ROPA 48 – Prescribed Agency Submission Response Document

Staff Analysis of Comments Received from Prescribed Agencies on Draft ROPA 48 – "An Amendment to implement components of the Regional Urban Structure to establish a hierarchy of strategic growth areas in the Regional Official Plan" Received February 16, 2021 to June 23, 2021.

Overview

This document provides responses to written submissions received by Halton Region on Draft Regional Official Plan Amendment (ROPA) No. 48 from February 16, 2020 to June 23, 2021

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

The submissions are organized chronologically.

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Submissions & Responses

No.	Source	Submission	Response
1	Town of Oakville	RECOMMENDATION: 1. That the report titled Regional Official Plan Review - Draft Regional Plan Amendment 48 - An Amendment to Define a Regional Structure dated March 9, 2021, be received. 2. That the report titled Regional Official Plan Review - Draft Regional Plan Amendment 48 - An Amendment to Define a Regional Structure dated March 9, 2021, be submitted to Halton Region as part of the statutory process for ROPA 48 and the Regional Official Plan Review. 3. That the report titled Regional Official Plan Review - Draft Regional Plan Amendment 48 - An Amendment to Define a Regional Structure dated March 9, 2021, be forwarded for information to the City of Burlington, the Town of Halton Hills, the Town of Milton, Credit Valley Conservation, Grand River Conservation Authority and Conservation Halton. KEY FACTS: The following are key points for consideration with respect to this report: Phase 2 of Halton's Regional Official Plan Review is underway and involves research, technical analyses and community engagement around key themes. The key theme of growth management and urban systems is focused on how and where to direct population and job growth that is required to achieve conformity with the province's 2019 Growth Plan, as amended. Intensification is a vital component of growth management for Halton Region and its local Municipalities, including Oakville. Regional staff has prepared a Regional Official Plan Amendment under Section 26 of the Planning Act that will advance certain strategic local municipal planning priorities related to urban structure. Regional Official Plan Amendment 48 helps define and provide direction on elements of the urban structure including Urban Growth Centres, Major Transit Station Areas, Regional Nodes and employment areas. An official plan amendment (or a new official plan) initiated by an uppertier municipality (or single-tier) under section 26 of the Planning Act that comprehensively applies the policies and schedules of 2019 Growth Plan, as amended, is known as a Municipa	

No.	Source	Submission	Response
		This report presents an overview of draft Regional Official Plan Amendment 48 and provides detailed comments from Town of Oakville staff.	
		BACKGROUND: The Regional Official Plan Review (ROPR) is being undertaken in partnership with its local Municipalities of Oakville, Burlington, Halton Hills and Milton and within the context of the provincial policy framework, which is based on the 2019 Growth Plan, as amended.	
		The 2019 Growth Plan, as amended, requires the accommodation of forecasted population and job growth, is focused on the development of complete communities and involves the integration of climate change considerations into growth management and planning decisions.	
		Halton Region is planned to 2031 as a result of the last ROPR. The 2019 Growth Plan, as amended, now requires that the region plan for an additional 20 years to 2051, which consists of accommodating a total population of 1.1 million and total jobs of 500,000. In broad terms, the required growth to be accommodated in the region to 2051 is nearly equal to the combined population and employment of today's Oakville and Burlington.	
		The ROPR is examining several key themes including climate change, natural heritage, rural and agricultural systems, growth management and urban systems. At present in the ROPR, there is an emphasis on planning to accommodate required growth within the urban area and with the majority of growth directed to an urban structure, which is described as follows:	
		"An urban structure is how the land use of a city or town is set out. It helps further the growth within our community by providing a way to guide the development of buildings, spaces or municipal infrastructure. An urban structure can consist of growth areas, employment areas, stable residential areas, and the transportation and growth corridors that connect these areas."	
		Numerous regional reports and initiatives have supported the concepts and dialog around a Regional Urban Structure involving Regional Council, Oakville Council, and the public as well as local and regional staff.	
		Report No. LPS56-20 - July 2020	

No.	Source	Submission	Response
		Regional Council authorized the release of the Regional Urban Structure Discussion Paper for public consultation. The discussion paper explored elements of a Regional Urban Structure for accommodating growth and intensification in Halton, aligned to local plans and priorities.	
		The discussion paper also described requirements of the 2019 Growth Plan, as amended, to be addressed through the ROPR including implementing Urban Growth Centres (UGCs), Major Transit Station Areas (MTSAs), Corridors and other potential strategic growth areas that were identified through local urban structures, as well as consideration for employment areas and employment conversions.	
		The discussion paper recognized a hierarchy of strategic growth areas to accommodate intensification and transit supportive growth.	
		At their meeting of September 8, 2020, Planning and Development Council received the report titled <i>Regional Official Plan Review – Regional Discussion</i> Papers, which provided and overview of the Regional Urban Structure Discussion Paper as well as the Climate Change, Natural Heritage, Rural and Agricultural System and the North Aldershot Planning Area Discussion Papers.	
		Report No. LPS84-20 - September 2020	
		Regional Council directed regional staff to prepare an initial scoped ROPA, under Section 26 of the <i>Planning Act</i> that would advance certain local municipal planning priorities related to urban structure as presented in the Regional Urban Structure Discussion Paper.	
		The report identified local priorities such as boundary and policy changes to UGCs, delineation and assignment of density targets for MTSAs, identification of additional growth nodes and strategic growth corridors with a corresponding policy framework as well as limited employment conversions to be considered in the ROPA.	
		LPS84-20 contained a letter from the province dated November 2019 confirming that municipalities could advance multiple official plan amendments to achieve a phased approach to its municipal comprehensive review.	
		Report No. LPS17-21 – February 2021	

No.	Source	Submission	Response
		Regional staff prepared draft ROPA 48 which identifies elements of a Regional Urban Structure to support strategic local municipal land use plans and priorities.	
		The draft ROPA 48 proposes direction on implementing urban structure elements such as UGCs, MTSAs, Regional Nodes, and certain strategic employment conversions by removing lands from the Regional Employment Area.	
		The draft ROPA 48 may be viewed as part of the Regional Council Meeting Agenda for February 17, 2021, as Attachment #1 to LPS17-21 at this link:	
		https://edmweb.halton.ca/OnBaseAgendaOnline/Meetings/ViewMeeting?id=41 96&doctype=1	
		At their meeting of February 17, 2021, Regional Council authorized regional staff to release draft ROPA 48 for public engagement and to initiate the statutory public process required by the <i>Planning Act</i> .	
		Regional staff circulated Report No. LPS17-21 and the draft ROPA 48 to the Minister of Municipal Affairs and Housing as required under the <i>Planning Act</i> . In addition the report and draft ROPA 48 was circulated to the City of Burlington, the Town of Halton Hills, the Town of Milton, the Town of Oakville, Conservation Halton, Credit Valley Conservation and Grand River Conservation for comment.	
		Given that draft ROPA 48 is part of a municipal comprehensive review as provided for in Section 26 of the Planning Act, the Minister of Municipal Affairs and Housing will be the approval authority for this amendment to the Regional Official Plan.	
		 In addition to adopting the recommendations of Report No. LPS17-21. Regional Council adopted additional recommendations that had the effect of: Adding additional lands in the Town of Milton to be considered by ROPA 48, namely portions of the Agerton and Milton Education Villages lands; Requesting regional staff to consider a policy to permit adjusting population and employment ratios outside of an MCR to provide flexibility and responsiveness to changes in the market around the nature of employment and the success of mixed use nodes; and Requesting regional staff to consider local input in defining growth node policies and that regional staff comment how growth nodes contribute to 	

No.	Source	Submission	Response
		higher density employment and how this is factored into the land needs for employment forecasts.	
		COMMENT/OPTIONS:	
		Oakville's Official Plan Review and Town-Wide Urban Structure	
		The Town of Oakville, like Halton, is also planned to 2031 by way of Livable Oakville. As part of the town's ongoing Official Plan Review, underway since May 2015, a significant amount of work has been undertaken including a number of planning studies completed and resulting in amendments to the town's Official Plan.	
		A number of additional studies have been initiated and are currently underway. A key component for Oakville is the town-wide urban structure established for Livable Oakville, which was recently updated and approved by the region through Official Plan Amendment No. 15. Oakville's town-wide urban structure is intended to accommodate required growth to 2041 and beyond and has the following goals:	
		 Protect the natural heritage system and cultural heritage resources Maintain the character of established areas Direct the majority of required growth to an interconnected system of nodes and 	
		 corridors supported by public transit. Other key components of the town's Official Plan Review are the area specific 	
		 studies to implement Oakville's town-wide urban structure including the Hospital District, the North West Area and Palermo Village, Bronte GO Major 	
		Transit Station Area and Midtown Oakville. Through the town's Official Plan Review, it is well positioned to feed into the current ROPR in the form of study results and planning decisions by Oakville Council.	
		Another benefit of all the work completed through the town's Official Plan Review is that it is well positioned to respond to what the region is proposing in draft ROPA 48.	
		Context for Draft Regional Official Plan Amendment 48	

No.	Source	Submission	Response
		Using the staged approach confirmed by the province, draft ROPA 48 proposes to advance local plans and priorities supported by studies and initiatives undertaken by the local Municipalities, ahead of the conclusion of the MCR.	
		Town staff notes that the draft of ROPA 48 has evolved positively in response to discussion and comments back and forth at the staff level. While this is indicative of the region's collaborative approach and a credit to good working relationships, town staff have identified some areas of the draft ROPA 48 that would benefit from further refinements.	
		The matter of where future growth will be accommodated is being addressed as part of the region's MCR through the Integrated Growth Management Strategy (IGMS).	
		The IGMS is the project to establish where and how Halton will accommodate required population and employment growth to 2051, not only within a Regional Urban Structure but also to include possible settlement area boundary expansions.	
		The IGMS is at a stage where four Growth Concepts have been developed and presented in a Discussion Paper. Regional Council authorized the release of this paper under the cover of Regional Report No. LPS18-21 at their meeting of February 17, 2021.	
		The Town of Oakville staff report on these matters is found elsewhere on tonight's agenda and is titled <i>Regional Official Plan Review - Growth Concepts Discussion Paper - Integrated Growth Management Strategy.</i> Regional staff confirmed the approach that moving forward with the draft ROPA 48 would not compromise the ability of Regional Council to comprehensively and objectivity evaluate the full range of growth concepts associated with the Integrated Growth Management and a subsequent Regional Official Plan Amendment.	
		Regional staff state that in addition to developing an updated Regional Urban Structure, the draft ROPA 48 also intends to implement non-discretionary and strategic elements required to achieve conformity to the 2019 Growth Plan, as amended. Town staff shares this opinion for portions of draft ROPA 48 but recommend further modifications that are discussed below with additional town staff opinion provided where appropriate.	

No.	Source	Submission			Response
		(SGAs), Regional Employment A Greenfield Area. These features A. The Regional SGAs and their Oa	Hierarchy Toposed, consisting of Strategic Growthereas, Built-Up Areas, and Designated are shown in proposed Map 1H in Apparatus Apparatus and Apparatus are strong most intense to least intense:		
		Region of Halton SGAs	Town of Oakville Equivalent SGAs		
		Urban Growth Centre (UGC)	Midtown Oakville UGC		
		Major Transit Station Area (MTSA)	Bronte GO MTSA		
		Primary Regional Node	Uptown Core Hospital District Palermo Village		
		Secondary Regional Node	Neyagawa Urban Core Kerr Village Bronte Village Downtown Oakville		
		urban structure of nodes and cor the mapping and policies for the	t elements also found in Oakville's tow rridors and the region is proposing to a se elements at a later stage of the MC anal Urban Structure are proposed in t	address CR.	
		ROPA but are not represented ir	n Oakville's town-wide urban structure or Transit Station Areas and Local Noo	. These	
	Town Staff Opinion: Town staff has reviewed the Regional Urban Structure elements of draft ROPA 48 and are of the opinion that it is consistent with Town of Oakville Official Plan Amendment 15. This includes the policies and process for adding new SGAs to the Region and Town's respective urban structures.				
			d boundaries for MTSAs including the SA as shown in Appendix B, which co TSA		

No.	Source	Submission	Response
		Town Staff Opinion: Town staff has reviewed the proposed boundary for Bronte GO MTSA and has no concerns since it consistent with the results of the town's Bronte GO MTSA Study.	
		However, Appendix B shows only the partial removal of the Regional Employment Area overlay from lands within the MTSA boundary.	
		Town Staff Opinion: Town staff is of the opinion that the entire MTSA area should be removed from the region's employment overlay in draft ROPA 48. This would be appropriate since it reflects the town's priorities, provides local flexibility to develop a mixed use node and would be the consistent with local Official Plan Amendments being advanced in the town's Official Plan Review.	Please see Regional staff's comments on this matter addressed in the response to Town of Oakville's May 20, 2021 staff report
		Notwithstanding the previous, regional staff indicate that the balance of the Bronte GO MTSA lands will be removed from the Regional Employment Area overlay following the completion of the MCR.	
		In addition, minor boundary adjustment are being proposed for Midtown Oakville UGC/MTSA by removing the MTO lands around the QEW interchanges and removing the Regional Natural Heritage System on the west side of the SGA.	
		Town Staff Opinion: Town staff has reviewed the proposed boundary for the Midtown Oakville UGC/MTSA and has no concerns since it consistent with the results of the town's Midtown Oakville Growth Area Review.	
		2051 Growth Forecasts	
		Draft ROPA 48 updates Table 1 in the Region's Official Plan to incorporate the revised growth forecasts from the 2019 Growth Plan, as amended. For Halton, this is a population of 1,100,000 and 500,000 jobs to the year 2051. Distribution of the 2051 population and employment forecasts to the local Municipalities will be determined through the IGMS and the MCR.	
		Town Staff Opinion: Town staff has no concerns with this item in the draft ROPA.	
		2051 Growth Targets Draft ROPA 48 introduces a new Table 2b, which contains for certain SGAs, minimum density targets and target proportions of residents and jobs, as shown in the table below.	

No.	Source	Submission				Response	
		Strategic Growth Areas	Minimum Density Target (Residents and Jobs per hectare)	Target P of Reside Jobs	roportion ents &		
			incom. oj	Residen	Jobs		
				ts			
		Midtown Oakville UGC	200	65%	35%		
		Bronte GO MTSA	150	40%	60%]	
		Uptown Core	n/a	85%	15%		
		Hospital District	n/a	40%	60%		
		Palermo Village	n/a	60%	40%]	
		Region based on wor Town Staff Opinion: T Targets proposed for Growth Plan, as amer supports the approact SGA's established as informed by work con concerns with the pro the opinion that these Town staff has review provincial planning do proportions of resider regard, town staff is o discretionary policy in Further, while the targ "aspirational", the con employment uses with discussed later in the Consistent with past o accommodating empl that the target proport	gets for the remaining k completed by the loc completed by the loc UGCs and MTSAs sin nded, and are conside h of allowing the Minimal required by the 2019 ducted at the local level posed Target Proportion targets should be removed the 2019 Growth Procuments and do not so that and jobs planned to fit the opinion that target troduced by the region get proportions for SGA phanion draft policies for hin SGAs are proposed report.	terns with the cethese ared non-distrum Density Growth Platel. However on of Residuted from Plan, as ame ee a required be achieved from the color implement of t	alities. The Minimum of the required of the r	n Density by the 2019 Staff also or other ded, to be f has s and is of A 48. companion arget GAs. In this o be a d as ing for his is	Given the importance of accommodating employment growth in SGAs to the Region's growth strategy, a target proportion of residents and jobs in Table 2b is maintained in ROPA 48. However, Table 2b is revised to: • clarify the general nature of the target (through the addition of the world 'General' and through the addition of the tilde (~) symbol which in commonly read as 'approximately'); • update the targets for specific SGAs based on local feedback (Milton UGC, Palermo Village) and/or to achieve a greater level of consistency across the SGAs and to reflect the more general nature of the targets (Aldershot, Acton, etc.); • add a footnote to reinforce the general / long-term / aspirational nature of the target and the latitude for refinements to it through a local process, consistent with Section 55.3, which has also been revised to clarify the

No.	Source	Submission	Response
No.	Source	 Submission Is a target proportion to be achieved over time within a SGA? Or will each individual development application require a target proportion? How is a target proportion to be achieved among disparate landowners with different aspirations? Across the SGA, which landowner gets to develop the residential proportion after the employment is achieved? And vice-versa? How is a ratio required within a mixed-use building? Could underachievement of a target proportion be used to deny planning approvals even if a development application conformed to the land use policies? How will the region monitor the target proportion since it will be a requirement of the Regional Official Plan? Town staff supports mixed use development due to the synergies created between the uses that locate in these areas. For example, mixed use areas that permit residential uses will attract better employers and better jobs. Likewise, higher density mixed use areas will produce more jobs and greater employment densities. 2051 Growth Targets - Oakville's Strategic Growth Areas In the event that target proportions for SGAs are introduced into the Regional Official Plan through ROPA 48, town staff could accept the targets for Midtown Oakville UGC, Bronte GO MTSA, Uptown Core and the Hospital District SGAs. However, town staff does have concerns with the target proportion for Palermo Village, specifically the jobs rate of 40% is far too high. The proposed target in draft ROPA 48 is based on outdated information in the Livable Oakville Plan from 2009, a time when the Palermo Village growth area consisted only of lands south of Dundas Street West. 	implementation of the general target in Table 2b through local planning processes. In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches
		Since then, development in Palermo Village has followed a different track and planning for the area has evolved such that Palermo Village now includes lands north of Dundas Street West. Further detail can be found in the report for the new Palermo Village SGA which is the subject of a local Official Plan Amendment scheduled to be recommended for adoption by Town Council on March 22, 2021.	
		It is important to note that the Palermo Village lands north of Dundas Street West have been under appeal for many years. Both Region and Town's Official Plans are not in full force and effect in this area. Because of these	

No.	Source	Submission	Response
		appeals, it is the opinion of Town staff that these lands are not located within the Regional Employment Area and therefore the town's recommended plan for a mixed use node on these lands does not constitute an employment conversion. This further supports assigning a much lower target proportion for jobs in Palermo Village, if there is to be any target.	
		The recommended plan for Palermo Village has a much higher proportion of residential uses as well as a substantial number of public service facilities and community amenities including a transit terminal, library and community centre and parks and open space. While employment opportunities will be encouraged, the amount of employment that can be generated in the plan for Palermo Village will be limited.	
		Town Staff Opinion: Town staff are of the opinion that the target proportion proposed in draft ROPA 48 for Palermo Village does not reflect Oakville's current plans and priorities and are requesting the opportunity to work with regional staff to establish an appropriate target proportion to be included in Table 2b.	Table 2b has been updated as described above and now contains a general target proportion of residents and jobs of 85% and 15% respectively.
		Planning for Employment Uses within Strategic Growth Areas	
		The region is proposing a series of policy requirements for the local municipalities in order to plan for employment uses in certain SGAs. These are excerpted in Appendix C.	
		As mentioned, town staff supports retaining and accommodating employment opportunities in SGAs, this is a requirement of Policy 2.2.5.14 from the 2019 Growth Plan, as amended, which states:	
		"Outside of employment areas, development criteria should be established to ensure that the redevelopment of any employment lands will retain space for a similar number of jobs to remain accommodated on site"	
		The region proposes this concept in draft ROPA 48, as follows: "Policy 79.3 (13) a) establishing development criteria to ensure that the site-specific redevelopment of any employment lands retains space for a similar number of jobs to remain accommodated on site" (emphasis added)	
		Town Staff Opinion: Town staff does not support the introduction of the term "site specific" to the policy; it alters the intent and gives the appearance of discretionary policy introduced by the region to draft ROPA 48.	

