments has retained Tom McCormack from Metro Economics to monitor and review the work that has been done to date on the Municipal Comprehensive Review (“MCR”). A report prepared by Metro Economics titled “The Market Demand for New Dwellings Halton Region to 2041” dated February 2021, was included with our previous submission to the Region, dated March 30, 2021 providing a technical, market analysis (appended to this letter for reference). The MGP analysis and conclusions noted above, align with the concerns raised in the February 2021 Metro Economics report with respect to Hemson Consulting’s market analysis.</li> </ul> <p>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.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p>  <p>The map, titled 'AERIAL CONTEXT PLAN', shows the subject properties outlined in red. It also displays the Urban Area boundary (dashed white line), the Regional Natural Heritage System (green shaded area), and the 2051 Urban Boundary (dotted white line). Key roads shown include Britannia Road West, Poplarville Lane, and 50th Street. The map includes a legend and notes regarding measurements and data sources.</p>	

No.	Source	Submission	Response
100.	<p>Jennifer Staden on behalf of Ms. Jo-Anne Vivian Snow and Mr. James Scott</p> <p>E-mail dated July 15, 2021</p>	<p>Glen Schnarr &amp; 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 Pan review and urban expansion.</p> <p>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.</p> <p>Specifically we agree with Town of Milton staff on the following points:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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".</li> <li>• 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</li> </ul>	<p>Please see response to April 15, 2021 submission in an earlier row of this chart above.</p>


No.	Source	Submission	Response
		<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>Thank you for your considerations. Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p>	



No.	Source	Submission	Response
		 <p><b>AERIAL CONTEXT PLAN</b>      50-Avenue Vivian Snow &amp;      5442 Bistanna Road &amp;      5490 Bistanna Road      Town of Milton</p> <p><b>Legend</b></p> <ul style="list-style-type: none"> <li>Property A (Address N/A) ±19.95ha (49.30ac)</li> <li>Property B (Address N/A) ±20.43ha (50.48ac)</li> <li>Property C (see address sheet) ±19.24ha</li> <li>Property D (see address sheet) ±14.80ha (36.32ac)</li> <li><b>TOTAL PROPERTY AREAS ±84.42ha (207.74ac)</b></li> <li>Greenbelt Natural Heritage System (GNHS)</li> <li>Regional Natural Heritage System (RNHS)</li> <li>Urban Area (as per Region of Halton ROPA 38 Urban Boundary expansion)</li> </ul> <p><b>Notes:</b>      all measurements and areas are approximate only      Regional Natural Heritage System (RNHS) as per release of Natural Resources and Forestry interactive mapping.</p> <p><b>GSAI</b>      GSAI Inc. 2021</p>	
101.	<p>Jennifer Staden on behalf of 236919 and 2661297 Ontario Inc. re: 8955 Boston Church Road, 8283 and 8369 Esquesing Road</p> <p>E-mail dated July 15, 2021</p>	<p>8283 Esquesing Line &amp; 8329 Esquesing Line</p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Mr. Dave Walia &amp; 236919 Ontario Inc., owners of approximately 4 hectares (10 acres) of land, and represents 15 hectares (38 acres) of land on the east side of Esquesing Line, north of James Snow Parkway in the Town of Milton (see Aerial Context Plan 1 enclosed). These lands are municipally addressed as 8283 Esquesing Line &amp; 8329 Esquesing Line. As a result of the previous Regional Official Plan process (Sustainable Halton ROPA 38 process), 3 hectares (8 acres) of land our client represents were brought into the Milton Urban Area for employment development. However, 0.63 hectares (1.56 acres) of their land were left outside of the Urban Area on the basis that the Region's employment land budget, calculated to accommodate the 2031 employment growth, was determined by the Region to be fulfilled. The lands are adjacent to existing Employment Area as per the current Regional Official Plan, and are partially within Provincially Significant Employment Zone 18 (Halton, Peel). 8955 Boston Church Road GSAI also represents 2661297 Ontario Inc. owner of approximately 12 hectares (30 acres) of land on the southeast corner of Number 5 Side Road and Boston Church Road in the Town of Milton (see Aerial Context Plan 2 enclosed). This property is municipality addressed as 8955 Boston Church Road. As previously noted in correspondence to the Region dated May 17, 2019, September 10, 2020, and October 30, 2020, and during a virtual meeting with Regional staff on April 29, 2021, our clients are desirous of the inclusion of their land into the 2051 Urban Area, for employment and mixed-use purposes.</p>	<p>8283 and 8329 Esquesing Line were considered for potential settlement boundary expansion as a result of the acknowledgement/commitments made in Minutes of Settlement for appeals to Regional Official Plan Amendment No. 38. The Esquesing subject lands are currently designated as Urban Area, Regional Natural Heritage System and Agricultural Area and are partially within the Provincial Greenbelt Plan Area. Those lands within the Provincial Greenbelt Plan Area are not eligible for inclusion in the Urban Area under Provincial Legislation. Based on the results of technical analysis, staff are recommending that the lands designated Urban Area remain unchanged and that lands within the Regional Natural Heritage System and Agricultural Area not be included within the Preferred Growth Concept.</p>

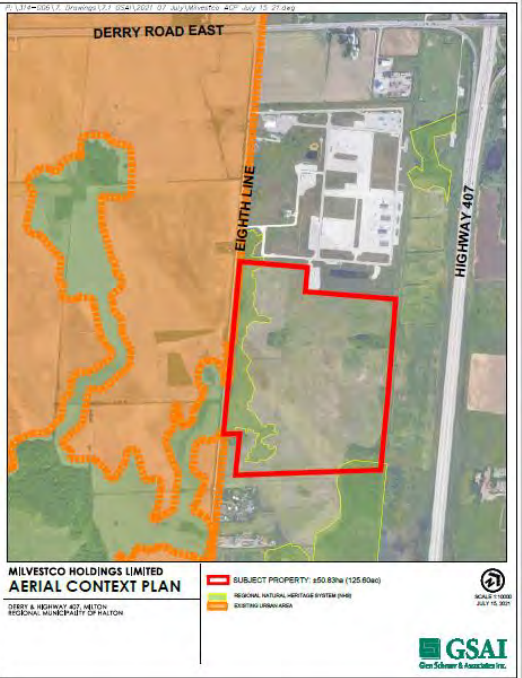
No.	Source	Submission	Response
		<p>We are in receipt of Town of Milton staff report DS-055-21 (appended to this letter) which was endorsed by Town Council on June 21, 2021 and we would like to express our support for Town’s position on the Regional Official Plan review and urban expansion. The Town 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.</p> <p>Specifically we agree with Town of Milton staff on the following points:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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”.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<p>In terms of the lands known as 8955 Boston Church Road (Boston Church subject lands), based on the results of technical analysis, the subject lands within the Primary Study Area ((which is the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy) and outside of the Provincial Greenbelt Plan Area are proposed to be included in the Preferred Growth Concept as Employment Area.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• 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.</li>   <li>• 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.</li>   <li>• 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.</li> </ul> <p>Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p>	

No.	Source	Submission	Response
		 <p><b>MR. DAVE WALLA 236919</b>  <b>ONTARIO INC.</b>  <b>AERIAL CONTEXT PLAN</b></p> <p>FILE # 2021-055-21 (MILTON REGIONAL MUNICIPALITY OF MILTON)</p> <p><b>Legend:</b></p> <ul style="list-style-type: none"> <li><b>Lands Client Represents:</b> <ul style="list-style-type: none"> <li>Employment/Use per the Conceptual Area (PCA): 45.25 ha (111.68 ac)</li> <li>Agricultural Lands: 20.20 ha (50.00 ac)</li> <li>AgriUrban Lands: 11.17 ha (27.69 ac)</li> <li>Area Within the S. Greenbelt: 11.07 ha (27.25 ac)</li> </ul> </li> <li><b>Lands Client Owns:</b> <ul style="list-style-type: none"> <li>Employment/Use per the Conceptual Area (PCA): 14.04 ha (34.83 ac)</li> <li>Agricultural Lands: 1.22 ha (3.03 ac)</li> <li>Area Within the S. Greenbelt: 0.50 ha (1.23 ac)</li> </ul> </li> <li><b>MEDICINAL NATURAL HERITAGE SYSTEM (MHS)</b></li> <li><b>EXISTING URBAN AREA</b></li> <li><b>EMPLOYMENT AREA</b></li> <li><b>GREENBELT PLAN PROTECTOR COUNTRYSIDE BOUNDARY</b></li> </ul> <p><b>GS&amp;A</b> Glen Schnarr &amp; Associates Inc.</p>	
102.	<p>Jennifer Staden on behalf Orlando Corporation (Milvestco Holdings Limited)</p> <p>E-mail dated July 15, 2021</p>	<p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Milvestco Holdings Limited (Orlando Corporation), owner of approximately 50.83 hectares (125.60 acres) of land in the Town of Milton, just outside of the existing Milton Urban Area (see Figure 1: Aerial Context Plan enclosed). Our client's lands are designated "Future Strategic Employment Area" in the current Regional Official Plan and are within Provincially Significant Employment Zone 18 (Halton, Peel). Our clients are desirous of the inclusion of their land into the 2051 Urban Area, for employment and mixed-use purposes. 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</p>	<p>Subject lands are currently identified as Future Strategic Growth Area. Based on the results of the technical analysis, these lands are proposed to be included in the Preferred Growth Concept as Employment Area.</p>

No.	Source	Submission	Response
		<p>Report DS-055-21 summarizes the findings of the MGP work endorsing a modified Concept 4 – “Halton Balanced” concept.</p> <p>Specifically we agree with Town of Milton staff on the following points:</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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”.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	


No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• 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.</li>   <li>• 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.</li> </ul> <p>Yours very truly,</p> <p>GLEN SCHNARR &amp; ASSOCIATES INC.</p>	

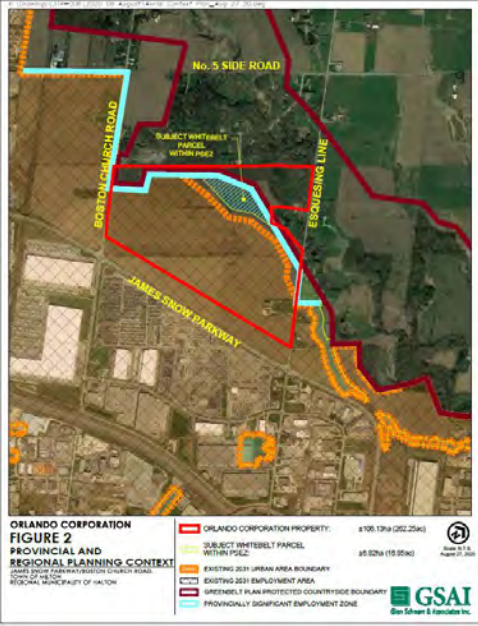
No.	Source	Submission	Response
		 <p>July 15, 2021 Refer To File: 314-006 Halton Region 1151 Bronte Road Oakville, ON L6M 3L1</p> <p>Attention: Curt Benson, MCIP, RPP Director, Planning Services and Chief Planning Official</p> <p>Re: Staff Report LPS18-21 – Regional Official Plan Review Integrated Growth Management Strategy - Growth Concepts Discussion Paper Formal Response from Orlando Corporation</p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) represents Orlando Corporation, owner of approximately 106 hectares (262 acres) of land in the Town of Milton (see Figure 1: Aerial</p>	<p>Subject lands were considered for potential settlement boundary expansion as a result of acknowledgement/commitments made in Minutes of Settlement for appeals to Regional Official Plan Amendment No. 38. The subject lands are currently designated as Urban Area, Regional Natural Heritage System and Agricultural Area and are partially within the Provincial Greenbelt Plan Area. Those lands within the Provincial Greenbelt Plan Area are not eligible for inclusion in the Urban Area under Provincial Legislation. Based on the results of technical analysis, staff are recommending that the lands designated</p>

No.	Source	Submission	Response
		<p>Context Plan enclosed). As a result of the previous Regional Official Plan process (Sustainable Halton ROPA 38 process), approximately 74 hectares (182 acres) of our client's land holdings were brought into the Milton Urban Area for employment development. However, a sliver of their land, approximately 7 hectares (17 acres) was left outside of the Urban Area on the basis that the Region's employment land budget, calculated to accommodate the 2031 employment growth, was determined by the Region to be fulfilled. As such, these lands were involved in the OMB hearing in 2015 but a settlement was reached whereby the following was agreed "Halton Region acknowledges that these lands will be considered as part of the next five year review of the Regional Official Plan through the Regional municipal comprehensive review process and in accordance with the applicable Regional Official Plan policies and Provincial Plans" (Minutes of Settlement, OMB Case # PL111358).</p> <p>Our client's lands, including this inadvertently excluded sliver of whitebelt land, are within Provincially Significant Employment Zone 18 (Halton, Peel) (see Figure 2: Provincial and Regional Planning Context enclosed). As stated previously, in correspondence to the Region dated May 24, 2019 and October 23, 2020, and during a virtual meeting with Regional staff on March 16, 2021, our client is desirous of the inclusion of their land into the 2051 Urban Area, for employment and mixed-use purposes.</p> <p>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 Pan 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").</p> <p>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:</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>	<p>Urban Area remain unchanged and that lands within the Regional Natural Heritage System and Agricultural Area not be included within the Preferred Growth Concept.</p>



No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• 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”.</li>   <li>• 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.</li>   <li>• 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.</li>   <li>• 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.</li>   <li>• 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.</li>   <li>• 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.</li> </ul>	

No.	Source	Submission	Response
		<p data-bbox="453 285 1373 337">Please do not hesitate to contact the undersigned at extension 224, should you wish to discuss this further.</p> <p data-bbox="453 367 630 394">Yours very truly,</p> <p data-bbox="453 420 884 448">GLEN SCHNARR &amp; ASSOCIATES INC.</p> 	

No.	Source	Submission	Response
		 <p>ORLANDO CORPORATION FIGURE 2 REGIONAL PLANNING CONTEXT ORLANDO CORPORATION PROPERTY: 4100, 17th (252.25ha) SUBJECT WHITBELT PARCEL WITHIN PSEZ: 45.82ha (113.05ha) EXISTING 2011 URBAN AREA BOUNDARY EXISTING 2011 EMPLOYMENT AREA GREENBELT PLAN PROTECTED COUNTRYSIDE BOUNDARY PROVISIONALLY SIGNIFICANT EMPLOYMENT EDGE</p> <p>Scale: 1:10,000 August 21, 2018</p> <p>GSAI Günther &amp; Associates Inc.</p>	
103.	<p>Paul Lowes on behalf of Milton P4 Trafalgar Landowners Group Inc.</p> <p>E-mail dated July 23, 2021</p>	<p>SGL Planning &amp; Design is the planning consultant to the Milton P4 Trafalgar Landowners Group Inc. The Milton P4 Trafalgar Landowners Group is comprised of the following landowners:</p> <ul style="list-style-type: none"> <li>• 2076828 Ontario Limited</li> <li>• White Squadron Development Corporation</li> <li>• Frontenac Forest Estates Inc.</li> <li>• Hannover Trafalgar Farms Limited &amp; Milton Sheva Land Limited O/A Hornby Land JV</li> <li>• York Trafalgar Golf Corp.</li> <li>• Comarin Corp.</li> <li>• Remington Trafalgar Inc.</li> </ul> <p>Together the landowners group owns approximately 415 hectares in the Trafalgar Corridor Secondary Plan Area. The secondary plan was adopted by the Town of Milton in March 2019 and is currently being reviewed by Region of Halton staff. We prepared a submission on behalf of the landowner's group on June 3, 2021, which contained a list of</p>	<p>Regional staff met with the MP4 landowners on July 15, 2021 to discuss their comments in detail.</p> <p>The comments in this submission will continue to be considered by Regional staff as part of the Integrated Growth Management Strategy and the development of a Preferred Growth Concept.</p>

No.	Source	Submission	Response
		<p>questions that we had on the IGMS Discussion Paper and the proposed growth concepts. We were able to meet with Regional planning staff and their consultants on July 15th to discuss our questions and seek clarification on the Discussion Paper. The meeting with staff was very helpful in better understanding the underlying assumptions set out in the Discussion Paper, and we thank Regional planning staff for taking the time to meet with us.</p> <p>Densification and the Policies to Achieve It</p> <p>We understand that “Densification” means a proportion of housing growth as apartment units in the Designated Greenfield Area (DGA) in addition to the 50% intensification target in the Built-up Area (BUA). We also understand from Regional planning staff and their consultants that these apartment units are already planned through existing secondary plans but won’t be built by 2031. Further we understand that the LNA in Table 44 anticipates between 1,170 (concept 4) and 12,870 (concept 3) apartments being delivered as “Additional high density units in the Existing DGA” in Milton from 2031 to 2051 in the four concepts. This is a huge range in the delivery of apartment units in the existing DGA.</p> <p>While relieved to understand that there won’t be any required revisions to the existing approved, adopted or under consideration secondary plans to accommodate the densification proportions, we question the ability to achieve these numbers in the context of the existing policy framework. Trafalgar Corridor has four nodes that permit a range of housing types including street townhouses, stacked townhouses, back to back townhouses and apartments plus Neighbourhood retail uses. There are no specific number of apartments planned in the Secondary Plan and no requirement that apartments actually be constructed. Although apartments are permitted and will form part of the development in the first phase, there is no policy basis to ensure that the apartment units contemplated through the densification assumptions in the four concepts will be delivered. The four nodes could be developed through a combination of ground related housing and or stand-alone neighbourhood retail uses in the first phase.</p> <p>We are concerned that despite what Staff says about not revisiting the secondary plans, they will have little recourse but to require wholesale revisions to the secondary plans to ensure that the apartment unit numbers in the higher densification assumptions in Concepts 2 and 3, if either were selected, are actually planned. Even if these apartment units were planned, there is no guarantee that they would be viable, or will be delivered. Furthermore, the higher densification assumptions have implications on community services including parks, schools, and emergency services and how and where they are located to build complete communities. For the reasons outlined above, we request that prior to the development of the Preferred Growth Concept, the Region provide additional detail on how Densification will be implemented.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>DGA Supply Appears to be Variable</p> <p>We understand from Hemson that the supply of housing in the existing DGA was based on municipal official plans and secondary plans. When we review the supply in tables 8 through 11 of the LNA, we note that the supply of both ground related housing and apartments changes for each of the four Concepts. For apartment units the supply differs by nearly 9,000 units between the four concepts and these variations are occurring on lands outside of the Strategic Growth Areas. There is no discussion on the rationale or assumptions used for the variations in supply and would appear to be assuming greater densities for both ground related and apartment units particularly in Concepts 2 and 3.</p> <p>With no discussion, explanation or analysis provided of the assumptions used in the LNA, we question the veracity of these higher density assumptions. Trafalgar Corridor The footnote to Figure 12 on page 56 references Trafalgar Road in north Oakville and Milton as being a DGA Strategic Growth Area. However, Trafalgar Road in ROPA 48 is not identified as a Strategic Growth Area and neither is it identified as such in the Trafalgar Secondary Plan although the secondary plan identifies four Neighbourhood Centres along the Trafalgar corridor. We understand from meeting with Regional Staff that the Trafalgar Corridor is not meant to be a Strategic Growth Area but rather a transit corridor. We further understand that the Region will not be requiring the Town to identify the entire corridor as a Strategic Growth Area and that the four nodes in the plan meet that requirement for a transit corridor. We request that this matter be clarified in the next report of the Region.</p> <p>Shift in Housing Preferences</p> <p>The higher densification targets in Concepts 2 and 3 require a significant shift from ground related housing to apartment housing. This shift in housing types also requires a shift in housing preferences by the consumer. In our opinion, there is no basis to assume that the same consumer (particularly a family) looking to purchase a ground related dwelling will just as likely purchase an apartment. We understand that a market shift is required to meet the minimum intensification target of the Growth Plan as the majority of housing in the BUA will need to be in the form of apartments. That shift in housing preferences just to meet the Growth Plan minimum intensification target as indicated by the Region's consultant "is a fairly big shift". No market research has been undertaken to determine if even the 50% minimum intensification target is feasible. Creating an even greater shift to apartments in Concepts 2 and 3 is unprecedented for the Region.</p> <p>Such a shift in housing preferences towards apartment units does not in our opinion, meet the PPS or Growth Plan requirements for providing market-based range and mix of housing types. Nor does it provide a balance of housing and growth options to the consumer and to the local municipalities, which will create a continued upward pressure</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>on ground related housing cost and amplify affordability issues within the Region. In Concept 3, we understand that the ground related housing supply will largely be built out by mid 2041 although some small amounts of supply in this concept may be built out over a longer period. Nonetheless, it is difficult to understand how Concept 3 can provide a range and mix of housing and achieve the PPS and Growth Plan requirement for market based housing needs with no settlement area boundary expansion. As we stated in our July meeting which was acknowledged by staff, this concept does not plan for any new ground related housing, but relies on a carry over of planned 2031 ground related housing until 2041, and post 2041 relies almost exclusively on apartment housing units for its growth.</p> <p>We agree with Regional Planning Staff that providing a market-based range and mix of housing has to be a factor in evaluating the four Concepts and in development of the Preferred Concept. Risk Assessment The Growth Outlook Report prepared by Hemson in 2020 to support the 2020 Growth Plan amendment highlighted that based on market demand the split for apartments vs. ground related units is generally 25% vs. 75%, respectively. In our opinion, the Region needs to undertake a risk assessment analysis to determine the impacts of deviating substantially from market-based demand and should use the risk assessment in evaluating the four Concepts. Such risk impacts could include a shortfall of units, impacts to the Region's current infrastructure funding model of front-ending DC payments (the allocation program), DC revenues and the veracity of the Best Planning Estimates.</p> <p>Housing Affordability</p> <p>Affordability is a significant concern for families looking to move to Halton Region. Small apartment units can provide an affordable option for small households, but it is not an affordable solution to families. The greater cost of construction of apartments on a per square foot basis compared to ground related housing means that a 3-bedroom unit is significantly more expensive than a comparable sized ground related unit in a townhouse. Although apartment units need to be provided as part of a balanced supply of housing to meet affordable housing for smaller households, focusing largely on apartments rather than ground related housing as is considered in Concepts 2 and 3 does not provide a balanced housing mix that can deliver housing affordability to a range of households. If a balanced housing mix is not delivered, the Region runs the risk of losing population to neighbouring municipalities as they search for affordable ground related product that meets their family's needs and preferences. This situation has implications on the Region's ability to support the development of complete communities and on climate change as homeowners compute farther to live in a ground related dwelling.</p> <p>Page 31 discusses affordable housing and says Concept 3 has the greatest amount of intensification and growth allocated to Strategic Growth Areas (SGAs) including MTSAs,</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>therefore having the most potential for affordable housing through inclusionary zoning. This statement is simply misleading. Affordable housing is not just delivered through inclusionary zoning. Townhouses and other multiple housing forms can also deliver affordable housing in a greenfield situation and in fact the Trafalgar Secondary Plan is required to deliver 30% of its greenfield housing as affordable housing much of it through ground related housing. Delay in Housing Absorption On page 37, the report states that, "in preparing the Land Needs Assessment for this current exercise, all concepts assume that DGA previously identified through the HUSP, and Sustainable Halton plans will be fully developed prior to any new development occurring within any new urban expansion areas. It is anticipated that these lands can reasonably satisfy greenfield demand into the 2031-2041 time period".</p> <p>We understand from Regional planning staff that growth has been slower than forecasted for the 2021 period, and it is not anticipated to catch up in the 2021 to 2031 time period. The consultants attributed this slower growth to the economic downturn 10 years ago. We suggest that the Region's allocation programme has also contributed to delays in the absorption of housing and urge the Region in its Official Plan update to ensure a stronger alignment between the implementation of the allocation programme and the Regional policy planning for residential units by time period. Delays in the planning process have also led to delayed permit availability.</p> <p>In addition, with higher intensification and densification rates, the allocation programme will be more difficult to deliver as the greenfield growth, which drives the allocation programme will be significant less. Infill development is not currently subject to front-end financing of infrastructure under the Region's allocation programme. If it were subject to the allocation programme to make up for less greenfield growth, it would be difficult to deliver as the intensification supply on any given site is far more unpredictable, has fewer units on a given site compared to a greenfield subdivision and is often not contiguous to other development properties creating increased infrastructure requirements and costs over a broader geographical area.</p> <p>Local Context</p> <p>Milton is in the early years of its community maturation and therefore has different needs and desires than the other municipalities in the Region. This local context and desire to continue to grow both their greenfield communities and employment lands while intensifying their Strategic Growth Areas should be factored into the Preferred Growth Concept. Further, we agree with Milton's conclusion that Concept 3B will negatively impact economic development within the Town and Region as a whole. Milton's employment lands along Highway 407 are identified in ROPA 38 as Future Strategic Employment Lands and located within Provincially Significant Employment Zones. These lands should be included in an Urban Boundary Expansion to ensure that the Region</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

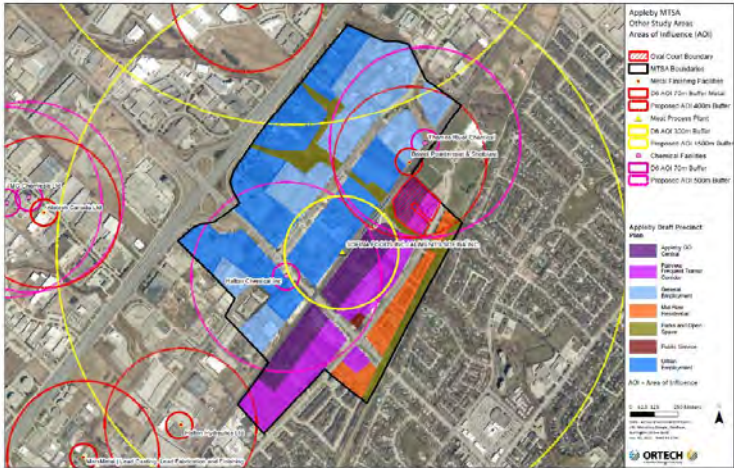
No.	Source	Submission	Response
		<p>remains competitive in attracting employers, supporting job creation and maintaining desirable non-residential to residential tax ratios. The Milton P4 Trafalgar Landowners Group supports the Town of Milton's Council direction supporting a modified Concept 4. Thank you for the opportunity to comment on the IGMS Discussion Paper. We look forward to the opportunity to review and provide further comments on the next steps in the IGMS.</p> <p>Yours very truly,</p> <p>SGL PLANNING &amp; DESIGN INC.</p>	
104.	<p>Ruth Victor on behalf of Branthaven</p> <p>E-mail dated July 29, 2021</p>	<p>Please find below and attached the submission from Branthaven regarding the Regional Official Plan Review process.</p> <p>Throughout the existing ROP and strengthened through the recently adopted ROPA 48, the policies speak to the need for land use compatibility and the application of the MECP guidelines to achieve land use compatibility. The Region of Halton has adopted their own land use compatibility guideline to assist in the application of these policies and MECP guideline.</p> <p>As you are aware, MECP has posted on the EBR a new proposed Land Use Compatibility Guideline. Our summary comments on that guideline are attached for your reference. If these guidelines proceed as currently written, there will be significant and serious issues in achieving the Region of Halton's growth targets and urban structure as recently adopted. The policies of the Regional Official Plan regarding the application of the MECP guideline will need to be further reviewed and updated to allow for the growth planned within the Region if this guideline proceeds as written.</p> <p>Branthaven is available to discuss this concern with staff at any time and will be reaching out to arrange a meeting to do so as this is a fundamental growth management issue that needs to be addressed now.</p> <p>Ruth Victor &amp; Associates</p> <p>[ATTACHMENT]</p> <p><b>Summary Submission on Proposed Land Use Compatibility Guideline Branthaven Development Corp</b></p>	<p>As per the Environmental Registry of Ontario Posting dated October 13, 2021 and available online <a href="#">here</a>, the Province is not proceeding with the proposed Land Use Compatibility Guideline as a result of feedback received through the Environmental Registry of Ontario. The current D-Series guidelines for land use compatibility will remain in effect. Any potential future updates to land use compatibility guidance would be posted as a new proposal on the Registry.</p> <p>Regional Official Amendment (ROPA) No. 48 was approved with few modifications on November 10, 2021 by the Minister of Municipal Affairs and Housing. ROPA 48 was updated to reflect the Province's direction as set out in the Provincial Policy Statement (2020) and Growth Plan (2020). In this Amendment, direction is provided</p>

