

REPORT

REPORT TO: Chair and Members of Planning, Public Works and Transportation

Committee

REPORT FROM: John Linhardt, Commissioner of Planning and Sustainability

DATE: February 8, 2019

REPORT NO.: PLS-2019-0016

RE: Growth Plan for the Greater Golden Horseshoe – Proposed

Amendment No. 1

RECOMMENDATION:

THAT Report No. PLS-2019-0016 dated February 8, 2019 regarding Proposed Amendment No. 1 to the Greater Golden Horseshoe Growth Plan be received:

AND FURTHER THAT the Minister of Municipal Affairs be requested to support the final approval of ROPA No. 47 including the rephasing of the portion of the Hodero lands outside of GTA West Corridor Protection in a timely fashion:

AND FURTHER THAT staff and legal counsel be directed to work with Ministry staff and the Region to identify appropriate mechanisms for achieving these goals such as clear policy direction in Amendment No. 1 to the Growth Plan, provisions in the transition regulation and/or other measures that facilitates the final approval of ROPA No. 47 and the rephasing of the portion of the Hodero lands outside of GTA West Corridor Protection;

AND FURTHER THAT the Minister be requested to set the minimum density target for Designated Greenfield Areas (DGA) in Halton at 60 residents and jobs per hectare rather than the 50 residents and jobs per hectare proposed in Amendment No. 1;

AND FURTHER THAT the Minister build in flexibility to the Growth Plan to enable municipalities to set contextually appropriate targets for Major Transit Station Areas (MTSAs) based on bona fide redevelopment sites and opportunities while protecting surrounding stable residential neighbourhoods;

AND FURTHER that the Minister not include lands within the Future Strategic Employment Areas (FSEA) in Provincially Significant Employment Lands at this time. Alternatively, if the Minister is looking to definitively identify such lands for long-term planning purposes, equal consideration must be given to FSEA located within Halton

Hills which are strategically located vis a vis Highway 401, the 407ETR and the proposed GTA West Corridor;

AND FURTHER THAT the Minister incorporate flexible policy language in Section 2.2.5 of the Growth Plan (Employment) to clearly facilitate employment generating uses that support more traditional Employment Uses and/or tourism uses;

AND FURTHER THAT the current wording of Policy 2.2.1 e) pertaining to the use of site and urban design standards to achieve high quality development as set out in the 2017 Growth Plan be maintained:

AND FURTHER THAT the Minister consider the contents in Council Resolution 2019-0025 passed on February 11, 2019 as well as the MEM-PLS-2019-0001 regarding climate change and greenhouse gas emission reductions;

AND FURTHER THAT a copy of this report be forwarded to the Premier of Ontario, Doug Ford, the Honourable Steve Clark, Minister of Municipal Affairs, the Honourable Todd Smith, Minister of Economic Development, Job Creation and Trade, the Honourable Rod Phillips, Minister of Environment, Conservation and Parks, the Honourable Michael Tibollo, Minister of Tourism, Culture and Sport, Ted Arnott, MPP Wellington-Halton, appropriate Ministry of Municipal Affairs and Housing staff, the Region of Halton, the City of Burlington, the Town of Milton and the Town of Oakville.

BACKGROUND:

The Growth Plan for the Greater Golden Horseshoe came into effect on July 1, 2017 in accordance with the Places to Grow Act and replaced the 2006 version of the Plan. Staff previously reported on the 2017 Growth Plan through a Council Workshop and Report No. PLS-2017-0020.

In the fall of 2018, the Province began a series of technical working group sessions with the municipal and development sectors to discuss Growth Plan implementation challenges.

On January 15, 2019, the Ministry of Municipal Affairs and Housing released proposed Amendment No. 1 to the 2017 Growth Plan for the Greater Golden Horseshoe with a commenting deadline of February 28, 2019. According to the material included on the Ministry of Municipal Affairs and Housing website, "the proposed changes are intended to address potential barriers to increase the supply of housing, creating jobs and attracting investments". The proposed Amendments deal with the following policy areas:

- Settlement Area Boundary Expansions
- Intensification and Density Targets
- Major Transit Station Areas
- Employment Planning
- Small Rural Settlement Areas
- Agricultural and Natural Heritage Systems

In addition, the Province's website indicates that the "Minister is also seeking feedback as to whether there are any specific planning matters (or types of matters) in process that should be addressed through the transition regulation. This could include, for example official plan or official plan amendments that have been adopted and are currently under appeal".