No.	Source	Submission	Response
		As shown in Appendix C, Policy 79.3 (13) continues, and requires that local Municipalities plan to achieve the target proportion of residents and jobs through prescriptive policies, including:	The words "site-specific" have been removed.
		Identification of <i>minimum employment targets</i> for SGAs; Identification of minimum amount of <i>gross floor area</i> to be planned for employment uses; Identification of a <i>minimum proportion or threshold of the total gross floor area</i> within this area to be developed for employment uses (<i>emphasis added</i>)	
		Town Staff Opinion: Town staff does not support the introduction of these requirements through draft ROPA 48 and recommends that they be removed to provide greater flexibility for meeting planning goals in SGAs. The proposed policies are not concepts from the 2019 Growth Plan, as amended, and appear to be discretionary policies being introduced by the region. Town staff is further of the opinion that a narrow and overly-prescriptive set of policies do not belong in an Upper-tier municipal official plan since they may not be appropriate for all SGAs across the local Municipalities. There is a concern for Oakville that the pace of development could be impaired through unintended consequences of prescriptive policies leading to missed opportunities.	
		Proposed Policy 79.3 (13) in draft ROPA 48 could be simplified and made more flexible if it simply copied Policy 2.2.5.14 from 2019 Growth Plan, as amended, directly into the Regional Official Plan. Local municipalities would then have the opportunity to develop appropriate and context specific development criteria for a particular SGA. Greater flexibility is also appropriate in light of the constantly evolving nature of employment recently brought into focus by the COVID-19 emergency pandemic.	
		Finally, as the approval authority for local municipal official plans and official plan amendments, the region would still have the final opportunity to modify the local policies to provide for appropriate levels of jobs within mixed use SGAs.	
		Town Staff Opinion: Town staff is supportive of a policy for monitoring, in conjunction with the region, the achievement of planning goals related to the balance of population and jobs in a SGA. Town staff is also supportive of a	In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more

No.	Source	Submission	Response
		policy to develop a strategy for redress in the case of a deficit or a deviation from achieving those planning goals related to the balance of population and employment.	flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches
		Draft ROPA 48 Timing and Next Steps Regional Council will be notified when dates for the Open House/Public Information Centre and statutory public meeting have been confirmed. Public notification of these engagement opportunities will be provided through the Region's website, newspaper advertisements, mailing lists, social media, stakeholder groups, and other means.	Policies for monitoring the achievement of planning goals related to the balance of population and jobs in SGAs have been maintained in the proposed ROPA.
		Town staff anticipates that the earliest opportunity for a Statutory Public Meeting on Draft ROPA 48 will be June 2021.	
		CONCLUSION AND NEXT STEPS: Town staff will continue to engage in the ROPR process to improve alignment among the parties and to focus on reaching consensus. As the ROPR moves into Phase 3, town staff will be providing Oakville Council with further updates, analysis and commentary.	
		Town staff anticipates that there will be substantial review work and comments generated during Phase 3 of the ROPR when Halton Region produces the Policy Directions Synthesis Report, draft official plan policies and a draft Regional Official Plan Amendment for consideration.	
		CONSIDERATIONS:	
		(A) PUBLIC There are no public considerations and no notice requirements from this report.	
		(B) FINANCIAL	
		There are no financial considerations from this report. (C) IMPACT ON OTHER DEPARTMENTS & USERS Multiple town departments have had the opportunity to provide input intothe town's responses to Halton's Regional Official Plan Review.	
		(D) CORPORATE AND/OR DEPARTMENT STRATEGIC GOALS	
		This report addresses the corporate strategic goal to:	

No.	Source	Submission	Response
		be the most livable town in Canada (E) COMMUNITY SUSTAINABILITY Consideration of the sustainability goals and objectives of the Livable Oakville Plan are part of all town reviews of Regional initiatives.	
		Prepared by: Recommended by: Kirk Biggar, MCIP, RPP Senior Planner, Policy Planning Diane Childs, MCIP, RPP Manager, Policy Planning and Heritage Submitted by: Gabe Charles, MCIP, RPP	
	Oite of	Acting Director, Planning Services	
2	City of Mississauga E-mail dated March 22, 2021	Good afternoon Matt, Thank you for the opportunity to provide comments on Halton's Regional Draft Official Plan Amendment (ROPA) No. 48. We have reviewed the documents and have no comments related to the proposed amendments.	Noted
		Thank you, Amina Menkad B.Arch/MSc.PL, MCIP, RPP Planner, P&B/Official Plan Review	
3	Conseil Scolaire Viamonde E-mail dated March 26, 2021	Good Morning Matt, The Conseil scolaire Viamonde has no comments regarding the Halton Region Draft Regional Official Plan Amendment (ROPA) No. 48. Best regards and happy Friday! Kenny Lamizana	Noted
4	Conservation Halton E-mail dated April 7, 2021	Hi Karyn, We have reviewed the materials provided on ROPA 48. Conservation Halton has provided feedback on the related discussion papers and draft ROPA	

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		language throughout the process, and can confirm we have no further feedback on the materials circulated. Our key feedback has focused on ensuring natural hazards are addressed through the ROPR, particularly in growth areas. Updates to the ROP natural hazard policies and the inclusion of hazard mapping in the ROP would further assist in identifying the constraints in these areas, and region wide. We will provide further feedback on updates to hazard policies/mapping when this topic area is addressed in the next phase of the ROPR. Thanks for the opportunity to provide feedback throughout the process. Please don't hesitate to contact me if we can provide further assistance or feedback. Kind Regards, Leah	Regional staff look forward to receiving Conservation Halton's comments on a future Regional Official Plan Amendments related to the Natural Heritage System and natural hazards policies.
5	Grand River Conservation Authority (GRCA) E-mail dated April 7, 2021	Hello Karyn: We did review the circulated information, and the GRCA will not be providing specific comments, but would defer to our neighbouring Conservation Authorises as they may have more of an interest in ROPA No. 48 which deals with Regional Urban Structure. If we can be of further assistance please let us know. (Response to Karyn's response to Leah Smith on behalf of Conservation Halton).	Noted
6	Credit Valley Conservation E-mail dated April 13, 2021	Hi Karyn, CVC staff have also reviewed the relevant materials with respect to ROPA 48 and echo CH's comments. I think for the most part our interest will lie with the continued updates to the ROP related to any natural hazards policies and associated mapping. We will provide further comments at that time and are always open to discussing and providing guidance as necessary, related to lands within CVC's jurisdiction and as a coordinated effort with the three CAs.	Regional staff look forward to continuing to work with Credit Valley Conservation on future Regional Official Plan Amendments related to natural hazards policies and associated mapping.

No.	Source	Submission	Response
		Thank you for the opportunity to review.	
		Dorothy Di Berto, RPP	
7	City of Hamilton E-mail dated April 19, 2021	April 19, 2021 Karyn Poad Senior Planner Region of Halton 1151 Bronte Road Oakville, ON L6M 3L1 Email: Karyn.poad@halton.ca Dear Ms. Poad, Re: Halton Region - Draft Regional Official Plan Amendment No. 48 - An Amendment to Define a Regional Urban Structure - Circulation for Comments Thank you for your letter dated March 9, 2021 and the opportunity to review the "Halton Region Draft Regional Official Plan Amendment No. 48 - An Amendment to Define a Regional Urban Structure". Please be advised that City of Hamilton staff have reviewed the draft Amendment and have no comments at this time. If you have any questions, please feel free to contact Heather Travis Yours truly, Steve Robichaud Director of Planning and Chief Planner Planning Division Planning and Economic Development Department City of Hamilton	Noted
8	Town of Halton Hills	RECOMMENDATION: THAT Report PD-2021-0015, Regional Official Plan Review – Draft Scoped	
	E-mail dated May 10, 2021	Regional Official Plan Amendment No. 48 (ROPA 48), dated April 22, 2021, be received;	
		AND FURTHER THAT prior to the adoption of ROPA 48 by Regional Council, the Region be requested to address the outstanding comments contained in Report PD-2021-0015 regarding:	

No.	Source	Submission	Response
		i) the proposed minimum density targets and population/employment ratios for the Georgetown and Acton Major Transit Station Areas; ii) ensuring that growth expectations for Local Nodes is reflective of the studies undertaken by the Town; iii) ensuring that the policy direction for Local Nodes can be implemented through Local Official Plan policies without the requirement for the preparation of Area Specific Plans (e.g. Secondary Plans); and, iv) the detailed policies that need to be satisfied regarding employment conversions; AND FURTHER THAT this report be submitted to Halton Region as the Town's comments during the statutory public process for ROPA 48 which is being prepared as part of the broader Regional Official Plan Review Process; AND FURTHER THAT a copy of this report be forwarded to the Local Municipalities of Burlington, Milton and Oakville, Conservation Halton, Credit Valley Conservation and the Grand River Conservation Authority.	
		BACKGROUND:	
		The purpose of this report is to highlight the key components of Regional Official Plan Amendment No. 48 (ROPA 48) — An Amendment to Define a Regional Urban Structure, which is being introduced as part of the Regional Official Plan Review (ROPR), and to present Town staff comments. A key element of the Regional Official Plan Review is the Integrated Growth Management Strategy which examines options on how to address growth requirements as per the <i>Growth Plan (2020)</i> in Strategic Growth Areas, Employment Areas, and Settlement Areas. As per Report PD-2020-0035, a Regional Urban Structure Discussion Paper was prepared by the Region identifying key population and employment growth areas, highlighting potential greenfield expansion areas and listing employment conversions being considered as part of the ROPR process. ROPA 48, attached to this report as Appendix A, has been introduced to implement components of the Regional Urban Structure, establish a hierarchy of strategic growth areas in the Regional Official Plan and to address local municipal planning priorities related to the urban structure in advance of the next phase of the ROPR process.	

No.	Source	Submission	Response
		At its meeting on February 23, 2021, Regional Council was presented with the draft ROPA 48 through Report LPS17-21. The draft ROPA includes the following planning matters: Urban Growth Centres, Major Transit Station Areas (including boundaries and density targets), Strategic Growth Areas and limited Employment Land Conversions of those properties identified by local municipalities as having strategic importance in advancing elements of the local urban structure. At the meeting, Regional Council amended the report requesting the inclusion of the following recommendations:	
		 To direct staff to include the southern portion of the Agerton Secondary Plan (lands south of hydro corridor) to facilitate the Major Transit Station Area and the southerly Milton Education Village employment land conversions as part of the draft ROPA. To request regional staff to consider a policy to permit adjusting population and employment ratios in growth nodes outside of Municipal Comprehensive Reviews to provide flexibility and responsiveness to changes in the market around the nature of employment and the success of mixed-use nodes. To request regional staff to consider local input in defining growth node policies and that regional staff comment on how growth nodes contribute to higher density employment and how this is factored into the land needs for employment forecasts. In accordance with the statutory public process required by Section 26 of the 	
		Planning Act, ROPA 48 has been released for public consultation. A Public Open House and a Statutory Public Meeting are also required as part of the process and are anticipated to take place in late May/early-June.	
		COMMENTS:	
		Town staff are generally supportive of the broad purpose and intent of ROPA 48. Town staff have previously reviewed draft ROPA 48 and detailed comments were provided to Regional staff through the Halton Area Planning Partnership (HAPP) consultation process on January 26, 2021. Below is a description of the key components of ROPA 48 and relevant Town staff comments that were provided for consideration by the Region.	
		Planning Targets:	
		Amendment 1 to the <i>Growth Plan</i> introduced population and employment forecasts for Halton Region. ROPA 48 proposes to update the Regional	

No.	Source	Submission	Response
		Official Plan to include the 2051 population and employment forecasts for Halton Region contained within the <i>Growth Plan (2020)</i> . However, the distribution of growth and jobs to the Local Municipalities would be determined through the next phases of the Regional Official Plan Review process.	
		 Table 1, attached as Appendix B to this report, would be updated to include the 2051 Regional population and employment forecasts for Halton Region. Table 2B, attached as Appendix C to this report, would be added to the Regional Official Plan to include minimum density targets of jobs and residents for certain Strategic Growth Areas. Table 2B would also include minimum job targets for certain Strategic Growth Areas in proportion to the number of residents that the areas are planned to accommodate. These minimum targets are to be achieved beyond the 2051 planning horizon of this Plan. Table 2B includes minimum density and resident/job ratios for the Major Transit Station Areas (MTSAs) located in Georgetown and Acton. The Georgetown density has been established at 100 residents and jobs per hectare and an 80% residents/ 20% jobs ratio, while in Acton, the minimum density has been established at 70 residents and jobs per hectare and 70% residents/ 30% jobs ratio. 	
		Town Staff Comments:	
		The inclusion of the 2051 population and employment forecasts into the Regional Official Plan is required in order to conform to the Growth Plan for the Greater Golden Horseshoe. As previously noted, the distribution of the growth to the local municipalities will be determined through subsequent phases of the Regional Official Plan review and be incorporated through a Regional Official Plan Amendment that implements the Preferred Growth Concept once selected by Regional Council.	The target identified for both the Georgetown GO and Acton MTSA took into consideration the existing low and medium density area context, as well as the available sites to accommodate redevelopment potential. The density target for
		To complete the review of the proposed MTSA minimum density targets and resident/job ratio and prior to the adoption of ROPA 48 by Regional Council, further discussion with Regional staff will be necessary on how the recommended targets for the Acton and Georgetown MTSAs have been determined. This is particularly important as the minimum targets and resident/jobs ratio will have to be incorporated into the Halton Hills Official Plan and pertinent Secondary Plans and be considered at the development review stage. Currently, the densities for both MTSAs are relatively low and staff would like to understand how local planning work such as the Intensification Opportunities Study Update and the Employment Land Needs	the MTSA do not need to be achived by 2051 and can go beyond the horizon of the plan. The established density target for the Georgetown GO MTSA density target was supported by the Town's Georgetown GO Secondary Plan,

No. Source	Submission	Response
	Assessment has been considering in establishing these densities. Further discussion regarding MTSAs is provided in an ensuing section of this report. Urban Growth Centres (UGC): Urban Growth Centres (UGC) are existing or emerging downtown areas identified in the <i>Growth Plan (2020)</i> . UGCs are intended to accommodate a large proportion of population and employment growth. There are currently three Urban Growth Centres identified in the Region of Halton: Burlington GO MTSA/UGC, Midtown Oakville GO MTSA/UGC, Milton GO MTSA/UGC. Changes propose include: • Adjustments to Urban Growth Centre boundaries. • Minor policy changes to achieve conformity with the Provincial <i>Growth Plan</i> . Town staff have not provided comments regarding UGC policies since there are no UGCs in Halton Hills. Major Transit Station Areas: Major Transit Station Areas are defined in the Growth Plan as areas within an approximate 500 to 800-metre radius of a transit station, representing about a 10 minute walk. Major Transit Station Areas are to be planned to accommodate growth including a diverse mix of uses such as additional residential and affordable housing. The Province directs Upper and Single-tier municipalities to delineate MTSA boundaries and identify minimum density targets. The Town has two Major Station (maps of the Georgetown and Acton MTSA boundaries have been attached as Appendix D) ROPA 48 introduces the following changes to the Regional Official Plan: • Boundary delineation and density targets for all Major Transit Station Areas. • Policy changes to ensure conformity with the <i>Growth Plan</i> and provide direction for Local Municipalities to implement Area Specific Plans for Major Transit Station Areas.	Intensification Opportunities Study update and Employment Land Needs Assessment. The target took into consideration the exsiting low and medium density area context, as well as the available sites to accommodate redevelopment potential. The target for the Acton GO MTSA was supported by the Town's Intensification Opportunities Study, as well as considering intensification opportunities within the delineated boundary, the existing low and medium density area context. Section 81.2(2.1) allows for the minimum density target for a Major Tranist Station Area to be updated as part of the Region's Municipal Comprehensive Review following completion of the Integrated Growth Management Strategy. A new objective is added to Section 81(7) and a policy to Section 81.2(4)k) that enables the local municipalities to consider contextually appropriate intensification opportunities within stable residential neighbourhoods through the area specific planning process.

No.	Source	Submission	Response
No.	Source	 Recommended interim policies for proposed Major Transit Station Areas (including the proposed Trafalgar GO Major Transit Station Area in Milton). Town Staff Comments: Town staff worked with the Regional staff to identify the proposed MTSA boundaries, which are generally in keeping with those identified through the Town's Employment Land Needs Assessment. The proposed Boundaries for Acton and Georgetown can be found in Appendix D to this report. As previously stated, Town staff require clarification on how the minimum densities and resident/ job ratio have been determined for the Acton and Georgetown MTSAs. Growth Nodes ROPA 48 will update the Regional Official Plan by identifying and recognizing Regional Nodes, or regionally-significant strategic growth areas. Local municipalities are required to prepare Area Specific Plans (e.g. Secondary 	Response
		Plans) or detailed Official Plan policies for Regional Nodes. The following areas indicated on the Regional Urban Structure map have been identified for accommodation of growth, concentration of public services and high-density uses at a scale appropriate for their context. Primary Nodes: Uptown Core, Oakville Hospital District, Oakville Milton Education Village, Milton Palermo Village, Oakville Uptown Urban Centre, Burlington The following historic downtown areas or villages or areas have been identified for growth through mixed-use intensification at a scale appropriate for their context: Secondary Nodes: Neyagawa Urban Core, Oakville Kerr Village, Oakville	See comment above.

No.	Source	Submission	Response
		 Bronte Village, Oakville Downtown Oakville Downtown Urban Centre, Burlington Downtown Urban Centre, Burlington Downtown Georgetown, Halton Hills Guelph Street Corridor, Halton Hills In addition, as part of Strategic Growth Areas, ROPA 48 includes policy references to Local Nodes which are recognized in local Official Plans and have a concentration of residential and employment uses with development densities and patterns supportive of pedestrian traffic and public transit. Town Staff Comments: Town staff seeks clarity as to which Local Nodes within the Town of Halton Hills are currently considered/included in the Regional Strategic Growth Areas and the expectations for these nodes to accommodate Regional growth. In Halton Hills, Local Nodes which are not included in the ROPA as either Secondary Regional Nodes or within the MTSA Areas, would include the broader Civic Centre District in Georgetown, which is subject to two Council approved Comprehensive Development Plans (CDP) and existing planning approvals, and the Queen Street Corridor in Acton, which was recently identified as an Intensification Area in the Intensification Opportunities Study Update. If Local Nodes are to be considered for accommodating expected Regional growth, the ROPA must include provisions to ensure that each Local Node's capacity for accommodating growth is assessed based on the local context. Further to the above comments, Town Staff require confirmation of the messaging provided by Regional staff at the January 21, 2021 Halton Area Planning Partnership (HAPP) meeting wherein it was explained that local nodes and corridors identified through the Scoped ROPA will not require the completion of an Area Specific Plan as is currently required per Section 48 of the Regional Official Plan. Staff recommend that Section 48 of the Regional Official Plan. Staff recommend that Section 48 of the Regional Official Plan sit	A Local Node is defined in Section 255.1 as a Strategic Growth Area identified by a Local Municipality in an approved Official Plan, which has a role in accommodating intensification. Therefore, these nodes are SGAs that do not currently rise to the level identified in the ROP, but do have a role in the accommodation of intensification. The magnitude of growth to be directed to the Local Nodes is informed by the Town's intensification Study to be confirmed through the development of a Preferred Growth Concept.

No.	Source	Submission	Response
		A limited amount of Employment Area conversions that meet the criteria identified by the Region in conformity with the <i>Growth Plan</i> are being considered for conversion to mixed use through ROPA 48. The proposed conversions have been identified by the Local Municipalities as having strategic importance in advancing elements of the local urban structure and support the Regional Urban Structure and strategic planning objectives. In the context of Halton Hills, these includes the properties in Acton located at 153, 159, 165, 173 Perth Street and 12 Wallace Street, and one parcel located at 344 Guelph Street in Georgetown. The conversions throughout the Region that are being considered in this ROPA including the proposed locations within the Town of Halton Hills can be found on the map attached as Appendix E.	Section 79.3(3) of Draft ROPA 48 modifies existing policy (which currently applies to Mixed Use Nodes identified in Local Official Plans, which requires either an Area-Specific Plan or detailed official plan policies for Strategic Growth Areas, including Local Nodes. No changes have been made to Section 48.
		Town Staff Comments:	
		 The conversion of these sites should consider a wide range of permitted uses that would enable the area to develop as a mixed-use area over the long-term. These sites may provide opportunities for office (a range of office uses, including multi-tenant office buildings smaller than 20,000 sq.ft.) retail and commercial services, and high-density or live-work residential uses. Conversion of these lands to provide for a broader range of uses over the long term would support the Town's intensification objectives. Section 79.3(13) requires "local municipalities to establish development criteria to ensure that the redevelopment of any employment lands outside of Employment Areas will retain space for a significant number of jobs". How is a significant amount of jobs defined? In the case of Halton Hills, enough flexibility must be given to these conversion sites to incentivize intensification and redevelopment opportunities that fit within the context of the area. 	Regional staff have recommended these employment conversions be advanced through Regional Official Plan Amendment No. 48 to support the Regional Urban Structure and Local
		Town staff also note that as part of the development of the Preferred Growth Concept further discussion with the Region will be required on whether the Gateway designations located south of Steeles Avenue in the Halton Hills Premier Gateway should be examined as potential conversion sites as part of the development of the Preferred Growth Concept given the existing development and/or land use permissions which align with the Town's vision to attract a broad range of employment uses to the area.	Municipal strategic planning objectives. More information on how this conversion conforms to the principles of the Region's employment conversion assessment criteria is available in Appendix C of the Growth Concepts Discussion Paper.
		Next Steps:	Section 79.3(13) has been modified to align with the language in the Growth Plan to require Local Municipalities to establish development criteria to

No.	Source	Submission	Response
		As required by the Planning Act, the proposed ROPA is to be presented at the Statutory Public Open House/Public Meeting in the summer and will be made available to the public on the Region's website at least 20 days before the Statutory Public Meeting. Notification of this engagement opportunity will be provided through the Region's website, newspaper advertisements, mailing lists, social media, stakeholder groups, and other means. Town staff is supporting the Region's communications efforts by using social media to advertise the Open House and inform local residents of future engagement opportunities. RELATIONSHIP TO STRATEGIC PLAN: This report directly aligns to the following values in the Strategic Plan 2019-2022 including: Foster a Healthy Community To maintain and enhance a healthy community that provides a clean environment and a range of economic and social opportunities to ensure a superior quality of life in our community. Preserve, Protect and Enhance our Environment To preserve, protect and enhance our natural environment for the health benefits and enjoyment it provides to present and future generations. Foster a Prosperous Economy To maintain and enhance the economic vitality of the Town through the provision of a wide range of opportunities for economic development. Achieve Sustainable Growth To ensure that growth is managed so as to ensure a balanced, sustainable, well planned community infrastructure and services to meets the needs of its residents and businesses The report is also closely linked with a number of Focus Areas/Priorities including Shaping Growth.	ensure that, outside of Employment Areas, the redevelopment of any employment lands will retain space for a similar number of jobs to remain accommodated on site rather than a significant number. The establishment of development criteria by the local municipality provides an opportunity to identify how this direction can be implemented in a manner appropriate to local contexts. Comments noted.