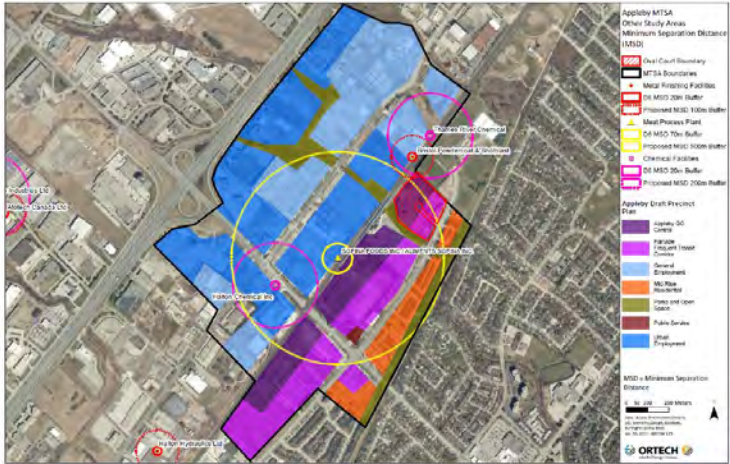


No.	Source	Submission	Response
		<p>The recently released proposed Land Use Compatibility Guidelines are an effort to update the provincial regulations that work to ensure industrial uses can operate without causing unacceptable impacts on sensitive land uses such as residential uses.</p> <p>The proposed guideline unfortunately contains a number of provisions that will result in unintended restrictions on planned industrial and mixed use developments. The proposed guidelines will make it more difficult to establish or maintain industrial facilities and the associated economic activity they generate. In too many cases, the excessively large Areas of Influence and Minimum Separation Distances proposed in the draft guideline will block or create excessive red tape and regulatory hurdles that will have the effect of discouraging investment in new job-creating industrial facilities.</p> <p>Additionally, the proposed draft guideline will restrict residential and mixed use development and intensification that other provincial policies are actively seeking to promote through provincial policies and the Growth Plan for the Greater Golden Horseshoe especially within MTSAs.</p> <p>The new guideline proposes to expand Areas of Influence now capturing a large amount of land that was previously unaffected. For example, the radius for the area of influence of a meat processing facility is proposed to increase from 300 m to 1500 m. This is a significant increase in the radius of some 500%. A single meat processing facility's area of influence could grow from 0.28 square km under the existing rules, to a massive area of influence exceeding 7 square km.</p> <p>A similar situation arises with respect to the industrial activity of chemical blending and packaging. This Area of Influence radius is proposed to go from 70 m to 500 m - an increase of 714%. In terms of the area of lands captured by the Area of Influence, this is an increase from 1.5 hectares to 78.5 hectares, an increase of over 51 times, or 5,100%, in the amount of land proposed to be included in the area of influence.</p> <p>Whenever any sensitive land use (including residential) is seeking to be introduced, or even modified in a minor way by seeking a minor variance, within the newly expanded area of influence, they will be put to the burden of undertaking a land use compatibility study and possibly not be able to be established due to new land use compatibility conflicts.</p> <p>This is not just a Region of Halton issue, the impact of the guidelines will occur all across the built-up areas of Ontario, with significant negative impacts on the ability to construct the residential and mixed use housing required by provincial policy.</p>	<p>on planning to ensure the long-term operational and economic viability of major facilities, and achievement of land use compatibility between major facilities and sensitive land uses within or adjacent to Strategic Growth Areas.</p> <p>Through the policy directions for the Regional Official Plan Review (ROPR), further changes to the Regional Official Plan as it relates to guidance on land use compatibility may be considered as required. Regional staff anticipate staff seeking Regional Council approval of the Policy Directions report in early 2022. The theme area Policy Directions report will set out broad recommended approaches for the policy areas that were under review, including draft recommendation to update land use compatibility policies for consistency with Provincial Plans and policies.</p>

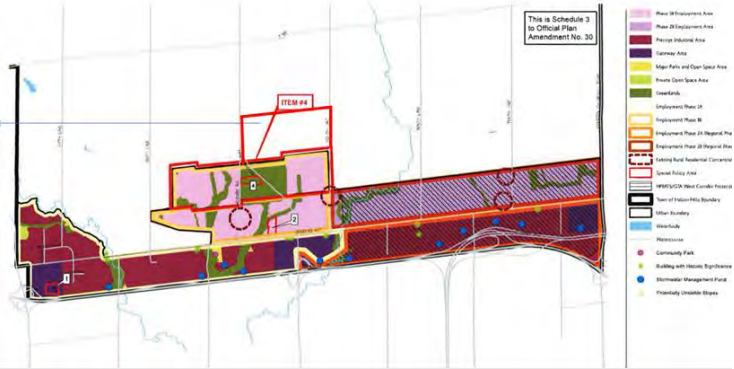
No.	Source	Submission	Response
		<p>The proposed massive expansion of impacted areas resulting from the proposed new Land Use Compatibility Guideline runs in direct opposition to provincial policies in the Growth Plan and the Provincial Policy Statement on Land Use Planning.</p> <p>Provincial Policy seeks to strongly encourage intensification, and infill - especially in Major Transit Station Areas. Under the Growth Plan, 50% of new population growth is to be accommodated by way of intensification. Most municipalities are looking to achieve these targets in large part through Major Transit Station Areas. By their nature, many Major Transit Station Areas (especially outside of the City of Toronto) are located around GO Train stations. Those train stations and train lines are usually surrounded by industrial areas filled with uses required to comply with the proposed Land Use Compatibility Guideline. If implemented as proposed, the effect of the Guideline will be to block, or severely constrain the potential for residential intensification in those places where the province is seeking to encourage such residential and mixed use growth.</p> <p>For example, two of the three Major Transit Station Areas in the City of Burlington will be constrained just by meat processing uses (before analyzing for any other uses). In fact, 100% of the Appleby GO Station Major Transit Station Area will be in the proposed Area of Influence for a neighbouring meat processing facility meaning most of the area will be unable to accommodate the residential intensification intended by the province in its land use planning policies.</p> <p>Simply put, the proposed Land Use Compatibility Guideline will make it impossible for municipalities to fulfil their planning and growth intensification obligations under the Growth Plan and the Provincial Policy Statement.</p> <p>One of the likely unintended consequences of the proposed new guidelines will be to make it significantly more difficult to establish the types of industrial uses the proposed guidelines are intended to protect.</p> <p>If a new facility must be surrounded by 50 to 100 times the amount of land that lacks sensitive uses by operation of the new Minimum Separation Distances, it will become very difficult to find new locations for such uses. Huge areas of land will simply no longer be available for the types of land uses covered by the guidelines.</p> <p>It will be much more difficult to identify possible sites that satisfy the minimum separation distance and even more difficult to satisfy the Area of Influence radius, and thus have the certainty that an investment in the land for the facility will be viable.</p> <p>Farmers in the agricultural sector have complained for years that they have been adversely affected by a decline in the number of meat processing facilities, and available options for their products. If these new proposed guidelines are adopted, it will become</p>	

No.	Source	Submission	Response
		<p>even more challenging to establish any new facilities, or even to expand existing facilities, without running afoul of the proposed rules. Paradoxically, a set of proposed rules intended to protect and encourage facilities like meat processing, will have exactly the opposite effect in practice, severely and excessively constraining and limiting their establishment and operation.</p> <p>The proposal states that the Area of Influence radius becomes the default Minimum Separation Distance “unless compatibility studies recommend a different separation distance”. The only Minimum Distance Separation with actual status under the document is the Area of Influence radius. This uncertainty will have a devastating impact on the ability to attract investment in employment uses, and will have a similar negative impact on potential introduction of residential uses.</p> <p>The proposed guideline introduces a new requirement for a “Demonstration of Need” if a sensitive use is to be introduced either with mitigation measures within an Area of Influence, or if it is to be located within a Minimum Separation Distance (which other parts of the draft Guideline suggest “should not” be permitted).</p> <p>A solution would be for the guideline to state that the identification of a site as being in a Major Transit Station Area would be, on its own, sufficient to satisfy the requirement of a “demonstration of need”.</p> <p>The proposed requirement that a demonstration of need must examine and compare with at least two alternative sites is problematic. In the case of a Major Transit Station Area, there should be no requirement to identify alternative sites. The provincial policies for a Major Transit Station Area are intended to ensure residential or mixed use development. The residential developer should not be put in the absurd position of having to justify why a body shop, cookie factory, or plastic basket manufacturing facility is not being proposed instead of the provincially mandated and market-demand supported residential or mixed use development.</p> <p>In addition, the entire concept of the demonstration of need is rendered somewhat meaningless by the statement at page 56 of the proposed guideline that, regardless of any land use planning policies or plans from the province, “policy tests to ensure land use compatibility still need to be met.”</p> <p>The effect of this statement is to ensure that, in all cases of conflict, the proposed draft guideline will prevail over the Provincial Policy Statement on Land Use Planning and the Growth Plan wherever there is a conflict. This statement for resolving the conflicts between the policies, when considered with the sweeping expansions of Areas of Influence and Minimum Distance Separation, means that the provincial policies respecting</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>infill, intensification, Major Transit Station Areas, and Growth Plan growth targets, will no longer be achievable.</p> <p>The below image demonstrates the devastating impact of the proposed draft guideline on land use for the Appleby GO Station in Burlington. The similar impact will result in many places across Ontario.</p> <p>Solid line circles represent the D6 guidelines. The much larger dotted line circles in the same colour represent the proposed, expanded Areas of Influence. The light and dark purple, and orange coloured areas on the map are those intended for significant residential intensification. The photo also shows literally hundreds of homes that get captured in Areas of Influence, and thus subject to the burdens that the guideline will impose on them. The image actually under estimates the extent of the Areas of Influence, as they have been drawn from a single point, rather than from the property boundaries. The actual Areas of Influence will be much larger than what is shown.</p>  <p>The following impacts are notable:</p> <ol style="list-style-type: none"> <li>1) All of the Major Transit Station Area (including all the proposed residential intensification) is within the Areas of Influence of a number of industrial facilities. (A select few have been identified on the mapping to illustrate the effect).</li> <li>2) Literally hundreds of single family homes are newly in the Area of Influence of Sofina Foods and Thames River Chemical.</li> </ol>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>3) The municipal staff burden will increase dramatically. Because of the need for all minor variances, or severance in these expanded Areas of Influence to submit land use compatibility studies, and this covering literally hundreds of sensitive use (residential) properties, the local municipal staff will face a dramatic increase in their workload evaluating such studies.</p> <p>4) The expanded Areas of Influence will make it much more difficult to establish any new industrial uses anywhere in this rail corridor, despite the lands being zoned to permit such uses. As part of their site plan application, they will now need to account for impacts on hundreds more sensitive uses (the residential development south of the railway). This problem repeats continuously as one moves west along the rail corridor.</p> <p>5) Conflicts will escalate, making any development that requires planning approvals very difficult. Homeowners who believed they were previously safely distanced from industrial uses will now become fearful and resistant to such uses. Industrial landowners can be expected to become more resistant to any residential intensification proposals even one and a half kilometre away, for fear that it will limit the range of allowable uses under the guideline on their land.</p>  <p>The new guidelines will result in the following:</p> <p>1) The area now sterilized from sensitive land use by the new Minimum Distance Separation (dotted line) is massive compared with the previous area (solid line) in images.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>2) Virtually the entire proposed residential and mixed use area within the Appleby GO Major Transit Station Area is out of bounds for the residential uses intended by provincial policy (the two shades of purple and the orange).</p> <p>3) It will be impossible for Halton Region and the City of Burlington to achieve their provincially mandated goals for intensification and residential growth under the Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement on Land Use Planning.</p> <p>4) The use of property lines results in entire properties being captured when only a small corner of a site may be touched by the Minimum Separation Distance. As a result, even more land is sterilized from sensitive use permissions than shown in this image. Hundreds more intended residential units than the image suggests will be wiped out as a result of this proposed approach.</p> <p>The images provided demonstrate how the new draft guideline, if applied, will severely constrain the ability of municipalities. to achieve its provincial policy objectives for residential growth and intensification. The attached images evaluated the impact of just three types of facility covered by the draft guideline - meat processing, metal finishing and chemical facilities. There are literally hundreds of additional industrial facilities in the area that all have their own Minimum Separation Distances and Areas of Influence that are not shown in this image. As a result, the constraining impact of the proposed guideline is, in fact, much greater than what is shown in the image.</p>	
105.	<p>Hanieh Alyassin on behalf of 8469, and 8493 Trafalgar Rd</p> <p>E-mail dated August 12, 2021</p>	<p>Hi Steven,</p> <p>During our investigation on Inclusion of 8469, and 8493 Trafalgar Road in the Employment Area, we also noticed the following:</p> <p>The Town of Halton Hills initiated OPA No. 30 that proposes to designate up to 75 hectares of additional land for Employment Uses to be added to the Town's Urban Area adjacent to the Phase 1B Premier Gateway Employment Area (pink in color). These lands are being added to replace the shortfall of employment lands within the Town as a result of lands being lost to corridor protection for GTA West/HPBATS.</p> <p>As shown on schedule A8 of the same attached document, the subject lands abut Phase 1B Employment Area to the North and as demonstrated in our earlier letter that lands on the south are not very conducive for redevelopment because of the presence of natural features ( dense woodlots). With the reasons mentioned on previously provided letters, we would request to replace the south abutting lands with the subject land for future employment use. Kindly append this email as part of our submission.</p>	<p>Please see response to E-mail dated July 15, 2021 above.</p>

No.	Source	Submission	Response
			
106.	<p>Dan Perry on behalf of 8482 Sixth Line</p> <p>Email dated June 23, 2021</p> <p>E-mail dated August 22, 2021</p>	<p><b>June 23, 2021</b></p> <p>I don't know why the region of Halton would come out with a concept excluding mostly all the employment lands in 3B concept this is absurd. We are going out of covid with far less jobs yet some might feel this is good idea it's nuts.</p> <p>We don't need more offices which is the move 3B would be making, if you work in an office during covid then you would know many companies have adapted and no longer need as much office space. Employment land like factories, warehousing, mechanical shops, mixed used strip malls create jobs for a lot of people with disabilities and limited education your basically saying if you have a disability we don't want you here cause thier are no jobs for you so jog on to the next region. You guys are kicking out the poor and Low Middle class working families plus immigrants who have very little English skills at first being here rely on these jobs as stable employment for years till they are able to move on or stay and rise threw the company. If you don't use these employment lands then you basically say you don't give a dam about lower income families. And while we stay stagnant in our old ways other regions will be profiting by the great workforce we gave up on. Not everyone in this region can be a millionaire you know some people have to bust thier ass in physically demanding jobs how do you guys think about your Amazon delivery that was done by the people I'm talking about. Thank you.</p> <hr/> <p><b>August 22, 2021</b></p>	<p>Regional staff reached out to Daniel Perry on numerous occasions to discuss concerns and questions. Comments noted and will be considered as staff proceed with the next phase and stage of the Regional Official Plan Review.</p>

No.	Source	Submission	Response
		<p>Hello again my name Daniel Perry from 8482 Sixth line Halton Hills I'm asking Halton region to incorporate or zone a small portion of the front east corner of our property into the employment lands destination.</p> <p>The province and the region threw their regional natural heritage designations on our and have destroyed the value of our farm, and as farmers hurt our ability to borrow from the bank's cause our value is so low and killed our pensions while across the street is worth six times as much and has ten acres of trees while we only have one. Its not fair while over the night in 2009 you single handedly devaluated our farmer land to the point where we can't survive we need your help for a make-up call on this one, bring the the value back up a bit so we can afford to put in valuable infrastructure back on the property to maintain our jobs as farmers and to give a bit of our pensions back. Thank you.</p> <p>I've put in some mapping the 3.5 acres lies outside the Greenbelt and Natural Heritage and Prime Agriculture farm land I think. And what area of our farm we are talking about. There is a water line 15 feet past our property line so there is some servicing there.</p> <p>So help us write a wrong only you guys can really help us out with this issue.</p> <p>Best regards the Perry's!</p>	



No.	Source	Submission	Response
			
107.	<p>Antonio Piazza on behalf of Salvatore and Teresa Piazza</p> <p>(E-mail dated September 2, 2021)</p>	<p>Re: 7538 Sixth Line, Town of Milton South West corner Sixth Line and 401 Salvatore and Teresa Piazza</p> <p>I am writing to you on behalf of my parents, Salvatore and Teresa Piazza the owners of the land at the south west corner of Sixth Line and Highway 401. Our family have owned this land since 1997 and have been long term residents of the Town of Milton. We are writing to you with respect to the Regions review of the urban boundary expansion for employment lands required to serve the needs of the Region to 2051.</p> <p>We have actively farmed this land throughout our long ownership and watched the steady growth around us. We were subject of a MTO expropriation in recent years and feel that we need now to engage the Town of Milton and the Region in this request. We realize that this submission is late in the process, however, how these lands have not been previously</p>	<p>Subject lands are currently identified as Future Strategic Employment Area. Based on the results of technical analysis, these lands are proposed to be included in the Preferred Growth Concept as Employment Area.</p>

No.	Source	Submission	Response
		<p>added to the urban boundary is a mystery to us. Notwithstanding our reluctance to engage in the historic processes of advocating for our farm to be added to the urban boundary. We believe and it's been well established that these lands could serve as valuable employment land within the Town and Region due to its strategic location and one of the few properties, outside of the urban boundary, that has frontage on the south side of the 401. We also understand that the Province has identified these lands as "Provincially Significant Employment Zone." We are also including a planning opinion from GSAI as an attachment to this letter which clearly outlines the viability of our property as really being the ideal property within the Halton Region to be included in this review period.</p> <p>As articulated in The Town of Milton Staff Report DS-028-21 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 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".</p> <p>These lands are also supportive of reducing greenhouse gas emissions given its proximity to the 401 and other 400 series highways.</p> <p>With regard to the employment allocation, we note that The Town of Milton retained Malone Given Parson (MGP) to undertake their 2051 growth study. It is MGP's opinion that the Region's allocation to Milton is too low. In the report it states that, 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.</p> <p>As part of Milton's land use needs assessment, the following were two of the recommendations contained in the report:</p> <ul style="list-style-type: none"> <li>- Provide a sufficient quantum of employment lands to allow for comprehensive planning and support the Town's economic competitiveness.</li> </ul>	





No.	Source	Submission	Response
		<p>Colin Chung, MCIP, RPP Partner</p> <p><b>Appendix I</b> – Town of Milton Zoning A1 – Agricultural Permitted Uses (Office Consolidation, December 2020)</p>	

No.	Source	Submission	Response																																																		
		<p><i>Town of Milton Comprehensive Zoning By-law 144-2003 – October 2019 Consolidation</i></p> <hr/> <p style="text-align: center;"><b>SECTION 10 RURAL ZONES</b></p> <hr/> <p>No person shall within any Rural Zone use any land, or erect, alter or use any building or structure except in accordance with the following provisions:</p> <p><b>10.1 PERMITTED USES (109-2004)(47-2005)(104-2008)(059-2019)</b></p> <p>Uses permitted in a Zone are noted by the symbol ‘*’ in the column applicable to that Zone and corresponding with the row for a specific permitted use. A number(s) following the symbol ‘*’, Zone heading or identified permitted use, indicates that one or more conditions apply to the use noted or, in some cases, to the entire Zone. Conditions are listed below the Permitted Use Table.</p> <p><b>TABLE 10A</b></p> <table border="1" data-bbox="499 630 1060 950"> <thead> <tr> <th rowspan="2">PERMITTED USES</th> <th>A1</th> <th>A2</th> </tr> <tr> <th>Agricultural</th> <th>Rural</th> </tr> </thead> <tbody> <tr><td><i>Agricultural operation</i></td><td>*</td><td>*</td></tr> <tr><td><i>Boarding kennel</i></td><td>*</td><td>*(1)</td></tr> <tr><td><i>Cannabis Production and Processing Facility</i></td><td>*(3)</td><td>*(3)</td></tr> <tr><td><i>Conservation use</i></td><td>*</td><td>*</td></tr> <tr><td><i>Cottage Industry</i></td><td>*</td><td>*</td></tr> <tr><td><i>Detached dwelling</i></td><td>*</td><td>*</td></tr> <tr><td><i>Equestrian centre</i></td><td>*</td><td>*</td></tr> <tr><td><i>Forestry use</i></td><td>*</td><td>*</td></tr> <tr><td><i>Home industry</i></td><td>*</td><td>*</td></tr> <tr><td><i>Home occupation</i></td><td>*</td><td>*</td></tr> <tr><td><i>Horticultural nursery</i></td><td>*</td><td>*</td></tr> <tr><td><i>Shared Housing (*2)</i></td><td>*</td><td>*</td></tr> <tr><td><i>Storage Building for Agricultural Equipment or Produce</i></td><td>*</td><td>*</td></tr> <tr><td><i>Veterinary Clinic – Large Animal</i></td><td>*</td><td>*</td></tr> <tr><td><i>Veterinary Hospital – Large Animal</i></td><td>*</td><td>*</td></tr> </tbody> </table> <p><small>Footnotes For Table 10A Above</small></p> <p>(*1) Permitted only on a lot having an area of greater than 4.0 hectares and provided that it is setback a minimum of 80m from any front lot line and 100m from any side lot line. Boarding Kennels are only permitted on a lot with an existing detached dwelling and must be operated by a resident of the dwelling.</p> <p>(*2) Shared Housing is permitted within any dwelling unit permitted in the zone.</p> <p>(*3) A Cannabis Production and Processing Facility must comply with the regulations set out in Section 4.1.2.9. Notwithstanding any provisions of the by-law to the contrary, cannabis processing shall only be permitted as an accessory use to cannabis production.</p> <hr/> <p style="text-align: center;">Section 10 – Rural Zones <span style="float: right;">10-1</span></p>	PERMITTED USES	A1	A2	Agricultural	Rural	<i>Agricultural operation</i>	*	*	<i>Boarding kennel</i>	*	*(1)	<i>Cannabis Production and Processing Facility</i>	*(3)	*(3)	<i>Conservation use</i>	*	*	<i>Cottage Industry</i>	*	*	<i>Detached dwelling</i>	*	*	<i>Equestrian centre</i>	*	*	<i>Forestry use</i>	*	*	<i>Home industry</i>	*	*	<i>Home occupation</i>	*	*	<i>Horticultural nursery</i>	*	*	<i>Shared Housing (*2)</i>	*	*	<i>Storage Building for Agricultural Equipment or Produce</i>	*	*	<i>Veterinary Clinic – Large Animal</i>	*	*	<i>Veterinary Hospital – Large Animal</i>	*	*	
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		<p><i>Town of Milton Comprehensive Zoning By-law 144-2003 – October 2019 Consolidation</i></p> <p><b>10.2 ZONE STANDARDS (104-2008)</b></p> <p>A number(s) following the Zone standard, Zone heading or description of the standard, indicates an additional Zone requirement. These additional standards are listed at the end of Section 10.2.</p> <p>No person shall within any Rural or Agricultural Zone use any lot or erect, alter, use any building or structure except in accordance with the following provisions:</p> <p><b>TABLE 10B</b></p> <table border="1" data-bbox="512 496 1056 998"> <thead> <tr> <th rowspan="2">PROVISIONS</th> <th colspan="2">ZONE</th> </tr> <tr> <th>A1 Agricultural</th> <th>A2 Rural</th> </tr> </thead> <tbody> <tr> <td><i>LOT AREA (Minimum)</i></td> <td></td> <td></td> </tr> <tr> <td>    <i>Residential Uses</i></td> <td>0.4 ha</td> <td>0.8 ha</td> </tr> <tr> <td>    <i>Equestrian Centres</i></td> <td>10.0 ha</td> <td>10.0 ha</td> </tr> <tr> <td>    <i>On-Farm Production, Conditioning, Processing &amp; Storing of Produce</i></td> <td>20.0 ha</td> <td>20.0 ha</td> </tr> <tr> <td>    <i>Agricultural Operation</i></td> <td>2.0 ha</td> <td>2.0 ha</td> </tr> <tr> <td>    <i>Cannabis Production and Processing Facility</i></td> <td>2.0 ha</td> <td>2.0 ha</td> </tr> <tr> <td>    <i>Boarding Kennels</i></td> <td>n/a</td> <td>4.0 ha</td> </tr> <tr> <td><i>LOT FRONTAGES (Minimum)</i></td> <td></td> <td></td> </tr> <tr> <td>    <i>Lots of 40 ha or more</i></td> <td>150.0m</td> <td>150.0m</td> </tr> <tr> <td>    <i>other Lots</i></td> <td>60.0m</td> <td>60.0m</td> </tr> <tr> <td><i>LOT DEPTH (Minimum)</i></td> <td>45.0m</td> <td>130.0m</td> </tr> <tr> <td><i>LOT COVERAGE (Maximum)</i></td> <td>25%</td> <td>15%</td> </tr> <tr> <td><i>FRONT YARD SETBACK (Minimum)</i></td> <td>15.0m</td> <td>22.5m</td> </tr> <tr> <td><i>REAR YARD SETBACK (Minimum)</i></td> <td>15.0m</td> <td>22.5m</td> </tr> <tr> <td><i>SIDE YARD SETBACK (Minimum)</i></td> <td></td> <td></td> </tr> <tr> <td>    <i>Interior Side Yard</i></td> <td>3.0m</td> <td>7.5m</td> </tr> <tr> <td>    <i>Exterior Side Yard</i></td> <td>15.0m</td> <td>22.5m</td> </tr> <tr> <td><i>BUILDING HEIGHT (Maximum)</i></td> <td></td> <td></td> </tr> <tr> <td>    <i>Residential Uses</i></td> <td>11.0m</td> <td>11.0m</td> </tr> <tr> <td>    <i>Agricultural Buildings</i></td> <td>No maximum</td> <td>No maximum</td> </tr> </tbody> </table> <hr data-bbox="464 1138 1045 1143"/> <p style="text-align: center;"><i>Section 10 – Rural Zones</i> <span style="float: right;">10-2</span></p> <p><b>Appendix II – Town of Halton Hills Zoning A – Agricultural Permitted Uses (Office Consolidation, December 2019)</b></p>	PROVISIONS	ZONE		A1 Agricultural	A2 Rural	<i>LOT AREA (Minimum)</i>			<i>Residential Uses</i>	0.4 ha	0.8 ha	<i>Equestrian Centres</i>	10.0 ha	10.0 ha	<i>On-Farm Production, Conditioning, Processing &amp; Storing of Produce</i>	20.0 ha	20.0 ha	<i>Agricultural Operation</i>	2.0 ha	2.0 ha	<i>Cannabis Production and Processing Facility</i>	2.0 ha	2.0 ha	<i>Boarding Kennels</i>	n/a	4.0 ha	<i>LOT FRONTAGES (Minimum)</i>			<i>Lots of 40 ha or more</i>	150.0m	150.0m	<i>other Lots</i>	60.0m	60.0m	<i>LOT DEPTH (Minimum)</i>	45.0m	130.0m	<i>LOT COVERAGE (Maximum)</i>	25%	15%	<i>FRONT YARD SETBACK (Minimum)</i>	15.0m	22.5m	<i>REAR YARD SETBACK (Minimum)</i>	15.0m	22.5m	<i>SIDE YARD SETBACK (Minimum)</i>			<i>Interior Side Yard</i>	3.0m	7.5m	<i>Exterior Side Yard</i>	15.0m	22.5m	<i>BUILDING HEIGHT (Maximum)</i>			<i>Residential Uses</i>	11.0m	11.0m	<i>Agricultural Buildings</i>	No maximum	No maximum	
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		<p style="text-align: center;"><b>PART 9</b> <b>NON-URBAN ZONES</b></p> <p><b>9.1 GENERAL PROHIBITION</b></p> <p>No person shall, within any Non-Urban Zone, use or permit the use of any land, or erect, alter, enlarge, use or maintain any building or structure for any use other than as permitted in Table 9.1 and in accordance with the standards contained in Table 9.2, the General Provisions contained in Part 4 and the Parking and Loading Provisions contained in Part 5 of this By-law.</p> <p><b>9.2 PERMITTED USES</b></p> <p>Uses permitted in a Non-Urban Zone are denoted by the symbol 'X' in the column applicable to that Zone and corresponding with the row for a specific permitted use in Table 9.1. A number(s) following the symbol 'X', or identified permitted use, indicates that one or more conditions apply to the use noted or, in some cases, to the entire Zone. Conditions are listed below on the Permitted Use Table 9.1 below:</p> <p><b>Table 9.1 – Permitted Uses (Non-Urban Zones)</b></p> <table border="1" data-bbox="464 656 1213 1159"> <thead> <tr> <th>USE</th> <th>A</th> <th>PC</th> <th>HR1 HR2</th> <th>HCC HC</th> <th>III</th> <th>HRD</th> <th>RCR1 RCR2</th> <th>RCC</th> <th>RCI</th> <th>CR</th> <th>MAR</th> <th>RU- EMP</th> </tr> </thead> <tbody> <tr> <td>Accessory Dwelling Units</td> <td>X (10)</td> <td>X (10)</td> <td>X (10)</td> <td>X (10)</td> <td></td> <td>X (19)</td> <td>X (19)</td> <td>X (19)</td> <td></td> <td>X (10)</td> <td>X (10)</td> <td></td> </tr> <tr> <td>Aggregate Transfer Stations (Under Appeal)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X (11) (16)</td> </tr> <tr> <td>Agricultural Uses</td> <td>X (4)</td> <td>X (4)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> </tr> <tr> <td>Animal Clinics</td> <td>X (2)</td> <td>X</td> <td></td> <td>X (3)</td> <td></td> <td></td> <td></td> <td>X (3)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Art Galleries</td> <td>X (12)</td> <td>X (12)</td> <td></td> <td>X (3)</td> <td></td> <td></td> <td></td> <td>X (3)</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Bed and Breakfast Establishments</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td>⊗</td> <td></td> <td></td> </tr> <tr> <td>Business Offices</td> <td>X (15) (12)</td> <td>X (15) (12)</td> <td></td> <td>X (3)</td> <td></td> <td>X</td> <td></td> <td>X (3)</td> <td></td> <td></td> <td></td> <td>X (12)</td> </tr> <tr> <td>Cannabis cultivation - outdoor</td> <td>X (16)</td> <td>X (16)</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Cannabis Analytical Testing Facilities, Cannabis Cultivation - Indoor</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X (17)</td> </tr> </tbody> </table> <p style="font-size: small;">Town of Hamilton Planning Bylaw 2014-01-001 (December 2014) (Re-Examined)   2014-01-001   Part 9 – Non-Urban Zones   14</p>	USE	A	PC	HR1 HR2	HCC HC	III	HRD	RCR1 RCR2	RCC	RCI	CR	MAR	RU- EMP	Accessory Dwelling Units	X (10)	X (10)	X (10)	X (10)		X (19)	X (19)	X (19)		X (10)	X (10)		Aggregate Transfer Stations (Under Appeal)											X	X (11) (16)	Agricultural Uses	X (4)	X (4)									X		Animal Clinics	X (2)	X		X (3)				X (3)					Art Galleries	X (12)	X (12)		X (3)				X (3)					Bed and Breakfast Establishments	X	X	X	X		X	X	X		⊗			Business Offices	X (15) (12)	X (15) (12)		X (3)		X		X (3)				X (12)	Cannabis cultivation - outdoor	X (16)	X (16)											Cannabis Analytical Testing Facilities, Cannabis Cultivation - Indoor												X (17)	
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		<p>5. Provided the use occupies no more than 250.0 square metres of net floor area.</p> <p>6. Only uses that legally existed on the effective date of this By-law are permitted. The maximum net floor area per premises is 500.0 square metres. For properties within the Hamlet of Norval, a maximum net floor area of 500 square metres per lot is permitted.</p> <p>7. The minimum distance between a Group Home Type 1 and any other Group Home Type 1, located in any permitted Zone, shall be 400 metres measured in a straight line from lot line to lot line. In addition, the minimum distance between a Group Home Type 1 and a Group Home Type 2 or a Treatment Centre located in any permitted zone shall be 1,000 metres measured in a straight line from lot line to lot line. In addition, the minimum required gross floor area per resident is 23.0 square metres.</p> <p>8. The minimum distance between a Treatment Centre and other Group Home Type 1, Group Home Type 2, or Treatment Centre, located in any permitted Zone, shall be 1,000 metres measured in a straight line from lot line to lot line. In addition, the minimum gross floor area per resident is 23.0 square metres per resident.</p> <p>9. Drive-through service facilities associated with this use are not permitted.</p> <p>10. The minimum distance between a Group Home Type 2 and any other Group Home Type 1, Group Home Type 2 or Treatment Centre, located in any permitted Zone, shall be 1,000 metres measured in a straight line from lot line to lot line. In addition, the minimum gross floor area per resident is 23.0 square metres.</p> <p>11. Provided the maximum net floor area is 200.0 square metres.</p> <p>12. Only uses that legally existed on the effective date of this By-law are permitted. The establishment of new buildings and/or the expansion of any buildings or structures for any use subject to this Special Provision is not permitted.</p> <p>13. Only the uses and the related floor area that legally existed on the effective date of this By-law are permitted on those lands in Glen Williams that are subject to the Holding (H5) provision as set out in Part 14 to this By-law.</p> <p>14. Only industrial uses that were legally permitted by the zoning in effect on the day before the effective date of this By-law are permitted. The establishment of new buildings and/or the expansion of any buildings or structures for an industrial use is not permitted.</p> <p>15. All forms and types of this use in terms of the services offered and/or products that are sold as defined by the By-law are permitted.</p> <p>16. <u>A lot containing this use shall have the lesser of a minimum lot coverage of 5% or a minimum ground floor area of all permitted buildings of 464 square metres. (Under Appeal)</u></p> <p>17. Permitted in the Hamlet of Norval only.</p> <p>18. Permitted in the Hamlet of Norval only. Only uses that legally existed on the effective date of this By-law are permitted.</p> <hr/> <p>Town of Halton Hills Zoning By-law 2010-0050 (December 2019 Office Consolidation) July 2010 Part 9 – Non-Urban Zones 9-5</p>	