It should be noted that substantial sections of the Growth Plan remain unaltered by the proposed changes.

The purpose of this report is to summarize and provide comments on the proposed amendments.

COMMENTS:

1. Settlement Area Boundary Expansions

The Province has indicated that they want to facilitate "local municipal decisions on reasonable changes to settlement areas boundaries in a timely manner so as to unlock land faster for residential and commercial development that supports more jobs and housing". Specific components of the proposed amendment include:

- a) Clarifying the policies to focus on outcomes rather than specifying types of studies to justify the feasibility and location of settlement area boundary expansions;
- b) A new policy that allows municipalities to adjust settlement area boundaries outside of a municipal comprehensive review¹ (MCR) if there is no net increase in land within settlement areas subject to criteria such as supporting a municipality's ability to meet the intensification and density targets established by the Growth Plan, meeting settlement area boundary expansion tests, and availability of municipal water and wastewater services;²
- c) A new policy that allows municipalities to undertake settlement area boundary expansions that are no larger than 40 hectares outside the MCR, subject to criteria that is similar to that referenced above with appropriate adjustments³.

Discussion

As drafted, the policy referenced in b) above appears to suggest that a settlement area boundary could be adjusted but that a corresponding reduction or down designation would be required elsewhere to maintain a no net increase in land within a settlement area. The overall policy intent has some similarities with the no net loss approach

¹ Municipal Comprehensive Review (MCR) is defined by the Growth Plan as "a new official plan, or an official plan amendment, initiated by an upper or single-tier municipality under Section 26 of The Planning Act that comprehensively applies the policies and schedules of this Plan".

² This policy would not apply to settlement areas located within the Greenbelt such as Acton.

³ The additional lands and forecasted growth need to be included in the land needs assessment associated with the next municipal comprehensive review.

followed by the Town and the Region with respect to the mitigating impacts associated with HPBATS/GTA West Corridor Protection on the Halton Hills Premier Gateway (ROPA 47, OPA 30, 31 A and 31 B). In this regard, through comprehensive study as part of the Phase 1B process, the Town and the Region identified 75 hectares of replacement employment land supply to compensate for employment lands located south of Steeles in the eastern section of the Halton Hills Premier Gateway that have been effectively frozen as a result of Corridor Protection requirements. Schedule One shows the identification of these lands in relation to the existing Halton Hills Premier Gateway.

As Committee will recall, the Ministry of Municipal Affairs and Housing and Hodero Holdings appealed ROPA 47 in the spring of 2018 to LPAT. The Ministry appeal essentially stipulates that ROPA 47 must be considered in the context of a MCR in accordance with the 2017 Growth Plan. Hodero's appeal requests that the portion of their lands located outside of the limits of HPBATS/GTA West Corridor Protection be rephased from the 2021-2031 time horizon to pre-2021.

Without further clarification from the Ministry on how the policy identified in b) above would be implemented, we cannot definitively say whether this represents a solution to the Provincial appeal filed against ROPA 47.

The policy referenced in c) above would permit settlement area boundary expansions up to 40 hectares outside of a municipal comprehensive review. Although the Town and the Region have not characterized ROPA 47 as a settlement area boundary expansion, the proposed policy could provide a basis for the Ministry to reconsider their appeal before LPAT. The 40 hectare limit though would only accommodate about one half of the replacement employment lands identified in ROPA 47 and the Phase 1B Secondary Plan (OPA 30 and 31B).

It should be noted that on December 10, 2018, the Mayor and Town staff met with the Honourable Steve Clark, Minister of Municipal Affairs and Housing to discuss the Ministry appeal of ROPA 47 and the on-going challenges associated with Corridor Protection requirements on the Premier Gateway. Mayor Bonnette sent a follow up letter dated January 22, 2019 to the Minister. This letter is attached as Schedule Two to this report.

Recommendation

That the Minister be requested to take the necessary steps to support the final approval of ROPA No. 47 including the rephasing of the portion of the Hodero lands outside of GTA West Corridor Protection in a timely fashion. This could be accomplished, for example, by incorporating clear policy direction in proposed Amendment No. 1 to the Growth Plan, appropriate provisions in the transition regulation and/or other measures to unlock economic development opportunities within these lands in a timely fashion.

2. Intensification Targets

The 2006 Growth Plan established a minimum intensification target of 40 % of new units to be located within the built boundary⁴ for upper and single tier municipalities for the 2015-2031 planning horizon. The 2017 Growth Plan revised these targets as set out in Table 1 to the 2041 planning horizon.

