

WESTON CONSULTING

planning + urban design

Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON
M7A 2J3

October 6, 2022
File 10566

**RE: Planning Opinion Letter – Urban Boundary Expansion Request for Consideration
Region of Halton Official Plan Review
8469 Trafalgar Road, Town of Halton Hills**

Weston Consulting has been retained by the owners 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 under the Region of Halton Official Plan Amendment 49 (OPA 49).

Site Description

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 80.1 hectares (197.9 acres).

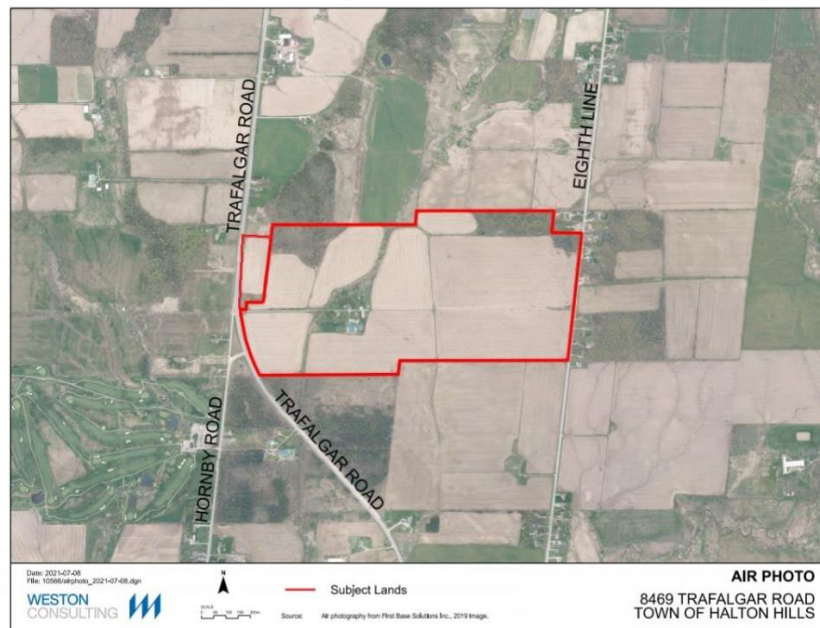


Figure 1: Subject Lands Boundary

The subject lands are located in proximity (a 15-minute walk) to soft infrastructure such as a shopping centre, a school, a place of worship, a community centre and a golf course. In our planning opinion the subject lands are underutilized and should be included in Urban Boundary as specified by the Regional Official Plan Review process as they offer further opportunities for community growth and economic engagement.

Background

The Regional Official Plan Amendment No. 48 was adopted by Regional Council on July 6, 2021 to define a Regional Structure which is key to the Region's Integrated Growth Management Strategy. One of the Key Principles for Preferred Growth Concept is providing a complete spectrum of employment opportunities. This principle will begin to shift significant future employment growth from Employment Land Employment into Major Office Employment directed to Strategic Growth Areas and existing Employment Areas. In addition, the Region would provide an adequate supply of new Employment Area in Milton and Halton Hills to accommodate market demand for advanced manufacturing, logistics/warehousing and supportive uses which require access to 400 series highways. Halton Hills supports a three-pronged 2051 growth strategy: Built-Up Area intensification, focused on key SGAs; compact residential/mixed-use Designated Greenfield Area development; and Employment Areas development. Halton Hills supports approx. 350 gross ha of new employment land.

The subject lands were initially included in the draft supplementary study, however, they were then omitted from urban expansion in the final approved OP. The reason why these lands were omitted was never provided by Regional Staff despite efforts to describe the suitability of an employment expansion for these lands. We are now asking that the Ministry of Municipal Affairs and Housing considers this request for inclusion in the Urban Expansion Boundary based on the following planning assessment.

Inclusion of adjacent lands in the Urban Expansion Boundary vs. the subject lands

The lands abutting the subject lands to the south are comprised of dense woodlands. These lands have been included in the Urban Area Boundary as shown in "Concept 3" of the "Integrated Growth Management Strategy, dated Feb 2021". Meanwhile the subject lands with flat topography and devoid of any significant Natural Heritage features are excluded from Urban Expansion Area.