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		<p><b>Table 9.2 – Standards for Non-Urban Zones</b></p> <table border="1" data-bbox="499 293 1178 878"> <thead> <tr> <th>ZONE</th> <th>Minimum Lot Frontage</th> <th>Minimum Lot Area</th> <th>Minimum Required Front Yard</th> <th>Minimum Required Rear Yard</th> <th>Minimum Required Interior Side Yard</th> <th>Minimum Required Exterior Side Yard</th> <th>Maximum Height</th> </tr> </thead> <tbody> <tr><td>A</td><td>180.0 m</td><td>4.0 ha</td><td>15.0 m (1)</td><td>15.0 m (1)</td><td>15.0 m (1)</td><td>15.0 m (1)</td><td>11.0 m</td></tr> <tr><td>PC</td><td>180.0 m</td><td>4.0 ha</td><td>15.0 m (1)</td><td>15.0 m (1)</td><td>15.0 m (1)</td><td>15.0 m (1)</td><td>11.0 m</td></tr> <tr><td>HR1</td><td>30.0 m</td><td>0.2 ha</td><td>4.5 m (2)</td><td>7.5 m</td><td>2.25 m</td><td>4.5 m (2)</td><td>11.0 (3)</td></tr> <tr><td>HR2</td><td>30.0 m</td><td>0.4 ha</td><td>7.5 m</td><td>7.5 m</td><td>4.5 m</td><td>7.5 m</td><td>11.0 (3)</td></tr> <tr><td>HOC</td><td>30.0 m</td><td>0.2 ha</td><td>4.5 m (2)</td><td>7.5 m</td><td>2.25 m</td><td>4.5 m (2)</td><td>11.0 (3)</td></tr> <tr><td>HC</td><td>30.0 m</td><td>0.2 ha</td><td>7.5 m</td><td>7.5 m</td><td>4.5 m</td><td>7.5 m</td><td>11.0 (3)</td></tr> <tr><td>HI</td><td>30.0 m</td><td>0.2 ha</td><td>7.5 m</td><td>7.5 m</td><td>4.5 m</td><td>7.5 m</td><td>11.0 m</td></tr> <tr><td>HRD</td><td>30.0 m</td><td>0.2 ha</td><td>4.5 (2)</td><td>7.5</td><td>2.25</td><td>4.5 (2)</td><td>11.0(3)</td></tr> <tr><td>RCR1</td><td>30.0 m</td><td>0.2 ha</td><td>7.5 m</td><td>7.5 m</td><td>4.5 m</td><td>7.5 m</td><td>11.0 m</td></tr> <tr><td>RCR2</td><td>30.0 m</td><td>0.4 ha</td><td>7.5 m</td><td>7.5 m</td><td>4.5 m</td><td>7.5 m</td><td>11.0 m</td></tr> <tr><td>RCC</td><td>30.0 m</td><td>0.2 ha</td><td>7.5 m</td><td>7.5 m</td><td>4.5 m</td><td>7.5 m</td><td>11.0 m</td></tr> <tr><td>RCI</td><td>30.0 m</td><td>0.2 ha</td><td>7.5 m</td><td>7.5 m</td><td>4.5 m</td><td>7.5 m</td><td>11.0 m</td></tr> <tr><td>CR</td><td>30.0 m</td><td>0.4 ha</td><td>9.0 m</td><td>9.0 m</td><td>4.5 m</td><td>9.0 m</td><td>11.0 m</td></tr> <tr><td>MAR</td><td>0.0 m</td><td>20.0 ha</td><td>15.0 m</td><td>15.0 m</td><td>15.0 m</td><td>15.0 m</td><td>n/a</td></tr> <tr><td>RU-EMP</td><td>30.0 m</td><td>0.2 ha</td><td>7.5 m</td><td>7.5 m</td><td>2.4 m</td><td>2.4 m</td><td>11.0 m</td></tr> </tbody> </table> <p><b>SPECIAL PROVISIONS:</b></p> <ol style="list-style-type: none"> <li>1. <i>Single detached dwellings</i> are subject to the provisions of the Country Residential (CR) Zone.</li> <li>2. The wall of the <i>private garage</i> facing the <i>lot line</i> the <i>driveway</i> crosses to access the <i>private garage</i> is to be located no closer than 5.5 metres from that <i>lot line</i>.</li> <li>3. For properties in the Hamlet of Norval the maximum <i>height</i> shall not exceed the lesser of 2 <i>storeys</i> or 11.0 metres</li> </ol> <p><small>Town of Halton Urban Zoning By-law 2013-01-01 Description: 11 Urban Zoning Consolidation July 2013</small></p>	ZONE	Minimum Lot Frontage	Minimum Lot Area	Minimum Required Front Yard	Minimum Required Rear Yard	Minimum Required Interior Side Yard	Minimum Required Exterior Side Yard	Maximum Height	A	180.0 m	4.0 ha	15.0 m (1)	15.0 m (1)	15.0 m (1)	15.0 m (1)	11.0 m	PC	180.0 m	4.0 ha	15.0 m (1)	15.0 m (1)	15.0 m (1)	15.0 m (1)	11.0 m	HR1	30.0 m	0.2 ha	4.5 m (2)	7.5 m	2.25 m	4.5 m (2)	11.0 (3)	HR2	30.0 m	0.4 ha	7.5 m	7.5 m	4.5 m	7.5 m	11.0 (3)	HOC	30.0 m	0.2 ha	4.5 m (2)	7.5 m	2.25 m	4.5 m (2)	11.0 (3)	HC	30.0 m	0.2 ha	7.5 m	7.5 m	4.5 m	7.5 m	11.0 (3)	HI	30.0 m	0.2 ha	7.5 m	7.5 m	4.5 m	7.5 m	11.0 m	HRD	30.0 m	0.2 ha	4.5 (2)	7.5	2.25	4.5 (2)	11.0(3)	RCR1	30.0 m	0.2 ha	7.5 m	7.5 m	4.5 m	7.5 m	11.0 m	RCR2	30.0 m	0.4 ha	7.5 m	7.5 m	4.5 m	7.5 m	11.0 m	RCC	30.0 m	0.2 ha	7.5 m	7.5 m	4.5 m	7.5 m	11.0 m	RCI	30.0 m	0.2 ha	7.5 m	7.5 m	4.5 m	7.5 m	11.0 m	CR	30.0 m	0.4 ha	9.0 m	9.0 m	4.5 m	9.0 m	11.0 m	MAR	0.0 m	20.0 ha	15.0 m	15.0 m	15.0 m	15.0 m	n/a	RU-EMP	30.0 m	0.2 ha	7.5 m	7.5 m	2.4 m	2.4 m	11.0 m	
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108.	Hanieh Alyassin on behalf of 9104 Dublin	Weston Consulting has been retained by the owner of the property municipally addressed as 9104 Dublin Line in the Town of Halton Hills, Regional Municipality of Halton (herein referred to as the 'Subject Lands'). We have been retained, by the owner, to prepare a planning letter in support of bringing the Subject Lands into the Future Employment Area.	The Subject lands are within the Escarpment Protection designation of the Niagara Escarpment Plan and are not eligible for inclusion in the Urban Area.																																																																																																																																

No.	Source	Submission	Response
	<p>Line, Town of Halton Hills.</p> <p>E-mail dated September 10, 2021</p>	<p><b><u>Description of Subject Lands Location and Context Area</u></b></p> <p>The Subject Lands are located on the east side of Tremaine Road, west side of Dublin Line in the, and north of Campbellville Road in the Town of Halton Hills. The subject property has three frontages, an approximate frontage of 477.28 metres along Tremaine Road, 804.66 metres along Campbellville Road, and 470.86 metres along Dublin Line. The Subject Land have an approximate area of 78.04 hectares (98.3 acres) (See Figure 1, below).</p>  <p>Figure 1: Subject Lands Boundary</p> <p>The land uses surrounding the subject property are as follows:</p> <p>North: Agricultural uses.</p> <p>East: Agricultural uses, and single detached dwellings which have been included in Future Strategic Employment Area of Halton Region Official Plan.</p> <p>South: Vacant lands which are designated as Urban Area of Regional Official Plan of Halton.</p> <p>West: Agricultural uses, and single detached dwellings.</p> <p>The Subject Lands are located in proximity (30- minute walk) of soft infrastructure such as shopping store, School, place of worship, and recreational golf course. In our planning opinion the Subject Land is underutilized, and have potential of being included in Urban boundary (see Figure 2).</p>	

No.	Source	Submission	Response				
		 <p data-bbox="453 954 1012 982">Figure 2: 30-minute walk radius from Subject Lands</p> <p data-bbox="453 1008 1176 1036"><b><u>Site Context w.r.t. potentials for inclusion in Employment Area:</u></b></p> <ul data-bbox="504 1040 1333 1122" style="list-style-type: none"> <li>• The Subject Land is located in close proximity to Highway 401 and Future Strategic Employment Area.</li> <li>• Furthermore, the Subject Land has frontage to two Arterial roads.</li> </ul> <p data-bbox="453 1179 871 1206"><b><u>Analysis of Policy conformity chart:</u></b></p> <p data-bbox="453 1206 1344 1260">The following summary has been prepared based on a review of relevant Provincial, Regional and Municipal documents:</p> <table border="1" data-bbox="457 1287 1356 1398"> <thead> <tr> <th colspan="2" data-bbox="457 1287 1356 1312">Provincial Policies</th> </tr> </thead> <tbody> <tr> <td data-bbox="457 1312 907 1398">Provincial Policy Statement 2020</td> <td data-bbox="907 1312 1356 1398">Subject Land is not within Specialty Crop Area.</td> </tr> </tbody> </table>	Provincial Policies		Provincial Policy Statement 2020	Subject Land is not within Specialty Crop Area.	<p data-bbox="1438 1190 1890 1243">Comments are acknowledged. Please see above for a detailed response.</p>
Provincial Policies							
Provincial Policy Statement 2020	Subject Land is not within Specialty Crop Area.						





No.	Source	Submission	Response
		<p>As per Section 2.1.5 of the Provincial Policy Statement (PPS), Development and site alteration shall not be permitted in:</p> <ul style="list-style-type: none"> <li>a) significant wetlands in the Canadian Shield north of Ecoregions 5E, 6E and 7E1;</li> <li>b) significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);</li> <li>c) significant valleylands in Ecoregions 6E and 7E (excluding islands in LakeHuron and the St. Marys River);</li> <li>d) significant wildlife habitat;</li> <li>e) significant areas of natural and scientific interest; and</li> <li>f) coastal wetlands in Ecoregions 5E, 6E, and 7E1 that are not subject to policy 2.1.4(b) unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.</li> </ul> <p>Analysis:</p> <ul style="list-style-type: none"> <li>• The Subject Lands are not within <b>Significant Groundwater Recharge Area (SGRA)</b> nor <b>Water Resource Protection Area</b>;</li> <li>• The Subject Lands are not within <b>Municipal Wellhead Protection Zones</b>;</li> <li>• The Subject Lands are not within <b>Identified Mineral Resource Area</b>; and,</li> </ul> <p>Sections 3.1 of the PPS states that "Development shall generally be directed, in accordance with guidance developed by the Province (as</p>	

No.	Source	Submission	Response
		<p>amended from time to time), to areas outside of:</p> <p>a) hazardous lands adjacent to the shorelines of the Great Lakes - St. Lawrence River System and large inland lakes which are impacted by flooding hazards, erosion hazards and/or dynamic beach hazards;</p> <p>b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards; and</p> <p>c) hazardous sites".</p> <p>Analysis:</p> <ul style="list-style-type: none"> <li>The Subject Lands are <b>outside of Natural Hazardous Area.</b></li> <li>There are no <b>Provincially Significant Wetlands (PSWs), Areas of Natural or Scientific Interest (ANSIs) or Environmentally Sensitive Areas (ESAs) located on or adjacent to the Subject Lands.</b></li> </ul>	
	Greenbelt Plan 2017		<p>Subject Land is located <b>inside</b> of the <b>Greenbelt Plan Area.</b></p> <p>The Subject Lands are designated as "Protected Countryside" within Greenbelt Plan.</p>
	Niagara Escarpment Plan 2017		<p>Subject Lands are located <b>inside</b> of the <b>Niagara Escarpment Plan (NEP).</b> The Subject Lands are designated as "Escarpment Protection Area" within Niagara Escarpment Plan. Permitted uses under this designation include:</p> <ul style="list-style-type: none"> <li>Agricultural uses, Agriculture-related uses and on-farm diversified uses, in prime</li> </ul>

No.	Source	Submission	Response
		<p data-bbox="1014 256 1344 943">agricultural areas, Existing uses, Single dwellings, Mobile or portable dwelling unit(s) accessory to agriculture, Non-motorized trail activities and snowmobiling, outside of prime agricultural areas, Unserved camping on public and institutional land, outside of prime agricultural areas, Forest, wildlife and fisheries management, Licensed archaeological fieldwork, Infrastructure, Accessory uses (e.g., a garage, swimming pool, tennis court, ponds or signs), Institutional uses, outside of prime agricultural areas, Uses permitted in the Parks and Open Space System Master/ Management Plans that are not in conflict with the Niagara Escarpment Plan, Home occupations and home industries, and more.</p> <p data-bbox="919 971 1339 1409">As per Section 6.1 (2.3), “Despite subsection (2.2), an application, request or proposal to redesignate land in the Niagara Escarpment Plan to the land use designation of Minor Urban Centre, Urban Area or Escarpment Recreation Area of the Niagara Escarpment Plan or to amend the Niagara Escarpment Plan to permit urban uses may be made during the review set out in subsection 17 (1) and in order for any such application, request or proposal to be considered during the review it must be included in the terms of reference established for the review under subsection 17 (2).</p>	

No.	Source	Submission		Response
			<p>2005, c. 1, s. 25 (1); 2009, c. 12, Sched. L, s. 9 (2)."</p> <p>Analysis: <b>The NEP Area could be re-evaluated when subject to subsection (17), when the overall NEP is subject to review (2027).</b></p> <ul style="list-style-type: none"> <li>Weston Consulting met with Niagara Escarpment Commission (NEC) staff on September 9, 2021. It was confirmed that next NEP Review would be conducted in 2027, and through this letter we would like to continue our candidacy for inclusion in Urban Boundary Expansion as well as NEP amendment.</li> </ul>	
		<p>A Place to Grow: Growth Plan for the Greater Golden Horseshoe ('Growth Plan'), 2020</p>	<p>Subject Lands are <u>not</u> located within the Built-Up Area-Conceptual of the Growth Plan.</p> <ul style="list-style-type: none"> <li>As per section (e) and (f), Settlement Area Boundary Expansion of Growth Plan, the expansion in the areas with key hydrological areas, and Natural Heritage System could be permitted. <b>The Subject Lands are not within Key Hydrological Areas.</b></li> <li>Also, as per section J of the same document, the expansion should meet the requirements of Greenbelt and Niagara Escarpment plans.</li> </ul>	
		<b>Conservation Authority Regulations</b>		
		Halton Region Conservation Area	Subject Lands are located <u>outside</u> of Halton Region Conservation regulated area.	
		<b>Upper Tier Municipal Policy</b>		

No.	Source	Submission	Response						
		<table border="1" data-bbox="455 254 1356 889"> <tr> <td data-bbox="455 254 905 363">Region of Halton Official Plan (2018 Office Consolidated)</td> <td data-bbox="909 254 1356 363">The Subject Lands are designated as “Prime Agricultural Area” and “Regional Natural Heritage system” of the Region of Halton Official Plan.</td> </tr> <tr> <td colspan="2" data-bbox="455 367 1356 394" style="text-align: center;"><b>Transportation</b></td> </tr> <tr> <td data-bbox="455 397 905 889">Roadway Classification</td> <td data-bbox="909 397 1356 889"> <p>Tremaine Road: Major Arterial Campbellville Road: Minor Arterial</p> <p>The subject Property is within walking distance (less than 1 kilometres) from the Highway 401 which is classified as Provincial Highway.</p> <p>Analysis: The Subject Lands are <b>located along arterial roads and has potential of being included in the Urban Boundary and Employment Area.</b></p> <p><b>The Subject Lands are within 2 Kilometres of Milton Urban Growth Centre and proposed Major Transit Stations Area (MTSA) of Town of Milton.</b></p> </td> </tr> </table> <p data-bbox="455 919 1184 946"><b><u>Comparative Analysis of Subject Lands vs. Adjacent East Lands</u></b></p> <p data-bbox="455 976 1402 1192">The lands abutting Dublin line to the east of Subject Lands comprise Key Natural Features as shown on Key Features within the Greenbelt and Regional Natural Heritage Systems of Halton Region Official Plan. We note that these lands have been included in the Future Strategic Employment Area as shown on concept 3 of Integrated Growth Management Strategy, dated Feb 2021 (see <b>Figure 3</b>). While Subject Lands which are of flat topography and devoid of any significant Natural Heritage features, are excluded from Employment Area. The above-mentioned lands also comprise a watercourse as shown on <b>Figure 3</b>.</p> <p data-bbox="455 1221 1394 1328">1- The lands to the east of Subject Lands are designated as Prime Agricultural Area, as shown on Map 1E (Agricultural System and Settlement Areas map) of Regional Official Plan. However, Subject Lands with the same designation is excluded from Future Employment Area.</p> <p data-bbox="455 1331 1335 1383">2- The Subject Lands are not within Highly Vulnerable Aquifer Area of Halton Conservation Plan, while the lands to the east partially are.</p>	Region of Halton Official Plan (2018 Office Consolidated)	The Subject Lands are designated as “Prime Agricultural Area” and “Regional Natural Heritage system” of the Region of Halton Official Plan.	<b>Transportation</b>		Roadway Classification	<p>Tremaine Road: Major Arterial Campbellville Road: Minor Arterial</p> <p>The subject Property is within walking distance (less than 1 kilometres) from the Highway 401 which is classified as Provincial Highway.</p> <p>Analysis: The Subject Lands are <b>located along arterial roads and has potential of being included in the Urban Boundary and Employment Area.</b></p> <p><b>The Subject Lands are within 2 Kilometres of Milton Urban Growth Centre and proposed Major Transit Stations Area (MTSA) of Town of Milton.</b></p>	
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No.	Source	Submission	Response
		<p>3- The lands to the east of subject property, also comprise Key Natural Heritage feature as indicated on <b>Figure 3</b>; however, Subject Land exclude any significant Natural Heritage Feature.</p> <p>4- The subject lands have few Historical Feature; however, we would like to note that the adjacent lands to the east of the subject property also include numbers of Historical Feature as indicated on Figure 2 of Archaeological Resources of The Regional Municipality of Halton (See <b>Figure 4</b>).</p>  <p><b>Figure 3: Inclusion of adjacent lands to the east in Future Strategic Employment Area vs. Subject Lands</b></p>  <p><b>Figure 4: Master Plan of Archaeological Resources of The Regional Municipality of Halton</b></p> <p>Our planning opinion, inclusion of Subject Land into Future Employment Area would not negatively impact Environmental policy of the region as the Subject Land is not within Mineral Aggregation Resource Plan Area, Source Protection Plan Area and does not include key natural heritage features.</p> <p><b><u>NHE Result Summary</u></b></p>	

No.	Source	Submission	Response
		<p>Natural Heritage Due Diligence Screening report conducted by LGL Limited on August 2021 approved that the main natural feature on the site is the woodlot, located on the north of the property; however, an appropriate setback has been proposed to preserve the feature.</p> <ul style="list-style-type: none"> <li>• As indicated on NHE study (see Appendix 'A') despite the presence of several species at risk within the closest 1 km grid squares to the subject property, no habitat for threatened or endangered species has been identified on the Subject Lands.</li> <li>• The Halton Region Source Protection Plan does not identify any 'Significant Groundwater Recharge Areas,' 'Highly Vulnerable Aquifers' or 'Wellhead Protection Areas' on the property.</li> </ul> <p><b>CONCLUSION</b></p> <ul style="list-style-type: none"> <li>• The Subject Lands have 3 frontages on Tremaine Road, Campbellville Road, and Dublin Line, and located at the intersection of two arterial roads.</li> <li>• The Subject Lands are within one kilometer of the highway 401.</li> <li>• The Subject Lands are not within Specialty Crop Area.</li> <li>• The Subject Lands are fairly flat.</li> <li>• The Subject Lands comprise small woodlot on the north.</li> <li>• The Subject Lands do not comprise watercourse.</li> <li>• Adjacent lands are included in Urban Expansion boundary, and Future Strategic Employment Area.</li> <li>• The Subject Lands are not within Key Natural Heritage Feature Area.</li> <li>• There are no livestock on the property currently or planned in the future (see Appendix 'B', attached letter of undertaking).</li> <li>• No endangered species have been identified on the site.</li> <li>• There are no Provincially Significant Wetlands (PSWs), Areas of Natural or Scientific Interest (ANSIs) or Environmentally Sensitive Areas (ESAs) located on the Subject Lands.</li> <li>• The Halton Region Source Protection Plan does not identify any 'Significant Groundwater Recharge Areas,' 'Highly Vulnerable Aquifers' or 'Wellhead Protection Areas' on the Subject Lands.</li> </ul> <p>We understand that the Subject Lands are part of the Niagara Escarpment Plan (NEP) Area and amendment to the Plan would only be possible by 2027 as part of the overall NEP review, and could only be initiated by the Minister of Natural Resources. However, we would like to bring to the attention of the staff that the Integrated Growth Plan of Halton Region horizon is for 2051, while NEP currently used for the Integrated Growth Plan is for 2027.</p>	

No.	Source	Submission	Response
		<p>The base provincial document used for the urban expansion is lagging behind 20 years and if this is the case -if the region is planning for 2051, then we would request that the subject property be included in urban expansion, if not for 2031 then for 2051 unquestionably.</p> <p>The Subject Lands are located at the intersection of two arterial loads; have the same official plan designation (Prime Agricultural Area) as adjacent property on the east which have been included in urban expansion boundary; is in proximity to transit corridor and highway, and even more developable than adjacent east properties; offering flat topography and no aquifer and watercourse. In our planning opinion, this seems equitable to consider the subject lands as a candidate for the Urban Boundary Expansion exercise on account of the inconsistent policy documents.</p> <p>If you have any questions or concerns, please contact the undersigned at ext. 335, or Hanieh Alyassin at ext. 337.</p> <p>Yours truly, Weston Consulting Per: Katie Pandey, MAES, RPP Associate</p>	
109.	<p>Elizabeth Chalmers on behalf of Joshua Creek Residents' Association</p> <p>E-mail dated October 1, 2021</p>	<p><b>Submission dated November 4, 2020:</b> <b>Re: Regional Official Plan Review (ROPR)</b></p> <p>Dear Sirs,</p> <p>I am writing on behalf of the Joshua Creek Residents' Association (JCRA) in Oakville to provide our feedback on the Region's current Official Plan Review. We would like to express our thanks and appreciation of the Region's extensive public consultation, and the multiple opportunities for public engagement on this review. We would also like to congratulate Regional staff on the clear, comprehensive, and well-prepared discussion papers and draft plan.</p> <p>JCRA endorses the five priorities proposed by Oakville's Mayor Burton for policy updates to the Region's Official Plan:</p> <p>1. <b>Parkland, Trails and Green Space.</b> Policy to require adequate parkland and green space in new subdivisions and settlement areas, while also acknowledging that higher densities require more public space.</p>	<p><u>Integrated Growth Management Strategy</u></p> <p><i>Preferred Growth Concept, ROPA 48, Employment Conversions</i></p> <p>The Preferred Growth Concept generally directs a significant amount of growth to strategic growth areas, including around GO stations, and on planned higher order transit corridors.</p> <p>The Preferred Growth Concept is informed by several Key Principles, including confirming and supporting a Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan. It also directs growth</p>