Table One – Growth Plan (2017) Minimum Intensification Targets

Timeline	Minimum Intensification Target
Until the completion of the next MCR	40 %
From the next MCR until 2031	50%
2031-2041	60%

The Province is now proposing to establish differing intensification targets inside the built boundary for upper and single tier municipalities in the Greater Golden Horseshoe based on geographic location. The targets for Inner Ring municipalities, which would come into effect at the next MCR with no further increase in 2031, are set out in Table 2 below:

Table Two – Proposed Minimum Intensification Targets

Upper or Single Tier Municipality	Minimum Intensification Target
Hamilton	60%
Peel	60%
York	60%
Durham	50%
Halton	50%

Discussion and Recommendation

The revised minimum intensification targets take into account different locational and community attributes as well as market demand considerations. The key difference in the targets for Halton relates to the post 2031 period where the minimum intensification target would remain at 50 % rather than increasing to 60%. Given that it can take time for intensification to ramp up in light of the need for larger sites and/or land assembly requirements, the presence of existing uses that have economic value and the newer development pattern that exists in Halton and the local municipalities, this is not an unreasonable change.

Regardless, a significant amount of future growth will still have to be accommodated inside the built boundary of the four local municipalities through infill and intensification.

⁴ The 2006 Growth Plan defines the built boundary as "the limits of the developed urban area as defined by the Minister of Infrastructure in accordance with Policy 2.2.3.5". The definition was updated in the 2017 Growth Plan and is now referred to as the delineated built boundary.

It should also be noted that 50% intensification rate is a minimum target which can be exceeded if the work done at the local and Regional level through the current Regional Official Plan review supports such a course of action.

Given the foregoing, staff does not have any concerns at this time with the proposed revisions to the minimum intensification target.

3. Designated Greenfield Area Density Targets

With respect to Designated Greenfield Area (DGA) density targets, the original Growth Plan established a minimum density target of 50 residents and jobs per hectare. This was revised in the 2017 Growth Plan as follows⁵:

Table Three – Growth Plan (2017) DGA Minimum Density Targets

Timeline	Minimum Density Target
Existing DGA - Until the completion of the next MCR	50 residents + jobs per ha
Existing DGA - After the next MCR until 2031	60 residents + jobs per ha
New DGA post 2031	80 residents + jobs per ha

The province is now proposing to revise these targets for Inner Ring municipalities⁶ as shown in Table Four below:

Table Four - Proposed Minimum DGA Density Targets

Upper or Single Tier Municipality	Minimum DGA Target
Hamilton	60 residents and jobs per ha
Peel	60 residents and jobs per ha
York	60 residents and jobs per ha
Durham	50 residents and jobs per ha
Halton	50 residents and jobs per ha

⁵ The designated greenfield target was measured across both greenfield residential and employment areas in the 2006 Growth Plan. Employment Areas, such as the Halton Hills Premier Gateway, were excluded from DGA target in the 2017 Growth Plan.

⁶ The Growth Plan stipulates that the Inner Ring is comprised of the cities of Toronto and Hamilton and the Regions of Durham, Halton, Peel and York.

Discussion and Recommendation

In staff's view, the minimum 80 residents and jobs per hectare target established for DGA by the 2017 Growth Plan is extremely challenging to achieve. In this regard, although land extensive uses such as schools, parks and stormwater management ponds are integral component of a complete community, they need to be offset by other land uses from a density perspective. The Town has direct experience with this with the Vision Georgetown Secondary Plan which has a minimum DGA density target of 60 residents and jobs per hectare despite over 50% of the housing mix intended for medium and high density development.

Notwithstanding the foregoing, we do not see the need to reduce the minimum DGA target to 50 residents and jobs per hectare. Instead, we suggest the target be set at 60 residents and jobs per hectare similar to what is proposed in Peel, York and Hamilton.

4. Major Transit Station Areas

Major Transit Station Area (MTSA) is currently defined by the Growth Plan as:

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 radius of a transit station, representing about a 10 – minute walk.

The Growth Plan sets a minimum density target of 150 residents and jobs combined per hectare for MTSAs that are served by the GO Transit rail network on Priority Transit Corridors identified by Schedule 5 to the Growth Plan.

The Acton and Georgetown GO Stations are considered to be MTSAs in the context of the Growth Plan. Neither station is currently located on a Priority Transit Corridor.

