

May 16, 2022

Curt Benson, MCIP, RPP  
Director of Planning Services and Chief Planning Official  
Regional Municipality of Halton  
1151 Bronte Road  
Oakville, Ontario  
L6M 3L1

Dear Mr. Benson:

### Re: Draft Regional Official Plan Amendment No. 49

Thank you for the opportunity to provide comments on draft ROPA 49.

ROPA 49 is intended to implement a Modified Preferred Growth Concept as directed by Regional Council on February 16, 2022. ROPA 49 sets population and employment forecasts of 931,000 and 420,000 jobs respectively to 2041 with all development to be accommodated within existing settlement area boundaries in accordance with the findings of the updated Land Needs Assessment prepared by Hemson Consulting Ltd in March 2022. The majority of additional growth beyond what was established through ROPA 38 to the 2031 planning horizon is being allocated to Oakville and Burlington. Our understanding is that an additional 169,000 residents and 80,000 jobs will have to be allocated to the local municipalities to the 2051 planning horizon through a future amendment. The updated Land Needs Assessment also indicates that additional urban land will be required post 2041 to meet the 2051 growth forecasts.

Please note that based on the meeting with Regional staff on April 29<sup>th</sup>, 2022, it is anticipated that additional updates to the ROPA 49 Employment Area policies will be made that have the effect of continuing to recognize existing local official plan policies that were in effect as of December 16, 2009. In addition, updated HPBATS/GTA West Corridor Protection Policies are under consideration that, among other matters, would reduce the amount of land within the Town subject to these policies. Therefore, these comments are subject to change once a thorough review of the final draft ROPA is completed.

Town Staff have reviewed draft ROPA 49 and can offer the following comments for your review and consideration:

- The Region's Employment Area policies prohibit major retail uses. Notwithstanding this, the Regional Official Plan contained a policy – 83.2 1 a) - that recognized existing local official plan permissions as of December 16, 2009, within the Employment Area. This policy was specifically requested by the Town during the to recognize our Gateway land use designations within the Premier Gateway located at the intersections of Steeles Avenue with James Snow Parkway, Trafalgar Road and Winston Churchill Blvd. The Gateway designation permits a broad range of uses, including retail. It

should be noted that the Gateway locations are also currently zoned for such uses. To date, Toronto Premium Outlets has developed in accordance with these permissions. P.A.Z. Properties has also expressed interest through the pre-consultation process in developing commercial uses, including retail on their lands located at the southwest intersection of Steeles and Trafalgar.

We understand from our meeting on April 29<sup>th</sup>, 2022, that the Region is replacing policy 83.21 a) with a new policy intended to recognize existing local official plan permissions for the Gateway land use designation. We look forward to seeing this new policy and to have an opportunity to review it prior to the adoption of ROPA 49 by Regional Council.

- Based on our meeting with Regional staff on April 29<sup>th</sup>, 2022, new corridor protection policies will be proposed through ROPA 49 which will protect a Primary Corridor (which aligns with the Hwy 413 Technically Preferred Route), a Secondary Corridor (which aligns with the Focus Analysis Area) and the HPBATS improvement Area. Town staff are currently looking at the implications of imposing corridor protection policies to the Secondary Corridor Area on the Premier Gateway Phase 2B project and our available employment land supply. Further discussion with the Region may be required.
- In a Halton Hills context, planned growth to 2031 as set out in the approved Regional and Halton Hills Official Plans is essentially now being distributed over an extended planning horizon. The financial ramifications of this for the Town are not clear. Assuming servicing is provided in a timely manner and corridor protection issues are resolved, it is questionable that the Town's designated greenfield and employment land supply will last until 2041. There is significant interest in the Town as demonstrated through the 2020 allocation program and the Town's Business Concierge Program. As presented by the Region on February 9, 2022, earlier work supporting the Integrated Growth Management Strategy suggested that urban land supply across the Region as a whole would last until the mid-late 2030s.
- The Town's approved minimum intensification target is 5,100 units to the 2031 planning horizon. The Town's updated Intensification Opportunities Study suggested a potential range of 5,177-7,575 units. ROPA 49 sets a minimum intensification target of 3600 units inside the built-up area to the 2041 planning horizon; the regional phasing numbers suggest 3,730 units. The reasons for this reduction by the Region over an extended planning horizon are unclear. Considering that intensification policy minimums will become de facto maximums as part of the next update to the Best Planning Estimates, it would be appropriate to consider additional intensification opportunities to provide the Town with increased flexibility. Further discussions would be beneficial in this respect prior to the adoption of ROPA 49 by Regional Council.



- The phasing provisions in ROPA 49 allocate 6,950 units within the Town's Designated Greenfield Areas between 2022 and 2041. (Note – The Vision Georgetown Secondary Plan, currently under appeal, contemplates 6,646 units with additional units under consideration through the preparation of Secondary Plans for Southeast Georgetown and Stewarttown). This represents a reduction in the number of units over an extended planning horizon vis a vis the approved Regional and Halton Hills Official Plans. The majority of the units are anticipated to be built between 2022 and 2031. Confirmation is required from the Region that the extended planning horizon will not adversely impact the timing for future allocation programs required to accommodate planned growth.

### **Georgetown and Acton MTSAs**

- Town staff are seeking confirmation from the Region as to whether setting the density targets for the Halton Hills Major Transit Station Areas (MTSAs) could be set through the next ROPA, while still being able to gain Protected Major Transit Station Area (PMTSA) status. We believe further discussions are required regarding the appropriate density targets for the Acton and Georgetown MTSAs.

If you have any questions or require clarification on any of the comments provided in this letter, please feel free to contact myself or Bronwyn Parker, Director of Planning Policy directly.

Sincerely,

John Linhardt, MCIP, RPP  
Commissioner of Planning and Development