No.	Source	Submission	Response
		<p>2. <b>Private Growth Node Initiatives.</b> Policy stating that a private application for development of any new growth node or area, beyond those already specified in a Municipal Official Plan, of sufficient magnitude as to require significant new public investment or having significant impact on transportation and existing public facilities, will require a Municipal Comprehensive Review.</p> <p>3. <b>Incompatible Land Use.</b> Policy building on Ministry of the Environment Land Use Guidelines (D-Series) to establish strong separation distances between incompatible land uses.</p> <p>4. <b>Intensity of Permitted Activity on Employment Land.</b> Policy which allows some regulation in Zoning By-Laws of the intensity of permitted activity on a site to reduce the impact of the activity on neighbouring property.</p> <p>5. <b>Conversion of Employment Area to Residential Area.</b> Policy to protect an employment area, following conversion of some of it into residential area, from attempts to limit permitted activity (traffic, noise etc.) on the remaining parts.</p> <p>Some additional points for your consideration:</p> <p>1. Maintain the protection of stable residential neighbourhoods by directing intensification to designated nodes and corridors that can accommodate intensification with access to public transit and our road network.</p> <p>2. Ensure policies that reflect the current and future impact of climate change concerns are reflected in the Official Plan so that future development includes green construction, green infrastructure, renewable energy sources, preservation and enhancement of tree canopy and green spaces, and compact, 'walking' neighbourhoods. Your Climate Change Discussion paper is thorough and comprehensive, and a critical element in the ROPR.</p> <p>3. As residents we expect our Official Plans and Zoning By-laws to be respected. We encourage the inclusion of guidance and direction in the updated ROP that helps strengthen the plan to withstand potential challenges to the collective vision of our community as expressed through our Official Plan.</p> <p>Thank you for the opportunity to provide our input to Halton's Official Plan Review Elizabeth Chalmers President, Joshua Creek Residents' Association</p> <p><b>Submission dated September 21, 2021</b> <b>Re: Halton Region Official Plan Growth Concepts</b></p>	<p>(referred to as “densification” in the Growth Concepts Discussion Paper) – which is “intensification” in the sense that it concentrates development to areas within the existing approved urban area – to potential future intensification sites.</p> <p>In terms of implementation, the Integrated Growth Management Strategy (IGMS) is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept. A number of strategic employment conversions are being recommended through the IGMS.</p> <p><i>Land Use Compatibility</i></p> <p>In terms of land use compatibility, as per the Environmental Registry of Ontario Posting dated October 13, 2021 and available online <a href="#">here</a>, the Province is not proceeding with the proposed Land Use Compatibility Guideline as a result of feedback received through the Environmental Registry of Ontario. The current D-Series guidelines for land use compatibility will remain in effect. Any potential future updates to land use compatibility guidance would be posted as a new proposal on the Registry.</p> <p>Regional Official Amendment (ROPA) No. 48 was approved with few modifications on November 10, 2021 by the Minister of Municipal Affairs and Housing. ROPA 48 was updated to reflect the Province's direction as set out in the Provincial Policy Statement (2020) and Growth Plan (2020).</p>

No.	Source	Submission	Response
		<p>Dear Sirs:</p> <p>I am writing on behalf of the Joshua Creek Residents' Association (JCRA) to provide feedback on the Region's Growth Concepts, as summarized in the materials presented at the public information session held on May 13, 2021. JCRA provided feedback on the Region's Official Plan Review in our letter dated November 4, 2020. We also participated on May 13, 2021, in the public information session and benefited from a presentation to the JCRA Board on the growth concepts by regional planning staff.</p> <p>We would like to express our thanks and appreciation for the Region's extensive public consultation on this topic. We would also like to congratulate Halton Region staff on the comprehensive Integrated Growth Management Strategy Growth Concepts Discussion Paper and the extensive public information materials.</p> <p>Choosing the best growth concept to accommodate Halton's Provincially mandated population and employment targets for 2051 is clearly a complex undertaking. There are pros and cons to each growth concept and, in the final analysis, often little quantitative differences between the concepts. Notwithstanding our review of the discussion paper and the presentation materials, it has proven difficult for JCRA to conclusively recommend one growth concept over the others. Given some of the preliminary and high-level information in the discussion paper and JCRA's lack of planning expertise, JCRA cannot identify the best growth concept. Ultimately, we look to the Region to utilize the necessary resources to identify the best growth concept which preserves the vision of Halton and its communities as set out in the Regional Official Plan.</p> <p><b>1. Urban Sprawl:</b> Growth Concept #4 provides for the maximum numbers of single-family homes requiring the largest amount of land, which will result in the highest number of vehicles on the roads, with the least amount of public transit, since single family homes do not provide the density needed for efficient public transit. We do not see any positives to Growth Concept #4 because it results in urban sprawl. In 2021, planning for future growth should not utilize urban sprawl as a planning principle to manage population growth.</p> <p><b>2. Agriculture, Environment and Climate Change:</b> JCRA applauds the inclusion of agriculture, environment, and climate as a theme. We expect the Region will conduct a comprehensive study of a growth concept's impact on agriculture, including the Agri-network, before finalizing the choice of a growth concept. Proximity and supply of agricultural land will increase in importance as droughts, extreme heat and fires negatively impact areas that have traditionally supplied our food. By 2051, access to land for food may well be more important than more housing. In addition, the Region should obtain</p>	<p>In this Amendment, direction is provided on planning to ensure the long-term operational and economic viability of major facilities, and achievement of land use compatibility between major facilities and sensitive land uses within or adjacent to Strategic Growth Areas.</p> <p>Through the policy directions for the Regional Official Plan Review (ROPR), further changes to the Regional Official Plan as it relates to guidance on land use compatibility may be considered as required. Regional staff anticipate staff seeking Regional Council approval of the Policy Directions report in early 2022. The theme area Policy Directions report will set out broad recommended approaches for the policy areas that were under review, including draft recommendation to update land use compatibility policies for consistency with Provincial Plans and policies.</p> <p><u>Climate Change</u></p> <p>The response to climate change in the Regional Official Plan Review is required by changes to provincial policy, plans, and legislation.</p> <p>The Planning Act requires an Official Plan to contain policies that identify goals, objectives, and actions to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate including through resiliency. The policies of the Growth Plan regarding how land is</p>

No.	Source	Submission	Response
		<p>rigorous modelling of greenhouse gas, building and transportation emissions before selecting a growth concept.</p> <p><b>3. Financial Impact and impact on Infrastructure:</b> While it may be difficult to accurately predict the financial impact and the impact on infrastructure of each growth concept, we expect the Region to carefully assess the financial impact of each growth concept and to maximize the efficient use of transportation and infrastructure in the Region.</p> <p><b>4. High Density Apartments Designed for Families:</b> With significantly increased densities under Growth Concept #2 and #3 for new developments, our concern is there will be significant growth of</p> <p>However, given the importance of this topic, JCRA provides the following feedback: 1- and 2-bedroom units geared to the investor market and no product geared to families.</p> <p>The Region and the Town should develop new zoning categories and by-laws outlining criteria for higher density apartments that are designed to accommodate families including 3+ bedroom units and possibly two-storey units within mid-rise buildings. There should be safe outdoor space for children in nearby parks or courtyards. The Livable Oakville Plan would need to be updated to include this housing design as a requirement.</p> <p>If family units are a requirement based on zoning placed on certain parcels of development land, then the land price will adjust (reduce) to reflect the lower number of units that can be built, which should keep prices down. However, family units may still not be built if the cost of construction is too high to cover the costs + profit, even with a lower land value. There may need to be development charges and HST incentives to get family units on the market.</p> <p><b>5. Intensity of Permitted Activity on Employment Land:</b> The employment growth in Concept #4 is almost entirely vast single-storey warehouses, requiring large amounts of land and bringing an in-flux of vehicles. We cannot support a growth concept that results in only that type of employment. Further the chosen growth concept must include some regulation in Zoning By-Laws of the intensity of permitted activity on employment lands to reduce the impact of employment activity on neighbouring property.</p> <p>In summary, as residents we look to the Region to identify a financially responsible growth concept that protects our climate, the environment, agriculture, and our stable residential neighbourhoods, and directs population and employment growth to designated nodes and corridors that can accommodate such growth with access to family accommodation, public transit, and adequate infrastructure.</p>	<p>developed, resources are managed and protected, and public dollars are invested are based on, among other items, integrating climate change considerations into planning and managing growth.</p> <p>This includes planning for more resilient communities and infrastructure – that are adaptive to the impacts of a changing climate – and moving towards environmentally sustainable communities by incorporating approaches to reduce greenhouse gas emissions.</p> <p>Halton Regional Council has formally declared a climate emergency and staff have been committed to taking action against climate change during the ROPR.</p> <p>The Preferred Growth Concept builds on the existing Regional Official Plan policies and objectives related to climate change. For example, over 80% of population, housing unit, and employment growth is being directed to the existing approved urban areas in line with the approved Regional Urban Structure. This represents an ambitious shift when compared to standards included in the current Regional Official Plan. There is a greater reliance on accommodating growth in apartment buildings as a means to optimize the use of land in the existing urban area. It directs growth to strategic growth areas where public services, infrastructure, and transit exist. It allocates significant growth around existing GO stations and other planned higher order transit nodes and corridors to optimize transit investment and operations while mobility objectives. It continues to protect</p>

No.	Source	Submission	Response
		<p>Thank you for the opportunity to provide our input into Halton's Official Plan growth concepts.</p> <p>Yours sincerely,  Elizabeth Chalmers  President  Joshua Creek Residents' Association</p>	<p>the Natural Heritage System such that 50% of the Region will be protected for natural heritage. It continues to protect considerable prime agricultural areas for farming and food security. All of these components of the Preferred Growth Concept support Council's climate objectives and the motion declaring a climate emergency.</p> <p>Regional planning staff has developed policy directions that align with Provincial policy and plans and were informed through feedback from members of the public, advisory committees, stakeholders, and local municipalities.</p> <p>The response to climate change through the Regional Official Plan is guided by the Growth Plan for the Greater Golden Horseshoe, the Provincial Policy Statement and the <i>Planning Act</i>. The Regional Official Plan Review will address land use-related climate change impacts through land use policies, actions, and strategies to mitigate greenhouse gas emissions and to provide for adaptation to a changing climate.</p> <p>The Region is also undertaking a broader set of actions to respond to climate change in accordance with the Region's Strategic Business Plan 2019-2022 and Council's emergency declaration.</p> <p>Halton Region has also partnered with Halton Environmental Network to advance the Region's work in addressing climate change. The partnership will result in the preparation of a community greenhouse gas emissions inventory, community</p>

No.	Source	Submission	Response
			<p>greenhouse gas emission reductions targets, community engagement, and outreach in collaboration with the Halton Climate Collective.</p> <p><u>Natural Heritage</u></p> <p>Policy Direction NH-10 recommends a new policy in the Regional Official Plan that requires the Region to develop a Halton Region Natural Heritage Strategy. The purpose of the strategy would be to identify a framework for initiatives such as monitoring, stewardship/restoration, and community awareness that need to be undertaken to achieve a sustainable, natural environment. As the Strategy is developed in consultation with the local agencies, stakeholders, and the public, it may be identified that a woodland strategy should be created under this 'umbrella' to address tree canopy loss within settlement areas.</p>
110.	<p>Linda Castiglione</p> <p>E-mail dated October 1, 2021</p>	<p><b>Notice of Objection to the North Aldershot Planning Area Regional Official Plan Review dated June 2020.</b></p> <p>We, the landowners of 103 Panin Road hereby notify the Region of Planning Representatives (ROPR) that we object to the North Aldershot Planning Discussion Paper and in particular designating North Aldershot as a rural area.</p> <p>The subject property, 103 Panin Road, is approximately a 14.5 acre parcel of land situated immediately north, west of the Waterdown Road and 403 highway. The land is currently owned by a group of families and was purchased from the City of Burlington in 1964. By way of background, Salvatore Castiglione and Antonio Morgante had recently immigrated to Canada with very little belongings. With hard work and a steady job, they managed to pull together the financial means to purchase this plot of land which they were proud of in the hopes that one day this land of opportunity could provide for their families.</p>	<p>Based on the results of the North Aldershot Policy Area Discussion Paper and technical analysis conducted for the Growth Concepts Discussion Paper under Appendix J, staff are recommending that lands within the North Aldershot Policy Area not be included within the Preferred Growth Concept.</p> <p>The Discussion Paper and Appendix J identified a number of Provincial policy constraints limiting the eligibility of these lands for settlement boundary expansion. Additionally, consideration for water and wastewater opportunities and constraints (Appendix J1 to the Growth Concepts</p>

No.	Source	Submission	Response
		<p>The subject property was originally a 20-acre plot of land however in 2008 the City of Burlington in conjunction with the Region of Halton and Ministry of Transportation unfortunately expropriated 6 acres of our 20-acre parcel, to relocate the highway 403 ramp and to extend Panin Road in order to accommodate urban growth in North Aldershot. At that time, we had an offer to purchase the 20-acre parcel and once the developer learned that 6 acres would be expropriated, he was no longer interested in the purchase. We were assured that the urban growth in the area would result in a demand in residential dwellings in the area.</p> <p>Since that time, we have received numerous offers to purchase the subject property by large and reputable developers and in each due diligence stage, the potential purchases would receive very negative feedback from the City of Burlington and the Region of Halton which has unfortunately deterred them from purchasing the property and in turn prohibited us from the selling the parcel of land. The maintenance costs including the property taxes that have accumulated on this parcel of land over the years has been a significant amount for us. We feel we have been unfairly treated and in addition we believe that the decisions being made at the municipal and regional level are contrary to the policies in place as well as the rights of landowners.</p> <p>Our position is that North Aldershot or the most southern portion, in particular 103 Panin Road should be designated as urban for many reasons including the following that were provided by an independent planner:</p> <ol style="list-style-type: none"> <li>1. The subject property (103 Panin Road) is in close proximity to a Major Mobility Hub, the Aldershot Go Station. The City has been intensifying all areas around the Mobility Hubs.</li> <li>2. The subject property is directly adjacent to one of the 400 series highways (403).</li> <li>3. The City of Burlington in conjunction with the Region of Halton constructed a ramp on lands formerly owned by us to meet the urban growth.</li> <li>4. There is a 300 mm watermain with the actual reservoir to the north of the subject property therefore more than enough water pressure to handle the lands.</li> <li>5. There is a 200 mm sanitary sewer in front of the lands.</li> <li>6. Waterdown Road is primarily used by those from Waterdown and areas north of Waterdown. People travelling along Highway 5 from Oakville and Mississauga etc. use Waterdown Road as a short cut to the 403 Hamilton or Aldershot bound.</li> <li>7. This road also serves inter-regional traffic travel demands.</li> <li>8. The amount of demand received by potential developers to purchase the property in order to build residential homes proves that it is a desirable area to live.</li> </ol>	<p>Discussion Paper) found that extension of municipal services to support residential development would be particularly challenging as compared to other potential growth areas due topography and natural heritage constraints among other factors. The recommended settlement boundary expansion areas in Milton and Georgetown minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>9. The trend over the past few years has been for people to migrate more westerly from Toronto and to commute to Toronto via the go station which is conveniently located adjacent to the subject property.</p> <p>10. North Aldershot has the lowest gas emissions, and this shows that North Aldershot meets the criteria for development that can sustain greenhouse gas emissions.</p> <p>11. Burlington taxpayers paid for the Aldershot go station and, the widening of Waterdown Road and therefore these services should primarily be used by residents living in Burlington.</p> <p>12. The City must ensure that appropriate infrastructure is provided to meet the servicing demands associated with new development.</p> <p>13. The City/Region created a ramp on vacant property however now want that to be protected as heritage land. This is inconsistent and can no longer be considered a natural heritage area as it is directly adjacent to tractor trailer trucks, traffic coming from the highway, Waterdown Road and the Go Station.</p> <p>14. Building residences in North Aldershot would reduce congestion and traffic/gas emissions as those travelling could travel less and live and walk to the go station.</p> <p>Other Reasons</p> <ol style="list-style-type: none"> <li>1. It is not fair that the region expropriated our 6 acre parcel of land for the intention of urban growth leaving the burden on us to be left with a less attractive parcel of land after ongoing zoning restriction changes.</li> <li>2. It is not fair that the region deems our land as "heritage" and yet we continue to incur the property tax costs and maintenance costs.</li> <li>3. It is not fair that the Region decision is prohibiting us from selling our property to developers.</li> </ol> <p>We understand that currently the Region of Halton has prepared studies and is not proposing any further growth in Burlington and more specifically in the North Aldershot area. We have read the discussion paper, spoken with City of Burlington planners, and have had a meeting with the Region of Halton to discuss the North Aldershot growth concept. We have also obtained the opinion from two independent planners over the last 12 years. We have also participated in PIC calls and are informed of the direction that the Region is interested in heading.</p> <p>We are hereby objecting to the proposed growth plan, specifically the North Aldershot Discussion Paper and the lack of growth that it is proposing in that area. Our position is that North Aldershot and more particularly the area North Aldershot that our property is located on, should be designated as an Urban Development area and we respectfully</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>request that you reconsider your direction and make some allowances to support designating our property as urban.</p> <p>The Growth Concepts were evaluated using the following four themes and we will provide summarized reasons to support how these themes and the Growth Concepts meet the policy objectives to also apply to North Aldershot (specifically the southern section of North Aldershot).</p> <p><b>Four Themes</b>  <b>Agriculture, Environment and Climate Change</b>  Currently no agriculture is being farmed on 103 Panin Road and in many parts of North Aldershot therefore, no farming would be lost in this area.</p> <p>We also acknowledge that certain parts of land such as ravines must be maintained and protected, however, we believe there are areas that can support much needed residential development. On the PIC call, callers expressed interest in development in Burlington. For instance, an individual by the name of Nicole (the first caller) indicated that she is a single mom with three children living in Waterdown and she travels through Waterdown Road to utilize the highway to get to work and her hope is that the City of Burlington creates more dwellings for her and her young family to live. Clearly and undoubtedly, there is a demand for people passing through Waterdown Road to get to work.</p> <p>In addition, Jeremy Murphy from SSG on the call indicated that Section 3B (which includes North Aldershot) has the lowest gas emissions and this shows that North Aldershot meets the criteria for development that can sustain greenhouse gas emissions.</p> <p>Mr. Murphy’s assessment was that in order to reduce the transmittal of emissions, we should reduce car trips. North Aldershot and in particular 103 Panin Road is adjacent to the highway and the go train. The development of residences adjacent to the train station and highway (on 103 Panin Road) would reduce the amount and length of car trips that people travel. By allowing residential development and providing urban zoning for all of or a portion of North Aldershot, this will further reduce greenhouse emissions because residents can walk to the go station.</p> <p>Furthermore, in a poll that was conducted on the call, rating in order of importance, “Natural heritage” was rated as “least important” which shows that as a sample of people, this criteria is not the most vital factor in the decision making process.</p> <p><b>Infrastructure and Financing</b>  Reasons to support North Aldershot as urban and for future growth:</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p> <p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response
		<p>A 403 ramp was built in the North Aldershot boundary. At that time there were three to four proposed locations for the ramp and the ramp location that was chosen was the North Aldershot location. Thus, creating urban infrastructure.</p> <p>An east bound 403 ramp was also built at that time which further supports the growth in Burlington and North Aldershot are essential.</p> <p>A transit go station was built creating a massive influx of cars on Waterdown Road. The amount of activity occurring from the town of Waterdown using Waterdown Road as a through way for the transit station and the 403 highway is significant.</p> <p>The expansion of Waterdown Road to create four lanes is further evidence showing the growth demands in this area. This proves that the function of North Aldershot is not rural in nature.</p> <p><b>Growing the Economy and Moving People and Goods</b> North Aldershot fits perfectly into this criterion and checks all these boxes.</p> <p>The southern most area of the North Aldershot quadrant is directly adjacent to the highway 403, one of, if not, the most major highway corridors in Ontario for the movement of people and goods.</p> <p>North Aldershot and specifically the southern part of North Aldershot, is adjacent and walking distance to the go station which was built to accommodate the direct movement of people and goods.</p> <p><b>Regional Urban System and Local Urban Structure</b> North Aldershot fits the criteria for Urban System. Designating it as rural goes against the true functioning character of the lands. North Aldershot has a sustainable transportation system and this is a key mitigating factor in the reduction of GHG emissions from vehicles. It further reduces auto dependence given its close proximity to the go station and highway corridor. Meeting these two criteria are a vital factor in the design of an urban structure as it serves to not only meet the needs of growth however it does so in an environmentally sustainable way.</p> <p>Further, it is designed for the pedestrian in mind given the close proximity to employment and local schools, fire stations and grocery stores.</p> <p><b>Conclusion and Summary</b> The above summary provides clear rationale and reasoning to support North Aldershot being included in the Regional Growth Concept plan as a higher density urban area.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>ROPR paper makes references to retaining and supporting the agricultural area. Agricultural by definition is: “the science, art, or practice of cultivating the soil, producing crops, and raising livestock and in varying degrees the preparation and marketing of the resulting products cleared the land to use it for agriculture”. North Aldershot Burlington and in particular 103 Panin Road, is not agricultural. There are no crops or raising livestock in the area. If North Aldershot Burlington is deemed agriculture, then why did the region spend tax dollars to widen Waterdown road? Why did the region spend tax dollars to expropriate our land to restructure the west bound 403 ramps to Hamilton and build a new east bound 403 ramp to Toronto? Was the region irresponsible with tax payer’s money given the deviation from previous decisions? North Aldershot Burlington is not agriculture and it is not rural.</p> <p>The ROPR paper states, “The policy framework addresses climate change mitigation through energy and emission reduction. These policies are related to complete communities (stores....)...jobs provide within communities to reduce commuting distances to work.” People will live where they desire to live regardless of the distance to work. Living close to work is no longer a necessity. Toronto residents are migrating to Hamilton/Burlington area. This is due to the fact that accessibility to the main highways, and the go station make it possible to commute. But if the region believes in developing areas to reduce commuting distances to work and reducing greenhouse gas, then North Aldershot is an ideal choice for development and growth. North Aldershot Burlington has the accessibility to the main highways and the go-station fulfilling the criteria of a complete community that supports the multi modal transportation network, urban centers, transit corridors and station areas and greenfield areas.</p> <p>There should be urban growth in North Aldershot Burlington to:</p> <ul style="list-style-type: none"> <li>• support the existing transit-supportive densities</li> <li>• to sustain the multi modal transportation network</li> <li>• to provide housing for the GTA buyers that are migrating to Hamilton and Burlington areas</li> </ul> <p>More housing is needed in Burlington to support the transit system, stores, restaurants that are trying to survive from the impacts of COVID. Burlington has one of the most popular shopping malls – Mapleview Mall as well as many stores and restaurants that need to be supported to survive and sustain and need to be part of the growth plan to support the Burlington economy and business owners.</p> <p>We are currently still dealing with COVID-19 variant, which is more deadly than the alpha and beta variant. The world is changing, and these studies need to consider the impacts and changes that have resulted in the economy from COVID-19. The housing market has exploded, and the development of new houses is not moving fast enough to keep up with the housing demand. North Aldershot Burlington is the ideal</p>	

No.	Source	Submission	Response
		<p>location for growth, neighbouring Hamilton and Oakville, provides for the convenience of the train station, the 403 corridor, and the train system allowing people to commute and reduce the emissions. North Aldershot Burlington is the location for development and growth. The other cities and towns considered for growth do not check all these boxes.</p> <p>On a personal note, as landowners, we feel that our rights are being infringed upon as we have been prevented from selling our land for the last 20 years to developers that want to enhance the area. Please consider the fairness to landowners who have incurred land purchase costs, annual maintenance fees and property taxes. It is not fair that we purchased the land from the City, pay property taxes each year and now must maintain it in its current state. These decisions have failed to value the opinion of landowners. On the call it was emphasized that the voices of those who provide feedback will be considered and we are hopeful that you will amend the North Aldershot decision and incorporate our developmental lands into the urban boundary. Although throughout this Notice of Objection we have provided objective as well as personal reasoning for objecting we have one additional personal thought. If you were a landowner in Burlington and the zoning of your property was changed resulting in it being valued as nil, a property that you worked very hard to pay for and maintain, how would you feel?</p> <p>Yours truly, Castiglione and Morgante Families (103 Panin Road, Burlington Landowners)</p>	
111.	<p>Glenn Wellings on behalf of Sheridan Nurseries Limited, Brander, and Carter</p> <p>Email dated October 21, 2021</p>	<p><b>Re: Halton Hills Growth Strategy to 2051 Future Strategic Employment Lands 9446, 9674 and 9880 Winston Churchill Boulevard Town of Halton Hills Our File No.: 2016/26</b></p> <p>We are Planning Consultants for Sheridan Nurseries Limited, Brandalea Farms Inc. (Brander) and 1494043 Ontario Inc. (Carter) (hereinafter referred to as "clients").</p> <p>Our clients collectively own approximately 132 hectares (327 acres) of land which includes portions within the Natural Heritage System. The subject lands are located west of Winston Churchill Boulevard between No. 5 Sideroad and No. 10 Sideroad.</p> <p>The subject lands consist of three (3) large contiguous properties presently identified as "Future Strategic Employment Area". The subject lands adjoin the existing Georgetown Urban Area and the Hamlet of Norval.</p>	<p>Subject lands are currently identified as Future Strategic Employment Area however based on the results of the technical analysis, staff are recommending that these lands not be included within the Preferred Growth Concept. The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>On July 6, 2021, Town Council resolved to support the inclusion of 350 gross hectares of additional employment lands net of the Natural Heritage System within the Town to the 2051 planning horizon. While the Premier Gateway was identified as a priority location for these additional employment lands, our client's lands are well positioned to provide employment opportunities for the Georgetown community. Such inclusion would offset the previous loss of employment lands in Georgetown South.</p> <p>Presently, the Georgetown community has a limited supply of available employment lands serving the local community. The Town has relied on the Premier Gateway and to a lesser degree, the Acton employment area to achieve its employment needs. Georgetown presents a unique challenge in that the Town's future employment lands are separated from and well removed from the community. This current arrangement encourages automobile travel and does not foster a live-work relationship for Georgetown residents where alternative means of travel can be considered. The separation of live and work does not in my opinion appropriately respond to provincial policies dealing with climate change and complete communities. Adding additional employment lands solely within the Premier Gateway would further exacerbate the current predicament.</p> <p>We believe our client's lands should be considered as the next phase of employment for the Town of Halton Hills. Our clients have a consistent vision and presently own large contiguous properties that are strategically located adjacent to the Georgetown Urban Area. Additionally, the continued agricultural use of these lands has some challenges/limitations with the future urbanization of the lands east of Winston Churchill Boulevard in the City of Brampton, and the existing salt contamination issues. The employment use of these lands would also provide the opportunity to assess realignment options for Winston Churchill Boulevard.</p> <p>We would respectfully request that the subject lands be considered for employment within the 2051 planning horizon. We would be pleased to have further dialogue with Town and Region staff to discuss the recognition of these lands within the 2051 employment growth forecast.</p> <p>Yours truly,  <b>WELLINGS PLANNING CONSULTANTS INC.</b></p> <p>Glenn J. Wellings, MCIP, RPP</p> <p>Copy: Mayor Bonnette and Members of Council, Town of Halton Hills  Bronwyn Parker, Town of Halton Hills  Curt Benson/Dan Tovey, Region of Halton  Rick Friesen, Sheridan Nurseries</p>	

No.	Source	Submission	Response
		<p>Harry Brander, Brandalea Farms Inc. Mike Carter, 1494043 Ontario Inc.</p>	
112.	<p>Norman Cheesman on behalf of Ontario Stone, Sand &amp; Gravel Association (OSSGA)</p> <p>E-mail dated November 3, 2021</p>	<p>November 3, 2021 Dan Tovey Region of Halton 1151 Bronte Road Oakville, ON L6M 3L1 (by email and regular mail) Dear Mr. Tovey: RE: Region of Halton Official Plan Update</p> <p>OSSGA is a not-for-profit association representing over 280 sand, gravel and stone producers and suppliers of products and services that serve the industry. Collectively, our members supply the majority of the 164 million tonnes of aggregate used, on average, each year in the Province to build and maintain Ontario's infrastructure needs. OSSGA works in partnership with governments, agencies and members of the public to promote a safe and competitive aggregate industry, contributing to the creation of strong communities in the Province.</p> <p>On behalf of OSSGA, we would like to thank the Region for meeting with us to discuss the preparation of the updated Region of Halton Official Plan. Further to this meeting OSSGA provides the following comments for the Region's consideration in preparation of the Region of Halton Official Plan update.</p> <p><b><u>Urban Boundary</u></b></p> <p>OSSGA has reviewed the Region of Halton's growth concepts and supports the Region proceeding with Growth Concept 3B because, as noted by Regional staff, this concept retains the greatest potential area for aggregate extraction as no encroachment on mineral aggregate resource areas is proposed.</p> <p><b><u>Official Plan Amendments for Mineral Resource Extraction</u></b></p> <p>Currently the Region of Halton Official Plan requires a Regional Official Plan Amendment for new or expanded mineral aggregate operations. In regards to this, can the Region of Halton please provide a response and/or confirm the following:</p>	<p>These comments will be further considered in a future phase of the Regional Official Plan Review project.</p> <p>Halton Region's Official Plan Review is being conducted in stages (as per the <a href="#">Work Plan Timeline</a> presented as part of the <a href="#">Draft Preferred Growth Concept Workshop</a>) and Regional staff have currently been focused on preparing consultation materials related to the Preferred Growth Concept which outlines how and where Halton will grow. The first Regional Official Plan Amendment (ROPA) considered by Regional Council under the ROPR was ROPA 48. This Amendment, adopted in July 2021, and subsequently approved with modifications by the Minister of Municipal Affairs and Housing, implemented a Regional Urban Structure and established a hierarchy of strategic growth areas. As mentioned above, staff anticipate being able to recommend consultation be undertaken for a second ROPA to implement the Preferred Growth Concept, in the coming weeks. Following consultation on this second ROPA, and subject to Regional Council's direction, Regional staff will undertake a third ROPA dealing with other policy themes of the ROPR including policies affecting Halton's rural area. We anticipate that this draft ROPA will be released for public consultation in early 2023 as noted in the</p>