Proposed amendments to the Growth Plan include the following:

- Revised policies for establishing alternative targets that reflect on the ground realities;
- b) A new policy that allows municipalities to delineate and set density targets for MTSAs in advance of a municipal comprehensive review; and,
- c) Clarification that MTSAs can range from 500 to 800 metres

Discussion and Recommendation

As noted above, the Acton and Georgetown MTSAs are not located on a Priority Transit Corridor as defined by the Growth Plan. As such, the 150 residents and jobs minimum target does not currently apply. Given that much of the land area within both MTSAs are within stable residential neighbourhoods, achieving that target over the 500-800 metre

radius would be extremely challenging. Arguably, the focus should be on establishing appropriate densities on areas that have been identified as having redevelopment potential through comprehensive study undertaken at the local level. This was the approach that was successfully followed by the Town in developing the Georgetown GO Station Mill Street Corridor Secondary Plan (OPA 7) in 2010.

Should, at some point in the future, the Acton and Georgetown MTSA be located on a Priority Transit Corridor, the ability for the Minister to approve an alternative target is considered to be appropriate. Alternatively, the Province could build in flexibility to the Growth Plan to enable municipalities to set contextually appropriate targets for MTSAs based on bona fide redevelopment sites and opportunities while protecting stable residential neighbourhoods.

5. Employment Areas

Proposed changes to the Growth Plan include the following;

- a) The introduction of Provincially Significant Employment Zones identified by the Minister of Municipal Affairs and Housing that must be protected and cannot be converted. Schedule One shows the location of such zones in the Town and Halton Region more generally.
- b) Removal of the Prime Employment Area designation set out in the 2017 Growth Plan:
- c) Creating a one-time window to allow municipalities to undertake some employment conversions between Amendment No. 1 to the Growth Plan coming into effect and their next MCR subject to criteria;
- d) Allowing municipalities to set multiple density targets for employment areas rather than setting a single target;
- e) Modified policies regarding locating and preserving employment areas adjacent to major goods movement facilities and corridors;
- f) A new policy that requires municipalities to retain space for a similar number of jobs when redeveloping employment lands;
- g) Clarification that within existing office parks, non-employment uses should be limited:
- h) A new policy that requires municipalities to provide for an appropriate interface to maintain land use compatibility between employment areas and adjacent non-employment areas.

Discussion and Recommendation

One of the most notable proposed changes to the employment policies is the introduction and mapping of Provincially Significant Employment zones. In a Halton Hills context, it includes the Mansewood Industrial lands and only lands in the Premier Gateway south of Steeles Avenue (see Schedule Three). It is unclear why the lands on the north side of Steeles Avenue have been excluded from this category. Given the

locational attributes and similar policy framework, staff would suggest that all lands within the Premier Gateway are provincially significant.

Staff also notes that Provincially Significant Employment zones have been identified on the west side of the north-south leg of Highway 407ETR in the Town of Milton (see Schedule Three). These lands are identified as Future Strategic Employment Areas (FSEAs) in the local and Regional Official Plans. No FSEAs within Halton Hills have been included within the proposed Provincially Significant Employment Zones⁷.

As Council, may recall FSEAs are lands that are strategically located with respect to major transportation facilities and existing Employment Areas. Although FSEA are considered suitable for employment uses beyond the 2031 planning horizon, such lands are not included inside the urban boundary and are subject to MCR requirements. Including such lands within the provincially significant employment zones has the potential to preempt the results of the Regional Official Plan Integrated Growth Management Strategy including the allocation of additional employment growth and lands to the local municipalities, including the Town. Based on the results emerging from the Town's Employment Land Needs Study, it is anticipated that we will require additional employment lands within our FSEA located in proximity to the Premier Gateway.

Given the foregoing it is suggested that the Province not include lands within the FSEAs in Provincially Significant Employment Lands at this time. Alternatively, if the Minister is looking to definitively identify such lands for long-term planning purposes, equal consideration must be given to FSEAs located within Halton Hills which are strategically located vis a vis Highway 401, the 407ETR and the proposed GTA West Corridor. As Council may recall the Provincial Government has indicated that they intend to resume the GTA West EA.

Staff also notes that the Employment Area policies "stipulate that municipalities should designate and preserve lands within settlement areas located adjacent to or near major goods movement facilities and corridors including major highway interchanges, as areas for manufacturing, warehousing and logistics and appropriate associated uses and ancillary facilities". Although it is important to plan for such uses, there should be flexibility within the policies to provide for other employment generating uses that support the broader Employment Area and/or provide tourism opportunities. This could include offices, hotels, conference centres and limited retail opportunities. A good example of such an approach is the existing Gateway Area designations located at the 401 interchanges with James Snow Parkway, Trafalgar Road and Winston Churchill Boulevard contained within the broader Halton Hills Premier Gateway Area.