No.	Source	Submission	Response
		FINANCIAL IMPACT:	
		There are no financial impacts associated with this report.	
		CONSULTATION:	
		Planning staff will continue to consult with the different Town departments including, Transportation and Public Works, Recreation and Parks, Economic Development, Climate Change, Finance and Fire and continue to update the Senior Management Team and Council as needed.	
		PUBLIC ENGAGEMENT:	
		The Region of Halton has ongoing consultation and engagement related to ROPA 48 and the ROPR process. A webpage has been created specifically to inform the public about ROPA 48 and ways to get involved in the process.	
		ROPA 48 is being advanced under Section 26 of the Planning Act, which requires the amendment to be approved by the Minister of Municipal Affairs and Housing. As a result, Section 17(17.1) of the Planning Act applies and requires the Region to circulate a draft ROPA for the Minister's review at least 90 days in advance of providing notification of an Open House and Statutory Public Meeting. Report LPS17-21 presented at the February 23rd Regional Council meeting, authorized the circulation of the draft ROPA 48 to the Minister of Municipal Affairs and Housing to meet this legislative requirement.	
		The Planning Act requires both an Open House/Public Information Centre and a Statutory Public Meeting to allow the public to review and provide comments on draft ROPA 48. An Open House/Public Information Centre as well as a Statutory Public Meeting is anticipated in late May/early June. Any comments received though the statutory process will be documented on the Region's public record and responded to by Regional staff prior to bringing forward a recommendation report to Regional Council.	
		In addition, the Region will be hosting six Public Information Centres on the Growth Concepts Discussion Paper starting from May 4 to May 29th (four municipally focused PIC, one Region wide PIC and one focused on North Aldershot).	
		Dates for the PICs are as follows: Halton Hills: May 4 at 7 p.m.	

No.	Source	Submission	Response
		 Milton: May 6 at 7 p.m. Burlington: May 11 at 7 p.m. Oakville: May 13 at 7 p.m. North Aldershot: May 17 at 7 p.m. Region-wide Wrap-up: June 29 at 7 p.m. 	
		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.	
		This report supports the Environmental Health pillar of Environmental Health and Social Well-Being. ROPA 48 advances components of the Region's Official Plan Review which include planning for growth within Urban Growth Centres, Major Transit Station Areas, Strategic Growth Corridors and considering limited Employment Land Conversions align well with this pillar. Overall, the alignment of this report with the Community Sustainability Strategy is: GOOD.	
		COMMUNICATIONS:	
		Upon Council approval of this report, a copy will be forwarded to the Region of Halton, the Local Municipalities of Burlington, Milton and Oakville, Conservation Halton, Credit Valley Conservation and the Grand River Conservation Authority.	
		CONCLUSION:	
		Regional staff have released the draft ROPA 48 to advance components of a Regional Urban Structure as part of the Regional Official Plan Review Process. An Open House/Public Information Centre as well as a Statutory Public Meeting are anticipated in late May/early June. As previously noted, Town staff are generally supportive of the broad purpose and intent of ROPA 48. A number of specific issues have been identified regarding minimum densities and population/employment ratios for the Georgetown and Acton MTSA, the policy and growth expectations for Local Nodes, and the detailed policies that need to be satisfied for employment conversions. It is recommended that the Region address the outstanding issues referenced in this report prior to the adoption of ROPA 48.	
		Reviewed and Approved by,	

No.	Source	Submission	Response
		Bronwyn Parker, Director of Planning Policy John Linhardt, Commissioner of Planning and Development Chris Mills, Acting Chief Administrative Officer	
9	Town of Oakville E-mail dated May 10, 2021	RECOMMENDATION: 1. That the report titled Regional Official Plan Review – Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 – May 10, 2021, be received. 2. That the report titled Regional Official Plan Review – Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 – May 10, 2021, be submitted to Halton Region as part of the statutory process for ROPA 48 and the Regional Official Plan Review. 3. That the report titled Regional Official Plan Review – Integrated Growth Management Strategy and Draft Regional Official Plan Amendment 48 – May 10, 2021, be forwarded for information to the City of Burlington, the Town of Halton Hills, the Town of Milton, Credit Valley Conservation, Grand River Conservation Authority and Conservation Halton. KEY FACTS: The following are key points for consideration with respect to this report: Phase 2 of Halton's Regional Official Plan Review is underway and involves research, technical analysis and community engagement around key themes. Halton is exploring issues and opportunities related to growth management through the Integrated Growth Management Strategy. This is a key component. Halton is exploring issues and opportunities related to growth Halton will grow to from 2031 to 2051. Another component of the Regional Official Plan Review is Regional Official Plan Amendment 48 that intends to advance certain strategic local municipal plans and priorities related to urban structure. Regional Official Plan Amendment 48 helps define a regional urban structure and provides direction on key elements including Urban Growth Centres, Major Transit Station Areas, Regional Nodes and employment areas.	

No.	Source	Submission	Response
		 Public engagement is an ongoing component of the Regional Official Plan Review and a range of opportunities has been provided to date. Current opportunities for participation include taking an on-line survey, attending a virtual Public Information Centre and having a discussion with a regional planner through a virtual meeting. This report presents an update on the Regional Official Plan Review and highlights comments from town staff. 	
		BACKGROUND:	
		The purpose of the Regional Official Plan Review (ROPR) is to update the Regional Official Plan (ROP) to meet the evolving needs of Halton Region. The ROPR will also update policies required by the 2019 Growth Plan, as amended, as well as other provincial plans and policies changes affecting the growth, development and protection of lands within the region.	
		Halton Region is undertaking the ROPR in partnership with its local Municipalities of Oakville, Burlington, Halton Hills and Milton. A wide range of residents, businesses, stakeholder groups, governmental agencies and Indigenous Communities are also engaged.	
		The ROPR is currently in Phase 2, which involves the following components:	
		Integrated Growth Management Strategy	
		Draft Regional Official Plan Amendment 48	
		Public Engagement	
		Town staff has participated in the ROPR since it was initiated in 2014 and has provided regular updates to Oakville Council. The most recent update was March 22, 2021 where Oakville Council received the following Discussion Items and accompanying staff presentations:	
		Item 3. Regional Official Plan Review - Growth Concepts Discussion Paper - Integrated Growth Management Strategy, March 11, 2021	
		Item 4. Regional Official Plan Review - Draft Regional Plan Amendment 48 - An Amendment to Define a Regional Structure, March 11, 2021	
		40 - An Amendment to Deline a Regional Structure, March 11, 2021	

No.	Source	Submission	Response
		This is the link to the meeting agenda containing those items #3 and #4: https://securepwa.oakville.ca/sirepub/mtgviewer.aspx?meetid=4176&doctype=AGENDA	
		The key messages from <i>Item 3. Integrated Growth Management Strategy</i> included:	
		Livable Oakville is the town's growth management strategy and Oakville's ongoing official plan review is focused on implementing a town-wide urban structure.	
		For Oakville to maximize the benefits of accommodating required population and employment growth, the Preferred Growth Concept resulting from Halton Region's Integrated Growth Management Strategy must:	
		 Support existing local urban structure; Minimize greenfield expansions to protect natural heritage and agricultural lands; and Build complete communities in a compact urban form with sustainable transportation choices. 	
		The key messages from <i>Item 4. Draft Regional Plan Amendment 48</i> identified areas of agreement and areas where town staff expressed the opinion that further refinement of the draft Regional Plan Amendment 48 (ROPA 48) would be appropriate:	
		For the Bronte GO Major Transit Station Area, Halton Region's Employment Area overlay should be entirely removed from the study area lands.	
		The use of minimum density targets of combined people and jobs per hectare as required by the 2019 Growth Plan to focus and distribute forecasted population and employment growth to strategic growth areas (SGAs) was appropriate.	
		The proposed regional requirements for a <i>Target Proportion of Residents & Jobs</i> for SGAs was not appropriate and since this is not a requirement of the 2019 Growth Plan, as amended, should be removed from draft ROPA 48.	

No.	Source	Submission	Response
		The proposed regional requirements for site-specific employment targets and development criteria such as gross floor area thresholds within mixed use SGAs was prescriptive and not appropriate for an upper-tier municipal official plan.	
		Town staff raised concerns with a prescriptive approach in the ROP related to difficulty in implementation and that unintended consequences of a restrictive approach could lead to missed opportunities and limit the town's ability to implement its urban structure and mange required growth accordingly.	
		Town staff expressed the opinion that flexibility in the policy framework would enable mixed use SGAs to thrive independently and that a generic or universal approach in the ROP for SGAs was not appropriate.	
		COMMENT/OPTIONS:	
		This section of the report provides an update on the ROPR key components listed above and highlights comments and opinion from town staff including areas where further refinement to the region's proposals would be appropriate. Town staff notes that collaborative discussions with regional staff are ongoing with the aim of reaching consensus on the outstanding matters and to see that this is reflected in the ROPR.	
		Integrated Growth Management Strategy	
		The Integrated Growth Management Strategy (IGMS) looking at how and where Halton Region will accommodate forecasted population and employment growth from 2031 to 2051, as required by the 2019 Growth Plan, as amended.	
		As presented to Oakville Council on March 22, 2021, the regions IGMS Growth Concepts Discussion Paper containing four Growth Concepts and an evaluation of those growth concepts has been released for public consultation.	
		Since then, through a series of reports and resolutions, regional staff has been directed by Regional Council to undertake:	
		An analysis that builds on Concept 3 that accommodates employment growth to 2051 without a settlement area boundary expansion	

No.	Source	Submission	Response
NO.	Source	An analysis on the creation of a permanent food belt/agricultural preserve A comparative assessment of greenhouse gas emissions for each Growth Concept Report No. LPS45-21 Additional Information relating to Growth Concepts associated with the Integrated Growth Management Strategy – Regional Official Plan Review received by Regional Council at their meeting of April 21, 2021, detailed this information and the directions to regional staff. Town Staff Opinion: Town staff is supportive of a Growth Concept that accommodates employment growth to 2051 without a settlement area boundary expansion. Town staff is also of the opinion that for Oakville, there is a strong future for high quality and dense employment opportunities in mixed used developments and through employment intensification at strategic locations. A Growth Concept that does not expand the settlement area boundary will protect agricultural lands and help reduce overall greenhouse emissions across the region. Draft Regional Official Plan Amendment 48 Draft ROPA 48 helps to define and provide direction on elements of a regional urban structure. This is accomplished through the identification of SGAs across the region including Urban Growth Centres, Major Transit Station Areas, Regional Nodes as well as providing long-term planning direction for employment areas. Regional staff has stated that draft ROPA 48 implements non-discretionary policies of the 2019 Growth Plan, as amended, in order to achieve conformity with that plan and is intended to advance certain strategic local municipal planning priorities related to urban structure. As presented to Oakville Council on March 22, 2021, town staff supports the intent of draft ROPA 48 and supports advancing draft ROPA 48 in a timely manner so that local plans and priorities can be recognized and implemented.	Response

No.	Source	Submission	Response
		Town staff identified areas of support for the region's amendment to the ROP through draft ROPA 48, including:	
		The region's proposed hierarchy of SGAs,	
		 The proposed boundaries for the Midtown Oakville Urban Growth Centre and the Bronte GO Major Transportation Station Area in accordance with provincial requirements, 	
		 Proposed updates to incorporate the revised growth forecasts from the 2019 Growth Plan, as amended. For Halton Region, this is a population of 1,100,000 and 500,000 jobs to the year 2051, 	
		 Assigning Minimum Density Targets to certain SGAs since these are required by the 2019 Growth Plan, as amended, and are considered non- discretionary. 	
		Notwithstanding the areas of support and alignment identified, there are remaining areas where town staff is of the opinion that further refinements to the region's proposals are necessary.	
		These outstanding matters are addressed in the following sections.	
		Process Timing and Responses to Comments	
		According to regional staff, draft ROPA 48 is targeted for a Statutory Public Meeting before Regional Council on June 16, 2021. Town staff has been providing comments to the region on draft ROPA 48 since initial versions were made available in January 2021 and more recently through authorized comments provided through Oakville Council.	
		Town Staff Opinion: In this context, town staff wishes to understand how and when comments provided to date will be recognized and acknowledged in the region's process.	Comments received on the Regional Urban Structure Discussion Paper and Supplementary Discussion Paper on the Burlington Urban Growth Centre and MTSA are summarized as
		Regional staff has advised that the date for a final recommendation report on ROPA 48 to Regional Council has yet to be confirmed.	Attachment #2 to LPS60-21 - Adoption of Regional Official Plan Amendment 48 - "An Amendment to Define a Regional Urban
		Town Staff Opinion: Town staff is of the opinion that the date for a recommendation report should reflect an appropriate period of time for	Structure".

No.	Source	Submission	Response
		consideration and acknowledgement of the comments received to date on draft ROPA 48.	Comments received from the public agencieis and public on draft ROPA 48 between between
		Regional Employment Area Overlay	February 16 and June 23, 2021 are considered in Attachments #3 and #4 to LPS60-21 - Adoption of Regional Official Plan Amendment 48 - "An
		Town staff continues to raise concerns around the application of the region's Employment Area overlay to the Bronte GO Major Transit Station Area (Bronte GO MTSA) and the Neyagawa Urban Core.	Amendment to Define a Regional Urban Structure".
		Town staff and regional staff continue to engage in productive dialogue to resolve matters and updated comments from town staff are presented below.	
		Bronte GO MTSA	Civan the earle of the Brents CO request its
		Town staff is of the opinion that the region's Employment Area overlay should be removed in draft ROPA 48 from the areas in the Bronte GO MTSA proposed to be designated Urban Centre and Urban Core. This would be appropriate since it reflects the town's priorities, provides local flexibility to develop a mixed use SGA and would be the consistent with local Official Plan Amendments being advanced through the town's Official Plan Review. 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	Given the scale of the Bronte GO request, its strategic location in relation to goods movement facilities, and that it currently functions as part of the Region's supply of employment land, the conversion of the entirety of the lands required further analysis and consideration. Analysis by the Town of Oakville through the Bronte GO MTSA study, as well as through the IGMS process, has identified the potential for the Bronte GO lands to accommodate significant employment growth following a conversion. A draft official plan amendment prepared by the
		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 Q4 2021.	Town would continue to provide opportunities for employment uses in a mixed use context, particularly within the 'Urban Centre' and 'Urban Core' land use designations, while maintaining certain areas within employment designations. On this basis, Regional staff have recommended the conversion of those lands designated 'Urban Centre' and 'Urban Core' to be advanced through
		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.	ROPA 48. The remaining lands in the Bronte GO MTSA are designated for employment uses in the official plan amendment which align with the permitted uses in the Regional Employment Area and as a result, these lands are recommended to
		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:	be retained within the employment area.

No.	Source	Submission	Response
No.	Source	Provided in 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. Prescriptive Employment Planning Policies in the Regional Official Plan Town and regional staff agree that certain SGAs being converted from Employment Area to mixed use areas should still be planned to maintain an employment focus. The success of mixed use nodes will depend on a combination of employment, commercial and residential uses. The region's policies should enable the local municipalities to implement this direction at the local level where it can be tailored to the local context. However, town staff continues to raise concerns around the prescriptive nature of certain policies proposed for SGAs in draft ROPA 48. Town staff is the opinion that a prescriptive and universal set of policies do not belong in the ROP since they may not be appropriate for all SGAs across the local Municipalities. There is a concern for Oakville that development focused on Council priorities and implementing the town-wide urban structure could be impaired through unintended consequences of restrictive policies leading to missed	In regard to the Neyagawa Urban Core, Regional staff recommend that the consideration of this request continue to occurr as part of the Integrated Growth Management Strategy and the development of a Preferred Growth Concept. More information on assessment of this request is available in Appendix C of the Growth Concepts Discussion Paper.
		opportunities. Town Staff Opinion:	
		Town staff is of the opinion that the ROP policies should enable flexibility in the policies for mixed use SGAs so they can thrive and be successful by responding to the market and the changing nature of employment. Greater flexibility is also appropriate in light of the constantly evolving nature of employment recently brought into focus by the COVID-19 emergency pandemic.	In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches
		This evolution was highlighted recently for Regional Council at their meeting of April 21, 2021 in a presentation from StrategyCorp titled the "Changing Nature of the Economy and Employment".	Policies for monitoring the achievement of planning goals related to the balance of

No.	Source	Submission	Response
No.	Source	That presentation covered initial research findings on the growth and composition of Halton's economy, impacts of the Covid-19 pandemic, Halton's non-residential real estate market outlook, financial risks, growth and jobs of the future and strategic approaches for attracting employment. Town staff understand that additional reporting on this research is still to come. The following sections of this report provide more detailed comments on proposed prescriptive policies in draft ROPA 48. Site-Specific Development Criteria for Strategic Growth Areas Draft ROPA 48 proposes a series of policy requirements for the local municipalities in order to plan for employment uses in certain SGAs. These proposed policies would apply to site-specific developments and require that multiple development criteria be satisfied, including: Identification of minimum employment targets for SGAs; Identification of minimum amount of gross floor area to be planned for employment uses; Identification of a minimum proportion or threshold of the total gross floor area within this area to be developed for employment uses (emphasis added) Town Staff Opinion: Town staff does not support the introduction of these requirements through draft ROPA 48 and recommends that they be removed to provide greater flexibility for meeting planning goals in SGAs. The proposed regional policies are not requirements of the 2019 Growth Plan, as amended, and appear to be discretionary policies being introduced by the region.	population and jobs in SGAs have been maintained in the proposed ROPA. See comment above.
		Target Proportions for Strategic Growth Areas Draft ROPA 48 introduces a new Table 2b, which contains for certain SGAs, Minimum Density Targets and Target Proportions of Residents & Jobs. As mentioned earlier, minimum density targets are non-discretionary requirements of the 2019 Growth Plan, as amended, and town staff has no concerns with this policy.	

No.	Source	Submission	Response
		However, Town staff has concerns with the proposed Target Proportion of Residents & Jobs. Draft ROPA 48 proposes the following regional requirement:	
		"Require Local Municipalities to plan for employment uses within Strategic Growth Areas by: b) planning to achieve, where applicable, the target proportion of residents and jobs within the Strategic Growth Area as identified in Table 2b, through policies that: [iii] identify the minimum amount of gross floor area that should be planned for employment uses, including major office uses, within the Strategic Growth Area in order to meet the minimum jobs target and the target proportion of residents and jobs."	
		Requiring local municipalities to create official plan policies that identify a minimum amount of gross floor area in order to meet the proposed target proportions is onerous and will be difficult to establish accurately.	
		Determining a minimum amount of floor area to accommodate a specific number of residents and job requires the use of numerous assumptions and estimates about the nature of the future development.	
		Some of these assumptions and estimates include:	
		estimated gross floor area per employee or job (which varies based on the type of employment)	
		estimated mix of employment uses	
		estimated average residential unit size	
		estimated persons per residential unit	
		estimated building efficiency	
		Knowing the exact values for each of these assumptions prior to development is not possible. The actual values can only be known after a development is completed and residents and tenants have moved in.	