In addition, land to the southeast of the subject lands are designated as Employment Area in the Regional Official Plan. Those lands are identified as Prime Agricultural Area as shown on Map 1E (Agricultural System and Settlement Areas map) of the Regional Official Plan. However, the subject lands of same designation are being excluded from Urban Boundary. The inclusion of subject lands into Urban Expansion Boundary would not negatively impact the availability of farmland in the region as subject lands are devoid of any specialty crop area.

Land Need Assessment Study

A Land Need Assessment Study was prepared by Hemson Consulting that concludes there is a requirement for the inclusion of more lands to accommodate growth through 2051. This Land Needs Assessment (LNA) is one of several reports that form part of Hemson Consulting's retainer with the Region of Halton to prepare background studies to support the Region's Official Plan update, or Halton Integrated Growth Management Strategy (IGMS).

The Region has completed a detailed assessment of five Growth Concepts which examined different rates of intensification and density throughout the Region. These Growth Concepts were evaluated and made available for public consultation, resulting in the development of a Preferred Growth Concept. This report determines the land needs for the Region to accommodate population and employment forecasts to 2051 as it relates to a Preferred Growth Concept, which aligns with the forecasts contained in Schedule 3 in A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (the Growth Plan). The Land Needs Assessment uses a methodology prescribed by Growth Plan policy 2.2.1.5 and considers regional and local market trends, the demand for housing, lands required for employment activities, the Region's and local municipal current land supply, and the policy requirements of the Growth Plan.

Based on the Land Needs Assessment, the Region requires additional land to accommodate long-term population and employment growth to 2051 established by Schedule 3 to the Growth Plan. The table below identifies the anticipated Community and Employment Area land need which is 400 ha of Employment Area in the Town of Halton Hills. Given the limited availability of future urban lands in the communities of Burlington and Oakville, urban boundary expansions are proposed in Milton and Halton Hills.

MUNICIPALITY	COMMUNITY AREA (HA)	EMPLOYMENT AREA (HA)	TOTAL LAND NEED (HA)
Milton	700	670	1,370
Halton Hills	350	400	750
TOTAL	1,050	1,070	2,120

Summary

Based on the planning analysis conducted, we ask that the following summarized points be considered:

- The subject lands have dual frontage on Trafalgar Road and Eighth Line.
- The subject lands are located along a major arterial regional road and in close proximity to Hwy 401, Hwy 407, and the future Hwy 413.
- A portion of the subject land's Trafalgar Road frontage has recently been expropriated to accommodate the road widening to 4 lanes (slated for 6 lanes), the inclusion of a multi-use pedestrian pathway, and the addition of new water mains.

- Along the 8th line frontage of the subject land, the road is scheduled to be widened to 3 lanes, and a new wastewater main is under construction.
- The subject lands are in close proximity to community and recreational facilities.
- The subject lands are not within Specialty Crop Area.
- The subject lands are fairly flat.
- The subject lands do not comprise of any significant dense woodlots.
- The watercourse on the subject lands is a farming drainage ditch.
- Adjacent lands southeast of the property have the same designation as Prime Agricultural Areas that are already included in urban boundary as Employment Areas.
- Adjacent lands south of the property are comprised of dense woodlots and are already included in the Urban Areas.
- **According to the Land Needs Assessment Study prepared by Hemson Consulting, the Town of Halton Hills will need 400 ha of additional land to sustain the foreseen economic growth.**
- **The subject lands were initially included in the Urban Expansion Boundary within the Draft Official Plan. However, the Region of Halton voted against the Urban Expansion, disregarding the recommendation presented by qualified professionals. No reason was given for removing the subject lands from the Expansion Boundary.**

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 an efficient use of underutilized land.

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 share our concerns. We are open to future discussions regarding this matter. If you have any questions, please contact Katie Pandey at ext. 335.

Yours truly,

Weston Consulting

Per:

A handwritten signature in black ink, appearing to read 'K. Pandey', written over a horizontal line.

Katie Pandey, MAES, MCIP, RPP
Associate

c. Naomi Murphy