No.	Source	Submission	Response
		<p>1. The Region of Halton Official Plan is being completed through a series of Official Plan Amendments and therefore is not considered a new Official Plan. As a result, Section 22 (2.1) (e.g. two year restriction) will not apply to any future Official Plan Amendments following approval of the Official Plan.</p> <p>2. When the Region approves the updated Official Plan, the Region will not repeal the existing Official Plan in its entirety and existing Official Plan Amendments will still be processed in accordance with the Region of Halton Official Plan that existed at the time of filing. In addition to the repeal by-law, can the Region please confirm that a transition provision will be included in the Official Plan to clarify that existing Official Plan Amendments can continue to be processed?</p> <p>3. Since the local Official Plans within the Region of Halton already require a local Official Plan Amendment to permit new or expanded mineral aggregate operations, the Region of Halton should not also require an Official Plan Amendment. This is consistent with the approach that other upper-tier municipalities in the Greater Golden Horseshoe (e.g. Region of Peel and Region of Waterloo) have implemented and still ensures there is a public process under the Planning Act before a new or expanded mineral aggregate operation can be permitted.</p> <p><b>Mineral Aggregate Resource Policies</b></p> <p>It is our understanding that the Region of Halton is not updating its Rural Area policies prior to the July 2022 deadline established by the Province. It is our understanding that the Region of Halton is consulting on this part of the Amendment in 2022 and is targeting final approval in 2023. During our meeting, the Region of Halton indicated it was not planning on making any substantial changes to the existing aggregate policies. In regards to this, can the Region of Halton please confirm that they will not be changing Section 110 (7.1) of the Region of Halton Official Plan to prohibit new or expanded mineral aggregate operations in habitat of endangered or threatened species or significant woodlands similar to the changes the Region made to the City of Burlington Official Plan?</p> <p>The Region of Halton Official Plan is required to be consistent with/conform to Provincial policy and is only permitted to exceed the standards when it will not conflict with another Provincial objective. As outlined in the Provincial Plans prohibition in the above noted features is only contemplated in a defined scenario and should not be applied Region wide. For example, only within the Provincial Natural Heritage System of the Greenbelt Plan and the Growth Plan are new operations prohibited within endangered and threatened species. This policy does not apply to the following:</p> <ul style="list-style-type: none"> <li>lands within the Escarpment Rural Area of the Niagara Escarpment Plan;</li> </ul>	<p>Work Plan Timeline above. At this point, it is premature to comment on any specific policies of this ROPA as Regional Council has not provided direction to Regional staff to release draft policies for public consultation.</p> <p>Regional staff suggest that OSSGA's interests may be most effectively addressed through the public consultation when this third ROPA is initiated. It is noted that the ROPR work plan, set under <a href="#">LPS110-16</a> (covering staff report to the full ROPR <a href="#">Directions Report</a>) did not specifically identify a need to revise policies related to mineral resource extraction, however staff are reviewing OSSGA's November 3, 2021 submission and will consider it when undertaking policy development for the third ROPA. We would be pleased to arrange a meeting with OSSGA and its representatives when we are in the process to start the development of the third ROPA.</p> <p>Regional staff have extended an opportunity to meet with OSSGA to discuss their comments.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• expansions within the Natural Heritage System of the Greenbelt Plan and Growth Plan; and,</li> <li>• new operations outside of the Natural Heritage System of the Greenbelt Plan and Growth Plan.</li> </ul> <p>Furthermore, the policy prohibiting extraction within significant woodlands only applies to woodlands that are deemed significant using Provincial criteria and are not considered early successional habitat or young plantation (e.g. not Regional criteria) in the following areas:</p> <ul style="list-style-type: none"> <li>• lands within the Niagara Escarpment Plan; and,</li> <li>• new operations within the Natural Heritage System of the Greenbelt Plan and Growth Plan.</li> </ul> <p>OSSGA looks forward to your written responses to these questions and working with the Region of Halton when the draft policies for the Rural Area are released for review.</p> <p>Yours truly, ONTARIO STONE, SAND &amp; GRAVEL ASSOCIATION</p> <p>Norman Cheesman Executive Director</p> <p>----</p> <p><b>Previous submission from OSSGA</b> <b>Source: E-mail dated May 27, 2021</b></p> <p>To Whom it May concern:</p> <p>Please find attached a letter from OSSGA concerning the Region's review of its Official Plan.</p> <p>Thank you.</p> <p>Norm Cheesman Executive Director</p> <p><b>Ontario Stone, Sand &amp; Gravel Association (OSSGA)</b> 5720 Timberlea Boulevard, Unit 103 Mississauga, ON L4W 4W2</p> <p><i>[ATTACHMENT]</i> May 27, 2021</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>


No.	Source	Submission	Response
		<p>Halton Region Regional Planning 1151 Bronte Road Oakville, ON L6M 3L1 (sent via email to ropr@halton.ca) <b>RE: PROVINCIAL PLAN CONFORMITY &amp; HALTON REGION OFFICIAL PLAN REVIEW</b></p> <p>The Ontario Stone, Sand &amp; Gravel Association (OSSGA) is a not-for-profit industry association representing over 280 sand, gravel, and crushed stone producers and suppliers of valuable industry products and services. Collectively, our members supply the substantial majority of the 164 million tonnes of aggregate consumed annually in the province to build and maintain Ontario's infrastructure needs. OSSGA is writing to express its interest in your endeavors to complete Official Plan updates in order to achieve conformity with the 2017 Provincial Plans and consistency with the PPS 2020.</p> <p>Resource management, planning for growth and environmental sustainability are key elements in land use planning. Municipalities are planning for significant growth, including developable areas, infrastructure plans, etc. However, the foundation of that growth also depends on securing a future long-term supply of quality aggregate close to market. Official Plans contain policies that determine where and under what circumstances new pits and quarries may be located, provide for long-term protection of aggregate resources and determine what land uses may be permitted around mineral aggregate operations.</p> <p>Greater Golden Horseshoe (GGH) municipalities are actively working on updating their Official Plans to conform to Provincial Plans and the 2020 PPS. This will result in 21 upper tier and 89 lower tier municipalities each producing a document for review in the next couple of years.</p> <p>OSSGA and its member companies want to be involved. We are looking to provide background and information on aggregate operations in your municipality and discuss the challenges that we face in planning for future aggregate supply that is required to meet future growth and infrastructure needs. We also wish to provide input that we think will help you meet your objectives and achieve the conformity and consistency required by the Province.</p> <p>OSSGA recognizes that land use planning in the GGH has become very complex – with potentially multiple, overlapping Provincial Policies depending on each area. In some municipalities achieving conformity with multiple Provincial Plans involves over 14 different land use policy approaches for aggregates and natural heritage depending on the location of the site and whether the site is a new operation or an expansion.</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response												
		<p>TABLE 1</p> <table border="1" data-bbox="457 310 1215 732"> <thead> <tr> <th colspan="2" data-bbox="457 310 1215 370">For the policies to establish new or expanded Mineral Aggregate operations within:</th> </tr> </thead> <tbody> <tr> <td data-bbox="457 373 730 433">Niagara Escarpment Plan Area</td> <td data-bbox="735 373 1215 433">Refer to Niagara Escarpment Plan and Provincial Policy Statement</td> </tr> <tr> <td data-bbox="457 436 730 496">ORMCP Area</td> <td data-bbox="735 436 1215 496">Refer to Oak Ridges Moraine Conservation Plan and Provincial Policy Statement</td> </tr> <tr> <td data-bbox="457 500 730 560">Lake Simcoe Protection Plan Area (outside of ORMCP)</td> <td data-bbox="735 500 1215 560">Refer to Lake Simcoe Protection Plan and Provincial Policy Statement</td> </tr> <tr> <td data-bbox="457 563 730 623">Greenbelt Plan Area (outside of ORMCP, NEP)</td> <td data-bbox="735 563 1215 623">Refer to Greenbelt Plan and Provincial Policy Statement</td> </tr> <tr> <td data-bbox="457 626 730 686">Growth Plan Area (outside of NEP, ORMCP, LSPP, Greenbelt Area)</td> <td data-bbox="735 626 1215 686">Refer to Growth Plan and Provincial Policy Statement</td> </tr> </tbody> </table> <p>With this background in mind, the following are some of the key points that we would like to put forward for discussion and consideration.</p> <ol style="list-style-type: none"> <li data-bbox="499 846 1409 1062">1. In Halton Region, there are three (3) Provincial Plans that are to be implemented. OSSGA is promoting a simplified approach whereby municipal Official Plans simply reference the appropriate Provincial Plan policy in their OPs when speaking about aggregate policy (see Table 1). This simplified approach should eliminate the confusion that arises from multiple policies with similar, but varying language and ensure that as the Provincial Plans evolve in the future, the aggregate policies in OPs will not be out of conformity.</li> <li data-bbox="499 1094 1409 1393">2. OSSGA is very interested in municipal refinements to the Provincial Natural Heritage Systems (NHS) and would like to understand and discuss your approach. Mineral aggregate policies are closely tied to Provincial NHS and associated mapping to ensure that an appropriate balance between these provincial interests is achieved. Therefore, it is important to OSSGA that any refinements to Provincial NHS mapping be in keeping with criteria released by the Province. Furthermore, it is important that mineral aggregate policies in OPs continue to be tied to Provincial NHS mapping. Therefore, it may be simplest to clearly distinguish Provincial NHS mapping in OPs so Provincial NHS mapping can be directly referenced in mineral aggregate policies.</li> </ol>	For the policies to establish new or expanded Mineral Aggregate operations within:		Niagara Escarpment Plan Area	Refer to Niagara Escarpment Plan and Provincial Policy Statement	ORMCP Area	Refer to Oak Ridges Moraine Conservation Plan and Provincial Policy Statement	Lake Simcoe Protection Plan Area (outside of ORMCP)	Refer to Lake Simcoe Protection Plan and Provincial Policy Statement	Greenbelt Plan Area (outside of ORMCP, NEP)	Refer to Greenbelt Plan and Provincial Policy Statement	Growth Plan Area (outside of NEP, ORMCP, LSPP, Greenbelt Area)	Refer to Growth Plan and Provincial Policy Statement	<p>Comments are acknowledged. Please see above for a detailed response.</p>
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Growth Plan Area (outside of NEP, ORMCP, LSPP, Greenbelt Area)	Refer to Growth Plan and Provincial Policy Statement														

No.	Source	Submission	Response
		<p>3. The interrelationship between natural heritage and aggregate resources is a key matter where the specific balance intended by the PPS and Provincial Plans determines how both Provincial interests are met. The list of protected natural heritage features and level of protection (e.g., no negative impact test) that relate to aggregate is required to be consistent with the PPS and conform with applicable Provincial Plans. Going beyond, (more features or higher levels of protection) would not be consistent or be in conformity. This should be kept in mind when preparing aggregate policies relative to natural heritage mapping.</p> <p>4. Providing clear reasonable mechanisms to permit new and expanded mineral aggregate operations is a critical component to be included in a Municipal Official Plan. Provincial Plans establish where such operations are permitted. Ideally, the Official Plans would conform by also permitting mineral aggregate operations in the appropriate Provincial Plan areas (without any OPA requirement). If an amendment to the local Official Plan is necessary, then we would recommend that there should not be the additional requirement for a Regional Official Plan Amendment.</p> <p>5. We also want to understand the approach Halton Region intends to take in order to transition active applications. For example, applications that started under the old Official Plan but remain active or are appealed can lose their status when the new Official Plan comes into effect if not properly addressed in the Repeal By-law.</p> <p>6. Given the two-year moratorium under Section 22(2.1) and 34(10.0.0.1) of the Planning Act, we want to understand the approach Halton Region intends to take in order to make aggregate available that is consistent with the PPS. If the process to establish a new or expanded mineral aggregate operation is to include the requirement for any OPA (upper or lower tier), then an exception to the moratorium would have to be set out in the policies of the Official Plan. The same should be required for Zoning By-law amendments where new comprehensive zoning bylaws are going to be required to implement the Official Plan.</p> <p>7. The PPS now includes the explicit requirement to identify deposits of mineral aggregate resources. The Official Plan should clearly identify quality mineral aggregate resource areas (bedrock resources as well as sand and gravel resource areas) on a Schedule that forms part of the plan and is consistent with Provincial resource mapping.</p>	

No.	Source	Submission	Response
		<p>8. The Official Plan should include policy that protects resource areas as well as existing mineral aggregate operations and adjacent lands from incompatible development and activities that would preclude or hinder their expansion or continued use (to be consistent with Policy 2.5.2.4 of the PPS).</p> <p>9. As per the PPS 2.5.2.1, demonstration of need for mineral aggregate resources shall not be required.</p> <p>10. The Official Plan should recognize the interim nature of extraction and provide appropriate direction for rehabilitation with pits and quarries. In particular, extraction on prime agricultural lands should be permitted as an interim use with limited exceptions in accordance with the PPS and, rehabilitation is taken into account in assessing negative impact for natural heritage features.</p> <p>11. Accessory, ancillary and associated uses are to be accommodated (recycling, asphalt and ready mix concrete batching).</p> <p>12. Wayside pits and portable plants should be permitted without the need for Official Plan amendments or rezoning.</p> <p>13. The Official Plan should describe and protect a road network to facilitate delivery of aggregate.</p> <p>14. The provincial jurisdiction for regulation of pits and quarries through the Aggregate Resources Act should be respected and recognized in Official Plans (e.g. regulating depth of extraction and fees).</p> <p>We thank you for the opportunity to present our views and would be happy to discuss them further with you by phone or zoom if you wish to do so. Sincerely,</p> <p>Norm Cheesman, Executive Director Cc: Heather Watt, Ontario Ministry of Municipal Affairs and Housing</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>
113.	Nolan Moss Nolan Moss on behalf of SmartCentres	<p>Dan Tovey Manager, Policy Planning Planning Services, Legislative &amp; Planning Services Region of Halton 1151 Bronte Road Oakville ON L6M 3L1</p> <p>Dear Dan,</p>	

No.	Source	Submission	Response
	<p>E-mail dated November 10, 2021</p>	<p>We have prepared this letter to provide context and information to Regional planners and decision-makers as it relates to Halton Region's Integrated Growth Management Strategy and its relationship to SmartCentres' long-term vision for the shopping centre located southwest of the intersection of Dundas Street East and Trafalgar Road (indicated in red in the aerial below). The total site area is approximately 20.6 hectares (51 acres), representing a significant portion of the Uptown Core, a Primary Regional Node.</p>  <p>While the shopping centre is well tenanted and operating quite successfully, SmartCentres is a forward-thinking company, and is taking a pro-active approach with respect to the long-term planning of this property with the Uptown Core. While our vision will be flexible and will evolve over time, it will be formed of core design principles that would inform new development &amp; redevelopment in a comprehensive multi-phase master plan. These core design principles are discussed below.</p> <p><b>Placemaking</b></p> <p>A core component for the master plan would be a place-making led approach, integrating a sequence of green spaces which provide places to wander, places to dwell and places for residents and visitors to live, work and play.</p> <p>Transit &amp; Pedestrian Focus &amp; Creating Connectivity Through the Community</p>	<p>On November 10, 2021, the Minister of Municipal Affairs and Housing approved Regional Official Plan Amendment No. 48 (ROPA 48) with a limited number of changes. The amendment is the first change to the Regional Official Plan that has been approved as part of the Municipal Comprehensive Review. ROPA 48 includes recognition of Regional Nodes, including Uptown Core a Primary Node in Oakville. Regional Nodes have been identified for accommodation of growth, concentration of public services and high-density uses at a scale appropriate for their context. They also support the regional transit network. Your comments regarding future development potential of the subject lands have been noted and will be considered as part of the Regional Official Plan Review. Staff encourage you to connect with the Region's Community Planning staff for site-specific development related inquiries.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>


No.	Source	Submission	Response
		<p>The master plan envisions a neighbourhood that promotes walking, capitalizing on local and regional connections through the adjacent lands and communities. Improvements to Trafalgar Road, and eventually Dundas Street East, provides opportunities for future residents to rely on non-automotive means of transportation, and in doing so allows for greater activation and animation of prospective building frontages and open spaces.</p> <p>The shopping centre is an integral part of the surrounding community. New connections would aim to connect to Memorial Park and the Oak Park community with a series of publicly accessible privately-owned Open Spaces (“POPs”) and multi-use spaces.</p> <p><b>Unique Land Use Opportunity</b></p> <p>The property contains unique opportunities to deliver a master planned, sustainable and complete community, deploying the core design principles above. Achieving the highest and best use, by-way of high densities, will be critical to achieve this vision. The positioning of the site would allow for urban and compact building forms that would then support a variety of residential and non-residential land uses, open spaces, and pedestrian opportunities.</p> <p>This master planned community is estimated to contain a range of 8,000 to 10,000 residential dwelling units and a total Floor Space Index of 5.0 to 5.5, inclusive of non-residential land uses that support and complement the residential uses. These figures may evolve as the design advances.</p> <p>We appreciate this opportunity to provide our comments during the Regional Official Plan Review process and look forward to future opportunities to consult with the Region.</p> <p>Kind regards, Nolan Moss Senior Development Manager, SmartCentres</p> <p><b>cc.</b> Christine Cote VP, Development, SmartCentres</p>	
114.	E-mail dated November 16, 2021	<p>Glenn Wellings on behalf of Sheridan Nurseries Limited, Brandalea Farms Inc. (Brander), and Carter</p> <p>November 16, 2021</p> <p>Regional Chair and Members of Council c/o Regional Clerk Graham Milne Regional Municipality of Halton</p>	<p>Subject lands are currently identified as Future Strategic Employment Area however based on the results of the technical analysis, staff are recommending that these lands not be included within the Preferred Growth Concept. The recommended settlement boundary expansion areas minimize conflict with the</p>

No.	Source	Submission	Response
		<p>1151 Bronte Road Oakville, ON L6M 3L 1</p> <p>Dear Chair Carr and Members of Regional Council:</p> <p>RE: Regional Official Plan Review: Draft Preferred Growth Concept Future Strategic Employment Lands 9446, 9674 and 9880 Winston Churchill Boulevard Town of Halton Hills Our File No.: 2016/26</p> <p>We are Planning Consultants for Sheridan Nurseries Limited, Brandalea Farms Inc. (Brander) and 1494043 Ontario Inc. (Carter). I have attached a letter addressed to Mr. John Linhardt of the Town of Halton Hills dated October 21, 2021 with respect to our client's lands located west of Winston Churchill Boulevard between No. 5 Sideroad and No. 10 Sideroad. The subject lands consist of three (3) large contiguous properties presently identified as "Future Strategic Employment Area" in the current Regional Official Plan.</p> <p>On behalf of my clients, I wish to reiterate our request that their lands be included within the preferred growth concept. These lands are a natural extension of the Georgetown urban boundary and would make up for the present shortfall of employment lands within the Georgetown community. With the uncertainties surrounding Highway 413 and the associated corridor protection area, we do not believe the addition of more employment lands within the east portion of the 401/407 corridor makes good planning sense at this time.</p> <p>Thank you for your consideration.</p> <p>Yours truly, WELLINGS PLANNING CONSULTANTS INC.</p> <p>Glenn J. Wellings, MCIP, RPP</p> <p><b><i>[ATTACHED LETTER]</i></b></p> <p>October 21, 2021 Mr. John Linhardt, MCIP, RPP Commissioner of Planning and Sustainability Town of Halton Hills 1 Halton Hills Drive Halton Hills, ON</p>	<p>Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>L?G 5G2</p> <p>Dear Mr. Linhardt:</p> <p>We are Planning Consultants for Sheridan Nurseries Limited, Brandalea Farms Inc. (Brander) and 1494043 Ontario Inc. (Carter) (hereinafter referred to as "clients"). Our clients collectively own approximately 132 hectares (327 acres) of land which includes portions within the Natural Heritage System. The subject lands are located west of Winston Churchill Boulevard between No. 5 Sideroad and No. 10 Sideroad. The subject lands consist of three (3) large contiguous properties presently identified as "Future Strategic Employment Area". The subject lands adjoin the existing Georgetown Urban Area and the Hamlet of Norval.</p> <p>On July 6, 2021, Town Council resolved to support the inclusion of 350 gross hectares of additional employment lands net of the Natural Heritage System within the Town to the 2051 planning horizon. While the Premier Gateway was identified as a priority location for these additional employment lands, our client's lands are well positioned to provide employment opportunities for the Georgetown community. Such inclusion would offset the previous loss of employment lands in Georgetown South.</p> <p>Presently, the Georgetown community has a limited supply of available employment lands serving the local community. The Town has relied on the Premier Gateway and to a lesser degree, the Acton employment area to achieve its employment needs. Georgetown presents a unique challenge in that the Town's future employment lands are separated from and well removed from the community. This current arrangement encourages automobile travel and does not foster a live-work relationship for Georgetown residents where alternative means of travel can be considered. The separation of live and work does not in my opinion appropriately respond to provincial policies dealing with climate change and complete communities. Adding additional employment lands solely within the Premier Gateway would further exacerbate the current predicament.</p> <p>We believe our client's lands should be considered as the next phase of employment for the Town of Halton Hills. Our clients have a consistent vision and presently own large contiguous properties that are strategically located adjacent to the Georgetown Urban Area. Additionally, the continued agricultural use of these lands has some challenges/limitations with the future urbanization of the lands east of Winston Churchill Boulevard in the City of Brampton, and the existing salt contamination issues. The employment use of these lands would also provide the opportunity to assess realignment options for Winston Churchill Boulevard.</p> <p>We would respectfully request that the subject lands be considered for employment within the 2051 planning horizon. We would be pleased to have further dialogue with Town and</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>



No.	Source	Submission	Response
		<p>Region staff to discuss the recognition of these lands within the 2051 employment growth forecast.</p> <p>Yours truly, WELLINGS PLANNING CONSULTANTS INC. Glenn J. Wellings, MCIP, RPP</p>	
115.	<p>Randy Griffin on behalf of The Erin Mills Development Corporation</p> <p>E-mail dated November 29, 2021</p>	<p><b>Good afternoon Gentlemen.</b> I listened to the Region of Halton Council Workshop on November 17th with interest. The presentation on the DRAFT Preferred Growth Concept and Land Needs Assessment, 2031- 2051 was comprehensive and informative.</p> <p>My interest is in regards to the Employment Growth being allocated to the Town of Halton Hills. Halton Hills Council had supported an additional Growth 350 Ha (865 ac.) of Community Lands, net of any NHS, and 350 Ha (865 ac.) of Employment Lands, net of any NHS over the study period.</p> <p>Employment Lands have been designated north of the existing Premier Gateway Employment Node, a logical extension in the employment area. It appears with Community Lands being designated south of 10 Sideroad, and Employment Lands continuing to extend north of Steeles Avenue, that the ultimate dividing line between Community Uses (residential, etc.) and Employment, will more than likely be 5 Sideroad.</p> <p>The on again- off again new transit route / Hwy 413 (GTA West Corridor) is proposed through the lands designated for future Employment. With the public's changing attitude it is anyone's guess if and when this new transportation corridor will be built. I expect the Province will continue to hold lands for this infrastructure and to monitor traffic until such time as a need arises.</p> <p>We are concerned that there may be a shortfall of land designated for employment when the corridor for Hwy 413 is taken out, and the NHS lands are taken out.</p> <p>You can verify your area calculations, however it may be prudent to add a little additional area for employment. We are suggesting squaring off the area east of Eighth Line, as noted in light blue on the attached Blow Up of the Preferred Growth Concept north of Hwy 401. We have also attached the Region's NHS land use schedule.</p> <p>In the Final Plan to be recommended in early 2022, perhaps there could be a more detailed overlay of the development lands excluded for natural heritage and future transportation, etc. so Council members and the public get a better understanding.</p> <p>Thank you for considering this as I am sure you will be receiving a number of submissions from other stakeholders in the area. Regards,</p>	<p>A portion of the subject lands west of Ninth Line were evaluated under Growth Concept 4. The subject lands are currently designated as Regional Natural Heritage System and Agricultural Area. Based on the results of the technical analysis, staff are recommending that a small portion of the subject lands west of Tenth Line and north of Steeles Avenue West be included within the Preferred Growth Concept.</p> <p>It is important to note that Regional Council has opposed the GTA West Corridor due to its adverse impacts on the local ecosystem and broader environment.</p>



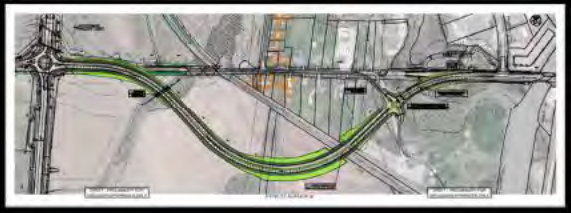
No.	Source	Submission	Response
		<p>Randy Griffin  THE ERIN MILLS DEVELOPMENT CORPORATION  2300 Steeles Avenue W, Suite 220  Concord, ON L4K 5X6</p> <p>[ATTACHMENT]</p>  <p>Received November 15, 2021</p> <p>DRAFT of the Preferred Growth Concept as an FYI  Halton Region Council Workshop on November 17, 2021</p> <p>FINAL Preferred Growth Concept  for Council decision , Q1 2022</p> <p><b>BLOW UP</b></p>	

No.	Source	Submission	Response
116.	<p>Carmen Jandu on behalf of Oskar Group</p> <p>E-mail dated December 8, 2021</p>	<p>Good Afternoon Steve, hope you are doing well.</p> <p>I wrote to the ROPR team earlier this year with respect to a request to consider our clients lands as part of the IGMS which was in consultation at the time. A copy of our correspondence is attached for your convenience. We are very close to the submission of our supporting material to the Ministry with recommendation that the lands be removed from the Niagara Escarpment Plan. We would like to reflect the latest information regarding IGMS process in our report to the MNRF. The Region's website indicates that the Region's is in Phase 3 of the process which key outcomes include policy direction and a draft regional official plan amendment the draft of the ESR will be available for public review for late 2021. In order to ensure accuracy with the process in our report, would you be so kind as to provide me with an update for this process? When do you anticipate</p>	<p>Please refer to response to June 30, 2021 submission provided earlier in this table. Subject lands were not within the Primary Study Area (the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy) which prioritized consideration of lands adjacent to the existing Urban Area outside of Provincial plan areas such as the Niagara Escarpment Plan and Greenbelt Plan.</p>

No.	Source	Submission	Response
		<p>a response to municipal and stakeholder comments to the IGMS presented this past summer?</p> <p>Looking forward to hearing your update. I will in turn keep you updated with our progress for the resubmission of a detailed application to the MNRF for these lands.</p> <p>Thanks very much for your assistance,</p> <p>Carmen Jandu MCIP RPP</p> <p>Associate, Sr. Planner</p> <p><b>[ATTACHMENT]</b></p> <p>June 28, 2021  Mr. Curt Benson MCIP RPP  Director, Planning Director and Chief Planning Official  Region of Halton  Halton Regional Centre  1151 Bronte Road  Oakville, Ontario  L6M 3L1</p> <p>Dear Mr. Benson:</p> <p>PROPOSED URBAN AMENDMENTS TO THE NIAGARA ESCARPMENT PLAN UA63  1652157 Ontario inc. And 1625488 Ontario inc. (Collectively the "Oskar Group") 0, 7649  Tremaine Road - Part Lots 14 and 15, Concession 1, Trafalgar NS Town of Milton, Region of Halton</p> <p>IBI Group has been retained by the Oskar Group to represent their interests for their land holdings in the Town of Milton. The land holdings are legally described as Part of Lots 14 and 15, Concession 1, Trafalgar in the Town of Milton (the "Subject Lands"). The Subject Lands are approximately 72.9 ha (180.15 acres) and are located on the east side of Tremaine Road, south of Steeles Ave. West and north of Main Street. The lands are currently outside of the Town of Milton's Urban Boundary and are located within the Niagara Escarpment Plan Area ("NEP). The location plan is provided below as Figure 1, while Figure 2 shows the location of the lands within the NEP.</p>	<p>The Land Needs Assessment identified an amount of land required, appropriate locations have been determined as part of the Preferred Growth Concept and technical studies. Based on this analysis, these lands do not fall within those areas and are not identified as part of the Preferred Growth Concept.</p> <p>Additionally, the subject lands are within the Provincial Greenbelt Plan Area and are not eligible for inclusion in the Urban Area.</p> <p>The Preferred Growth Concept is being developed and implemented through a Regional Official Plan Review/Municipal Comprehensive Review. Given the comprehensive and interrelated nature of the process, it is not possible to defer a decision on a specific area.</p>

No.	Source	Submission	Response
		 <p data-bbox="457 597 1409 646">Figure 1: Location of the subject lands shown on Schedule D of the Town of Milton Official Plan</p>  <p data-bbox="457 974 1247 1019">Figure 2: excerpt of Map 3 of the NEP for the Halton Region (source: NEC) Background</p> <p data-bbox="457 1052 1402 1383">By way of background, the Oskar Group applied for an amendment to the Niagara Escarpment Plan to permit urban boundary change, urban uses and urban services during the 2017 Co-ordinated Provincial Plan Review (“CPR”). The Subject Lands are designated Escarpment Protection Area. The effect of the original application submitted in 2016 during the CPR sought the redesignation of approximately 72.9ha of land from the NEP. Unfortunately, during the consultation phase of the CPR three applications were inadvertently overlooked for various reasons and were not included in the circulation for public comment and therefore no decision was made on the applications. Our client’s lands were among the submissions that were overlooked. Nonetheless, in an information report from the NEC dated January 26, 2017, the Commission provided that they would complete an analysis of the submissions and provide a conclusion on whether it aligns with the purpose and objectives of the Niagara</p>	