No.	Source	Submission	Response
		Furthermore, these values do not remain constant over the life of a development and change continually as the occupants of the places of employment and residential units change periodically. The exercise is also not as simple as requiring a minimum proportion of gross floor area that is equal to the target proportion in Table 2b. In general, gross floor area used by a resident is greater than the gross floor area used by an employee or job. For example, requiring a minimum 35% of all gross floor area to be dedicated to employment would likely yield far more than 35% jobs. Depending on the values selected for the above list of assumptions, 35% gross floor area dedicated to employment could yield 55% jobs and thereby only 45% residents. The target proportion is looking for more residents than jobs. If this same proportion were applied to gross floor area, however, the result would be more jobs than residents. Town Staff Opinion: Town staff is of the opinion that these targets should be removed from draft ROPA 48. The 2019 Growth Plan, as amended, and companion provincial planning documents do not contain requirements for target proportions of residents and jobs planned to be achieved within SGAs. In this regard, the proposed regional target proportions appear to be a discretionary policy introduced by the region. And while it may be possible for a regional policy to be more restrictive than a provincial policy, that possibility alone does not constitute a planning rationale for the more restrictive policy. Public Engagement in the Regional Official Plan Review Information about the Regional Official Plan Review can be found on-line at their main webpage for the project: https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)-(1)/Halton-s-Regional-Official-Plan-Review-(ROPR)?mc_cid=a40331bb63&mc_eid=d937cdb23a From that page, there are links to additional information, including: Learn about the Growth Concepts Take a short questionnaire Join a virtual Public Information Centre	Given the importance of accommodating employment growth in SGAs to the Region's growth strategy, a target proportion of residents and jobs in Table 2b is maintained in ROPA 48. However, Table 2b is revised to: • clarify the general nature of the target (through the addition of the world 'General' and through the addition of the tilde (~) symbol which in commonly read as 'approximately'); • update the targets for specific SGAs based on local feedback (Milton UGC, Palermo Village) and/or to achieve a greater level of consistency across the SGAs and to reflect the more general nature of the targets (Aldershot, Acton, etc.); • add a footnote to reinforce the general / long-term / aspirational nature of the target and the latitude for refinements to it through a local process, consistent with Section 55.3, which has also been revised to clarify the implementation of the general target in Table 2b through local planning processes. In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches.

No.	Source	Submission	Response
No.	Source	Read the initial consultation report A virtual Public Information Centre (PIC) for the Town of Oakville is scheduled for Thursday, May 13 at 7:00 PM. Town staff will attend the Oakville PIC. The full schedule and instructions on how to join are in the table below: Dates	Response
		report.	

No.	Source	Submission	Response
		(B) FINANCIAL There are no financial considerations from this report. (C) IMPACT ON OTHER DEPARTMENTS & USERS Multiple town departments have had the opportunity to provide input into the town's responses to Halton's Regional Official Plan Review. (D) CORPORATE STRATEGIC GOALS This report addresses the corporate strategic goal(s) to be the most livable town in Canada. (E) CLIMATE CHANGE/ACTION Managing and directing required population and employment growth to a defined urban structure is an action to mitigate Climate Change. Prepared by: Kirk Biggar, MCIP, RPP Senior Planner, Policy Planning and Heritage Recommended by: Diane Childs, MCIP, RPP Manager, Policy Planning and Heritage Submitted by: Gabe Charles, MCIP, RPP Acting Director, Planning Services	
10	Town of Milton E-mail dated May 12, 2021	Regional Official Plan Amendment (ROPA) 48 was initiated through Report No. LPS17-21 as endorsed by Council in February 2021. ROPA 48 advances select local municipal planning priorities related to urban structure and will provide important foundational policies to support Provincial objectives to increase housing supply and support growth and economic development in Halton. This report provides Milton's response to ROPA 48 for the consideration of Halton Region.	

No.	Source	Submission	Response
		Background Regional Council directed Regional staff to prepare an initial scoped ROPA, under Section 26 of the Planning Act that would advance certain local municipal planning objectives. The draft ROPA 48 may be viewed as part of the Regional Council Meeting Agenda for February 17, 2021, as Attachment #1 to LPS17-21 at this link: https://edmweb.halton.ca/OnBaseAgendaOnline/Meetings/ViewMeeting?id=41 96&doctype=1 ROPA 48 (see map in Attachment 1) is proposing to advance the following key changes to the Regional Official Plan that align with and implement the Provincial Growth Plan: Adjustments to boundaries and policy changes to Urban Growth Centres (Burlington, Mid-Town Oakville, and Milton) Delineation and assignment of density targets for Halton's Major Transit Station Areas (MTSAs); Identification of additional growth nodes and strategic growth corridors with the corresponding policy framework; and Advancement of strategically important employment conversions to advance and support a mixed-use development approach.	
		ROPA 48 would implement an adjustment to the Burlington Urban Growth Centre designation that would identify the area around the Burlington GO MTSA as the Urban Growth Centre and primary growth node to stimulate growth and redevelopment of the MTSA as the focus of growth in the City of Burlington. ROPA 48 contains key employment land conversions to support growth planning in Halton, in accordance with the Growth Plan, that can achieve economic development objectives in a changing economy. These include: Iands within the Aldershot and Burlington GO MTSAs in Burlington; Iands within the Acton GO and Guelph Street Corridor areas in Halton Hills; Iands within the Bronte/Main Street Corridor, the Meritor lands as well as the Milton Education Village (MEV) and Agerton areas in Milton; and Iands within the Palermo Village, the Hospital District and Trafalgar Corridor and a portion of the Bronte GO MTSA in Oakville. Further to the above, it must be noted that Regional Report No. LPA17-21, as originally authored did not include Milton's most strategically important	

No.	Source	Submission	Response
		employment land conversions (Agerton and the MEV), despite Milton's repeated requests and supporting rationale. In light of this, a motion was tabled and approved at the Regional Council meeting held February 17, 2021 directing the following: "THAT Regional staff be directed to include the southern portion of the Agerton Secondary Plan (lands south of hydro corridor) to facilitate the Major Transit Station Area and the southerly Milton Education Village employment land conversions as part of the draft "Regional Official Plan Amendment 48 – An Amendment to Define a Regional Urban Structure", attached to Report LPS17-21 and work with Town of Milton staff to frame the supporting rationale and basis for the inclusion of these lands prior to commencing the statutory public process and circulating the draft amendment to the Minister of Municipal Affairs and Housing." "THAT given the changing nature of employment and the need to understand the role of employment in the mixed use growth nodes, request that Regional staff consider a policy which would allow for changes in the ratio between population and jobs within each of the growth nodes outside of municipal comprehensive reviews. A policy should allow for changes to capture the evolving nature of employment uses which are flexible and responsive to the market and which capture the contribution the mix of employment and residential uses which contribute to the vibrancy and success of the growth nodes." Given that draft ROPA 48 is part of a municipal comprehensive review as provided for in Section 26 of the Planning Act, the Minister of Municipal Affairs and Housing will be the approval authority for this amendment to the Regional Official Plan. There is no ability to appeal the decision of the Minister. As such, it is imperative that Milton's interests are addressed in this amendment.	
		Discussion	
		At their meeting of February 17, 2021, Regional Council authorized Regional staff to release draft ROPA 48 for public engagement and to initiate the statutory public process required by the Planning Act.	Regarding the Agerton lands, ROPA 48 proposes to convert the Agerton employment area that is west of Trafalgar Road. The conversion of the Agerton employment area east Trafalgar is
		This report is seeking direction to submit the following comments as Milton's formal response to ROPA 48: Rationale and Basis for the Inclusion of the MEV and Southern Agerton in ROPA 48	proposed to be considered as part of the balance of the IGMS. There are number of reasons for this approach.
		General comments:	The Agerton lands were originally identified as requiring further analysis in order to more fully

No.	Source	Submission	Response
		 It is good planning to require that urban places be created to support and complement the significant investment in the MEV and the Trafalgar GO station in Agerton. Providing for an appropriately planned mix of housing and jobs together with complementary retail and services uses accomplishes this. This approach to planning will serve to increase the density of these areas and provide for a greater diversity of jobs in Milton as well as create an urban environment attractive to both employers and employees. The nature of planning for employment is aspirational and about creating the opportunity to attract employers. The employment planned for these areas includes new types of employment, which typically occur within urban or community areas as opposed to in more traditional employment areas on designated employment lands. Once designated, the lands could accommodate all jobs immediately, although the timing for when they are realized cannot be predicted with the precision requested by the Region. The Town continues to strongly market itself, particularly through its economic development efforts to attract employers. These activities occur outside of the planning documents. Secondary Plans are land use planning documents that provide a policy framework to arrange land uses and comprehensively manage development in a manner that achieves densities and growth objectives. With regard to the MEV Secondary Plan, the vision includes a mix of uses across the entire MEV. Maintaining the current Employment Area designations could allow warehousing and logistics at the MEV and would completely contradict Council's direction to develop the MEV as a complete community anchored by a strong post-secondary presence and innovation employment. The Town is taking this one step at a time – securing the Trafalgar GO station is a major investment that will spark employment and population growth in this area of the Town. The intent is to create significant demand at this GO station that co	understand whether the conversion would have the potential to adversely impact the Region's supply of land over the 2051 planning horizon and the ability to achieve Regional employment targets. Further analysis was also required to confirm that there was a demonstrated need for the conversion on the basis of its strategic location and strategic opportunity to contribute to key strategic growth management objectives and to assess how the conversion relates to the lands to the north owned by Canadian Pacific Railway from a compatibility perspective. The lands west of Trafalgar Road are located in the vicinity of the Proposed Trafalgar GO Station as identified in the Regional Urban Structure and conversion could enable strategic opportunities for growth that would support the Regional and/or Local Urban Structure by contributing to strategic growth management objectives such as accommodating significant population and employment growth and achieving density targets within strategic growth areas. As a result, Regional staff are of the opinion that the conversion of the lands west of Trafalgar Road to enable development that accommodates residential and employment growth following conversion is supportable and recommended that this conversion be advanced as part of ROPA 48. The basis of Regional Council's direction to move forward with ROPA 48 was to advance select local municipal planning priorities related to urban structure including advancing an initial set of strategic employment land conversions required for fully implementing local municipal plans and priorities related to growth and intensification and which support the Regional Urban Structure. Given the scale of the Agerton request, its strategic location in relation to goods movement facilities, and that it currently functions as part of

No. Source Submission Re	Response
requirement for employment lands and the types of jobs generated by more traditional employment uses should be considered overall through the Region's MCR process, along with updated Best Planning Estimates (BPEs). Growth Plan Policies and Responses: The Growth Plan allows the contemplation of employment land conversions subject to various tests. The following outlines how the proposed conversions of southern Agerton and the MEV meet these tests (responses are bold italicized):	the Region's supply of vacant employment land available to accommodate employment growth in the Region, the conversion of the entirety of the ands requires further consideration to understand the potential impacts to the Region's supply of and required for employment purposes over the 2051 planning horizon. As a result, the conversion of the Agerton lands east of Trafalgar through ROPA 48 is not recommended by Regional staff as it would be more appropriate to continue considering this conversion through the balance of the IGMS and the development of a Preferred Growth Concept.

No.	Source	Submission	Response
		types jobs in that timeframe for Halton Region (previously forecasted at 206,000 employment lands type jobs and now closer to 164,000 jobs.	
		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; neither the MEV nor Agerton conversions will preclude the realization of employment lands type employment on adjacent lands, and as noted both will result in an increase in employment with higher densities. Through detailed secondary planning exercises, the Town has demonstrated that appropriate transitions can be incorporated which will maintain land use compatibility.	
		e) there are existing or planned infrastructure and public service facilities to accommodate the proposed uses. Both the MEV and Agerton have planned infrastructure and public service facilities to accommodate the proposed uses, as demonstrated through the secondary plan processes.	
		2.2.5.10 Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing employment areas may be converted to a designation that permits non-employment uses, provided the conversion would:	
		a) satisfy the requirements of policy 2.2.5.9 a), d) and e); noted above.	
		b) maintain a significant number of jobs on those lands through the establishment of development criteria; both the MEV and Agerton conversions will realize an increase in the number of jobs.	
		c) not include any part of an employment area identified as a provincially significant employment zone unless the part of the employment area is located within a major transit station area as delineated in accordance with the policies in subsection 2.2.4. Neither Agerton nor MEV are within a provincially significant employment zone.	Given the importance of accommodating employment growth in SGAs to the Region's
		Additional General Comments on ROPA 48:	growth strategy, a target proportion of residents and jobs in Table 2b is maintained in ROPA 48. However, Table 2b is revised to:
		While staff does not object to the concept of "Regional Nodes" and "Strategic Growth Areas" (SGAs), when located in greenfield locations (i.e. Trafalgar Secondary Plan, Agerton Secondary Plan, MEV Secondary Plan); the Region's Official Plan should not define density and job targets. Rather, this should occur through the comprehensive Secondary Plan	clarify the general nature of the target (through the addition of the world 'General' and through the addition of the tilde (~)

No.	Source	Submission	Response
		 process undertaken at the local level. Any suggestion to set density and job targets in ROPA 48 should refer to "Area Specific Plans". This will prevent conflicting policy while still providing specific targets, consistent with local urban structure plans, through a comprehensive process. Staff offers no concerns with the Minimum Density Targets proposed for Urban Growth Centres and Major Transit Station Areas since these are required by the 2019 Growth Plan, and are considered non-discretionary. Staff also supports the approach of allowing the Minimum Density Targets for other SGAs as required by the 2019 Growth Plan, to be informed by work conducted at the local level. However, Town staff has concerns with the proposed Target Proportion of Residents and Jobs and is of the opinion that these targets should be removed from draft ROPA 48. Staff is supportive of the proposed employment land conversions of the "Meritor Site" and "Bronte/Main Street Corridor", as depicted in ROPA 48. 	symbol which in commonly read as 'approximately'); • update the targets for specific SGAs based on local feedback (Milton UGC, Palermo Village) and/or to achieve a greater level of consistency across the SGAs and to reflect the more general nature of the targets (Aldershot, Acton, etc.); • add a footnote to reinforce the general / long-term / aspirational nature of the target and the latitude for refinements to it through a local process, consistent with Section 55.3, which has also been revised to clarify the implementation of the general target in Table 2b through local planning processes.
		While staff generally supports the delineation of Milton's Major Transit Station Area at the Milton GO Station, as depicted in ROPA 48, staff requests that lands at 45 Bruce Street, the former site of a Milton Library also be included.	In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches.
		 Staff does not support the delineation of the Major Transit Station Area for Agerton (proposed Trafalgar GO Station) at this stage. This should be defined and informed through the comprehensive Secondary Plan process. 	Regional staff have recommended 45 Bruce Street be included within the Milton GO MTSA and UGC to support the Regional Urban Structure and Local Municipal strategic planning objectives.
		Subject to the population and employment targets being defined at the local level through an "Area Specific Plan" and not through the Region's Official Plan, staff supports the identification of Trafalgar Road as a "Regional Corridor".	The Trafalgar GO MTSA is not delineated through ROPA 48, however the policy framework for Proposed Major Transit Stations applies until a location for a station is confirmed.
		The Milton Mobility Hub Study Demonstration Plan has a projected density of 221 persons per hectare. This is based on 25,114 residents and 4,137 jobs. The proportion of residents and jobs is 85% and 15% respectively. There was estimated to be 2,971 existing jobs in the area. ROPA 48 must be revised accordingly to reflect this.	Comments noted. Table 2b has been updated to reflect the study findings and now contains a general target proportion of residents and jobs of 80% and 20% respectively.

No.	Source	Submission	Response
No.	Source	 With respect to new policy 78.1 - What do a "significant proportion of" and "certain types of" mean? Suggest revising this to read: "To promote population and employment growth within Strategic Growth Areas". With respect to new policy 78.1 - How does the Regional Urban Structure provide "increased opportunities"? We suggest deleting this to read: "To provide for the development of Affordable Housing". With respect to new policy 79.3(12) - This is based on the land use compatibility policy in the Provincial Policy Statement which refers to major facilities - not major employment uses. Major facilities is a defined term and should be used here. With respect to new policy 79.3(13) - This is based on 2.2.5.14 of the Growth Plan. But, notably, the words "site-specific" have been added. There may be circumstances where we would want flexibility to consider the transfer of employment from one site to another in the same ownership. For example, the phased redevelopment of the Milton Mall may involve relocating jobs from one development site to another site. With respect to new policy 79.3(13)(v) - This proposed policy could stifle development and intensification and should be removed. Next Steps: Regional Council will be notified when dates for the Open House/Public Information Centre and statutory public meeting have been confirmed. Public notification of these engagement opportunities will be provided through the Region's website, newspaper advertisements, mailing lists, social media, stakeholder groups, and other means. Town staff anticipates that the earliest opportunity for a Statutory Public Meeting on Draft ROPA 48 will be June 2021. Financial Impact There are no financial implications from this report. However, the implementation of the Region's ultimate growth management strategy – through regional and local official plan amendments will impact the financing and delivery of municip	No change made. No change made. Terminology has been updated to reflect the PPS, 2020. The words "site-specific" have been removed. In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches.

No.	Source	Submission	Response
		Respectfully submitted, Barbara Koopmans, MPA, MCIP, RPP, CMO Commissioner, Planning and Development For questions, please contact: Jill Hogan, MCIP, RPP	
11	City of Burlington E-mail dated May 12, 2021	Recommendation: Direct the Director of Community Planning to submit community planning department report PL-20-21 and its appendices as the City of Burlington submission on the Region of Halton's Regional Official Plan Amendment Number 48; and Direct the Director of Community Planning to provide any further comments to the Region, if any, upon Council's decision on May 18, 2021. PURPOSE: To provide comments on the first Regional Official Plan amendment (ROPA 48) which has been prepared to define a Regional Urban Structure. Vision to Focus Alignment: Increase economic prosperity and community responsive city growth Improve integrated city mobility Support sustainable infrastructure and a resilient environment Building more citizen engagement, community health and culture Executive Summary: City of Burlington Staff have reviewed the Region of Halton's scoped Regional Official Plan Amendment titled Regional Official Plan Amendment 48 and have prepared a submission to inform the Statutory Public meeting and to inform the finalization of the amendment. Staff are supportive of the amendment and of moving the implementation of the Regional Official Plan Review forward in a phased manner. Staff encourage the Region to move expeditiously to prepare a recommendation report related to the amendment and to provide sufficient time to consider any comments received prior to, and through the statutory process. Staff have also proposed a series of modifications for consideration to support implementation of the policies. Overall, modifications proposed by City Staff are intended to support local plans and priorities by providing the flexibility to plan within the local context of each municipality.	
		1.0 Regional Official Plan Review	

No.	Source	Submission	Response
		In April 2014, through Report No. LPS28-14, Regional Council authorized the commencement of a statutory five-year review of the Halton Region Official Plan, referred to as the Regional Official Plan Review (ROPR). Regional staff developed a Work Plan, Communications and Engagement Strategy, and Directions Report to guide the ROPR through Report No. LPS110-16 which was delivered to Regional Council in October 2016. The Directions Report was the culmination of Phase 1 of the ROPR and identified a high-level work plan for subsequent phases. The Regional Official Plan Review is being advanced in partnership with Halton's local municipalities and in consideration of local plans and priorities. The Region continues to be responsive to the local vision for growth established by the local municipalities throughout the process.	
		The Regional Official Plan Review (ROPR) in Phase 2 focused on research, analysis and a set of Discussion Papers on five key theme areas. The Discussion Papers were prepared and released for public consultation in July 2020. For more details and to review the comments provided in September 2020, please refer to staff report PL-28-20 titled <i>Submission on Region of Halton's Official Plan Discussion Papers</i> . These City prepared comments highlighted key issues related to the various discussion papers as well as discussing recent changes (August 2020, Amendment 1) to the Growth Plan (2019), and the Burlington City Council Direction to request the Region consider an adjusted Urban Growth Centre boundary.	
		During the consultation period related to the Discussion Papers, Regional Staff prepared staff report LPS84-20 titled <i>Advancing Key Planning Priorities of the Halton Municipalities through the Regional Official Plan Review.</i> The report directed staff to prepare an initial Scoped ROPA, under Section 26 of the Planning Act which would advance select local municipal planning priorities related to urban structure as presented in the Regional Urban Structure and Supplemental Discussion Paper.	
		Report No. LPS84-20 outlined a number of local municipal planning priorities that were to be considered as part of the initial Scoped Regional Official Plan Amendment including boundary and policy changes to Urban Growth Centres, delineation and assignment of density targets for MTSAs, identification of additional growth nodes and strategic growth corridors with a corresponding policy framework and limited employment conversions.	