6. Rural Settlement Areas

The proposed policy changes include the following:

⁷ In a Halton Hills context, FSEAs are located in proximity to Highways 401 and 407ETR and the proposed HPBATS/GTA West Corridor.

- a) The identification of the new defined term **rural settlement** as a subset of **settlement areas** and the removal of **undelineated built up areas**;
- b) Excluding Rural Settlement Areas such as Glen Williams and Norval from the DGA;
- c) Permitting the minor rounding out of rural settlements outside of a MCR and subject to criteria such as maintaining the rural character of the area.

• Discussion and Recommendation

Staff does not have any concerns with the proposed policy changes. The exclusion of Rural Settlement Areas from the DGA is logical and appropriate given the limited amount of and very low density nature of development within such communities.

It should be noted that the proposed minor rounding provision would not apply to communities located in the Greenbelt (e.g. Norval, Ballinafad, and Bannockburn). Logical boundaries for these communities have been previously established by the Town through earlier planning processes. On this basis, the exclusion of such communities from the minor rounding provision does not raise any concerns.

7. Agricultural and Natural Heritage Systems

The proposed amendments include the following:

- a) Specification that the provincial mapping of the agricultural land base and the Natural Heritage System for the Growth Plan does not apply until it has been implemented in upper and single tier Official Plans;
- b) Before the mapping is integrated into upper and single tier official plans, the Growth Plan policies for protecting prime agricultural areas and the NHS will apply to existing municipal mapping;
- c) Specification that the upper and single tier municipalities can refine and implement provincial mapping in advance of the municipal comprehensive review;
- d) Specification that once provincial mapping of the agricultural land base has been implemented in official plans, further refinements may only occur through a MCR.

Recommendation

The Province introduced provincial mapping of the agricultural land base and the Natural Heritage System as part of the 2017 Growth Plan. The need for this additional provincial mapping was never entirely clear given the detailed work already undertaken on such matters by municipalities. Nevertheless, to the extent that the Province wishes to maintain the mapping, the proposed amendments are considered to be appropriate.

7. Other Policy Matters

Urban Design

The proposed amendment would revise Policy 2.2.1 e) by deleting references to the use of site and urban design standards to achieve high quality development. The revised wording is much more general in nature and refers to compact built form and a vibrant public realm.

The delivery of high quality built form and attractive public realm is critical particularly within the context of infill and intensification and more compact greenfield development patterns. To that end, the current wording of Policy 2.2.1 e) as set out in the 2017 Growth Plan is preferred.

Climate Change

The major change in Proposed Amendment No. 1 relates to deleting references to the previous Provincial government's Climate Change Strategy and referencing the new government's Preserving and Protecting our Environment for Future Generations: A Made in Ontario Environment Plan. This also includes a revised greenhouse gas emission target of 30 percent below 2005 levels by 2030.

Staff has already provided comments on the Province's revised Environmental Plan that are summarized in MEM-PLS-2019-0001. In addition, on February 11, 2019, Council passed a resolution calling for the Province to adopt a robust impactful Climate Action Strategy to ensure that Ontario make a positive contribution towards Canada meeting its Climate Change commitments. The resolution also requests that the federal government fast track measures to address Climate Change and consider making the goal of reducing Canada's GHG emissions more ambitious. A copy of that resolution is attached to this report as Schedule Four.

Public Service Facilities

Proposed Amendment No. 1 does not contemplate any policy changes to Public Service Facilities⁸. Such facilities include schools, which are a critical component of a complete community. Although currently not a significant issue in Halton Hills, the timely provision of schools has been a challenging issue in other communities within Halton Region. The Province is encouraged to ensure that adequate funding is provided to ensure that schools required to accommodate growth are delivered in a timely fashion.

⁸ The Growth Plan defines public service facilities as lands, buildings and structures for the provision of programs and services provided or subsidized by a government or other body, such as social assistance, recreation, police and fire protection, health and educational programs, and cultural services. Public service facilities do not include infrastructure.

Acton

The Town has recently been focusing on various initiatives to enhance investment within the Community of Acton, including collaborating with the Acton BIA to support downtown vitality and actively marketing the Halton Hills Industrial Park. The limited supply of affordable housing and intensification sites remains an on-going challenge.