No.	Source	Submission	Response
		<p>Escarpment Planning and Development Act (“NEPDA”) and the NEP, as well as other higher order provincial plans, relevant at the time.</p> <p>The analysis the NEC concluded that if urban development was to be the outcome on the Subject Lands than:</p> <p><i>“it is recommended that such development be planned in a co-ordinated manner with the Halton Region and the Town of Milton by first considering intensification opportunities within Existing urban boundaries, and then evaluating growth options in the broader municipal context. This should be done as part of a municipal comprehensive review, in accordance with the PPS and the growth plan policies.”</i></p> <p>The NEC also stated that:</p> <p><i>“Although the submission does make reference to the growth targets assigned to Halton Region, it is not known if the Region and Town of Milton intend to request an urban boundary expansion at the time of the next municipal comprehensive review. As noted in both the PPS and the Growth Plan, a municipality must demonstrate that sufficient opportunities for intensification or redevelopment are not available to accommodate expected growth before an urban boundary expansion will be considered. The applicant did not provide this information, and neither Halton Region nor the Town of Milton submitted comments addressing this issue. NEC staff recommends that this analysis should be done as part of a municipal comprehensive review led by a municipality, and should not be initiated by private development interests.”</i></p> <p>The NEC also noted in their analysis that the objectives of the Escarpment Protection Area was to maintain and enhance the open landscape character of the area providing a buffer to prominent escarpment features and encouraging agriculture.</p> <p>Through further consultation with the agencies, the Oskar Group proposed two more development concepts which proposed different portions of the land for urban development. The latest concept submitted in early 2018 proposed to re-designate 12.1 hectares at the south end of the Subject Lands, fronting on Given Lane, to Urban Area and to maintain the Escarpment Protection Area and Escarpment Rural Area designations on the remaining 60.1 hectares.</p> <p>In accordance with the NEDPA, the proposed amendment was posted onto the Environmental Registry and circulated to the Region of Halton for their comments. The Region responded to the circulation with a letter from Mr. Rob Catarino dated June 20, 2018. In their remarks Mr. Catarino commented that:</p> <ul style="list-style-type: none"> <li>▪The subject lands are designated Regional Natural Heritage System and Agricultural Area under Map 1 of the Halton Region Official Plan 2009 (“ROP”) and identified to be within the Prime Agricultural Area as identified on Map1E;</li> </ul>	

No.	Source	Submission	Response
		<p>•That Policy 77 (7) of the ROP enables the Region to consider, “only by amendment to Regional Plan, Urban Area expansions based on a municipal comprehensive review undertaken as part of the Region’s statutory 5-year review of the Official Plan under the Planning Act”; and,</p> <p>•Halton Region has concerns with taking a site-specific approach to expanding Urban Area as the Region’s population and employment targets, associated land and serving requirements Need to be comprehensively consider determine the appropriate location for growth.</p> <p>In short, the Region for the above reasons was unable to support the proposed amendment in 2018 as it did not conform to higher level provincial policy at the time which included the 2017 Places to Grow Plan and the Halton ROP.</p> <p><b>Application Process Update</b> Our recent correspondence with the Ministry of Natural Resources and Forestry, who have carriage of the amendment application, have confirmed that the 2017 is application for UA63 remains open and will be continued to be evaluated in accordance with the Niagara Escarpment Planning and Development Act.</p> <p>In addition, the Region commenced the <u>Steeles Avenue (Regional Road 8) Transportation Corridor Improvements Municipal Class Environmental Assessment Study</u> (“the Class EA”) for the realignment of the Steeles Avenue from west of Bronte Road to where it meets the Tremaine Road roundabout. The Region held the second Public Information Centre for the Class EA online in April/May 2021 recommending Concept 2 as the preferred alignment. This concept transects</p> <p>the northern portion of the Subject Lands as shown on <b>Figure 3</b> below. We understand that the Region will commence with the agencies and stakeholder consultation for Summer of 2021 and anticipates a Draft Environmental Study Report prepared for Fall of 2021. We look forward to meeting with you or your staff for this coordination.</p> 	

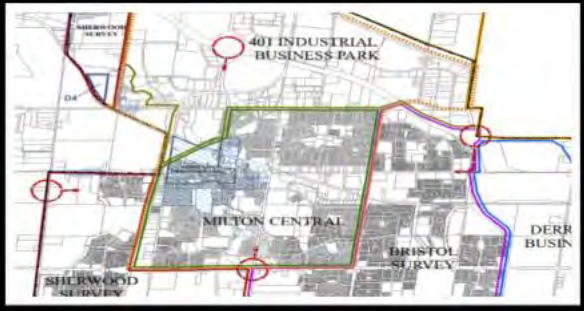
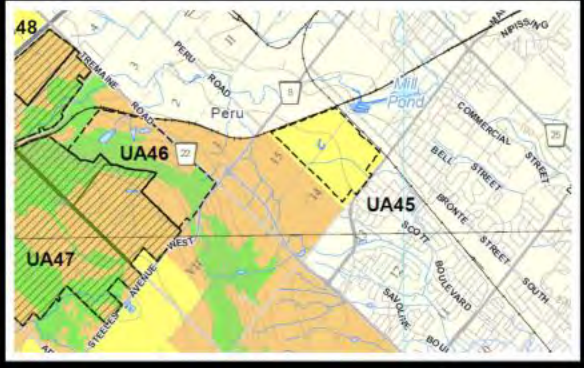
No.	Source	Submission	Response
		<p>Figure 3: Preliminary preferred design for Steeles Avenue MCEA Study (source: Halton Region)</p> <p>As stated above, previous comments from the NEC, Region and Town recommended that consideration of the lands should be based on a municipal comprehensive review (“MCR”) undertaken during at the Regional and Town levels.</p> <p>Therefore, in light of the open application with the MNR/NEC, the preferred option for the Steeles Avenue Corridor as well as the ongoing Halton MCR and Town of Milton MCR, we submit that the Oskar Lands should be considered as lands that are appropriate for the settlement boundary expansion required to meet the 2051 Growth Plan forecasts for the Town of Milton. In support of the inclusion of these lands, we provide the following:</p> <ul style="list-style-type: none"> <li>• In the Town of Milton staff report to Milton Council (DS-055-21) dated June 21, 2021 the Town expressed a broad support for a balanced approach to growth through both intensification and new designated greenfield development.</li> <li>• In their report, Town of Milton Council endorsed a Modified Growth Concept 4-“Halton Balanced” as supported by a Lands Needs Assessment (“LNA”) prepared on behalf of the Town by Malone Given Parsons (“MGP”).</li> <li>• In their report, MGP identified that a boundary expansion is critical for the Town and states that the Town will need to include all white belt lands into the settlement area boundary in order to meet the Town and Regions 2051 Growth forecast.</li> <li>• PPS Policy 1.1.3.8 states that removal of land from prime agricultural areas for new or expanding settlement areas can only be considered by planning authorities at the time of a comprehensive review of the municipal official plan. During comprehensive reviews, municipalities look at how best to manage growth (e.g., servicing feasibility, building complete communities) while protecting provincial interests like protecting prime agricultural areas for long-term use for agriculture.</li> <li>• In 2008 Halton Region undertook a Land Evaluation and Area Review (LEAR) to identify remaining areas of prime production potential. The LEAR is an alternative structured methodology of identifying the long-term agricultural potential of the land base. The LEAR Scores were referenced and taken into consideration during the ongoing Integrated Growth Concept Strategy development. It is notable that the Subject Lands’ LEAR score is similar or lower than other lands within the Town of Milton identified and/or endorsed for expansion.</li> <li>• Since the 2008 LEAR evaluation, the Subject Lands were further fragmented through the expropriation of Tremaine Road and will be again with the proposed realignment of Steeles Avenue corridor. The road speeds and fragmented nature of the land are not ideal or desirable for farming operations.</li> </ul>	

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• The Subject Lands can be considered the “hole in the doughnut” situated between the north and south of the Towns’ Sherwood Secondary Plan areas and bounded by major transportation corridors. Together with the future Steeles Avenue alignment, Tremaine Road is an appropriate and logical settlement area boundary for the Town of Milton.</li> <li>• The Oskar Group is proposing a new concept plan that promotes observes and promotes the agricultural nature of the area and maintains the open landscape character with a mix of single and semi-detached and row-housing that is interspersed with community gardens and natural preserve areas. The proposed “agri-hood” concept includes a mix of ground related dwellings that would contribute to the balanced market-based supply of housing as noted in MGP’s LNA report and endorsed by Town of Milton Council.</li> <li>• The proposed agri-hood concept is in keeping with the 2016 Halton Rural Agricultural Strategy (“RAS”) by: <ul style="list-style-type: none"> <li>○ increasing awareness of the importance of food security;</li> <li>○ finding new and innovative approaches to provide local agricultural products;</li> <li>○ encouraging urban agriculture; and,</li> <li>○ creating opportunities to create partnerships to establish business focused on agri-food.</li> </ul> </li> <li>• Any urban development proposed for the Subject Lands would be located outside of the natural and hydrologically sensitive features and their required buffers.</li> <li>• The realignment of Tremaine Road contains the toe of slope for the Niagara Escarpment to the west of Tremaine leaving most of the Subject Lands as being outside of the Escarpment topography. Tremaine Road therefore provides the appropriate buffer to the prominent Escarpment features.</li> <li>• The Subject lands can be considered the “hole in the doughnut” situated between the north and south areas of the Towns’ Sherwood Secondary Plan. Therefore, Tremaine Road provides an appropriate limit for the settlement area for the Town of Milton and proposes development on lands that fall outside of the Niagara Escarpment slopes and features.</li> <li>• The Subject Lands have existing access from Tremaine Road and would have opportunities for future access points from the future realigned Steeles Avenue.</li> <li>• Conservation Haltons proposed Giant’s Rib Geopark is currently disconnected between the Escarpment View Park and the Niagara Escarpment feature to the west. The realignment of Steeles Avenue can provide opportunities for a land contribution to this park by the Oskar Group which among other things, provide safe pedestrian access between these two uses. The future interchange of Tremaine Rd and Highway 401 anticipated for completion in 2022 will provide crucial infrastructure for west Milton including the Oskar lands.</li> </ul>	




No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Regional Services for water and stormwater are present on Tremaine Road and sanitary servicing to service Milton Heights is nearby.</li> <li>• The recent approval of the Milton Educational Village identifies west Milton as an innovation corridor of the Town which is in keeping with the unique Agri-hood concept being proposed for the Subject Lands.</li> </ul> <p>The above professional opinion was developed through a review of the following technical reports and processes:</p> <ul style="list-style-type: none"> <li>• Environmental surveys and existing conditions of the site;</li> <li>• Available and proposed services for Tremaine Road and the Tremaine/Steeles intersection;</li> <li>• Phase 3 Sustainable Halton Report – An Agricultural Evaluation;</li> <li>• Halton Regions' preferred option for the Steeles Avenue corridor realignment;</li> <li>• Halton Region Integrated Growth Plan Strategy concepts;</li> <li>• The LNA prepared by MGP on behalf of the Town of Milton.</li> </ul> <p>We understand the inclusion of the recently added Growth Concept 3B the Region has extended the commenting period for the Growth Concept Discussion to July 15, 2021. We kindly ask that we be advised of what the process is from this point forward in order to advance the Subject Lands for consideration and inclusion for the preferred Growth Concept Strategy. We would appreciate the opportunity to meet with you and your staff to discuss above.</p> <p>Yours truly,</p> <p>Carmen Jandu, MCIP RPP Associate, Senior Planner</p>	
117.	<p>Ritee Haider on behalf of Oskar Group</p> <p>E-mail dated January 7, 2022</p>	<p><i>EMAIL</i></p> <p>Good Afternoon Steven,</p> <p>Happy New Year! I am assisting Carmen with the ongoing Niagara Escarpment Plan Application for the lands located at 0 &amp; 7649 Tremaine Road, Milton. Please find the attached letter as a formal request to defer any decisions as part of the ongoing MCR Review relating to the lands on the basis of an open provincial application. Please let us know if you have any questions!</p> <p>Regards, Ritee Haider MCIP RPP Planner</p>	<p>Please see response provided to E-mail dated December 8, 2021 above.</p>

No.	Source	Submission	Response
		<p><b>IBI GROUP</b></p> <hr/> <p><i>ATTACHMENT</i></p> <p>January 7th, 2022  Steven Burke  Senior Planner – Planning Services  Legislative and Planning Services  Halton Region  1151 Bronte Road  Oakville, Ontario L6M 3L1  Dear Mr. Burke:  NIAGARA ESCARPMENT PLAN AMENDMENT APPLICATION (UA 63) - 0 &amp; 7649  TREMACHINE ROAD, MILTON</p> <p>IBI Group are the planning consultants representing 1625488 Ontario Inc. and 1652157 Ontario Inc. (Oskar Group), who are the owners of approximately 72.9 hectares of land, municipally referred to as 0 &amp; 7649 Tremaine Road, Milton and legally described as Part of Lots 14 and 15, Concession 1, Trafalgar NS, Town of Milton, Region of Halton (“herein referred to as the subject lands”). The subject lands are on the east side of Tremaine Road, between Steeles Avenue and Main Street and located adjacent to the Town of Milton’s Escarpment View Park Lands and their current Urban Boundary. The subject lands are also designated in the Niagara Escarpment Plan Area (“NEP”) as ‘Escarpment Protection Area’. A location plan is provided below as Figure 1, while Figure 2 shows the location of the lands within the NEP.</p> <p>IBI Group is retained to provide planning support for an ongoing Niagara Escarpment Plan Area Application (UA 63) submitted but not completed as a part of the 2017 Coordinated Review. At that time, the application proposed the re-designation of a portion of these lands to the ‘Urban Area’.</p> <p>The purpose of this letter is to provide an understanding of the background of the existing NEPA and request that a decision on the subject lands within the new Region of Halton Official Plan Review be deferred until a final decision has been made for the open application by the Ministry of Natural Resources and Forestry (“MNR”) and the Niagara Escarpment Commission (“NEC”).</p>	

No.	Source	Submission	Response
		 <p data-bbox="457 570 1339 618">Figure 1: Location of the Subject Lands shown on Schedule D of the Town of Milton Official Plan</p>  <p data-bbox="457 1021 1276 1045">Figure 2: Excerpt of Map 3 of the Niagara Escarpment Plan for Halton Region</p> <p data-bbox="457 1073 680 1097"><b>1.0. BACKGROUND</b></p> <p data-bbox="457 1105 1409 1349">During the 2017 Coordinated Provincial Plan Review, 1625488 Ontario Inc. and 1652157 Ontario Inc. (Oskar Group) applied for an amendment to the Niagara Escarpment Plan (“NEP”). The effect of the original application submitted in 2016 during the Coordinated Provincial Plan Review sought the re-designation of approximately 72.9 hectares of land from the NEP. The application was revised to re-designate approximately 12.1 hectares of the southern portion of the subject lands, fronting onto Given Lane to Urban Area, while maintaining the Escarpment Protection designation on the remainder of the lands. This would have subsequently allowed an expansion of the Town of Milton Urban Boundary and permitted urban/recreational uses and the extension of urban servicing.</p>	

No.	Source	Submission	Response
		<p>Unfortunately, during the public consultation phase of the Coordinated Provincial Plan Review, this application alongside two other applications were inadvertently overlooked for various reasons and were not included in the circulation for public comments, and therefore, no decisions were made on the applications. Nonetheless, the Niagara Escarpment Commission (“NEC”) provided an analysis of the proposed Niagara Escarpment Amendment Application by 1625488 Ontario Inc. and 1652157 Ontario Inc. (Oskar Group) (“UA 63”) and a conclusion on whether the application aligned with the purpose and objectives of the Niagara Escarpment Planning and Development Act (“NEPDA”) and the NEP, as well as higher order provincial plans relevant at the time.</p> <p>The analysis the NEC concluded that if urban development was to be the outcome on the Subject Lands than:</p> <p><i>“...it is recommended that such development be planned in a co-ordinated manner with the Halton Region and the Town of Milton by first considering intensification opportunities within Existing urban boundaries, and then evaluating growth options in the broader municipal context. This should be done as part of a municipal comprehensive review, in accordance with the PPS and the growth plan policies.”</i></p> <p>The NEC also stated that:</p> <p>The NEC also noted in their analysis that the objectives of the Escarpment Protection Area was to maintain and enhance the open landscape character of the area providing a buffer to prominent escarpment features and encouraging agriculture.</p> <p><i>“Although the submission does make reference to the growth targets assigned to Halton Region, it is not known if the Region and Town of Milton intend to request an urban boundary expansion at the time of the next municipal comprehensive review. As noted in both the PPS and the Growth Plan, a municipality must demonstrate that sufficient opportunities for intensification or redevelopment are not available to accommodate expected growth before an urban boundary expansion will be considered. The applicant did not provide this information, and neither Halton Region nor the Town of Milton submitted comments addressing this issue. NEC staff recommends that this analysis should be done as part of a municipal comprehensive review led by a municipality, and should not be initiated by private development interests.”</i></p> <p>Through further consultation with the agencies, the 1625488 Ontario Inc. and 1652157 Ontario Inc. (Oskar Group) proposed two more development concepts which proposed different portions of the land for urban development. The last concept submitted in early 2018 proposed to re-designate 12.1 hectares at the south end of the Subject Lands, with frontage onto Given Lane, to Urban Area and to maintain the Escarpment Protection Area</p>	

No.	Source	Submission	Response
		<p>and Escarpment Rural Area designations on the remaining 60.1 hectares for potential recreational uses.</p> <p>In accordance with the NEDPA, the proposed amendment was posted onto the Environmental Registry and was later circulated to the Region of Halton, the Conservation Authority and the Town for their comments. The Region responded to the circulation with a letter from Mr. Rob Catarino dated June 20, 2018. In their remarks Mr. Catarino commented that:</p> <p>The NEC also noted in their analysis that the objectives of the Escarpment Protection Area was to maintain and enhance the open landscape character of the area providing a buffer to prominent escarpment features and encouraging agriculture.</p> <p>Through further consultation with the agencies, the 1625488 Ontario Inc. and 1652157 Ontario Inc. (Oskar Group) proposed two more development concepts which proposed different portions of the land for urban development. The last concept submitted in early 2018 proposed to re-designate 12.1 hectares at the south end of the Subject Lands, with frontage onto Given Lane, to Urban Area and to maintain the Escarpment Protection Area and Escarpment Rural Area designations on the remaining 60.1 hectares for potential recreational uses.</p> <p>In accordance with the NEDPA, the proposed amendment was posted onto the Environmental Registry and was later circulated to the Region of Halton, the Conservation Authority and the Town for their comments. The Region responded to the circulation with a letter from Mr. Rob Catarino dated June 20, 2018. In their remarks Mr. Catarino commented that:</p> <ul style="list-style-type: none"> <li>• The subject lands are designated Regional Natural Heritage System and Agricultural Area under Map 1 of the Halton Region Official Plan 2009 ("ROP") and identified to be within the Prime Agricultural Area as identified on Map1E;</li> <li>• That Policy 77 (7) of the ROP enables the Region to consider, "only by amendment to Regional Plan, Urban Area expansions based on a municipal comprehensive review undertaken as part of the Region's statutory 5-year review of the Official Plan under the Planning Act"; and,</li> <li>• Halton Region has concerns with taking a site-specific approach to expanding Urban Area as the Region's population and employment targets, associated land and serving requirements Need to be comprehensively consider determine the appropriate location for growth.</li> </ul>	

No.	Source	Submission	Response
		<p>In short, the Region for the above reasons was unable to support the proposed amendment in 2018 as it did not conform to higher level provincial policy at the time which included the 2017 Places to Grow Plan and the Halton ROP.</p> <p><b>2.0 APPLICATION PROCESS UPDATE</b> Correspondence with the Ministry of Natural Resources and Forestry, who have carriage of the amendment application, have confirmed that the 2017 is application for UA63 remains open and will be continued to be evaluated in accordance with the Niagara Escarpment Planning and Development Act.</p> <p>In addition, the Region commenced the Steeles Avenue (Regional Road 8) Transportation Corridor Improvements Municipal Class Environmental Assessment Study (“the Class EA”) for the realignment of the Steeles Avenue corridor from west of Bronte St. N. until it joins with the Tremaine Road roundabout. The second Public Information Centre (“PIC”) for the Class EA was held online in April/ May 2021 recommending Concept 2 as the preferred alignment option which transects the northern portion of the Subject Lands as shown on Figure 3 below. A form of this alignment was also contemplated during the development of the Sherwood Secondary Plan.</p>  <p>Figure 3: Preliminary Preferred Design for Steeles Avenue Study</p> <p>As stated above, previous comments from the NEC, Region and Town level recommended that consideration of the lands should be based on a municipal comprehensive review (“MCR”) undertaken during the Town and the Region levels. As the MCR process is currently undergoing, we are submitting the following request to be considered.</p> <p><b>3.0 PROPOSED REQUEST</b> In light of the open application with the MNRF/ NEC and a formal resubmission of a revised plan for UA 63 to the MNRF, we are formally requesting that any decision on the subject lands within the ongoing MCR Review and Regional Official Plan update be deferred until the Ministry has had an opportunity to make a formal decision.</p>	

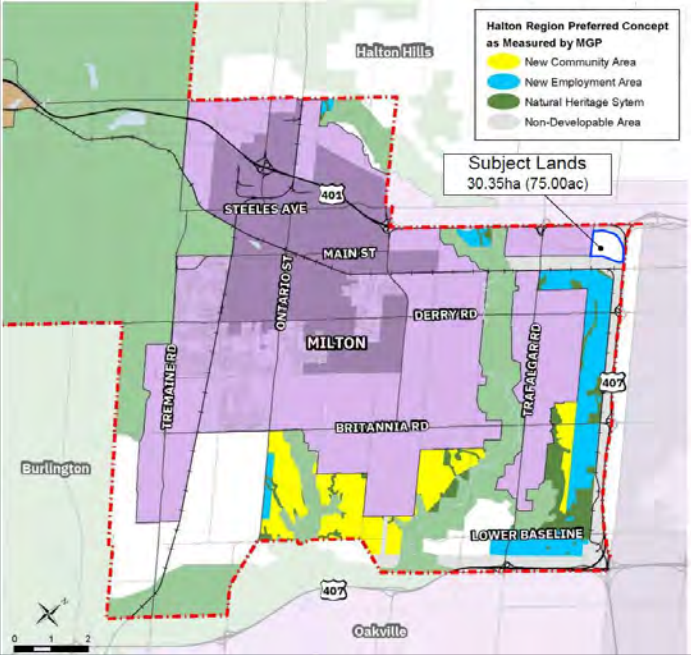
No.	Source	Submission	Response
		<p>The subject lands are designated 'Escarpment Protection' within the Niagara Escarpment Plan, and therefore, any changes or modifications applying to the NEP, must be approved by the appropriate commenting agency, such as the NEC and MNRF prior to the upper tier approval authority approving any changes.</p> <p>The Regional Official Plan has to conform with Provincial Plans and this direction is confirmed within the existing Official Plan as Policy 62 states "All development within the Niagara Escarpment Plan Area is subject to the provisions of the Niagara Escarpment Planning and Development Act and the Niagara Escarpment Plan, as well as applicable policies of this Plan, Local Official Plan, and Local Zoning Bylaws." Therefore, until an ultimate decision has been made by the provincial agencies, no changes or designations should be contemplated on the subject lands.</p> <p>We are continuing to work with the MNRF on the application, and will circulate the materials to the Town, Region and the Niagara Escarpment Commission for input.</p> <p>4.0 CONCLUSION</p> <p>As we understand, Regional Staff anticipate Regional Approval of the Preferred Growth Concept and the theme area Policy Directions report in February 2022 which will be the foundation for a new Regional Official Plan Amendment which will be brought for Public Consultation. In light of the imminent approval of the Preferred Growth Concept Plan, please accept this letter as a formal request for a deferral for any decisions for the subject lands on the basis of an open provincial application for re-designation. We would be happy to meet with you and the ROPR team to answer any questions or coordinate a meeting with you directly or through a member of your staff.</p> <p>We thank you for your consideration and and look forward to working with you. Regards,</p> <p>IBI Group Carmen Jandu MCIP RPP Senior Planner Ritee Haider MCIP RPP Planner</p> <p>Cc. John Ariens, IBI Group Pancy Pong, Oskar Group Jessica Dorgo, Region of Halton Dan Tovey, Region of Halton</p>	
118.	Bal Thandi on behalf of 7459, 7499	Good afternoon,	Subject lands were not within the Primary Study Area (the combination of all the lands included in the Growth Concepts

No.	Source	Submission	Response
	<p>&amp; 7539 Auburn Road E-mail dated January 13, 2022</p>	<p>Please find attached correspondence in relation to the Halton Regional Official Plan Review and the matter of Auburn Road in Milton, Ontario for the meeting on January 17<sup>th</sup>, 2022.</p> <p>If you have any questions, please feel free to contact me.</p> <p>Thank you,</p> <p>Bill Thandi</p> <p>----- ATTACHEMENT</p> <p>January 13, 2022</p> <p>The Mayor and Members of Town Council The Corporation of the Town of Milton Town Hall 150 Mary Street Milton, ON L9T 6Z5</p> <p><b>RE: Halton Regional Official Plan Review Region's Draft Preferred Growth Scenario 7459, 7499 &amp; 7539 Auburn Road, Town of Milton</b></p> <p>I, along with other owners on Auburn Road in Milton, own 30 hectares (75 acres) of land at the northeast quadrant in Milton bounded by Highway 401 to the north, Highway 407 to the east, Hydro corridor to the south and 8th Line to the west. We have attached a key map to show where our lands are located in Milton.</p> <p>We were made aware of the Region's Official Plan Review process and the recent release of the Region's draft Preferred Growth Scenario. We also understand that the Town of Milton at its Council meeting on January 17th will consider and respond to the Region on the draft Preferred Growth Scenario.</p> <p>When the Region undertook the previous Sustainable Halton process (ROPA 38), our neighbours' land on the west side of 8th Line were included in the 2031 Urban Boundary for future employment needs. Our neighbours' land to the south of the Hydro Corridor were identified as 'Future Strategic Employment Land' in ROPA 38. Our land was left as is without any recognition as viable urban employment land and it seemed that the Region forgot that it is viable employment land and at minimum our lands should have been recognized as Future Strategic Employment Land in ROPA 38.</p>	<p>developed and assessed as part of the Integrated Growth Management Strategy) which prioritized consideration of lands adjacent to the existing Urban Area outside of Provincial plan areas such as the Niagara Escarpment Plan and Greenbelt Plan. The Land Needs Assessment identified an amount of land required, appropriate locations have been determined as part of the Preferred Growth Concept and technical studies. Based on this analysis, these lands do not fall within those areas and are not identified as part of the Preferred Growth Concept. However, the subject lands remain identified as Future Strategic Employment Area.</p>

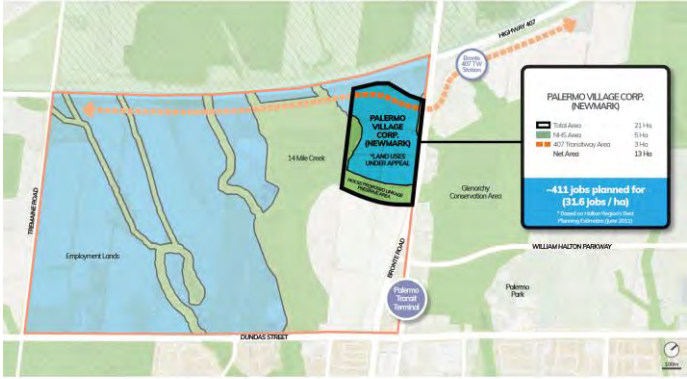




No.	Source	Submission	Response
		<p>Our land is the only remaining Provincial Whitebelt land in Milton that is along Highway 401 not recognized as a viable employment land in Milton.</p> <p><b><u>Request to the Town of Milton Council:</u></b></p> <p>We respectfully ask Milton Council to support our request and ask the Region to include our lands into the Region's 2051 Preferred Growth Scenario to provide public benefit for the Town and the Region in delivering future employment land needs, jobs and municipal tax assessment.</p> <p><b><u>Why Are We Asking for Employment Land Urban Expansion:</u></b></p> <p>We have reviewed the Region's draft Preferred Growth Scenario and we see that all other lands adjacent to our lands are either in the current Urban Area or shown in the Region's draft Preferred Growth Scenario as future Urban Area. Our lands are the only remaining area not included in the existing or future Urban Area.</p> <p>If the Region decides not to include our lands into the Urban Area, this is the only remaining area to be left over for future planning process on urban expansion. <u>I wonder how do you plan for a small remaining parcel in the future when the rest of the adjacent lands are planned and developed now as Urban? Do you do a Secondary Plan for a small parcel remaining? Would it not make sense to comprehensively plan the entire northeast quadrant in Milton at Highway 401 and Highway 407 together?</u> We are not professional land use planners but this does not make any sense to us.</p> <p><b><u>GTA West Corridor EA:</u></b></p> <p>Some have told us that our lands are not identified as Future Strategic Employment Land or considered for Urban Employment since the Province is advancing the GTA West Corridor EA process and this section of Highway 401 and Highway 407 is the key interchange/terminus.</p> <p>If this is the case, why are my neighbours' land west of 8th Line in the Urban Area when the GTA West Corridor EA Focus Area of Analysis affect their land as well? We reviewed the Region's draft Preferred Growth Scenario and the employment lands north of Steeles Avenue West in Halton Hills are proposed to be Urban and more of those lands are affected by the Provincial Focus Area of Analysis than our lands. This is not consistent and fair in how the Region is applying the Provincial Focus Area of Analysis for lands affected by the GTA West Corridor EA.</p> <p><b><u>Conclusion:</u></b></p>	