No.	Source	Submission	Response
		By way of a letter dated November 12, 2019 the Province confirmed that municipalities may advance a phased approach to municipal comprehensive reviews through multiple official plan amendments.	
		In response to City of Burlington Staff report PL-33-20, a supplemental discussion paper was prepared jointly by Regional and City staff titled "Downtown Burlington Urban Growth Centre and MTSA Supplemental Discussion Paper" which was released in October 2020. City of Burlington comments were provided in staff report PL-59-20 titled <i>Update on the Downtown Burlington Urban Growth Centre (UGC) and Major Transit Station Area (MTSA) Supplemental Discussion Paper</i> . Further discussion of the adjusted Downtown Burlington Urban Growth Centre is provided below.	
		On February 17 Regional Council considered three reports on its agenda related to the Regional Official Plan Review:	
		LPS05-21 – Regional Official Plan Review – Phase 2 Initial Consultation Summary	
		LPS18-21 – Regional Official Plan Review – Integrated Growth Management Strategy – Growth Concepts Discussion Paper	
		LPS17-21 - Draft Regional Official Plan Amendment 48 - An Amendment to Define a Regional Urban Structure.	
		The purpose of the subject report is to provide comments on ROPA 48 as presented in LPS17-21 in advance of the Statutory Public Meeting. City staff will also provide discussion and an associated submission related to both the Initial Consultation Summary and the Growth Concepts discussion paper in a forthcoming report.	
		Regional Council amended the recommendations related to LPS17-21. The effect of the modifications were to add a specific geographic area to be considered for employment conversion around the Milton Education Village and to add the following considerations for Regional staff:	
		THAT given the changing nature of employment and the need to understand the role of employment in the mixed use growth nodes, request that Regional staff consider a policy which would allow for changes in the ratio between population and jobs within each of the growth nodes outside of municipal comprehensive reviews. A policy should allow for changes to capture the	

No.	Source	Submission	Response
		evolving nature of employment uses which are flexible and responsive to the market and which capture the contribution the mix of employment and residential uses which contribute to the vibrancy and success of the growth nodes.	
		THAT Regional staff consider the local input in the defining the growth node policies.	
		THAT Regional staff comment on the ability of the growth nodes to contribution to higher density employment and how this is factored into the land needs for employment forecasts. City staff look forward to working with Regional staff to review the above noted considerations.	
		2.0 Regional Official Plan Amendment 48	
		The Region has prepared, in line with the recommendation, a draft Regional Official Plan Amendment (ROPA 48) which is being advanced under Section 26 of the Planning Act. This amendment, among other things, identifies non-discretionary components of a Regional Urban Structure that support local plans and priorities while ensuring that Regional Council retains its ability to comprehensively and objectively evaluate the full range of Growth Concepts associated with the Integrated Growth Management Strategy.	
		City staff are supportive of the approach to present this first phase amendment to the Regional Official Plan which has been drafted with a focus on settlement areas, specifically within the Urban Area, to:	
		define the Regional Urban Structure;	
		 reinforce Local Urban Structures; and, enable Local municipalities to move forward with critical work at the local level. 	
		The amendment is well written and easy to understand. The specific details of the amendment are considered below. Detailed comments on the proposed amendment (Attachment 1 to LPS17-21) are included as Appendix A: ROPA 48 Comment Table. While the comments in this report and in Appendix A form the City's comments at this time, staff will monitor the progress of ROPA 48 and will provide further comments, if necessary, in advance of the Region's Statutory Public Meeting.	

No.	Source	Submission	Response
NO.	Source	The comments below are divided into the following categories: 2.1 Population and Employment to 2051 2.2 Regional Structure 2.2.1 Urban Area and Regional Urban Structure 2.2.2 Strategic Growth Areas a) Urban Growth Centres b) Major Transit Station Areas c) Regional Nodes d) Targets & Proportions for UGCs, MTSAs and Regional Nodes e) Employment Uses in Strategic Growth Areas f) Other Regional Urban Structure Elements	Response
		2.2.3 Employment Conversions 2.1 Population and Employment to 2051 Draft ROPA 48 implements the Halton Region-wide target to 2051 in Table 1 and replaces 2031 with 2051 in other locations in the amendment. Table 1 includes an asterix with respect to population and employment forecasts for each of the Local Municipalities to 2051 which refers to the following footnote: *Distribution of the 2051 population and employment forecasts to the Local Municipalities, forecasts to be determined through the municipal comprehensive review.	
		City staff agree that the Region must apply the forecasts from Schedule 3. Staff also agree that Halton Region can only fully achieve the Growth Plan policy direction through the completion of the municipal comprehensive review. In consideration of the Growth Plan policy 5.2.4.3 which states:	
		The population and employment forecasts and plan horizon contained in the applicable upper- or single-tier official plan that is approved and in effect as of August 28, 2020 will apply to all planning matters in that municipality, including lower-tier planning matters where applicable, until the upper- or single-tier municipality has applied the forecasts in Schedule 3 in accordance with policy 5.2.4.2 and those forecasts are approved and in effect in the upper- or single-tier official plan.	
		Staff Position City staff request that the Region consider modifying the note on Table 1 to clarify that until the completion of the municipal comprehensive review that the	This text has been modified to provide interim clarification that Table 1 is modified in part

No.	Source	Submission	Response
		Population and Employment Distributions to 2031 also found in Table 1, and in effect as of August 28, 2020, will apply to all planning matters in Halton Region and within lower-tier planning matters, where applicable. For the specific comment and proposed modification please see Appendix A.	through ROPA 48 and will be comprehensively modified though the Region's Municipal Comprehensive Review.
		2.2 Regional Structure	
		Limited modifications have been made to the policies relating broadly to Halton's Regional Structure in the phased Regional Official Plan Amendment. Modifications are focused on enhancing the details of the Urban Area and its Regional Urban Structure which is supported by Map 1H, which is included as Appendix B: Regional Urban Structure Map 1H.	
		2.2.1 Urban Area and the Regional Urban Structure	
		ROPA 48 includes a new goal related to the Urban Area and the Regional Urban Structure which states: The goal of the Urban Area and the Regional Urban Structure is to manage growth in a manner that fosters <i>complete communities</i> , enhances mobility across <i>Halton</i> , addresses climate change, and improved housing affordability, sustainability, and economic prosperity.	
		In support of this goal, Objective 72.1(6) is also modified to clarify that the proposed policies identify a Regional Urban Structure that directs growth to Strategic Growth Areas and protects Regional <i>Employment Areas</i> .	
		New policies 51.3 and 78 are also added to clarify that the lands within the Urban Area are further defined by having a Regional Urban Structure consisting of the following:	
		 Strategic Growth Areas Regional Employment Areas Built-Up Areas and Designated Greenfield Areas 	
		The comments in this section are focused on the Strategic Growth Areas and the Regional Employment Areas as no changes have been proposed through ROPA 48 to the Built- Up Areas or the Designated Greenfield Areas. Changes to those features of the Regional Urban Structure will be considered after the completion of the Integrated Growth Management Strategy.	

Source	Submission	Response
	2.2.2 Strategic Growth Areas	
	One of the key elements of ROPA 48 is the presentation of a Region-wide approach to responding to the direction from the Growth Plan which requires Upper-tier and Single-tier municipalities to "establish a hierarchy of settlement areas, and of areas within settlement areas" in line with the policies of the Growth Plan.	
	Strategic Growth Areas are a new term, first coined in the Growth Plan in 2017. Strategic Growth Areas are defined in the Growth Plan 2019:	
	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.	
	In general, the approach that ROPA 48 takes is to propose the former defined term "Intensification Areas" in the Regional Official Plan be replaced throughout with the newly defined term "Strategic Growth Areas". Staff are supportive of this approach as the defined term from the Growth Plan is implemented and further supported by the establishment of a Strategic Growth Area hierarchy in ROPA 48.	
	ROPA 48 proposes an important clarification related to the agricultural, natural heritage systems and to the Strategic Growth Areas which are all defined as durable elements of the Region's Official Plan which recognizes that the horizon for these elements is far beyond the planning horizon of 2051. ROPA 48 proposes the following Strategic Growth Areas	
	- Urban Growth Centres;	
	- Major Transit Station Areas;	
	- Proposed Major Transit Station Areas;	
	- Primary Regional Nodes;	
	Source	2.2.2 Strategic Growth Areas One of the key elements of ROPA 48 is the presentation of a Region-wide approach to responding to the direction from the Growth Plan which requires Upper-tier and Single-tier municipalities to "establish a hierarchy of settlement areas, and of areas within settlement areas" in line with the policies of the Growth Plan. Strategic Growth Areas are a new term, first coined in the Growth Plan in 2017. Strategic Growth Areas are defined in the Growth Plan 2019: 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. In general, the approach that ROPA 48 takes is to propose the former defined term "Intensification Areas" in the Regional Official Plan be replaced throughout with the newly defined term "Strategic Growth Areas". Staff are supportive of this approach as the defined term from the Growth Plan is implemented and further supported by the establishment of a Strategic Growth Area hierarchy in ROPA 48. ROPA 48 proposes an important clarification related to the agricultural, natural heritage systems and to the Strategic Growth Areas which are all defined as durable elements of the Region's Official Plan which recognizes that the horizon for these elements is far beyond the planning horizon of 2051. ROPA 48 proposes the following Strategic Growth Areas - Urban Growth Centres; - Major Transit Station Areas;

No.	Source	Submission	Response
		- Secondary Regional Nodes; and	
		- Regional Corridors	
		Policy 79.2 identifies a proposed hierarchy of Strategic Growth Areas (SGAs) delineated or identified by symbol on Map 1H. The SGAs that correspond to each and, where applicable, to Table 2b as proposed, are included in bold italics within () below):	
		(1) Urban Growth Centres / Major Transit Station Areas on a Priority Transit Corridor; (<i>Downtown Burlington UGC / Burlington GO and Midtown Oakville UGC/Oakville GO</i>)	
		(2) Urban Growth Centres / Major Transit Station Areas on a Commuter Rail Corridor; (Downtown Milton UGC / Milton GO)	
		(3) Major Transit Station Areas on a Priority Transit Corridor; (Bronte GO and Appleby GO)	
		(4) Major Transit Station Areas on a Commuter Rail Corridor; (Aldershot GO, Georgetown GO and Acton GO)	
		(5) Proposed Major Transit Station Areas; (Proposed Trafalgar GO)	
		(6) Primary Regional Nodes; (Uptown Core, Oakville; Hospital District Oakville; Milton Education Village; Palermo Village; Uptown Urban Centre, Burlington)	
		(7) Secondary Regional Nodes; (Neyagawa Urban Core, Oakville; Kerr Village, Oakville; Bronte Village, Oakville; Downtown Oakville; Downtown Urban Centre, Burlington; Downtown Georgetown, Halton Hills; Guelph Street Corridor, Halton Hill) and,	
		(8) Regional Corridors. (Not currently identified in ROPA 48) The Regional Urban Structure is supported by the Local Urban Structures identified in Local Official Plans which reflect this hierarchy of Strategic Growth Areas and may include additional Local Nodes, which are not expressly identified as specific Strategic Growth Areas.	
		The City supports the reference to the role of Local Official Plans, Local Urban Structures and associated policies. In addition, City staff confirm that the hierarchy proposed is generally appropriate and reinforces the City's Urban	

No.	Source	Submission	Response
		Structure and Growth Framework policies found in the new Official Plan. Burlington-specific comments are provided below related to each of the Strategic Growth Areas.	
		a) Urban Growth Centres	
		Urban Growth Centres are shown on Map 1H and are included on Map 6, which is made up of a series of maps including the specific details of the proposed boundaries for both UGCs and MTSAs. The amendment includes the adjustment to the Downtown Burlington Urban Growth Centre boundary as proposed through the "Downtown Burlington Urban Growth Centre and MTSA Supplemental Discussion Paper". In addition, boundary adjustments have been made to the Downtown Milton UGC and Midtown Oakville to remove the regulated flood plain in those areas.	
		City staff agree with the proposed boundary adjustment to the Downtown Burlington UGC. The adjustment of the Downtown Burlington UGC brings Regional policies in alignment to Growth Plan Schedule 5: Moving People – Transit. All of the Region's 3 UGCs are located along Existing Higher Order Transit Corridors. Further, the adjusted Downtown Burlington UGC and Midtown Oakville UGC are both located on Priority Transit Corridors. City staff also agree with the boundary adjustments to the Downtown Milton UGC and Midtown Oakville UGC to remove the regulated flood plain in those areas.	
		City staff recommend that modifications be made to Map 1H to better distinguish Urban Growth Centres that are also Major Transit Station Areas on a Priority Transit corridor from other MTSAs. Clarification in the mapping would support a better visual understanding of proposed Strategic Growth Area hierarchy set out in Policy 79.2.	Map 1h does currently distinguish between Urban Growth Centres and Major Transit Station Areas, while also distinguishing between the Priority
		New Official Plan The new Official Plan was prepared in conformity with the Region's current Official Plan (ROPA 38) with a horizon to 2031. The scoped re-examination of the downtown set out policies and vision to guide future growth in the downtown to 2031 while recognizing the wide variety of unique areas that make up the downtown with a focus on strong policies for a retail main streets, urban design, and cultural heritage.	Transit Corridor and Commuter Rail Corridor. Opportunities to enhance the mapping may be considered through the balance of the Regional Official Plan Review.
		A specific "given" was established in the Public Engagement Plan for the scoped re-examination as the following:	

No.	Source	Submission	Response
		Planning policy is guided by various legislative requirements and policy documents, such as the Planning Act, Provincial Policy Statement, provincial plans, the Halton Region Official Plan, Bill 108, and the Metrolinx Regional Transportation Plan. These legislative requirements include policies for the Urban Growth Centre (UGC), Major Transit Station Areas (MTSAs), and Mobility Hubs. City Council has directed staff to report back on any changes to the Urban Growth Centre and Major Transit Area designations after the completion of the Official Plan and Interim Control By-law studies. This analysis will not form part of the current project.	
		The policy framework, recently considered through the scoped re-examination project, which informed modifications to the adopted Official Plan, provides a framework for accommodating new growth in a manner that reflects the existing context and identifies potential for growth in accordance with those policies. The new Official Plan Downtown Urban Centre policy framework recognizes the existing boundary of the Downtown Burlington Urban Growth Centre which conforms to the Regional Official Plan. Should ROPA 48 be approved, it is expected that the policies of the Downtown Urban Centre would require only minor changes to the policy framework to bring the policies into conformity with the Regional Official Plan with the exception of establishing affordable housing targets which will be considered through the Housing Strategy currently underway and concluding in mid-2022.	
		Given that the Regional Official Plan Review is considering the future beyond 2031 to 2051, in conformity with the Growth Plan, this is the appropriate time for comments from the City of Burlington to reinforce that the adjustments to the supports the vision established in the Local Official Plan and in the Downtown Urban Centre policies.	
		Staff Position	
		City staff support the boundary adjustments to the existing Urban Growth Centres in Halton Region. Staff recommend enhancements to Map 1H to reinforce the Strategic Growth Area hierarchy set out in Policy 79.2.	
		b) Major Transit Station Areas	Opportunities to enhance the mapping may be considered through the balance of the Regional Official Plan Review.

No.	Source	Submission	Response
		ROPA 48 identifies and delineates Major Transit Station Areas across the Region. Similar to the comment provided with respect to the Urban Growth Centre, staff support the Major Transit Station Areas identified as part of the Regional Urban Structure on Map 1H. Staff are supportive of the removal of the MTSA designation in Downtown Burlington as discussed in the "Downtown Burlington Urban Growth Centre and MTSA Supplemental Discussion Paper". Similar to the comments related to the adjustment of the UGC, the removal of the MTSA does not impact the high-level direction and policies approved by the Region in the City's new Official Plan. There are likely to be several modifications required to language and mapping in the new Official Plan as it relates to the identification of the lands around the John Street Bus Terminal as a Major Transit Station Area. The New Official Plan maintains and reinforces the transit connection between the Burlington GO Station, downtown and the rest of the City. The City's new Official Plan also identifies long term frequent transit corridors, which reinforce transit connections among key destinations. Staff are supportive of the identification of Major Transit Station Areas as Protected Major Transit Station Areas is naccordance with Section 16 (16) of the Planning Act. One of a number of considerations related to Protected Major Transit Station Areas is the potential to develop Inclusionary Zoning Bylaws to support the introduction of affordable housing. Staff request further discussions related to the preparation of the required municipal assessment reports as there may be some potential for identifying a shared opportunity among the Region and Local municipalities. The City of Burlington has initiated a Housing Strategy and would like to move ahead with detailed discussions about the development of Inclusionary Zoning. i) Delineation of Major Transit Station Area head with detailed discussions about the development of Inclusionary Zoning. The Growth Plan requires that Upper o	Regional staff look forward to working with City staff in support of the City's Housing Strategy and in advancing the development of Inclusionary Zoning.

No.	Source	Submission	Response
		Study area boundaries around the existing GO Stations in Burlington have had a series of different treatments over time. First, the adopted Official Plan (2018) established Mobility Hub study boundaries. The intent of the Mobility Hub study areas was to signal and identify where additional study would be undertaken including a variety of studies like a transportation analysis, noise and vibration studies, archeological assessments to support the development of area-specific plans. When the boundaries were created in 2017 staff included a larger area, capturing existing public service facilities, including parks and open spaces, as well as neighbourhoods within the boundary for the purpose of studying the area holistically. These broader boundaries were established in anticipation of the need to identify connections and any potential impacts from a transportation network perspective such as increased traffic flows to and from the GO Station, opportunities for pedestrian and active transportation connections, as well as matters such as noise and air quality studies.	
		Next, through the Region's consideration of modifications to the New Official Plan "MTSA Special Planning Areas" were established which clarified that the formal delineation of MTSA boundaries would occur through the Region's municipal comprehensive review. To implement Official Plan Amendment No.119 while ensuing clarity and consistency throughout the Official Plan, the City proposed modifications to update the overall nomenclature and policy framework for transit-supportive development, which included the removal of the redundant term "mobility hub" and the introduction of the "MTSA Special Planning Area" concept to replace the former "Mobility Hub Study Area" terminology and align with provincial and regional policy. With one exception in the Aldershot Area, the "Mobility Hub Study Area" and the "Major Transit Station Area Special Planning Areas" are identical.	
		Lastly, the proposed Major Transit Station Areas Boundaries delineated in ROPA 48 are the result of the application of the Region's delineation methodology first described in the Urban Structure Discussion Paper in 2020. City staff are supportive of the Region of Halton's MTSA delineation methodology. Staff note that a primary goal of delineating an MTSA through the Region's process is to identify a minimum boundary density target to be achieved in alignment with the Growth Plan (2019). The earlier Mobility Hubs Study Areas were created to study matters like connectivity, transportation, air quality, noise impacts etc. at a larger scale, and therefore included parks, open spaces and some neighbourhood areas. Based on the Region's methodology, areas such as parks, open spaces and neighbourhood areas are excluded from the MTSA delineation.	

No.	Source	Submission	Response
		City Staff note that while the MTSA will have a delineated boundary, through area-specific planning staff will continue to consider areas adjacent to MTSAs to identify and strengthen connections, and consider any potential impacts from a transportation network perspective such as potential increased traffic flows from the GO Station, or potential opportunities to support pedestrian connections to the GO Station, as well as technical matters such as noise and air quality. As noted in PL-28-20 "Submission on Region of Halton's Official Plan Discussion Papers", the proposed MTSA boundaries proposed at that time for Burlington GO and Appleby GO vary slightly from their respective former Mobility Hubs study area boundaries. These variations relate primarily to the exclusion of parkland as well as minor refinements in Appleby GO, west of Appleby Line and north of the rail, which were made to align with ownership parcel fabric data. City staff are supportive of the proposed Downtown Burlington UGC / MTSA boundary and the Appleby GO MTSA boundary. Several differences are noted between the Aldershot MTSA Special Planning Area boundary within the new City of Burlington Official Plan and the proposed Aldershot GO MTSA boundary.	
		The Region's proposed Aldershot GO MTSA boundary excludes Grove Park, Aldershot Park and the properties located at 1135 Gallagher Road. Staff are supportive of the Region's proposed Aldershot Major Transit Station Area boundary, consistent with the Region's delineation methodology. 1150 and 1200 King Road The Region's proposed Aldershot GO MTSA boundary excludes 1150 and 1200 King Road. As part of the submission related to the Discussion Papers in the Fall of 2020 the following comment was provided: Staff note that the lands at 1200 King Road are addressed in Minutes of Settlement between the City and the owner of those lands, Paletta International Corporation. The City agreed, through the Minutes of Settlement, to conduct a review to determine whether the portion of the 1200 King Road lands located west of Falcon Creek should be developed with MTSA land uses. That review, which includes a	Comments noted.

No.	Source	Submission	Response
		natural heritage component, has not yet been completed. City staff await a response from the Province respecting the natural heritage review that has been completed for these lands. Once received, the City will consider the Province's comments and conclude its review. Through previous correspondence, the Region has noted that the proposed Aldershot GO MTSA boundary as presented in the IGMS Discussion Paper is consistent with the Region's delineation methodology to following the Natural Heritage System (NHS) boundary.	
		A portion of 1200 King Road was supported for employment conversion through the new Official Plan process given its inclusion in the Mobility Hub Study Area boundary as noted on Appendix D to PB-04-18. The Aldershot Mobility Hub Draft Precinct Plan identified that the same area was subject to further environmental review and it would be premature to prepare any draft precinct information for that portion of the study area. The City has recently been informed by the Province that a new Provincially Significant Wetland named Grindstone-Falcon Creeks Headwater Wetland Complex has been identified on a significant portion of the western half of 1200 King Road lands nearest the Aldershot GO station. Given this information staff believe that the natural heritage component of the work has been sufficiently completed. The findings confirm that significant natural heritage constraints exist on these lands. These constraints severely limit the potential of those lands of being able to accommodate development contemplated within an MTSA. Accordingly, staff are supportive of the Region's proposed Aldershot Major Transit Station Area boundary, consistent with the Region's delineation methodology. In general, should ROPA 48 be approved as proposed a number of mapping and policy issues would need to be addressed at the time of consideration of Local Official Plan conformity.	Comments noted.
		Staff Position	
		City staff:	
		- Support the removal of the MTSA designation from lands around the John Street Bus Terminal;	
		- Support the identification of all MTSAs shown on Map 1 H and Map 6 as Protected Major Transit Station Areas in accordance with Section 16(16) of the Planning Act;	Comments noted.