Proposed Amendment No. 1 does not change the applicable policies as they relate to the Community of Acton. The 2017 Growth Plan framework stipulates that growth will be limited in settlement areas that are located in the Greenbelt. The expansion policies are more restrictive than that contained in the original Greenbelt Plan. In this regard, any proposed expansion must be modest in size, representing no more than a 5 percent of the geographic size of the community up to a maximum size of 10 hectares. In addition, residential development is limited to 50% of any expansion area.

RELATIONSHIP TO STRATEGIC PLAN:

The Town's Strategic Plan contains nine strategic directions complemented by Goals and Strategic Objectives. This report relates extensively to all of the strategic directions with a particular emphasis on those that are related to growth management. Some of the more pertinent Strategic Objectives include the following:

- A.1 To promote an adequate supply of housing and range of housing choices to meet the needs of present and future residents, including affordable, accessible and seniors housing.
- C.1 To ensure an adequate supply of employment lands to provide flexibility and options for the business community and provide a range of job opportunities.
- C.4 To protect strategic employment lands from conversions to non-employment uses.
- C.5 To aggressively promote all of the Town's employment areas, including the opportunities provided by the 401/407 Employment Corridor.
- E.2 To recognize, protect, and enhance the established network of rural settlement areas that support and contribute to the countryside character of the Town.
- G.1 To provide for a moderate scale of growth that is in keeping with the Town's urban structure and protects its rural character.
- G.7 To ensure that the character and stability of existing residential neighbourhoods is maintained when accommodating growth.
- G.8 To promote the identification of strategic employment land reserves to accommodate employment growth beyond 2031.

- G.10 To promote intensification and affordable housing in appropriate locations within the Town.
- I.1 Support Council and staff participation in efforts to advocate for issues important to the Halton Hills community.
- 1.6 To participate fully in Region wide-initiatives to protect and promote the Town's objectives

FINANCIAL IMPACT:

There is no immediate financial impact associated with this report.

CONSULTATION:

The CAO and staff in Economic Development and Strategic Planning as well as legal counsel were consulted during the preparation of this report.

PUBLIC ENGAGEMENT:

There is no public engagement associated with or required for purposes of preparing this report.

SUSTAINABILITY IMPLICATIONS:

The Town is committed to implementing our Community Sustainability Strategy, Imagine Halton Hills. Doing so will lead to a higher quality of life.

The recommendations outlined in this report are linked to the Economic, Environmental and Social Pillars and in summary the alignment of this report with the Community Sustainability Strategy is Good.

COMMUNICATIONS:

A copy of this report and accompanying Council resolution will be submitted to the Honourable Steve Clark, Minister of Municipal Affairs and Housing, the Honourable Todd Smith, Minister of Economic Development, Job Creation and Trade, the Honourable Rod Phillips, Minister of Environment, Conservation and Parks, Ted Arnott, MPP Wellington-Halton, appropriate Ministry of Municipal Affairs and Housing staff, the Region of Halton, the City of Burlington, the Town of Milton and the Town of Oakville.

CONCLUSION:

This report has summarized and provided commentary on proposed policy changes set out in Growth Plan Amendment No. 1. In our view, most of the proposed policy changes are considered to be appropriate. Specific areas of concern with accompanying recommendations for enhancements have also been identified. These include:

- the need for clear enabling policies to facilitate the final approval of ROPA 47 and the Halton Hills Premier Gateway Phase 1B Secondary Plan to unlock employment opportunities and assessment growth in a timely manner;
- the location of lands within the proposed Provincially Significant Employment Zones and the potential to pre-empt the Region Official Plan Integrated Growth Management Strategy with adverse impacts on Halton Hills;
- ensuring flexibility for planning of employment lands and MTSAs;
- the reduction of minimum DGA targets from 80 residents and jobs per hectare to 50 residents and jobs per hectare is seen as unnecessary. A minimum target of 60 residents and jobs per hectare is viewed as reasonable;
- Maintaining the current Growth Plan Policy 2.2.1 e) pertaining to the use of site and urban design standards to achieve high quality development;

It is recommended that Council endorse the recommendations set out in this report. A copy of the report and accompanying Council resolution should be submitted to the Province, the Region of Halton, the City of Burlington, the Town of Milton and the Town of Oakville.

Reviewed and Approved by,

Drent Warshall

Brent Marshall, Chief Administrative Officer