No.	Source	Submission	Response
		<p>We believe that the Town of Milton and the Region of Halton have the opportunity now to make these adjustments to the Region's draft Preferred Growth Scenario. We were told that the Preferred Growth Scenario is just a draft for now and changes will be made if there is a rationale for it.</p> <p>We believe that we have a justifiable rationale to ask for these changes. We honour and respect the Town and the Region to do the right thing. We truly believe that including our lands into the Urban Area when past and current decisions are made to include other lands adjacent to us as Urban.</p> <p>We thank you for taking the time to review our request herein and we trust the planning process that common sense and the right decision will prevail.</p> <p>Yours very truly,</p> <p>Baljinder Thandi Co-owner of 7499 Auburn Road (with Mr. Paramjit Sandhu) 2687009 Ontario Inc.</p> <p>Also signed on behalf of:</p> <p>Mr. Gurjinder Singh Brar Owner of 7539 Auburn Road 2543133 Ontario Inc.</p> <p>and</p> <p>Mr. Surjit S. Uppal Owner of 7459 Auburn Road 2163832 Ontario Inc.</p> <p>cc. Susan Galvin, Town Clerk Curt Benson, Halton Region Steven Burke, Halton Region Jill Hogan, Town of Milton</p>	

No.	Source	Submission	Response
			
119.	<p>Kevin Singh on behalf of Palermo Village Corporation</p> <p>E-mail dated January 14, 2022</p>	<p>Email</p> <p>Curt,</p> <p>Sorry that you weren't able to attend our meeting earlier this week. As requested, see attached for a copy of the presentation that was made for the benefit of you and your team.</p> <p>We understand that the Region requires the jobs that have been protected (as per the Best Planning Estimates) for in the northern portion of the site that currently shows the employment designation per the Region's current land use plan. <b>Based on previous discussions with your staff, we understand this area had protected for 411 jobs. Our demonstration of our land use plan, using the region's methodology for calculating jobs per squared metre projects that we can provide approximately 677 jobs in the same area.</b></p> <p>Aside from this, we are also planning for another 1600 jobs in our Old Bronte Main Street District along Dundas and Bronte Road where we will be integrating the following uses:</p>	<p>In terms of employment conversion requests for Palermo Village Corporation lands, Regional staff recommend retaining the subject lands (Palermo Village, O-24) within the Regional Employment Areas. More information on how this conversion meets the principles of the Region's employment conversion assessment criteria is available in Appendix B of the Preferred Growth Concept Report.</p> <p>Regional staff note that Regional Official Plan Amendment No. 48 (ROPA 48) was approved by the Minister of Municipal Affairs and Housing on November 10, 2021. ROPA 48 implements a Regional Urban Structure to establish a hierarchy of strategic growth areas which are nodes</p>




No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Government Office – We understand that there is some interest for both school boards within Halton to relocate their head offices to this location and we continue to work hard at making this a reality</li> <li>• Library / Community Centre – we understand that aside from typical recreational activities, Town staff will also look to incorporate working space and meeting rooms as well</li> <li>• Innovation Building – As you'll see, we've put more context to what our vision of what this Centre could be and how we can really incorporate Medical Science Training and Research with the intent to connect in some capacity to the Oakville Trafalgar Memorial Hospital</li> </ul> <p>It's important to note that the total of over 2200 traditional jobs within both mixed use areas <u>DO NOT</u> include work from home spaces, as that would be above and beyond this summary. However, as part of the presentation on the last slide, we have included a layout in a condo design that is coming forth in Milton that shows common area/amenity space that does offer both individual working stations as well as collaborative working space.</p> <p><b><u>Summary</u></b></p> <p>Understanding what has been requested from the Region, we believe our presentation and work to date shows that not only can we accommodate the 411 jobs protected for, but we can exceed this target in a mixed use configuration. <b><u>Therefore, we are requesting that the Region remove the employment use for the subject lands on the north portion of Palermo Village Corp as part of the current Growth Conformity Work (ROPA 49) so that this entire area can be planned as a mixed use community,</u></b> optimizing the use of both the Palermo Transit Terminal and the Bronte 407 Transitway Station.</p> <p>Should you have any questions or concerns, please don't hesitate to contact me directly.</p> <p>Thanks,</p> <p>Kevin Singh</p> <p>M 647-828-8558 E kevin@argoland.com argoland.com</p> <hr/> <p>Attachment</p>	<p>like Urban Growth Centers and Major Transit Station Areas, and corridors intended to be the focus of concentrating population and job growth.</p> <p>In terms of implementation, the Integrated Growth Management Strategy is addressed through Regional Official Plan Amendment No. 48 (ROPA 48), or will be addressed through a future Regional Official Plan Amendment, including the Preferred Growth Concept.</p>

No.	Source	Submission	Response										
		 <p data-bbox="821 738 1125 760">North Oakville West - Traffic Zone Employment</p>  <table border="1" data-bbox="972 837 1119 1000"> <thead> <tr> <th colspan="2">PALERMO VILLAGE CORP: (NEWMARK)</th> </tr> </thead> <tbody> <tr> <td>Total Area</td> <td>21 Ha</td> </tr> <tr> <td>14 Mile Creek</td> <td>8 Ha</td> </tr> <tr> <td>407 Transportation Area</td> <td>3 Ha</td> </tr> <tr> <td>Net Area</td> <td>13 Ha</td> </tr> </tbody> </table> <p data-bbox="972 951 1104 1000">~411 jobs planned for (31.6 jobs / ha)</p> <p data-bbox="972 1000 1104 1016">*Based on 100% development Planning Database (June 2022)</p> <p data-bbox="982 1149 1125 1166">Employment Study   Palermo Village 1</p>	PALERMO VILLAGE CORP: (NEWMARK)		Total Area	21 Ha	14 Mile Creek	8 Ha	407 Transportation Area	3 Ha	Net Area	13 Ha	
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No.	Source	Submission	Response								
		<p style="text-align: center;"><b>OPA 289 (Under Appeal) Demonstration</b></p>  <p style="text-align: center;"><b>OPA 289 (Under Appeal) Demonstration</b></p> <p><b>PALERMO VILLAGE CORP. (NEWMARK)</b></p> <table border="1"> <tr><td>Total Area</td><td>21 Ha</td></tr> <tr><td>NR-45 Area</td><td>5 Ha</td></tr> <tr><td>407 Transitway Area</td><td>3 Ha</td></tr> <tr><td>Net Area</td><td>13 Ha</td></tr> </table> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">Employment 13 buildings 81,246 FTA <b>-411 jobs</b></p> <p style="text-align: center; background-color: #0070C0; color: white; padding: 2px;"><b>-411 jobs planned for!</b></p> </div> <p><b>Permitted Uses (Per OPA 289)</b></p> <ul style="list-style-type: none"> <li>- Light Industrial Operations</li> <li>- Business / Professional Offices</li> <li>- Service Establishments</li> <li>- Research &amp; Development Uses</li> <li>- Info Processing / Call Centres</li> <li>- Computer Based Services</li> </ul> <p><small><sup>1</sup> Based on Halton Region's Best Planning Estimates (June 2011) Employment Study   Palermo Village 2</small></p>	Total Area	21 Ha	NR-45 Area	5 Ha	407 Transitway Area	3 Ha	Net Area	13 Ha	
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		<p style="text-align: center;"><b>Proposed Mixed-Use Demonstration (Palermo Gateway District)</b></p>  <p style="text-align: center;"><b>Proposed Mixed-Use Demonstration (Palermo Gateway District)</b></p> <p><b>PALERMO VILLAGE CORP. (NEWMARK)</b></p> <table border="1"> <tr><td>Total Area</td><td>21 Ha</td></tr> <tr><td>NR-45 Area</td><td>5 Ha</td></tr> <tr><td>407 Transitway Area</td><td>3 Ha</td></tr> <tr><td>Net Area</td><td>13 Ha</td></tr> </table> <div style="display: flex; justify-content: space-around; margin: 10px 0;"> <div style="border: 1px solid red; padding: 5px; background-color: #F08080;"> <p style="text-align: center; color: red;"><b>Retail / Commercial</b></p> <p style="text-align: center; color: red;">37,190 sqft 3,447 sqm 46,000 jobs<sup>1</sup> <b>-75 jobs</b></p> </div> <div style="border: 1px solid blue; padding: 5px; background-color: #ADD8E6;"> <p style="text-align: center; color: blue;"><b>Office / Employment</b></p> <p style="text-align: center; color: blue;">131,170 sqft 12,124 sqm 80,000 jobs<sup>1</sup> <b>-591 jobs</b></p> </div> </div> <div style="display: flex; justify-content: space-around; margin: 10px 0;"> <div style="border: 1px solid purple; padding: 5px; background-color: #8A2BE2;"> <p style="text-align: center; color: purple;"><b>Community Use</b></p> <p style="text-align: center; color: purple;">8,158 sqft 756 sqm 70,000 jobs<sup>2</sup> <b>-11 jobs</b></p> </div> <div style="border: 1px solid grey; padding: 5px; background-color: #D3D3D3;"> <p style="text-align: center; color: grey;"><b>Work From Home</b></p> <p style="text-align: center; color: grey;">1,750 units pop. density = 23.35 people / acre (58.00 / ha)<sup>3</sup> <b>-376 jobs<sup>4</sup></b></p> </div> </div> <div style="border: 1px solid orange; padding: 5px; margin: 10px 0; background-color: #FFD700;"> <p style="text-align: center; color: orange;"><b>-677 traditional jobs</b> <b>-3,812 people &amp; jobs</b></p> </div> <p><small><sup>1</sup> Population PPU based on Town of Oakville Development Charges Background Study (2017, 2017-2021 Forecast) <sup>2</sup> Employment Requirements and Employment Land Study, Regional Municipality of Halton, December 23, 2008, Wilson &amp; Associates Townships Ltd. <sup>3</sup> 2014 Census 25% work from home jobs assumed 20% available based on Ontario's Canadian Council Survey on Business Conditions, August 2010 <sup>4</sup> Workforce - assumes 60% of population ages 20-64, 2016 Census of Canada.</small></p> <p style="text-align: right;"><small>Employment Study   Palermo Village 3</small></p>	Total Area	21 Ha	NR-45 Area	5 Ha	407 Transitway Area	3 Ha	Net Area	13 Ha	
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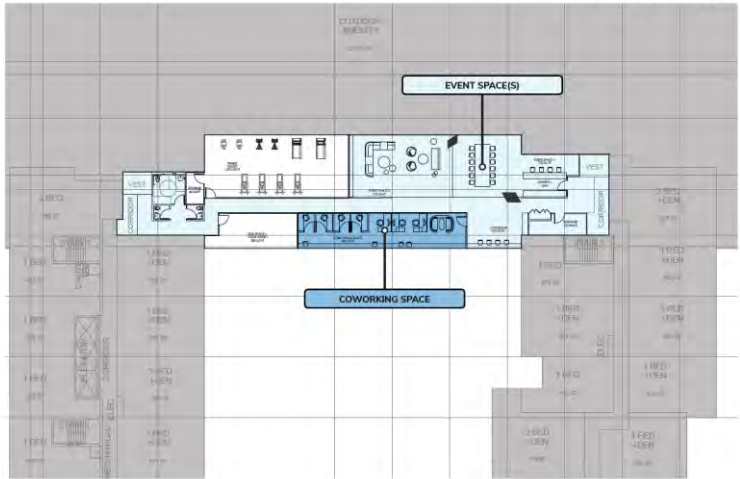


No.	Source	Submission	Response
		<p style="text-align: center;">Proposed Mixed-Use Demonstration   Massing</p>  <p style="text-align: right; font-size: small;">Employment Study   Palermo Village 4</p> <p style="text-align: center;">Proposed Mixed-Use Demonstration   Rendering</p>  <p style="text-align: right; font-size: small;">Employment Study   Palermo Village 5</p>	

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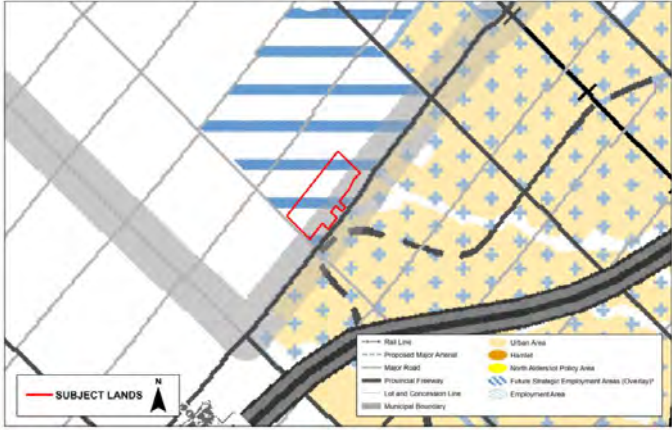


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120.	<p>Josh Florence (Crestpoint Real Estate Investments Ltd.) on behalf of 7201 5 Sideroad</p> <p>E-mail dated January 18, 2022</p>	<p>Email</p> <p>Hi Owen – I hope this note finds you well and keeping safe!</p> <p>I received your e-mail address from Melissa Ricci (cc'd) at the Town of Halton Hills. We have been in discussions with Melissa to submit a request to the Region for the property located at 7201 5 Sideroad in Halton Hills, ON to be included in the Urban Area as part of the ongoing Municipal Comprehensive Review.</p> <p>We have prepared a letter (attached), which outlines our submission to the Region. If you have some time available, it would be great to hop on a call to walk you through this. We look forward to hearing from you.</p> <p>Best, Josh</p> <p><b>Josh Florence</b> Manager, Acquisitions &amp; Asset Management Crestpoint Real Estate Investments Ltd. C: 647-262-9760 F: 416-363-2089 Email: <a href="mailto:jflorence@cclgroup.com">jflorence@cclgroup.com</a></p>	<p>Subject lands were not within the Primary Study Area (the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy) which prioritized consideration of lands adjacent to the existing Urban Area outside of Provincial plan areas such as the Niagara Escarpment Plan and Greenbelt Plan. The Land Needs Assessment identified an amount of land required, appropriate locations have been determined as part of the Preferred Growth Concept and technical studies. Based on this analysis, these lands do not fall within those areas and are not identified as part of the Preferred Growth Concept. However, the subject lands remain identified as Future Strategic Employment Area.</p>

No.	Source	Submission	Response
		<p data-bbox="451 289 619 337">--- ATTACHMENT</p> <p data-bbox="451 367 1146 529">January 18th, 2022 Halton Region 1151 Bronte Road Oakville, ON L6M 3L1 Re: Submission for 7201 5 Sideroad Inclusion in Urban Boundary</p> <p data-bbox="451 558 674 586">Dear Halton Region,</p> <p data-bbox="451 615 1388 777">We are writing to you today to submit a request that the property located at 7201 5 Sideroad in the Town of Halton Hills, ON (the “Property”) be included in the Urban Area, and thus designated as an ‘Employment Area’, as part of Halton Region’s ongoing Municipal Comprehensive Review (“MCR”). The below will provide further rationale as to why we believe this is a great opportunity for both the Town of Halton Hills and Halton Region.</p> <p data-bbox="451 807 1388 1294">Crestpoint Real Estate Investments Ltd. (“Crestpoint”) is a commercial real estate investment manager dedicated to providing investors with direct access to commercial real estate assets. With over \$7B in assets under management, Crestpoint is focused on the execution of its disciplined investment approach and the active management of its properties. Crestpoint strives to deliver stable income and attractive long-term returns through a diversified portfolio of office, retail and industrial properties. Crestpoint is committed to building best-in-class buildings in all markets in which we operate, and currently owns more than 24 million square feet of industrial assets across Canada. Further, Crestpoint has a history of developing industrial buildings across Canada, including in Mississauga, Ajax, Waterloo, Montreal, Calgary, and more. The collective Crestpoint team brings over 160 years of transaction and asset management experience and a significant presence within the Canadian commercial real estate community. Crestpoint manages capital on behalf of Pension funds, Foundations &amp; Endowments, Unions, High Net Worth individuals, and more. Crestpoint is part of the Connor, Clark &amp; Lunn Financial Group Ltd., an independently owned multi-boutique asset management firm whose investment affiliates, including Crestpoint, are collectively responsible for the management of over \$100 billion in financial assets on behalf of institutional, private and retail clients.</p> <p data-bbox="451 1323 1402 1406">Crestpoint has signed a conditional offer to purchase the Property with the intent to construct approximately 650,000 – 800,000 square feet of best-in-class industrial product. Our understanding is that the Property is currently designated for agricultural uses;</p>	

No.	Source	Submission	Response
		<p>however, is recognized as a 'Future Strategic Employment Area' as per the Regional Official Plan Map 1C – Future Strategic Employment Areas (see Appendix A). As part of the ongoing MCR, Crestpoint would like to formally request that the Property be included in the Urban Area and thus designated as an Employment Area. Recognizing that the Property is slated for Future Strategic Employment, we believe that the proposed near-term development would be in-line with the Town and Region's planned land use, and will be beneficial to the Region in achieving their future growth targets.</p> <p>From a Planning perspective, expanding the employment node around 5 Sideroad &amp; Highway 25 is seen as an efficient use of existing infrastructure and services which is supported by Provincial Policy.</p> <p>With existing Employment Areas in close proximity both in the Town of Halton Hills (northeast of 5 Sideroad &amp; Highway 25) and in the Town of Milton (directly south of the Property), we believe that development of the Property for industrial use would help to create a strong industrial node in the Halton Region. Crestpoint will work actively with the Halton Region to design and extend any required municipal services to the Property. With these surrounding developments having occurred relatively recently directly south of 5 Sideroad, Crestpoint believes that services should be able to be extended from 5 Sideroad &amp; Highway 25. Additionally, as we have done on a number of prior projects, Crestpoint also plans to work with the appropriate Conservation Authority to ensure that natural heritage features are appropriately identified and protected. Crestpoint has a strong relationship with the Toronto and Region Conservation Authority, having conveyed 120+ acres to the TRCA over the past couple years.</p> <p>We believe that this project would be of significant economic benefit for the Halton Region. Based on current development plans, upon completion of construction, it is anticipated that this would bring 300+ jobs to the Region on a permanent basis. From Crestpoint's activity in the broader GTA industrial market, we have identified 20+ tenants (representing 5,000,000+ square feet) with near-term industrial space requirements. With vacancy rates at all-time lows across the GTA, much of this tenant demand will need to be satisfied through new development opportunities. With the Property being included in the Urban Area as part of this MCR process, we hope to begin discussions with potential tenants for occupancy as soon as the appropriate re-zoning is complete.</p> <p>In summary, Crestpoint would like to submit that the Property be included in the Urban Area as part of this MCR so that we may develop best-in-class industrial facilities. Crestpoint has a strong track record of developing in multiple markets. We are excited about the opportunity to work with the Town of Halton Hills and Halton Region to realize our vision for this development, and bring both employment and revenue opportunities.</p>	

No.	Source	Submission	Response
		<p>Should you have any questions, please do not hesitate to contact the undersigned at 647-262-9760 or JFlorence@cclgroup.com. We look forward to hearing from you.</p> <p>Sincerely, Crestpoint Real Estate Investments Ltd. Per:</p> <p>Josh Florence Manager, Acquisitions &amp; Asset Management</p> <p>Appendix A (Regional Official Plan Map 1C):</p> 	
121.	<p>Stephanie Matveeva on behalf of South Georgetown Landowners Group (SGLOG)</p> <p>E-mail dated January 19, 2022</p>	<p>Good morning,</p> <p>On behalf of our Clients, we are pleased to provide the attached Comment Letters in relation to the Halton Regional Official Plan Review. We kindly request that a copy of the Letters be provided to the Mayor and Members of Council.</p> <p>Thank you for your time. Please do not hesitate to contact our office if there are any questions.</p> <p>Best regards,</p> <p>Stephanie Matveeva, MCIP, RPP   Planner 700 - 10 Kingsbridge Garden Circle Mississauga, ON L5R 3K6 C: 416-456-5182</p>	<p>Majority of the subject lands were within the Primary Study Area (which is the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy). The remaining lands were also considered for potential settlement boundary expansion as a result of acknowledgement/commitments made in Minutes of Settlement for appeals to Regional Official Plan Amendment No. 38. The subject lands are currently designated as Regional Natural Heritage System and Agricultural Area. Based on the results of the technical analysis, staff are</p>

No.	Source	Submission	Response
		<p data-bbox="451 256 569 280"><a href="http://www.gsai.ca">www.gsai.ca</a></p> <hr data-bbox="451 310 1413 313"/> <p data-bbox="451 342 888 451">ATTACHMENT January 19, 2022 Halton Region 1151 Bronte Road Oakville, ON L6M 3L1</p> <p data-bbox="451 480 892 561">Attn: Curt Benson Director of Planning Services RE: Halton Regional Official Plan Review</p> <p data-bbox="451 591 1213 615">Draft Preferred Growth Scenario South Georgetown Landowners Group</p> <p data-bbox="451 644 642 669">Dear Mr. Benson,</p> <p data-bbox="451 698 1373 836">Glen Schnarr &amp; Associates Inc. (GSAI) are the planning consultants to the South Georgetown Landowners Group who collectively own approximately 243 hectares (600 acres) of land in the Town of Halton Hills (the 'Subject Lands'). On behalf of the South Georgetown Landowners Group, we are pleased to provide this Comment Letter in relation to the ongoing Halton Regional Official Plan Review ('ROPR') initiative.</p> <p data-bbox="451 865 1409 1003">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. We have reviewed the Draft Preferred Growth Concept, dated November 2021, and offer the comments outlined below.</p> <p data-bbox="451 1032 1381 1190">The Subject Lands comprise a collection of lands, generally located south of 10 Side Road, east of Trafalgar Road, north of 5 Side Road and west of Ninth Line and are adjacent to the existing Georgetown community. We have reviewed the Draft Preferred Growth Concept, dated November 2021, and note that a segment of the Subject Lands are identified for inclusion in the Town of Halton Hills Urban Area as New Community Area lands.</p> <p data-bbox="451 1219 1398 1409">We are writing to request that you reconsider the location of lands to be included in the Town's Urban Area. More specifically, we are requesting that while the overall quantum of lands to be added remains the same, the proposed configuration and designation be adjusted to include those lands identified in the enclosed Master Concept Plan. Inclusion of the proposed lands has the potential to support a comprehensively planned, complete community to occur within the Town of Halton Hills. Furthermore, the proposed area will support the future provision of a new Hospital site and a new Town-wide Park complex,</p>	<p data-bbox="1434 256 1890 446">recommending that a significant portion of these lands, including those lands located generally within Concessions 8, 9, 10, Part Lots 9 and 10, be included as Community Area within the Preferred Growth Concept. Please see Preferred Growth Concept mapping for additional detail.</p>

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		<p>while also facilitating a broad range of housing, new employment opportunities and community infrastructure. In our opinion, inclusion of the requested lands represents good planning as this will enable development in an appropriate and desirable location.</p> <p>Furthermore, inclusion of the requested lands represents a natural and logical extension of growth in an appropriate location, will support Provincial growth targets, will facilitate Provincial targets of compact, complete communities, will enable the long-term preservation and health of key natural heritage features and functions and will facilitate cost-efficient development forms and servicing given infrastructure is being provided along the Trafalgar Road corridor.</p> <p>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.</p> <p>We look forward to being involved. Please feel free to contact the undersigned if there are any questions.</p> <p>Yours very truly,  GLEN SCHNARR &amp; ASSOCIATES INC.</p> <p>Colin Chung, MCIP, RPP Partner  cc. John Linhardt, Town of Halton Hills  Bronwyn Parker, Town of Halton Hills</p>	

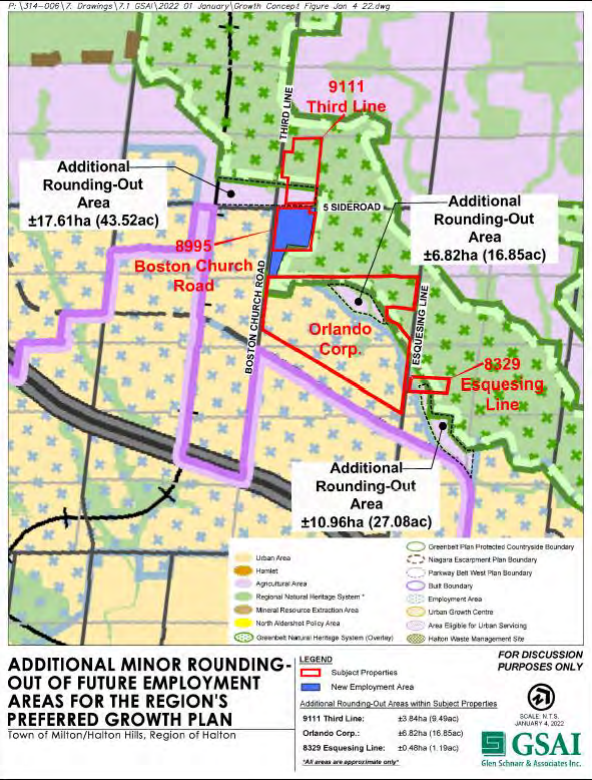


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		<p style="text-align: center;"><b>*FOR DISCUSSION PURPOSES ONLY*</b></p> <p style="text-align: center;"><b>SOUTH GEORGETOWN - MASTER CONCEPT PLAN</b></p> <table border="0"> <tr> <td><b>LEGEND</b></td> <td> <ul style="list-style-type: none"> <li>COMMUNITY USE AREA: ±399.19ha (912.08ac)</li> <li>EMPLOYMENT AREA: ±227.09ha (562.33ac)</li> <li>HOSPITAL DISTRICT HUB: ±12.35ha (30.62ac)</li> <li>TOWN WIDE PARK: ±46.13ha (121.40ac)</li> <li>INHS: WITHIN PROP. NEW URBAN AREA: ±149.55ha (369.57ac)</li> <li>ADJACENT TO EMPLOYMENT AREA: ±126.78ha (298.45ac)</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>GTA WEST FOCUSED ANALYSIS AREA</li> <li>GTA WEST PREFERRED ROUTE</li> <li>CORRIDOR PROTECTION FUTURE STRATEGIC EMPLOYMENT AREA</li> <li>PROPOSED GEORGETOWN NEW URBAN AREA</li> </ul> </td> <td> <p><b>Notes</b></p> <ul style="list-style-type: none"> <li>All Areas and calculations are approximate only</li> <li>INHS calculations exclude area east of North Line</li> </ul> </td> </tr> </table>	<b>LEGEND</b>	<ul style="list-style-type: none"> <li>COMMUNITY USE AREA: ±399.19ha (912.08ac)</li> <li>EMPLOYMENT AREA: ±227.09ha (562.33ac)</li> <li>HOSPITAL DISTRICT HUB: ±12.35ha (30.62ac)</li> <li>TOWN WIDE PARK: ±46.13ha (121.40ac)</li> <li>INHS: WITHIN PROP. NEW URBAN AREA: ±149.55ha (369.57ac)</li> <li>ADJACENT TO EMPLOYMENT AREA: ±126.78ha (298.45ac)</li> </ul>	<ul style="list-style-type: none"> <li>GTA WEST FOCUSED ANALYSIS AREA</li> <li>GTA WEST PREFERRED ROUTE</li> <li>CORRIDOR PROTECTION FUTURE STRATEGIC EMPLOYMENT AREA</li> <li>PROPOSED GEORGETOWN NEW URBAN AREA</li> </ul>	<p><b>Notes</b></p> <ul style="list-style-type: none"> <li>All Areas and calculations are approximate only</li> <li>INHS calculations exclude area east of North Line</li> </ul>	
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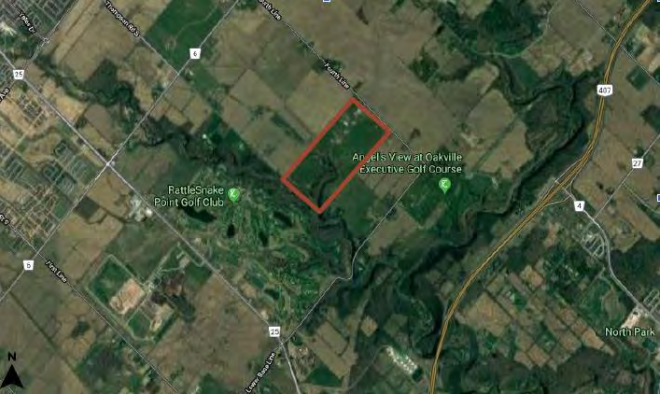
No.	Source	Submission	Response
122.	<p>Stephanie Matveeva on behalf of 9111 Third Line</p> <p>E-mail dated January 19, 2022</p>	<p>Good morning,</p> <p>On behalf of our Clients, we are pleased to provide the attached Comment Letters in relation to the Halton Regional Official Plan Review. We kindly request that a copy of the Letters be provided to the Mayor and Members of Council.</p> <p>Thank you for your time. Please do not hesitate to contact our office if there are any questions.</p> <p>Best regards,</p> <p>Stephanie Matveeva, MCIP, RPP   Planner 700 - 10 Kingsbridge Garden Circle Mississauga, ON L5R 3K6 C: 416-456-5182 <a href="http://www.gsai.ca">www.gsai.ca</a></p> <hr/> <p><b>ATTACHMENT</b></p> <p>January 19, 2022 Halton Region 1151 Bronte Road Oakville, ON L6M 3L1</p> <p>Attn: Curt Benson Director of Planning Services RE: Halton Regional Official Plan Review</p> <p>Draft Preferred Growth Scenario 9111 Third Line, Town of Halton Hills</p> <p>Dear Mr. Benson,</p> <p>Glen Schnarr &amp; Associates Inc. (GSAI) are the planning consultants to Ranbir and Jasbir Dhaliwal (the 'Owner') of the lands municipally known as 9111 Third Line in the Town of Halton Hills (the 'Subject Lands' or 'Site'). On behalf of the Owner, we are pleased to provide this Comment Letter in relation to the ongoing Halton Regional Official Plan Review ('ROPR') initiative.</p> <p>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.</p>	<p>The Land Needs Assessment identified an amount of land required, and appropriate locations have been determined as part of the Preferred Growth Concept and technical studies.</p> <p>Based on this analysis, these lands do not fall within those areas and are not identified as part of the Preferred Growth Concept. The southerly portion of the subject lands remain identified as Future Strategic Employment Area.</p> <p>The recommended settlement boundary expansion areas minimize conflict with the Natural Heritage and Agricultural System, represent more logical extensions of existing settlement areas and better support the movement of goods and people.</p>