No.	Source	Submission	Response
		- Support the delineation methodology used to propose the Major Transit Station Area boundaries set out in Map 6; and	
		- Support the boundaries of the Major Transit Station Areas set out in Map 6.	
		c) Regional Nodes (additional growth nodes)	
		ROPA 48 establishes a set of additional growth nodes which form part of the Local Urban Structure. In the City of Burlington two Regional Nodes are identified: the Uptown Urban Centre which is identified as a Primary Regional Node and the Downtown Urban Centre which is identified as a Secondary Regional Node on Map 1H (Appendix B).	
		City staff are supportive of the identification of Regional Nodes. By identifying the Regional Nodes ROPA 48 includes all of the existing Urban Centres and emerging Major Transit Station Areas as Strategic Growth Areas in the City of Burlington. In doing so ROPA 48 includes all areas identified as Primary Growth Areas within the City's new Official Plan.	
		One key policy related to Regional Nodes is the requirement to prepare area-specific plans in accordance with Policies 48 and 77(5). For reference City Staff, in preparing the area-specific policies for the Downtown Urban Centre were guided by the same policy framework and confirm that with the exception of specific targets for Affordable Housing, which is a city-wide issue and will be considered through the City's Housing Strategy, all elements of the area-specific planning policies with respect to a redevelopment of a community were considered as part of the preparation of the modifications to the Downtown Urban Centre policies.	
		Through the development of the new Official Plan a review of the policies in the Uptown Urban Centre was undertaken to recognize the maturity of the Uptown Area which was first subject to Secondary Planning in the 1990's. Staff will work with the Region to review the Uptown Urban Centre policies in the new Official Plan to determine if further area-specific planning or study may be required in the future.	
		While supportive of the Regional Nodes policies, City staff also suggest that several refinements are required to:	
		- clarify the objectives of the Regional Nodes;	
		- distinguish Primary and Secondary Regional Nodes more clearly in policy;	

No.	Source	Submission	Response
		- in an abundance of caution, support the policy that encourages and allows for discretion by the Local municipality with respect to the delineation of Regional Node areas and the establishment of density targets.	
		Detailed comments and modifications are proposed in Appendix A: ROPA 48 Comments Table.	See responses below to Appendix A comments
		Staff Position	
		City staff: - Support the identification of Regional Nodes, reflective of Local Official Plans; and	An additional objective has been added to the list in Section 82: "To reflect and reinforce Local Urban Structures.
		- Suggest refinements to the Regional Nodes Policy and related concepts in Table 2b to support Local municipal discretion related to a number of aspects	Primary and secondary nodes are distinguished in Section 79.2 and elaborated on in Section 82.1.
		of the policy. d) Targets and Proportions for UGS's, MTSA's and Regional Nodes	The detailed directions have been replaced with a more general direction that allows for flexibility in local implementation.
		Table 2b in ROPA 48 establishes minimum density targets for the Urban Growth Centres and Major Transit Station Areas, as well as targets for the proportion of residents and jobs in the Urban Growth Centers, Major Transit Station Areas and Primary Regional Nodes.	Given the importance of accommodating employment growth in SGAs to the Region's growth strategy, a target proportion of residents
		Staff are supportive of the minimum density targets for the UGCs and MTSAs identified in ROPA 48, including the alternative density target of 120 people & jobs per hectare for the Appleby GO MTSA, which is unique in nature given that a significant portion of the MTSA is within the Region's Employment Area. While supportive, staff suggest the following refinements: - Add a note to Table 2b to identify that the targets are to be considered in the development of local OPAs;	and jobs in Table 2b is maintained in ROPA 48. However, Table 2b is revised to: • clarify the general nature of the target (through the addition of the world 'General' and through the addition of the tilde (~) symbol which in commonly read as 'approximately');
		- Flexibility at the local level is needed to balance residents and jobs. Modifications to the target proportions of residents and jobs should be allowed through a local process implementing the relevant Regional OP policies;	update the targets for specific SGAs based on local feedback (Milton UGC, Palermo Village) and/or to achieve a greater level of consistency across the SGAs and to reflect
		As previously indicated, staff are supportive of the Region's policy which encourages local municipalities to delineate boundaries and establish minimum density targets for other Strategic Growth Areas which are not	the more general nature of the targets (Aldershot, Acton, etc.);
		directly mandated through Provincial policy, such as Regional Nodes.	add a footnote to reinforce the general / long- term / aspirational nature of the target and the latitude for refinements to it through a

No.	Source	Submission	Response		
		Detailed comments and modifications are proposed in Appendix A: ROPA 48 Comment Table.	local process, consistent with Section 55.3, which has also been revised to clarify the implementation of the general target in Table		
		e) Employment Uses in Strategic Growth Areas	2b through local planning processes.		
		ROPA 48 provides clear direction and solid expectations for the development of employment uses within Strategic Growth Areas, supported by detailed planning and monitoring.	In terms of Section 79.3(13), the detailed directions in Draft ROPA 48 have been replaced with more general direction that allows for more		
		In planning to achieve the target proportion of residents and jobs within Strategic Growth Areas, local municipalities are to establish policies identifying specific employment requirements including the identification of a minimum proportion or threshold of the total gross floor area to be developed for employment uses. Staff are of the opinion that the policy as written is too prescriptive. It may be more appropriate to identify a set of high level criteria to guide the Region when considering local approaches to achieving this balance. This approach would give local municipalities the opportunity to use a variety of tools and allow for flexible and creative approaches to support the broader Regional and Local objective of ensuring a balance of jobs and people in a way that best suits each unique local area. Detailed comments and modifications are proposed in Appendix A: ROPA 48	flexibility in local implementation. This includes the removal of requirements related to specific development criteria or policy approaches		
		f) Other Regional Urban Structure Elements There are two remaining elements of the Regional Urban Structure that will be considered in subsequent amendments and those are Regional Corridors and Local Nodes. On the issue of Regional Corridors City staff look forward to discussing the identification and mapping of Regional Corridors at a later stage of the process. City staff are supportive of the Regional Official Plan reinforcing Local Urban Structure and policies. As the Region moves forward with developing Local Nodes policy City staff recommend distinguishing Local Nodes in the Regional Official Plan. Local Nodes will each have unique local context and will be subject to the policies of Local Official Plans. In addition, staff recommend that Regional policy continue to support that Local Nodes may only be added through Local Official Plan Reviews and that the policy frameworks related to any identified Local Nodes should be exempt from Regional approval. Regional Policy 44 identifies that the "Local Urban Structure of each of the	Comments noted.		

No.	Source	Submission	Response
		Local Municipalities, for instance are the responsibilities of the Local Municipalities as long as the overall planning vision for Halton and the policies of this Plan, including the Regional Urban Structure, are adhered to." Staff support this position and look forward to future discussions. 2.2.3 Employment Conversions As was noted earlier, the City as part of the adoption of the new Official Plan presented Appendix D to PB-04-18 that included the range of employment conversions recommended by the City to be considered through the Region's municipal comprehensive review. With the exception of 1150 and 1200 King Road (see row E and O of Appendix D) discussed above, all City recommended employment conversions have been supported in the Growth Concepts Discussion Paper. Staff also note that of those supported only one area (see row I of Appendix D) has not been included in ROPA 48. Staff request that the area be brought forward into ROPA 48. Given the nature of the conversion it is appropriate as it has been highlighted in the Growth Concepts Discussion Paper that these decisions to convert do not have an impact on the consideration of the rest of the IGMS. Further details on other employment conversions and comments related to Employment Area additions will be provided as part of the City's comments on the Growth Concepts Discussion Paper. Strategy/process ROPA 48 is being advanced under Section 26 of the Planning Act to advance local municipal planning priorities related to defining the Regional Urban Structure and to achieve conformity with the Growth Plan, 2019. Official Plan Amendments made under Section 26 of the Planning Act require approval from the Minister of Municipal Affairs and Housing, with the Minister's decision not subject to appeal. The Planning Act also requires the Region to circulate draft ROPA 48 for the Minister's review at least 90 days in advance of providing notification of an Open House and Statutory Public Meeting. To that end, on February 17, 2021, through report LPS17-21, Re	The Employment Area lands known as "North Service Road / Industrial Street" are recommended for conversion through the Preferred Growth Concept, Regional staff have not recommended that this conversion be advanced through Regional Official Plan Amendment No. 48 because it does not meet the criteria for prioritizing inclusion at this time. Where conversion requests are not required to support local municipal plans and priorities they will be addressed through the Preferred Growth Concept. More information on the assessment is available in Appendix C of the Growth Concepts Discussion Paper.

No.	Source	Submission	Response
		Currently, the Region has indicated that the Virtual Public Information Centres, Open House and Statutory Public Meetings are targeted for June, 2021 with no date formally scheduled at the time of the preparation of this report. Staff note that engagement opportunities will also be available through the Virtual Public Information Sessions for the Growth Concepts Discussion Paper and Phase 2 – Initial Consultation Summary Reports as part of the Region's Integrated Growth Management Strategy work. These Virtual Public Information Sessions are currently targeted for May 2021. At the time of ROPA 48's approval, the City of Burlington will be required to	
		bring its Official Plan into conformity with the Region's Official Plan as amended by ROPA 48. Burlington's Official Plan will be brought into conformity with the Regional Official Plan through a phased approach. In the near-term, Staff will focus on bringing the site specific employment conversions into conformity while the broader conformity issues will be addressed through a series of Official Plan Amendments. It is expected that this will be accomplished in part through the forthcoming MTSA Area Specific Plan study work and in part through a broader amendment to the new Official Plan. Staff will consider approaches in delivering this conformity and will provide update on this process at the appropriate time.	
		Options Considered	
		Not applicable.	
		Financial Matters:	
		Not applicable.	
		Total Financial Impact	
		Not applicable.	
		Source of Funding Not applicable.	
		Other Resource Impacts	
		Not applicable.	
		Climate Implications	

No.	Source	Submission	Response
		The Region's Urban Structure focuses on growth within the existing Urban Areas of the Region of Halton. The Regional Urban Structure and the identification a hierarchy of Strategic Growth Areas across the Region reinforces the Region's ability to accommodate intensification and encourage and prioritize transit supportive growth.	
		Engagement Matters:	
		Staff consulted with a number of City Departments as well as Burlington Economic Development to gather feedback on ROPA 48 in the preparation of this report and its appendices. This consultation included an internal virtual meeting with various City departments.	
		Please see the "Strategy/process" section above for information on the Region's engagement process.	
		Regional staff have noted that there will be sufficient time to incorporate the findings from the Statutory Public Meeting into ROPA 48. As noted in the Regional Staff report LPS17-21 it is expected that:	
		Any comments received through the statutory process will be documented on the public record and responded to by Regional staff prior to bringing forward a recommendation report to Council.	
		Conclusion:	
		ROPA 48 advances a number of local plans and priorities. Staff are supportive of ROPA 48 and the expeditious approval of the amendment will position the City to move forward on Major Transit Station Area area-specific plans at Aldershot GO, Downtown Burlington UGC / MTSA, and at Appleby GO.	
		Respectfully submitted, Alison Enns, MCIP,RPP Manager of Policy and Community	
		Appendices:	
		A. ROPA 48 Comments Table	
		Alison Enns, MCIP,RPP Manager of Policy and Community Appendices:	

No.	Source	Submis	sion		Response	
		Notifical Curt Ber Report All report Financial Counsel Append	tions: nson, Region Approval: ts are review officer and the control of the control the control of the control of the control the control of the control of the control of the control the control of th	of Halton red and/or approved by E the Executive Director o 48 Comments Table A: ROPA 48 Comment		
		2/3 (pdf pgs 5/6)	Policy No.	The basis should include discussion of the path to full conformity to Growth Plan 2019.	Proposed Modifications to LPS17-21 Attachment #1 (pages 1 through 31) (Additions are indicated in blue underlined text and deletions are indicated in strikethrough text) The contents of this amendment do not compromise the ability of Regional Council to comprehensively and objectivity evaluate the full range of growth concepts associated with the Integrated Growth Management	Noted
		3 (pdf	Contents	Edit	and a subsequent Regional Official Plan Amendment. The decision on a preferred growth concept and the finalization of technicalwill result in one or more ROPAs to implement the findings of the work. legislative requirements under Section 16(1516) of the Planning Act.	Change made
		pg 6)				

No.	Source	Submis	sion		Response	
		3 (pdf pg 6)	Contents	"Regional Nodesalready recognized". This is an appropriate description of the Regional Nodes.	No change suggested.	
		3 (pdf pg 6)	Contents	Repeated text.	Employment Area Conversions – Provides an initial set of strategic employment land conversions required for fully implementing local municipal plans and priorities related to growth and intensification which meet the criteria identified by the Region in conformity with the Provincial Growth Plan and which support the Regional Urban Structure, Local Urban Structure, and the implementation of local municipal plans and priorities related to growth and intensification.	
			55	The policy as written states that the Regional Structure is accompanied by a growth strategy for Halton based on the distribution of population and employment for the planning horizon year of 2051 as contained in Table 1 and in accordance with the Regional phasing outlined in Map 5 (Regional Phasing Table 2A).	See edit for Table 1 footnote below.	ROPA 48 has been revised to remove the reference to 2051 and clarify that the distribution to 2051 will be updated through the MCR. This acts as an interim policy, and will eventually be updated to read as originally proposed through the subsequent growth strategy ROPA.

No.	Source	Submission		Response	
		6 (pdf pg 9) 7 (pdf pg 10) Table 1	The growth strategy is still underway; with the distribution of population and employment still to come and with the Regional phasing only to 2031. If the amendment continues to include the population and employment forecast region-wide to 2051 city staff request that the Region consider adding additional language to the Table 1 footnote clarify the application of Growth Plan Policy 5.2.4.3. See proposed edit below. Minimum density targets will be addressed in later sections. Targets for the proportion of residents and jobs to be achieved within specific SGAs will be addressed in later sections The policy as written states that the Regional Structure is accompanied by a growth strategy for Halton based on the distribution of population and employment for the	The Regional Structure also sets out targets that apply to certain Strategic Growth Areas as set out in Table 2b. This includes minimum density targets for Urban Growth Centres and Major Transit Station Areas, as well as targets for the proportion of residents and jobs planned to be achieved within specific Strategic Growth Areas, where appropriate. The population and employment forecasts and plan horizon of 2031 contained in Table 1 will apply to all planning matters in Halton Region, including lower-tier planning matters until Halton Region has Distribution of distributed the 2051	Changes are proposed to provide a greater level of description of the targets identified in Table 2b, including how/when they are to be planned for and achieved. For the density targets, the 2031 / post-2051 timeframes are clarified, consistent with the original footnote to Table 2b in Draft ROPA 48. For the proportion targets, a number of changes are proposed to reflect their role as general, overall targets intended to be achieved over the long-term. In addition, clarification is provided that the overall targets can be refined,
			planning horizon year of 2051 as contained in Table 1 and in accordance with the Regional phasing outlined in Map 5 (Regional Phasing Table	population and employment forecasts to the Local Municipalities, forecasts to be determined through the municipal comprehensive review.	subject to Regional approval (i.e., when being implemented through an Area-Specific Plan) provided the change does not compromise the Region's overall growth strategy, which informs the identification of the target in Table 2b.

No. Source Submission Res	Response		
ZA). The growth strategy is still underway; with the distribution of population and employment still to	nis text has been modified to provide interim arification that Table 1 is modified in part rough ROPA 48 and will be comprehensively odified though the Region's Municipal omprehensive Review.		

No.	Source	Submission			Response
		7 Table 2B (pdf pg 10)	**Note 2 – suggest modifying to make clear that Strategic Growth Areas like Urban Growth Centres and Major Transit Station Areas are more durable elements of the Plan. This could include a reference to policy section number 35. Modification wording not suggested. ***Note 3 - What is the mechanism for addressing modifications to the target proportion of residents and jobs. The policy should at a minimum detail that modifications to the target proportion be allowed through a local process to implement relevant Regional OP policies.	*** Target proportion are not policy requirements, rather are considerations in Local Official Plan Amendments.	Additional note regarding the general proportion targets added.
		9 75 (pdf pg 12)	Propose modifications that detail that the targets are to be considerations in the development of local OPAs. Suggest adding a note to the table. In line with the note above suggest modifying to distinguish that this policy refers to the minimum density targets required by the Growth Plan.	shown in Table 2a, and the minimum density targets for Strategic Growth Areas as shown in Table 2b	No change recommended by Regional staff. Given the changes to Table 2b and the policies that describe the target (Section 55.3) and speak to its implementation (Section 79.3(13)), Regional staff see this general reference to all of the Table 2b targets as appropriate. The proportions of residents and jobs in the SGAs are generally reflected in the growth strategy and the planning of Halton's Urban Area and SGAs.

No.	Source	Submission			Response
		9 78.1 (pdf pg 12)	This policy should be modified to acknowledge that many of the elements of the Regional Urban Structure are considered durable elements of the Region per policy section 35. Strategic Growth Areas are considered durable elements.	(1) To provide a structure and a hierarchy in which to direct population and employment growth within the Urban Area to the planning horizon of this Plan, and beyond;	No change recommended by Regional staff.
		N/A 79 (1)	Consider reinforcing the importance of the development of and enhancement of existing complete communities. Note: this policy was not included as part of draft ROPA 48.	(1) To provide an urban form that is complementary to existing developed areas, uses space more economically, promotes live-work relationships, fosters social interaction, enhances public safety and security, reduces travel by private automobile, promotes active transportation, and is environmentally	Recommendation accepted with minor adjustment.
		11 79.1 (3) (pdf pg 14)	Note that Primary and Secondary Nodes are reflective of Local Official Plan Urban Structures	more sustainable all in order to promote the development of complete communities. Primary and Secondary Regional Nodes identified by symbol on Map 1H due to their contribution to the Regional Urban Structure, which have a concentration of residential and employment uses with development densities and patterns reflective of Local Official Plan Urban Structures and supportive of pedestrian traffic and public transit,	No change. The definition of 'Regional Node' includes a reference Local Urban Structure.
		N/A 79 (7)	Reinforce the role of parks and open spaces as part of complete communities. Note: this policy was not	(7) To provide high quality <u>public parks and</u> open spaces with site design and urban design	Recommendations accepted.

No.	Source	Submis	Submission			Response
				included as part of draft ROPA 48.	standards that create attractive and vibrant places to promote the development of complete communities.	
		9 (pdf pg 13)	79(11)	Consider moving the objectives specific to Regional Corridors to somewhere within 79.1 or into a new policy 83 called Regional Corridors directly following Regional Nodes.	Change suggested.	Noted. This will be considered through a subsequent ROPA.
		11 (pdf pg 14)	79.2	This policy is very clear about the SGA hierarchy. Consider ways of revising Map 1H to reflect the hierarchy clearly.	See comments on Map 1H	Noted. See comment above.
		12 (pdf pg 15)	79.3(7)	Since this is direction to the Local Municipality it is not appropriate to include a reference to a municipal comprehensive review. Refer instead to an Official Plan Review. The definition of municipal comprehensive review should also be modified to conform to the Growth Plan.	prohibit site-specific Official Plan or Zoning By-law amendments to reduce development density within a Strategic Growth Area unless it is part of a municipal comprehensive Local Official Plan Review of the Official Plan or a review of the Area-Specific Plan for the Strategic Growth Areas; and Modify 259.4 MUNICIPAL COMPREHENSIVE REVIEW	Recommendation accepted.
		14 (pdf pg	79.3(13) a) and b)	Suggest simplifying to more closely match the	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 the Growth Plan. Require Local Municipalities to plan for employment uses	
		17)	,	associated Growth Plan	within Strategic Growth Areas by:	

No.	Source	Submission		Response
		policy 2.2.5.14 to allow for greater flexibility. The implementing mechanism is the Local Planning exercise to determine appropriate policies. These policies could instead be considered as guidance for Regional staff when considering local approaches to ensuring that local plans establish means of achieving a balance of residence and jobs. Suggestions include renumbering and deletions.	a) establishing development criteria outside of Employment Areas to ensure that the site specific redevelopment of any employment lands will retains space for a similar number of jobs to remain accommodated on site; b) identify a minimum employment target for the Strategic Growth Area. c) considering a wide range of policy approaches to demonstrate to the Region that the Strategic Growth Areas has been planned to support a balance of residents and jobs appropriate to the growth area determined through area specific planning, or in general alignment with the target proportion of residents and jobs within the Strategic Growth Area as identified in Table 2b. through policies that: delete remainder of 79.3(13)b) policies not included above.	The detailed directions have been replaced with a more general reference / direction that allows for flexibility in local implementation.

No.	Source	Submissi	ion			Response
		15 (pdf pg 18) 15	79.3(13)d)	Renumber to c)	d) monitoring on a regular	
		15 (pdf pg 18)	79.3(13)e)	Renumber to d) Monitoring the progress of all SGAs as well as all Secondary Plans is an exercise that the Region could incorporate in its routine monitoring and reporting. The Region, as the approval authority, will have a role in setting the local policies. Staff suggest that there are alternatives to setting specific policies about "significant deficits or deviations". Generally, suggest that the resident to employment ratios are guides or considerations as noted in comments related to Table 2b.	d) monitoring on a regular basis and in conjunction with the Region, the amount of residential and employment development within Strategic Growth Areas to assess progress toward achieving the balance of residents and jobs appropriate to the growth area determined through Local areaspecific planning, or the targets identified in Table 2b, and if there are significant deficits or deviations from these targets, developing a strategy to redress them as part of a review of the Local Official Plan or applicable Area-Specific Plan.	Noted.
		15&16 (pdf pg 18 & 19)	80(4)	This policy could be modified to reinforce the hierarchy established in Policy 79.2.	To function as the primary Strategic Growth Areas of the in accordance with policy 79.2 of the Regional Urban Structure hierarchy where a significant share of population and employment growth will be accommodated.	Noted. No change required.
		16 (pdf pg 19)	80.2 (2)	Suggest modifying to speak to the intent of 80.2(1).	Require Local Official Plans to show how policies have been developed to plan to achieve the development density target for Urban Growth Centres under Section 80.2(1) can be met including the submission to the Region of any supporting background documentation.	Noted. Change made.

No.	Source	Submissio	Submission			Response
		16 (pdf pg 19)	81(1)	Reinforce that the definition of public service facilities includes public parks and open spaces.	To leverage infrastructure investments and the development of public service facilities, including public parks and open spaces, to support a significant share	Noted. No change made.
		16 (pdf pg 19)	81 (2)	Consider the addition of parks.	To provide a range and mix of transit- supportive uses, such as residential, retail, office, parks and public uses that supports the area in a pedestrian-oriented urban environment.	Change made and included reference to public service facilities as well.
		16 & 17 (pdf pg 19 & 20)	81(6)	Significant is not a defined term in the context of this policy.	To protect existing significant employment uses within Major Transit Station Areas by ensuring land use compatibility with adjacent new development is achieved.	Removed word "significant"
		17 (pdf pg 20)	81.2(2) a)	Suggest this policy reference the durable elements of the plan (Policy 35).	The minimum density target for each Major Transit Station Area as prescribed in Table 2b, which may be achieved beyond the planning horizon of this Plan in accordance with policy 35;	No change made.
		17 (pdf pg 20)	81.2(2) a)	Reframe the target proportion of residents and jobs within each MTSA as considerations.	plan to achieve the target proportion a context appropriate balance of residents and jobs within each Major Transit Station Area as guided by Local Area-Specific Planning or as generally established in set out in Table 2b, where applicable	Changes made consistent with other sections of the amendment.
		18 (pdf pg 21)	81.2(4) b)	Reframe as a locally confirmed context appropriate balance of residents and jobs along with appropriate policies and monitoring and other mechanisms.	identifies the locally confirmed context appropriate balance target proportion of residents and jobs that must be planned for in accordance with as guided by Table 2b.	Changes made consistent with other sections of the amendment.
				and other methanisms.		

No.	Source	Submission			Response
		18 (pdf pg 21) 81.2(4) e)	Consider adding the need to identify and protect for future transportation infrastructure to support active transportation.	identifies and protects lands that may be needed for future enhancement or expansion of transit operations, transportation and infrastructure, as appropriate.	No change. Definition of "infrastructure" includes transit terminals and rolling stock.
		18 (pdf pg 21) 81.2(4) g)	The policy could be modified to describe the action that the policies should take.	Identifies transportation and transit networks which are transit-supportive and achieve multimodal access to the stations, ensure connections to all transit service, and provide infrastructure to support	Change made.
		18 (pdf pg 21) 81.2(4) i)	Section 86 identifies Region-wide Affordable Housing Targets. Given that these are Regional targets it would be more appropriate for the policy to direct the establishment of affordable housing targets to support the Region in achieving its targets. By their nature these intensification areas will far exceed the targets established at the Regional level. Consider distinguishing the affordable housing policy from the inclusionary zoning policy. Is it necessary to include the components of an Inclusionary Zoning Assessment Report in the policy? Should any of the requirements change, it may result in further amendments to the Plan.	active transportation. establishes Affordable Housing targets to support the achievement of the targets in accordance with the applicable policies of Section 86 of this Plan, and inclusionary zoning policies authorizing a The Inclusionary Zoning policies will be based on the completion of an assessment report in accordance with the Planning Act, which is prepared by the Region or Local Municipality, to the satisfaction of the Region.	No change recommended. The policy as worded appropriately indicates that the affordable housing targets must be informed by the Regional targets in Section 86, which are positioned as minimums. Change made to add reference to <i>Planning Act</i> and to remove details which can be incorporated based on further discussion / review and incorporated in Section 86 of the ROP through the broader IGMS ROPA.

No.	Source	Submission			Response
			Consider simplifying the policy by referring to the Planning Act.		
		18 (pdf pg 21) 81.2(4) i)	Subject to suggested changes above. It is possible that this policy would be appropriate should the changes proposed to 79.3(13) be included.	includes detailed policies and development criteria to ensure that the development of employment uses planned within the Major Transit Station Area meet the requirements of Section 79.3(13) of this Plan	Change made elsewhere.
		20 82(1) (pdf pg 23)	Consider simplifying objective 1.	To recognize Strategic Growth Areas in the Region which are an integral component of the Regional Urban Structure and are historic downtown areas, or contain a concentration of public service facilities (i.e. hospitals, universities) and/or transit- supportive, high	No change – content provides necessary description / context.
		n/a 82 New objective	Since the policies establish a hierarchy of Regional Nodes the objectives should include an objective reflective of that policy.	(4) To reflect and reinforce Local Official Plan Urban Structures, and to establish a hierarchy of Primary and Secondary Regional Nodes.	Addition made to reference the Local Urban Structures. The notion of a hierarchy is already present in Section 79.2 and elaborated on in Section 82.1.
			The policy in 82.1 should describe the distinctions among Primary and Secondary Regional Nodes.		
		82.1	Suggested language. The Regional Nodes are recognizing areas that have already are subject to Local Official Plan policies.	The Regional Nodes as identified on Map 1H by symbol are identified in Local Official Plans and have been categorized as either Primary Regional Nodes or Secondary Regional Nodes to reflect each respective node's role in the Region's Strategic Growth Area hierarchy established in policy 79.2.	No change made.

No.	Source	Submission	Response	
No.	Source	82.1(1) Modify wording. Distinguish Primary Regional Nodes from Secondary Regional Nodes. Modify wording. Prim plan plan plan prov their more char	ary Regional Nodes-that are need to accommodate with at a scale appropriate to context and display two or e of the following acteristics or features: • contain a concentration of existing or planned public service facilities; or, • contain existing or planned public service facilities; or, • contain existing or planned transit-supportive high-density mixed uses; or, • which are located on a Regionally identified Higher Order Transit Corridor or alternatively will be planned to perform a regional transit network function at a scale appropriate for their context: ary Regional Nodes include: a) Uptown Core, Oakville; b) Hospital District, Oakville; C) Milton Education Village, Milton;	No change made.
			Milton; d) Palermo Village, Oakville; and e) Uptown Urban Centre, Burlington.	

No.	Source	Submission		Response
		82.1(2) Modify wording. Distinguish Primary Regional Nodes from Secondary Regional Nodes.	Secondary Regional Nodes that are historic downtown areas or villages that are planned to accommodate mixed use intensification growth at a scale appropriate to their context, and/or are intended to be a focus for growth through mixed use intensification at a scale appropriate for their context: Secondary Regional Nodes include: a) Neyagawa Urban Core, Oakville; b) Kerr Village, Oakville; c) Bronte Village, Oakville; d) Downtown Oakville; e) Downtown Urban Centre, Burlington; f) Downtown Georgetown, Halton Hills; and g) Guelph Street Corridor, Halton Hills.	No change made.

No.	Source	Submission		Response
		This set of policies should acknowledge the existing local policy framework. Please note that policy (2) in the tracked changes version of the policies uses the word encourage. City staff are supportive of this policy being framed as encourage to allow for a flexible local approach to determining whether a boundary and target is appropriate.	It is the policy of the Region to: (1) Direct development with higher densities and mixed uses to Regional Nodes in accordance with the hierarchy identified in Section 79.2, reflective of existing Local Official Plan policies and based on the level of existing and planned transit service. (2) Encourage Require the Local Municipalities to delineate the boundaries of Regional Nodes, and identify a minimum density target expressed as the minimum number of residents and jobs per hectare for the delineated area, where appropriate. (3) For applicable Primary Regional Nodes identified in Table 2b, require the Local Municipalities to develop policies in order to plan to achieve the target proportion of residents and jobs specified or identify an alternative proportion reflective of local context while still achieving a balance among population and employment. (4) Require the Local Municipalities to prepare detailed official plan policies oran Area-Specific Plan for Regional Nodes, in accordance with Sections 48 and 77(5) of this Plan.	No change made. Change made to "Encourage". No change made.

No.	Source	Submission		Response
		This policy is relevant to the Appleby GO MTSA area as well as the Burlington GO UGC/MTSA. These areas will be subject to future area-specific planning the policy should be framed with that lens. It is also suggested that the policy should describe the general objectives and leave latitude for the development of solutions or approaches that achieve the objective (treating these areas reflective of their dual purpose)that are appropriate to the local context.	Where Employment Areas are located within a Major Transit Station Area as delineated on Map 1H, recognize the dual role and function of these Major Transit Station Areas as mixed use Strategic Growth Areas as well as the location of important existing employment uses, and, require Local Municipalities in accordance with 48 and 77(5) to recognize to plan for these areas by: a) recognizing the importance of existing employment uses and the potential for employment growth and intensification within the Employment Area and within adjacent mixed use areas;. The policies must consider land use compatibility and must ensure that new uses b) providing an appropriate interface between the Employment Area and adjacent mixed use areas to maintain land use compatibility; and c) c) only permitting development within adjacent mixed use areas if land use compatibility can be addressed in a manner that protects existing employment uses in accordance with Section 79.3(12) of this Plan.	Changes have been incorporated to address the role of future Area-Specific Planning work undertaken by Local Municipalities in implementing these policies. Direction related to the importance of existing employment uses, providing an appropriate interface, and ensuring land use compatibility have been maintained.

No.	Source	Submissi	on			Response
		Mapping	240 1H	FREQUENT TRANSIT It will be important to distinguish the Frequent Transit definition from the Higher Order Transit definition and the Higher Order Transit Corridors identified on a variety of Regional Maps. Staff also understand that the identification of Regional Corridors will form part of a future ROPA. It is somewhat difficult to	No modification suggested. Propose mapping changes.	Noted
				distinguish Urban Growth Centres from MTSAs on Map 1H. The hierarchy outlined in 79.2 can be reinforced through Map 1H.		Opportunities to enhance the mapping may be considered through the balance of the Regional Official Plan Review.
		Mapping	1H	All but one of the supported employment conversion requests within the City are being implemented through ROPA 48. Given that the conversion of the employment lands identified as B-09 in Appendix C.1 of the Growth Concepts Discussion Paper are not expected to have an adverse impact on the overall supply of employment lands, this conversion should be included in ROPA 48.	Modify the mapping to include the conversion of these lands through ROPA 48.	The Employment Area lands known as "North Service Road / Industrial Street" are recommended for conversion through the Preferred Growth Concept, Regional staff have not recommended that this conversion be advanced through Regional Official Plan Amendment No. 48 because it does not meet the criteria for prioritizing inclusion at this time. Where conversion requests are not required to support local municipal plans and priorities they will be addressed through the Preferred Growth Concept. More information on the assessment is available in Appendix C of the Growth Concepts Discussion Paper.

No.	Source	Submiss	ion			Response
		Mapping	6B	Suggest a title change to Map 6B	Modify from Map 6b – Downtown Burlington GO UGC / MTSA To Map 6b – Downtown Burlington UGC / Burlington GO MTSA	Change made.
12	City of Brampton E-mail dated May 17, 2021	Senior Plance Regional 1151 Broo Oakville, L6M 3L1 Dear Kary RE: DR. AMEND HALTO. The City of wherein the Regional a Regional a Regional a Regional official Plance Structure purpose of Structure. The City of anticipated the growt Developm preferred draft City designation of the company of	ad, RPP Moanner Municipality nte Road Ontario yn, AFT REGIO N REGION of Bramptor he Regiona Official Plai al Urban Sti lan Amendr and Halton of Halton Re and a hiera of Bramptor he trends an nent Comm growth sce Structure, vons and wh n Plan Publi	of Halton ONAL OFFICIAL PLAN A DEFINE A REGIONAL In received the circulation I Municipality of Halton re In Amendment (ROPA) No received In Segional Council Minute I Regional Counc	memo, dated March 9, 2021, equests comments on the Draft of 48 - "An Amendment to Define d the proposed <i>Draft Regional ment to Define a Regional Urban</i> as of February 17, 2021. The plement the Regional Urban areas. Into Plan (Official Plan) Review the City of Brampton presented	

No.	Source	Submission	Response
		Staff have no comments at this time on Halton Region's ROPA 48 and will continue to monitor the ongoing review. The project team is working collaboratively with the Region of Peel to ensure conformity with the ongoing Region of Peel Regional Official Plan Review.	
		For more information, please visit the Brampton Plan (Official Plan) Review project webpage at: https://www.brampton.ca/officialplan	Noted
		Thank you for the opportunity to provide comments on Halton Region's ongoing review and would appreciate to be circulated on future requests for comment.	
		Sincerely, Shahinaz Eshesh Assistant Policy Planner	
		Official Plan & Growth Management, City Planning & Design Planning, Building and Economic Development City of Brampton 2 Wellington Street West City Hall	
		c. Andrew McNeill, Manager, Official Plan & Growth Management Bob Bjerke, Director, City Planning & Design	
13	Region of Peel E-mail dated May 21, 2021	Thank you for the opportunity to comment on Halton Region's ROPA 48 – Amendment to Define a Regional Urban Structure. The following encompasses comments from Peel Region Transportation Planning.	
		Overall Comments: 1. In accordance with Provincial policy, the Amendment should continue to	ROPA 48 is being advanced as a phased Section 26 amendment as part of the Region's Municipal
		protect for the GTA West Corridor/HPBATS improvements identified on Map #3 (currently under appeal).	Comprehensive Review. The amendment identifies elements of a Regional Urban Structure of strategic growth areas for growth and
		2. In accordance with Provincial policy, the Region of Peel is including corridor protection policies for the North West GTA Transmission Corridor Identification Study. Clarification is being sought from Halton Region on the	intensification. The GTA West Corridor/HPBATS corridor
		status of this corridor and similarly, the inclusion of protection policies.	protection area continues to be identified on Map 3 (under appeal) as amended through ROPA 48.
		3. Upon further review, Region of Peel Transportation staff note the Amendment does not include road infrastructure needs driven by 2051 growth forecasts. At this time, Transportation staff are unable to provide detailed	Through the balance of the ROPR, protection policies for provincial infrastructure will be

No.	Source	Submission	Response
		comments on the transportation network, specifically the regional mid-block right-of-way requirements.	considered in accordance with Provincial plans and policies.
		4. Prior to finalizing the Amendment, further coordination is recommended between identification of Halton's strategic goods movement network and that of Peel's to address right-of-way requirements as well as designation of the strategic goods movement network.	Following the concluision of the Integrated Growth Management Strategy and identification of a preferred growth concept, the Region will advance a subsequent amendment which will include updates to transportation related policies.
		5. To further support coordination of right-of-way requirements, mapping associated with the Amendment should properly identify jurisdiction of boundary roads.	
		Should there be any questions regarding the comments above, please do not hesitate to contact us.	
14	Halton District School Board E-mail dated May 31, 2021	May 31, 2021 Karyn Poad Legislative & Planning Services Department - Region of Halton 1151 Bronte Road Oakville ON L6M 3L1 Dear Ms. Poad: Subject: Draft Regional Official Plan Amendment No. 48 An Amendment to Define a Regional Urban Structure	
		Thank you for the opportunity to comment on the Draft Regional Official Plan Amendment\ (ROPA) No. 48. It is understood that Draft ROPA 48 is part of the Region's phased approach to a comprehensive review and conformity with the Province's 2019 Growth Plan. Draft ROPA 48 includes minimum density targets and proportional mix targets for residents and jobs in strategic growth areas. Included with the circulation of Draft ROPA 48 is Report No. LPS17-21 and Halton Regional Council February 17, 2021 Minutes.	
		General Comments on Student Accommodation in the Region of Halton The Halton District School Board for the 2021-22 school year will have 89 elementary schools and sixteen (16) secondary schools over four (4) municipalities in the Region of Halton which	

No.	Source	Submission	Response
		accommodates over 65,000 elementary and secondary students as of October 31, 2020. Public school student enrolment in the Region has increased 4% since 2016. It is projected that student enrolment will increase by approximately 7% over the next ten (10) years. Student projections include completed secondary plans (Boyne, North Oakville) that currently have development applications in circulation and the projected build-out of the Vision Georgetown Secondary Plan.	
		It is anticipated that student enrolment will increase further with the development of Urban Growth Centres (UGC) and Major Transit Station Areas (MTSA) as outlined in Draft ROPA 48. School boundary maps and the Long Term Accommodation Plan (LTAP) which includes the long-range school enrolment projections over ten (10) years and a list of proposed capital projects can be found on the Board's website. The LTAP also outlines areas experiencing student accommodation pressures and proposes school boundary and program reviews for the Board to consider and undertake. Student projections developed in the LTAP rely on historical student yields in established communities and the residential units projected in secondary plans and development plans circulated by the municipalities. School boundary maps and the LTAP are reviewed and updated every year.	
		Education Development Charges (EDCs) are a revenue source used by school boards to fund school site acquisitions and other site-related costs. The EDC background study includes demographic projections and residential and non-residential growth forecasts for the Region of Halton over fifteen (15) years from the time of EDC study preparation. Student projections developed in the EDC study rely on residential dwelling unit forecasts which are used to project students from new development.	
		Board Comments on Draft ROPA No. 48 The Board has reviewed the draft document and has a number of comments as it pertains to education and other matters as it relates to school board facilities. The Board looks forward to participating in future conversations and providing updated comments as the Region's comprehensive review progresses.	
		PART II BASIC POSITION Halton's Planning Vision (Sections 25 to 33)	

No.	Source	Submission	Response
No.	Source	Planning Horizon (Sections 34 to 35) The Board acknowledges the change of the planning horizon from 2031 to 2051 for this amendment. Please note that the Board conducts long-range projections for a number of background studies and boundary and program reviews usually ranging from 10 to 15 years. Halton and the Province of Ontario (Sections 36 to 38) Halton and Its Surrounding Region (Sections 39 to 42) Halton and the Local Municipalities (Sections 43 to 49) The Board acknowledges the intent to provide a broad policy direction on strategic matters and recognizes that local municipalities are to deal with their local environments. The Board will provide comments to the municipalities on their more specific policies and plans moving forward. Halton's Regional Structure (Sections 50 to 56) These sections list a number of map and table updates to reflect the boundaries of the proposed Strategic Growth Areas and the change in the planning horizon from 2031 to 2051. The Board is interested in viewing an updated Map 5, Regional Phasing, in ROPA June 19, 2018 office consolidation. Section 56, Table 2, Intensification and Density Targets, and Table 2a, Regional Phasing, show targets up to 2031. Please circulate the Board once the 2051 municipal forecasts are updated. The Board requests that, where possible, to split the Regional Phasing of Medium-Density units and High-Density units. The Board develops its long-term enrolment forecasts and school site needs using low, medium, and high-density yields. The Board acknowledges that Table 2b, Strategic Growth Area Targets, sets out certain Strategic Growth Areas and includes minimum density targets for Urban Growth Centres (UGC) and Major Transit Station Areas (MTSA) and targets for residents to job proportion planned to be achieved. Strategic Growth Areas require further study and targets are subject to change. It is the intent of the Board to participate in future studies for these areas and provide comments.	Updates to Map 5, Regional Phasing will be considered in a subsequent ROPA and is not being updated as part of ROPA 48. Comment noted. The Halton Disctirct School Board will be circulated subsequent ROPAs as part of the ROPR process. Updates to Table 2a are outside the scope of ROPA 48 and could be considered as part of the next Regional Official Plan Amendment to implement the Region's Growth Strategy. Comment noted.
		PART III LAND STEWARDSHIP POLICIES	

No.	Source	Submission	Response
No.	Source	Development Criteria (Sections 57 to 70) Land Use Designations (Sections 71 to 89, Section 170) Urban Area and the Regional Urban Structure (Sections 72 to 77) • The Board acknowledges that the goal of the Urban Area and the Regional Urban Structure is to manage growth in a manner that fosters complete communities, enhances mobility across Halton, addresses climate change, and improve housing affordability, sustainability, and economic prosperity. • The Board is in support of phasing of growth that ensures the logical and orderly progression of development. This ensures timeliness in the Board's delivery of any new capital projects and addressing any student accommodation pressures in existing facilities through boundary and program reviews. • To accommodate the growth in accordance with the Region's desire to improve and maintain regional unity and create complete communities, infrastructure like schools are required to be built and funded in a timely manner. A large portion of the analysis includes the development of student projections and knowledge of the rate and phasing of growth that will occur.	
		 The Board notes that "Intensification Areas" have now been replaced with "Strategic Growth Areas" and "Major Transit Station Areas" and "Intensification Corridors" have now been replaced by "Regional Corridors". Section 77 mentions a number of reports such as the "Annual Intensification Monitoring Report" made to the Regional Council and the "Joint Infrastructure Staging Plan" to assist in the setting of development charges and to help prepare plans for the provision of Regional services. The Board requests that these reports be circulated. The Board supports the policy of the Region to create Areas Specific Plans for Strategic Growth Areas and encourages local municipalities to include the Board in their circulations in the development of these policies for major growth areas. It is the intent of the Board to participate in the development of these plans and policies with the Local Municipalities and offer comments as needed. The Board acknowledges that Halton Region is encouraging public agencies to adopt and use the population and employment forecast. The Board will adopt the forecasts once the population allocation to each municipality is completed as part of the municipal comprehensive review. The Board would benefit from having access to Low, Medium, and High-density unit targets by municipality to complete the student yield analysis more accurately. 	Comment noted. Comment noted. Implementation tools and updates to guidelines and annual reporting will be considered as part of the next phase of the Municipal Comprehensive Review Comment noted. Comment noted.