No.	Source	Submission	Response
		<p>The Subject Lands are located on the east side of Third Line and north of 5 Sideroad. The Site consists of agricultural lands in the southern quadrant and lands subject to the Provincial Greenbelt Plan in the northern quadrant. The Site is also situated in proximity to the planned Town of Milton's 401 Industrial / Business Park Secondary Plan area, as modified by the inclusion of the North Porta lands (Town File LOPA-03/21) and immediately adjacent to lands municipally addressed as 8995 Boston Church Road, in the Town of Milton which are proposed for inclusion in the Town of Milton Urban Area for employment-related purposes based on the Draft Preferred Growth Concept Plan, dated November 2021 (see Growth Concept Figure enclosed). For clarity, we support the proposed inclusion of the lands addressed as 8995 Boston Church Road within the Town of Milton Urban Area as this will enable a logical continuation of employment-related development within the planned 401 Industrial / Business Park Secondary Plan area.</p> <p>Given the above-noted locational attributes, we request that you consider the Subject Lands for inclusion within the Town of Halton Hills Urban Area to facilitate future employment-related development. In our opinion, inclusion of the Subject Lands supports good planning principles as the Site would facilitate a natural and logical extension of employment-related development, would support the achievement of Provincial growth targets, would support the preservation of key natural heritage features and systems and would facilitate cost-efficient servicing given development occurring in the nearby 401 Industrial / Business Park area. The Subject Lands would also enable a rounding out of lands that will not adversely impact the Land Needs Assessment efforts completed to date.</p> <p>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.</p> <p>Yours very truly,  GLEN SCHNARR &amp; ASSOCIATES INC.  Colin Chung, MCIP, RPP Partner  cc. John Linhardt, Town of Halton Hills  Bronwyn Parker, Town of Halton Hills</p>	

No.	Source	Submission	Response
		 <p><b>ADDITIONAL MINOR ROUNDING-OUT OF FUTURE EMPLOYMENT AREAS FOR THE REGION'S PREFERRED GROWTH PLAN</b> Town of Milton/Halton Hills, Region of Halton</p> <p><b>LEGEND</b></p> <ul style="list-style-type: none"> <li>Subject Properties</li> <li>New Employment Area</li> <li>Additional Rounding-Out Areas within Subject Properties</li> <li>9111 Third Line: ±3.84ha (9.49ac)</li> <li>Orlando Corp.: ±6.82ha (16.85ac)</li> <li>8329 Esquesing Line: ±10.96ha (27.08ac)</li> <li>*All areas are approximate only.</li> </ul> <p><b>FOR DISCUSSION PURPOSES ONLY</b></p> <p>SCALE: 1:10,000 JANUARY 4, 2022</p> <p><b>GSAI</b> Glen Scheiner &amp; Associates Inc.</p>	
123.	<p>Arthur Grabowski on behalf of Samuel, Son &amp; Co. Ltd.</p> <p>E-mail dated January 24, 2022</p>	<p>EMAIL</p> <p>Good evening,</p> <p>On behalf of Samuel, Son &amp; Co, please see enclosed our written submission for 5274 Fourth Line, in Milton, regarding the draft Preferred Growth Concept that was provided on November 17, 2021.</p> <p>We look forward to participating in the next steps outlined below and reviewing additional materials noted below. Please confirm receipt of this correspondence.</p>	

No.	Source	Submission	Response
		<p>Thank you</p> <p>Arthur</p> <hr/> <p>ATTACHMENT</p> <p>January 24, 2022  Curt Benson, RPP, MCIP  Director, Planning Services and Chief Planning Official, Halton Region  1151 Bronte Road  Oakville, Ontario, L6M 3L1</p> <p><b>Re: Comments on the Halton Region MCR in regards to the Draft Preferred Growth Concept</b></p> <p>The Planning Partnership acts for Samuel, Son &amp; Co. Ltd (“landowner”), the owners of the lands at the northwest corner of Fourth Line and Lower Baseline West, known municipally as 5274 Fourth Line, in the Town of Milton (“Subject Site”). The Subject Site is approximately 82.1 hectares (200 acres) in lot area.</p> <p>We have made several submissions during the duration of the Region’s MCR process. We have attached the letters that we previously submitted to the Region on behalf of our client for your reference. We were also in attendance for the Region’s recent Public Information Centre (PIC) for the Town of Milton regarding the Regional Official Plan Growth Concepts on May 6, 2021, and the Region-wide PIC on June 29, 2021.</p> <p>We have reviewed the materials that were presented to Staff at the November 17, 2021 Council Workshop. At this Workshop, Regional Staff presented the Draft Preferred Growth Concept. Staff are recommending a balanced growth concept that takes “the best elements from the Growth Concepts” to arrive at the Draft Preferred Growth Concept.</p> <p>We are in support of the Region’s recommendations for inclusion of the Subject Site as part of the new “New Community Areas”. Based on the current trajectory of the growth in Milton, the Subject Site is an excellent candidate to accommodate new greenfield growth in the Region. We acknowledge and support the Region’s efforts to consider a balanced approach to Halton’s urban structure that considers all factors related to housing supply, jobs, protection of natural heritage resources, and agricultural among others.</p> <p>Further to the above, the Region’s Land Needs Analysis confirms that the Town of Milton is expected to grow significantly. The Region is proposing to require a New Community Area density target of 65 persons and jobs per hectare. We applaud the Region in planning for new compact greenfield areas to address a significant need for high quality housing and provide for sustainable, walkable and transit supportive communities.</p> <p>We note that the Town of Milton Staff have recommended Local Council endorsement of the Draft Preferred Growth Concept (Staff Report DS-006-22). We concur with the</p>	<p>As noted in a response to the June 11, 2021 submission provided above, based on the results of technical analysis, lands within the Primary Study Area (the combination of all the lands included in the Growth Concepts developed and assessed as part of the Integrated Growth Management Strategy) and outside of the Provincial Greenbelt Plan Area are proposed to be included in the Preferred Growth Concept as Community Area.</p>

No.	Source	Submission	Response
		<p>recommendations of Town of Milton Planning Staff. Given the significant levels of growth that is forecast for Milton, we also agree with Milton Staff's recommendations for a "concurrent steady stream of developable land" to allow for the implementation of the Draft Preferred Growth Concept in an orderly and sequential manner.</p> <p>The timing of this letter coincides with an important juncture in the MCR process. The Region will be seeking feedback on the Draft Preferred Growth Concept over the next few months. Based on the timeline that was provided to Regional Council, it is understood that following the feedback received, the Region will further refine the Draft Preferred Growth Concept and will recommend a final Draft Concept to Council by February 2022. Regional Official Plan Amendment 49 (ROPA 49) is targeted for Council approval in May 2022. We look forward to participating in future public consultation events as they are scheduled. We respectfully submit this letter for your consideration. Please feel free to contact the undersigned, with any questions or comments.</p> <p>Sincerely, Ron Palmer, MCIP, RPP, Principal</p> <p>Attachments: Appendix 1 – Comments on the Halton Region MCR in regards to 5274 Fourth Line, Milton dated August 13, 2019</p> <p>Appendix 2 – Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy dated February 24, 2020</p> <p>Appendix 3 - Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy dated June 11, 2021</p> <p><b>APPENDIX 1</b></p> <p>August 13, 2019 Curt Benson, RPP, MCIP Director, Planning Services and Chief Planning Official 1151 Bronte Road Oakville, Ontario, L6M 3L1</p> <p>Re: Comments on the Halton Region MCR in regards to 5274 Fourth Line, Milton</p> <p>The Planning Partnership acts for Samuel, Son &amp; Co. Ltd ("landowner"), the owners of the lands at the northwest corner of Fourth Line and Lower Baseline West, known municipally as 5274 Fourth Line, in the Town of Milton ("subject site"). The subject site is approximately 82.1 hectares (200 acres) in lot area (Figure 1).</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		 <p data-bbox="457 652 682 678">Figure 1: Subject Site</p> <p data-bbox="457 706 966 732">The subject site is currently identified as follows:</p> <ul data-bbox="504 735 1365 873" style="list-style-type: none"> <li>• Immediately abutting the future settlement area boundary of the “Sustainable Halton Lands”;</li> <li>• Designated as Prime Agricultural lands, but not a Specialty Crop Area; and,</li> <li>• A portion of the site is identified within the Provincial Natural Heritage System Mapping and located within the Greenbelt Plan Area.</li> </ul> <p data-bbox="457 906 1402 1015">We have been monitoring the Region’s Municipal Comprehensive Review (MCR) process on behalf of the landowner. We understand that the Town has been working closely with the Region, and has also recently initiated a review of its Official Plan, which will generally be concurrent with the Region’s MCR timeline.</p> <p data-bbox="457 1042 1375 1205">We have reviewed the Region’s “Integrated Growth Management Strategy Growth Scenarios: Halton Region to 2041” technical paper, which was circulated to local area municipalities. It is our understanding that the Region will issue a Draft Growth Concept later in 2019 for consultation based on eight “draft” scenarios that were identified in the technical paper. The final Regional Official Plan Amendment (ROPA) is targeted for approval sometime in late 2020.</p> <p data-bbox="457 1230 577 1256"><b>PURPOSE</b></p> <p data-bbox="457 1260 1396 1399">The Town of Milton has experienced rapid ongoing growth and is expected to grow to a population of over 400,000 people. It is also rapidly urbanizing through recent urban expansions in a southern direction towards Oakville and Highway 407, and more recently intensification, particularly around areas within the Downtown Milton Major Transit Station Area and Urban Growth Centre.</p>	

No.	Source	Submission	Response
		<p>The purpose of this letter is to express a desire on behalf of the landowner to work with the Region to achieve an orderly, logical expansion to its Urban Area in Milton, that would allow for the development of urban uses on the subject site. This would require the redesignation of the eastern portion of the subject site (outside of the natural heritage feature) from "Agricultural Area" to "Urban Area". We note that the inclusion of the subject site within the Urban Area is consistent with local priorities.</p> <p>We understand that the Growth Management Study/MCR is ongoing and will, ultimately, allocate growth to the Town to 2041. We have reviewed available public documentation to-date and offer the following issues for discussion:</p> <p><b>ISSUES FOR DISCUSSION</b></p> <p><b>1. LONG TERM URBAN STRUCTURE IMPLICATIONS</b> - The Region has experienced several waves of growth over time to accommodate its rapid demand for new housing. Originally, this was served by the growth of the lakefront municipalities of Burlington and Oakville, and more recently has included the greenbelt communities of Milton and Halton Hills. In Milton, the most recent era of urban expansion through ROPAs 38 and 39 allocated significant additional lands in the Southeast Milton Expansion Area. The allocation of new growth requires a consideration of the resultant urban structure.</p> <p>Through your Growth Management Study/MCR process, and ultimately in an Amendment to the Regional Official Plan, you will be allocating growth to all of the Region's constituent municipalities. The Region as a whole is rapidly urbanizing, and it is important, and desirable to create distinct communities, rather than an amorphous mass, barely recognizable when moving from one to another.</p> <p>As you are aware, Milton is a desirable community that provides an alternative to the increasingly urban and compact communities of Oakville and Burlington. Further, as land in Oakville and Burlington and other areas in the Greater Golden Horseshoe (GGH) becomes too expensive and/or is exhausted and housing values continue to increase, it is expected that communities like Milton will continue to be attractive to purchasers in the long-term. In observing existing land use patterns, the allocation of new growth must recognize unique characteristics and built form trends.</p> <p>We have reviewed the Region's draft growth scenarios to 2041, which range from no new greenfield growth to moderate new greenfield growth. Designated Greenfield Areas within Burlington and Oakville are fully accounted for in the 2031 horizon, and almost fully built out. Therefore, the majority of any greenfield expansion contemplated by the scenarios would occur in Milton and/or Halton Hills. Based on the current trajectory of the growth in</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>Milton, the subject site is an excellent candidate to accommodate new greenfield growth in the Region.</p> <p><b>2. TOWN'S PREFERRED URBAN STRUCTURE</b> - In a report to Council on September 24, 2018 (Report No. ES-016-08), Town Staff identified its preferred growth scenario for accommodating new growth in the Town to 2041. Appendix "C" of the Report identifies the subject site for inclusion within the Settlement Area Boundaries as part of the "Phase III Residential Area". We appreciate the Town's proactive approach in planning growth in Milton, and concur with the recommendations of Town Staff.</p> <p>Milton has become a very desirable community, providing an alternative and more affordable location than the southernmost municipalities of Oakville and Burlington. The lakefront municipalities in Halton have become unaffordable to many and/or first-time home buyers, and Milton has become increasingly attractive as prices in the south continue to rise. The need to address housing affordability has been a priority of the current Provincial government.</p> <p>Growth, in itself, can be identified as a key driver of economic development and necessary to create a larger tax base and create a better opportunity for financial sustainability. Thoughtful and fiscally responsible planning can help increase property values, contribute to public health and ease transport problems. The Town of Milton can be identified as a key driver of economic development, facilitating a larger tax base to create a better opportunity for financial sustainability. The fiscal sustainability of the Town must be a focus for your Growth Management Study/MCR and, ultimately, within your updated Official Plan.</p> <p><b>3.POLICY 2.2.8.2 AND 2.2.8.3 OF THE GROWTH PLAN (2019)</b> - The new policies of the Growth Plan for the Greater Golden Horseshoe have come into force on May 16, 2019, which define the new criteria that the Province will use to evaluate the feasibility and appropriateness of a proposed settlement area boundary expansion. We recognize that the proposed Settlement Area Expansion needs to be justified through the Region's ongoing Growth Management Study/Municipal Comprehensive Review.</p> <p>Milton is a greenbelt municipality and is surrounded by protected and significant natural heritage features all of which are protected by the Greenbelt Plan. The Town also contains a significant, but quickly diminishing prime agricultural area, which has increasingly been replaced by new urban areas. Milton's opportunities for future growth appear to be physically limited by the Greenbelt Area to the north.</p> <p>As referenced above, the subject site immediately contiguous and adjacent to the Southeast Milton Expansion Area to the east. The inclusion of the subject site within the Urban Area, provides for a logical "rounding-out" of the settlement area, which is well demarcated and bounded to the west by the natural heritage system.</p>	

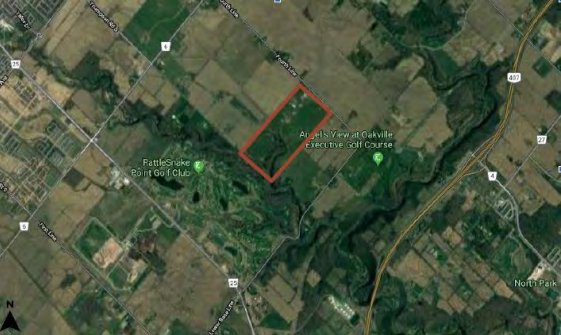


No.	Source	Submission	Response
		<p><b>4. DESIGNATED GREENFIELD AREA DENSITIES</b> – The Town is forecasted to grow to 238,000 persons and 114,000 jobs by 2031. The vast majority of this growth to-date has occurred through the identification of Designated Greenfield Areas, most recently which included the Southeast Milton Expansion Area. Given that Milton is expected to continue to grow at a rapid pace, the identification of new Designated Greenfield Areas is likely required to accommodate new growth, and respond to prevailing market conditions.</p> <p>Recent changes to the Growth Plan have reduced the Region’s minimum Designated Greenfield Area target to 50 persons and jobs combined per hectare, which is effectively a return to the targets that were included in the 2006 Growth Plan. ROPA 38, requires the Town to accommodate a minimum of 58 persons and jobs per hectare. This is a town-wide Greenfield density target, though the Town has approved much higher targets for the Southeast Milton Expansion Area. We believe the current target will:</p> <ul style="list-style-type: none"> <li>• Impact housing affordability by constraining the supply of new land to accommodate Milton’s significant population and employment growth;</li> <li>• Result in a reduction in housing choices, particularly for more traditional ground-oriented housing; and,</li> <li>• Promote an urban structure wherein the greatest densities are located on the periphery of the Town.</li> </ul> <p>We note that many existing greenfield areas in Milton have already been planned, or “committed” at much lower densities. Consequently, the Southeast Milton Expansion Area appears to have been planned at much higher densities to compensate for these lower densities, and results in an average of 70 persons and jobs per hectare. It is also understood that these greenfield densities were an effort by the Town to begin transitioning towards higher greenfield densities that were contemplated by the previous 2017 Growth Plan. The continued lower density housing forms shortage is one of the primary contributing factors to the increase in housing prices in the GTHA.</p> <p>The current greenfield densities are overly aggressive for residential growth, and appear to be disproportionately high to compensate for lower densities elsewhere in Milton. This is not desirable from a regional and local urban structure perspective. Directing greater densities to fringe locations, away from potential existing or planned rapid transit is counterintuitive, and would result in greater congestion and traffic.</p> <p>Overall, we believe that the MCR should require that new growth maintains an appropriate mix of housing types, and densities to serve a wide range of income types, while responding to market conditions. A more diverse array of housing options in Milton can act as an attractor to more, and different types of employment opportunities throughout</p>	

No.	Source	Submission	Response
		<p>the Town. In our opinion, a lower greenfield density target should be considered for urban expansion areas in Milton as part of the MCR.</p> <p><b>5.INTENSIFICATION</b> - The Growth Plan continues to evolve, and requires 50 percent of new residential growth to be within the built boundary. Similar to the discussion on greenfield density, in our opinion, it is essential that the intensification target be reviewed in terms of urban structure, built form, housing mix, housing affordability and marketability perspectives. Rates of intensification have varied across the region and its area municipalities. The majority of new intensification has been planned to occur in Oakville and Burlington, though new higher density-built forms have become increasingly prevalent around the Milton GO Station. Nevertheless, the vast majority of new growth in Milton to-date has been in greenfield areas. Based on historic growth patterns in Milton and market preference to ground oriented housing, it is unlikely that the Town will achieve its forecasted 2041 targets on intensification alone.</p> <p><b>6.LINKING GROWTH WITH INFRASTRUCTURE INVESTMENT</b> – It is our understanding that the subject site will be within proximity to new available water and wastewater services on Fourth Line. This would allow for the orderly, and cost-effective implementation of new planned infrastructure. It is recognized that the allocation of capacity and/or the expansion of facilities are long-term initiatives and that any capacity issues to accommodate long-term growth and development will need to be in your long-term capital planning considerations. Additionally, the subject site would also able to capitalize on existing Highway 407 service, particularly a readily available on-ramp to the highway located on Fourth Line. In the future, transit service may be provided to the Sustainable Halton Lands, of which the subject site would also be able to make efficient use of, to further support the use of transit.</p> <p><b>CONCLUSION</b> Please consider the following as you work through your Growth Management Study/MCR:</p> <ul style="list-style-type: none"> <li>• Capitalize on Milton’s rapid population and employment growth to promote long-term economic development, and financial sustainability;</li> <li>• Consider a reduction in the greenfield density target in Milton to better reflect the demands of the housing market, and to ensure that there is a sufficient supply of more affordable, ground oriented housing forms;</li> <li>• Ensure that there is an appropriate balance between intensification, and new Designated Greenfield Areas to allow for a diverse housing mix that reflects market conditions in Milton;</li> <li>• Work with the Town of Milton to identify new growth opportunities and priorities, including the identification of new employment areas in strategic locations with good access to major goods movement facilities and corridors, and areas well served by transit; and,</li> </ul>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<ul style="list-style-type: none"> <li>• Ensure future expansions to the water and wastewater facilities are considered in long-term capital planning considerations to ensure that land is development ready.</li> </ul> <p>We thank you for providing an opportunity to submit comments, and look forward to future participation in the MCR process. We look forward to meeting with you as work progresses.</p> <p>Please feel free to contact the undersigned, with any questions or comments.</p> <p>Sincerely,</p> <p>Ron Palmer, MCIP, RPP, Principal</p> <hr/> <p><b>Appendix 2</b></p> <p>February 24, 2020  Curt Benson, RPP, MCIP  Director, Planning Services and Chief Planning Official 1151 Bronte Road  Oakville, Ontario, L6M 3L1</p> <p>Re: Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy</p> <p>The Planning Partnership acts for Samuel, Son &amp; Co. Ltd (“landowner”), the owners of the lands at the northwest corner of Fourth Line and Lower Baseline West, known municipally as 5274 Fourth Line, in the Town of Milton (“subject site”). Since our initial letter submission dated August 13, 2019, we have continued to monitor the status of the Region’s Municipal Comprehensive Review (“MCR”) on behalf of the landowner.</p> <p>On October 8, 2019, we met with Halton Region staff to discuss the status of the MCR, as well as the “Progress Update on the Integrated Growth Management Strategy” (June 19, 2019) as it relates to our client’s lands. It is understood that the Region will issue a Draft Growth Concept in September 2020 for consultation based on the input received from local municipalities in Halton. We commend the Region for working with each local municipality in Halton on determining an appropriate urban structure and weighting criteria to accommodate new growth to 2041. We have reviewed the comments that have been provided by each of the local municipalities.</p> <p>We have recently met with the Town of Milton planning staff, who has been proactive in working with the Region in providing for an urban structure that is reflective of local</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>priorities. On January 20, 2020, the Town of Milton issued a report to Council recommending that local Council endorse Option 4B of the Region's Integrated Growth Management Strategy. We concur with the recommendations of local staff, and offer the following for consideration:</p> <ul style="list-style-type: none"> <li>• <b>GROWTH CANNOT BE ACCOMODATED BY INTENSIFICATION ALONE:</b> As noted, all four of the local municipalities are expected to significantly growth in population and employment to 2041. This new growth cannot be accommodated only through intensification, as suggested by the response issued by the Town of Oakville (dated November 20, 2019). Identifying a new urban structure requires a balanced approach of intensification and the identification of new greenfield areas. We reiterate that it is essential that the intensification target be reviewed in terms of urban structure, built form, housing mix, housing affordability and marketability perspectives.</li> <li>• <b>NO REMAINING GREENFIELD AREAS IN OAKVILLE AND BURLINGTON:</b> The southernmost area municipalities of Burlington and Oakville have almost no remaining greenfield areas to accommodate new ground oriented built forms and have been unable accommodate new growth through intensification. Therefore, the majority of any greenfield expansion contemplated by the scenarios would occur in Milton and/or Halton Hills. Based on the current trajectory of the growth in MiltOn, the subject site is an excellent candidate to accommodate new greenfield growth in the Region.</li> <li>• <b>MARKET CONSIDERATIONS:</b> Milton has experienced rapid and continued growth, and has a current market demand to accommodate a balanced mix of a new intensification and new greenfield areas. In addition, the lakefront municipalities of Oakville and Burlington have become unaffordable to many and/or first-time home buyers, and Milton has become increasing attractive as prices in the south continue to rise. Overall, we believe that the MCR should require that new growth maintains an appropriate mix of housing types, and densities to serve a wide range of income types, while responding to market conditions.</li> <li>• <b>URBAN STRUCTURE WEIGHTING CRITERIA:</b> We believe that "Theme 1: Regional Urban System and Local Urban Structure" is the most important from a Region and Local perspective and should be given the highest consideration from a weighing perspective. While all weighting criteria are interconnected, a comprehensive and well-planned urban structure provides a means to direct population and employment growth, ensure the efficient movement and people and goods, protect natural heritage and, and help with resiliency against climate change.</li> </ul>	

No.	Source	Submission	Response
		<p>We respectfully submit this letter for your consideration in advance of the Regional Council Meeting on March 25, 2020. Please feel free to contact the undersigned, with any questions or comments.</p> <p>Sincerely, Ron Palmer, MCIP, RPP, Principal</p> <hr/> <p><b>Appendix 3</b></p> <p>June 11, 2021</p> <p>Curt Benson, RPP, MCIP Director, Planning Services and Chief Planning Official 1151 Bronte Road Oakville, Ontario, L6M 3L1</p> <p>Re: Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy</p> <p>The Planning Partnership acts for Samuel, Son &amp; Co. Ltd (“landowner”), the owners of the lands at the northwest corner of Fourth Line and Lower Baseline West, known municipally as 5274 Fourth Line, in the Town of Milton (“Subject Site”). The Subject Site is approximately 82.1 hectares (200 acres) in lot area (Figure 1).</p>  <p>Figure 1: Subject Site</p> <p>We have continued to monitor the Region’s MCR process since our initial comment letters, dated August 13, 2019, and February 24, 2020 and meeting with Halton Region</p>	<p>Comments are acknowledged. Please see above for a detailed response.</p>

No.	Source	Submission	Response
		<p>staff on October 8, 2019. We would like to correctly note that the site area is indeed approximately 82.1 hectares (200 acres), and not 8.21 hectares (20 acres) as indicated in our August 13, 2019 submission. The property boundaries as shown in Figure 1 (on both letters) remains unchanged and generally shows the extent of our client's lands. We have attached the letters that we previously submitted to the Region on behalf of our client for your reference. We were also in attendance for the Region's recent Public Information Centre (PIC) for the Town of Milton regarding the Regional Official Plan Growth Concepts on May 6, 2021, and we look forward to attending the Region-wide PIC on June 29, 2021. We would again like to reiterate our support for Growth Concept 4 as a balanced approach to growth that incorporates both intensification and new designated greenfield development. We believe Growth Concept 4 represents a healthy and sustainable approach to accommodating growth that would establish a strong foundation for the Region's continued economic success and further build on its reputation as a desirable place to work and live.</p> <p>The Town of Milton Planning Staff (Staff Report DS-028-21 dated May 3, 2021) appear to share our concerns with the Growth Concepts 1, 2 and 3 (and 3B). The Town has instead indicated support for Growth Concept 4, which envisions a balance of intensification and new greenfield areas to support the rapid new growth that is forecast for Halton Region. We agree with the Town of Milton's position, and believe that Growth Concept 4 is the most desirable for the growth of Halton Region.</p> <p>The timing of this letter coincides with an important juncture in the MCR process as the Region nears completion of Phase 2 of the Regional Official Plan Review (ROPR). The Region will move into Phase 3 of its workplan, where a Preferred Growth Concept and Policy Directions Report will be presented for Regional Council's consideration. The timing of this letter also coincides with the preparation of draft Regional Official Plan Amendment 48 (ROPA 48), which will update the current Regional Structure through the delineation of the updated Urban Growth Centres and Major Transit Station Areas, Regional Nodes and Corridors and Employment Areas.</p> <p>We respectfully submit this letter for your consideration. Please feel free to contact the undersigned, with any questions or comments.</p> <p>Sincerely,  Ron Palmer, MCIP, RPP, Principal  Attachments:  Appendix 1 – Comments on the Halton Region MCR in regards to 5274 Fourth Line, Milton dated August 13, 2019  Appendix 2 – Comments on the Halton Region MCR in regards to Integrated Growth Management Strategy dated February 24, 2020</p>	