No.	Source	Submission	Response
		Regional Urban Structure (Section 78) It is understood that Map 1h, Regional Urban Structure, shows the locations of the Strategic Growth Areas which include MTSAs, proposed MTSAs, UGC's, Primary Regional Nodes, and Secondary Regional Nodes. The Board notes that the following Board facilities are located within or adjacent to these Strategic Growth Areas: o Milton Education Centre (Milton - Map 6c) o Aldershot High School (Burlington - Map 6d) o Georgetown District High School (Halton Hills - Map 6g) o Robert Little Public School (Burlington - Map 6h) The Board would like to ensure that there are no policy implications with schools being located within or adjacent to the MTSA's that would preclude their redevelopment or alterations for school purposes, as well as their continued operation. Strategic Growth Areas (Section 79) The Board requests more information on the "Community Planning Permit System". The Board encourages Strategic Growth Areas to be development-ready. By making water, waste-water, and transportation service capacities immediately available for development and lining up the timing of Local Municipalities of Official Plan and Zoning By-law policies to come into effect at the same time as Regional policies, greatly helps the timing of the Board's strategic implementation of Capital Priority requests to the Province and other related construction requirements. The Board supports the requirements of achieving land use compatibility between major employment uses and sensitive land uses within or adjacent to Strategic Growth Areas by either avoiding or minimizing and mitigating potential adverse effects. The Board supports the adoption by Local Municipalities to adopt parking standards and policies to promote the use of active transportation and public transit and to consider planning approval financial and other incentives to promote the development of Strategic Growth Areas. The Board also supports the proposed conversions of Employment Areas that Local Municipalities have	Policies in ROPA 48 direct the local municipalities to develop detailed official plan policies or area specific plans for Major Transit Station Areas. Through the detailed local planning work, public service facilities are planned to support the planned growth. A Community Planning Permit System, also known as a Development Permit System, is a Planning Act tool identified under Sections 70.2 and 70.2.1. This tool can be used to streamline development approvals by combining zoning, site plan and minor variance processes into one process with shorter approval timelines. To enable a Community Planning Permit System, municipalities must pass an Official Plan Amendment and associated by-law which together address matters such as permitted uses and standards, review procedures, potential conditions of approval, and the areas to which the Permit System applies. Comments noted.

No.	Source	Submission	Response
		identified as having strategic importance in advancing elements of the local urban structure that support the Regional Urban Structure and planning objectives.	
		Urban Growth Centres (Section 80) and Major Transit Station Areas (Section 81)	
		 It is understood that UGCs and MTSAs are focal areas for the investment of infrastructure, the development of public service facilities and public services and to support the local and regional transit network. It is also understood that these areas are to hold a significant share of population and employment growth while protecting existing significant employment uses and to ensure land use compatibility with adjacent neighbourhoods. Please note that the Board utilizes the existing active transportation network in these Strategic Growth Areas and the connectivity to the surrounding areas. The Board is in support of policies that improve the pedestrian and cycling networks (ie. Continuous sidewalks and cycling facilities, dedicated cycling infrastructure, improving multi-use pathways). The Board recognizes that improved connectivity generally provides benefits to the community, including students that choose these networks to access school sites all year round. The Board is in support of sustainable directives that involve recommendations around the enhancement and encouragement of active transportation. The Board supports students travelling to and from school sites union active transportation to the board extent pencills in a note manner all. 	Comments noted.
		using active transportation to the best extent possible in a safe manner all year round. • It is projected the students will be generated from these growth areas and will be eligible for school board transportation. Please note that the Halton Student Transportation Services (HSTS) administers student transportation on behalf of the Halton District School Board and the Halton Catholic District School Board. Policies and procedures surrounding student transportation can be found on the HSTS website. • The Town of Oakville is currently conducting the Bronte GO MTSA study to develop an Area Specific Plan as part of the Town's Official Plan Review. The study area includes the following land use designations: Office Employment, Urban Core 1, Urban Core 2, Urban Centre 1, and Urban Centre 2. Permitted uses in these land use designations include a mix of uses to complement the employment uses, contribute to transit-supportive densities, and support the efficient use of municipal infrastructure and services.	Comments noted.

No.	Source	Submission	Response
		The Board would like to share their comments to the Town of Oakville with the Region to inform of the Board's strategies moving forward with the development of UGCs and MTSAs moving forward: o It has been requested by the Board as part of this MTSA study that publicly funded school board uses to be permitted with any zoning designations, such as but not limited to elementary schools, secondary schools, adult education, and/or child care centres. o There are a number of adult, alternative, and continuing education and night school programs offered by the Gary Allen Learning Centres in several different locations across the Region which are designed to provide unique and innovative learning opportunities to all students. An increase in demand and/or requests to be located in more locations around the Region may impact the accommodation needs of these programs.	Comment noted.
		Consideration may also be given to the benefits ofhaving a site located in an area that contributes to transit-supportive densities. More information on our Gary Allen Learning Centres can be found on our website. o With the Covid-19 pandemic and the introduction of virtual learning with all publicly funded school boards across the province, school boards will need to consider possible future innovations in virtual learning. Potential new and alternative spaces may be needed to accommodate this type of learning if it is deemed by the Province that long-term plans need to be considered and implemented. o In the event that student yields increase, housing trends change, and/or impacts from provincial educational policy changes, there may be a need for onsite student elementary or secondary accommodation within UGCs and MTSAs. This may be achieved in innovative school construction (ie. podium schools) or the creation of community hubs within existing facilities (ie. joint agreements with the private sector/other public agencies).	Comment noted.
		 Regional Nodes (Section 82) It is understood that Primary and Secondary Regional Nodes are planned areas to accommodate growth and intensification at a scale appropriate for their context. It is the intent of the Board to participate in the development of these plans and policies (or the development of Area-Specific Plans for Regional Nodes) with the Local Municipalities and offer comments as needed. 	Comment noted.

No.	Source	Submission	Response
		Employment Areas (Section 83) ■ The Board would like the Region to consider public-funded school board uses as a permitted use in Employment Areas to benefit in having a site located in areas that contribute to transit-supportive densities and to participate in the innovation of education accommodation. Board rationale has been outlined in comments to Sections 80 and 81. Housing (Sections 84 to 86)	The Growth Plan directs municipalities to prohibit or limit sensitive land uses in Employment Areas. Schools are not considered an appropriate land use within planned Employment Areas. Further updates to the policy framework for Employment Areas will be addressed as part of the next phase of the Municipal Comprehensive Review.
		The Board requires residential housing details by unit type and phasing information for the study area. This information helps to perform school enrolment projections and to determine school accommodation requirements. This information also helps the Board with long-term planning of capital projects. It should be noted that the Board reserves the right to review its school accommodation requirements in the study area when updated information on housing details and phasing is received.	Comment noted.
		 Urban Water Supply and Wastewater Treatment Services (Sections 87 to 89) The Board requires phasing information for development which assists in the development of school enrolment projections and helps identify school accommodation requirements. The Board recognizes that water and wastewater servicing are the constraints for development. Please continue to circulate the Board with future updates as the Board will continue to monitor and adjust future phasing of potential residential units within the study area. The Board requests that the "Joint Infrastructure Staging Plan" be part of the circulation list to assist in providing urban services which include the delivery of publicly funded education to the Region and to help identify future educational requirements that are planned out in conjunction with other Regional urban services. 	Comment noted. Implementation tools and updates to guidelines and annual reporting will be considered as part of the next phase of the Municipal Comprehensive Review
		PART VI DEFINITIONS (Sections 211 to 295) ■ Section 212.1 defines the term, Active Transportation. Please note that Active Transportation is also a focus for school boards and that the Board prefers students to use Active Transportation to travel to and from school all year round. The Board would like the Region to consider the inclusion of safety features in the definition. Safety features can include enhancement to crosswalks, speed reduction, and streetscaping.	Crosswalks are included in the existing definition of Active Transportation. Regional staff will consider this request as Transprotation related policies will be addressed as part of the next phase of the Municipal Comprehensive Review

No.	Source	Submission	Response
		The Board acknowledges the inclusion of Section 269.1 where Public Service Facilities are identified which includes lands, buildings, and structures that include education programs.	Comment noted.
		The Board will provide comments as required on any future updates and reviews of the Regional Official Plan.	
		Should you have any questions regarding our comments, please contact the undersigned.	
		Sincerely, Frederick Thibeault General Manager of Planning	
		cc Ian Gaudet, Executive Officer of Facility Services - Halton District School Board	
		Laureen Choi, Senior Analyst Planning – Halton District School Board Michelle D'Aguiar, Senior Analyst Planning - Halton District School Board David Colley, General Manager of Halton Student Transportation Services Branko Vidovic, Senior Manager of Planning Services - Halton Catholic District School Board	
15	Ministry of Municipal Affairs and Housing E-mail dated	June 7, 2021 Sent via email only Graham Milne Regional Clerk Office of the Regional Clerk 1151 Bronte Road	
	June 7, 2021	Oakville, ON L6M 3L1	
		Dear Graham Milne,	
		Re: Draft Regional Official Plan Amendment No. 48 – Regional Urban Structure MMAH File: 24-OP-217386 Thank you for providing the Ministry of Municipal Affairs and Housing ("Ministry") with the opportunity to review and provide comments on the Region's draft Official Plan Amendment 48 ("ROPA 48").	
		The Ministry understands that draft ROPA 48 implements components of the Region's Urban Structure, with the balance of the Regional Official Plan Review expected to be implemented through a subsequent amendment presented later in 2021. Draft ROPA 48 proposes to confirm boundaries of the Region's urban growth centres ("UGCs"); delineate and establish densities for	

No.	Source	Submission	Response
		Major Transit Station Areas ("MTSAs") along the Region's priority transit corridor; identify strategic growth areas; and convert employment areas.	
		This draft ROPA was circulated to staff at the Ministry of Transportation ("MTO"); the Ministry of Environment, Conservation and Parks ("MECP"); and the Ministry of Economic Development, Job Creation and Trade ("MEDJCT"). In addition to the high level comments below, please find attached a consolidated table of comments related to conformity with the Growth Plan for the Greater Golden Horseshoe, 2019 ("Growth Plan") and Provincial Policy Statement, 2020 ("PPS") on draft ROPA 48 for consideration.	
		In addition to these comments, MMAH staff would appreciate the opportunity to schedule a meeting with your staff prior to the Region's public consultation on the ROPA.	
		Urban Growth Centres	
		As part of our one-window review, we note that draft ROPA 48 proposes to relocate the Downtown Burlington UGC to an area substantially different from that previously established by the Minister.	
		In considering this request, we note that Growth Plan policy 2.2.3.1 specifies that UGCs, including the Downtown Burlington UGC, will be planned as the focus of growth and employment while also supporting investments made in the regional transit network. Similarly, the Growth Plan defines UGCs as: "existing or emerging downtown areas shown in Schedule 4 and as further identified by the Minister on April 2, 2008". However, in considering the Region's request, we note that Growth Plan policy 5.2.2.1 provides the ability for the Minister to identify, establish or update the size and location of UGCs.	
		Accordingly, after contemplating the policy intent of the Growth Plan in relation to the potential relocation of the Downtown Burlington UGC, the Ministry is interested in understanding Council's position on this matter and looks forward to receiving the Council endorsed-position related to the location of the UGC.	
		Employment Area Conversion.	
		The attached comment table outlines specific comments related to proposed employment area conversions. Our comments are included for further discussion with regional staff. Of note, the Ministry would also benefit from reviewing any draft Land Needs Assessment work the Region may have	Comment noted. Regional staff look forward to further discussion with Ministry staff regarding the Region's Land Needs Assessment and

No.	Source	Submission	Response
		available to better understand the cumulative impact of the conversions on the Region's long-term supply of employment land.	employment conversion assessments undertaken as part of the Municipal Comprehensive Review
		Protected / Major Transit Station Areas	
		Subsection 2.2.4 of the Growth Plan provides direction to identify, delineate and establish minimum density targets for MTSAs. Draft ROPA 48 proposes delineations, minimum density targets and policies for 8 MTSAs in accordance with subsection 16(16) of the <i>Planning Act</i> and proposes to remove the existing Downtown Burlington MTSA. Although not a requirement under the Growth Plan, the Ministry is supportive of the Region delineating and prescribing minimum density targets for 4 of the 8 for MTSAs which are located not on priority transit corridors. However, additional information is needed to demonstrate the need for an alternative minimum density target for Appleby GO MTSA as per Growth Plan policy 2.2.4.4. The table below provides more specific comments related to protected/ major transit station areas for further discussion.	The supporting rationale for the alternative target request fro the Appleby GO MTSA is Included as Attachment #5 to Report No. LPS60-21,
		Engagement with Indigenous Communities Both the Growth Plan (policies 5.2.3.4 and 5.2.3.7) and PPS (policy 1.2.2), require planning authorities to coordinate planning matters with Indigenous communities. The Ministry is interested in understanding any engagement efforts that the Region has undertaken on this proposed amendment. Should the Region adopt ROPA 48, it is requested that information respecting any municipal engagement process be provided to the Ministry, including any submissions.	The Region is undertaking meaningful engagement with Indigenous Communities and are required to, and will look to go beyond fulfilling Provincial legislative and policies requirements. Section 17(31) of the <i>Planning Act</i> requires a record compiled which includes prescribed information and material to be submitted to the approval authority.
		Conclusion	
		Thank you again for providing the opportunity to review draft ROPA 48. Our comments contained in this letter, and in the attached table are provided for further discussion with Regional staff. In this regard we look forward to continuing to work with Halton Region staff on this and future work undertaken as part of the Region's official plan review.	
		If you have any questions or wish to discuss these comments in more detail, please do not hesitate to contact me by email at Laurie Miller by email at Laurie.Miller@ontario.ca or by phone at 437-855-6078.	The requested mapping can be shared with the Province that presents the UGC boundary
		Sincerely,	

No.	Source	Submission	Response
No.	Source	CORIGINAL SIGNED BY> Laurie Miller, MCIP, RPP Regional Director, Municipal Services Office C. Dan Tovey, Manager – Policy Planning, Halton Region MTO MEDJCT MECP Pop Sec.	changes for the Milton UGC and Midtown Oakville. The Midtown Oakville western boundary was adjusted to consider the floodplain as well as the Region's draft 2019 Natural Heritage System mapping and the 16 Mile Creek. The eastern portion of the Town of Milton's existing Urban Growth Centre is centred on the Milton GO Station. The lands around the GO station consist of extensive areas of low density, low rise and predominantly under-utilized lands and buildings within 800m of the station, along Ontario Street, Main Street and Nipissing Road. The western portion of the UGC overlaps with the historic downtown character area and the Sixteen Mile Creek floodplain. Development in this area needs to be sensitive to the cultural heritage of the historic character area. Within the Regional Storm Flood Plain, intensification is generally not permitted. The floodplain and built heritage limit opportunity for growth in the UGC west of Ontario Street. Intensification is not anticipated in this part of the UGC and the area around the Milton GO has the potential capacity to accommodate a significant portion of population and employment growth supported by transit.
		2 79.3 (7) Densities established in table 2b of c) "prohibit site-specific Official Plan and Zoning By-law amendments to through a site-specific official plan or zoning by-law amendment as Strategic Growth Area unless it is	The policy as modified, does not permit a lowering of the density target in Table 2b. 79.3(7) b requires local municipalities to prescribe development density for lands in the strategic growth area. There may be lands that are higher density or lower density, but together they must

No.	Source	Submission	Response
		stated in this draft policy. Although the local municipality may consider higher densities than what the Region has established, a lower density would result in a conflict with the Region's official plan.	achieve the target in Table 2b. The policy requires that an amendment to a site-specific development density can only occur as part of a comprehensive process due to the relationship to the targets identified in Table 2b. Any change would occur through a Local Official Plan Amendment or Area Specific Plan to ensure comprehensive consideration and positions the Region as the approval authority. This policy has been maintained with minor adjustments for clarification that reductions in development density can only occur through a comprehensive process/area specific plan, and not a site-specific Official Plan Amendment or Zoning Bylaw Amendment.
		3 79.3 (7) c) & 82.2 (2) Should minimum density targets be established for strategic growth areas to which targets and delineations are not required under the Growth Plan, they must first be established in the Region's official plan, along with delineations. To implement the minimum density targets applicable to the delineated areas, lower-tier municipalities would then undertake more detailed planning, such as secondary plans, to establish permitted uses and identify densities, heights and other elements of site design. Where the Region has not delineated nor established a minimum density target for a strategic growth area, lower-tier municipalities are able to delineate boundaries and undertake more detailed planning work, although minimum density targets cannot be established.	The policy has been modified to "encourage" rather than "require" the local municipalities to delineate the boundaries of Regional Nodes and identify a minimum density target. Corridors are a key component of the Regional Urban Structure that are not being addressed through ROPA 48, but will be addressed through the overall IGMS. The Region intends to have further consultation with the local municipalities on the merits of the delineation and setting of minimum density targets for Primary Regional Nodes that are on a transit corridor, and this will be addressed through the overall IGMS ROPA.

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		280.2	Comment noted. Modification has been made.
		79.3 (12) To better align with the PPS, it is recommended that this policy use the term "major facilities" instead of "major employment uses" and that a definition be provided which is consistent with the PPS. Alternatively, the Region may continue to use the term "major employment use" and include a definition for the term which is consistent with the PPS definition for major facilities.	Terminology has been updated to reflect the PPS, 2020.
		The PPS, 2020 introduced a new policy under 79.3 (12.1) The PPS, 2020 introduced a new policy which provides protection for employment uses proposed adjacent to sensitive land uses (12.1) The provides protection for employment uses proposed adjacent to sensitive land uses where avoidance of potential adverse effects from the employment use is not possible. It is recommended that the Region add a new policy to ensure consistency with the PPS, 2020. The PPS, 2020 introduced a new policy which provides protection for employment uses proposed in accordance with section 79.3 (12), planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other uses that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses are only permitted if the following are demonstrated in accordance with provincial guidelines, standards and procedures: a) There is an identified need for the proposed use; b) Alternative locations for the proposed use have been evaluated and there are not reasonable alternative locations; c) Adverse effects to the proposed sensitive land	A new Section 79.3(12)b) has been added to implement Section 1.2.6.2 of the PPS, 2020.

No.	Source	Su	ıbmissio	n		Response
					use are minimized and mitigated; and d) Potential impacts to industrial, manufacturing or other uses are minimized and mitigated."	
		7	Map 1h	256.8 hectares of lands within employment areas to non-employment uses. It is unclear whether the Region intends to undertake the proposed employment area conversions prior to the completion of the MCR in accordance with policy 2.2.5.10; or as part of the MCR in accordance with policy 2.2.5.9.	If the Region intends to undertake the conversions in accordance with policy 2.2.5.10, please see items 8 - 10. If, however, the Region intends to undertake the conversions in accordance with policy 2.2.5.9, further information/rationale would be required to demonstrate that the lands are not required over the 2051 planning horizon and that sufficient employment lands will be maintained to accommodate forecasted growth to 2051.	The Region is advancing the conversions indentified in ROPA 48 as a phased amendment that forms part of the Municipal Comprehensive Review. Regional staff look forward to further discussion with Ministry staff regarding the Region's Land
		8	Map 1h	The Region's assessment of the proposed employment area conversions appears to focus mainly on site-specific considerations.	Additional information is needed to better understand whether the achievement of minimum intensification and density targets will be adversely affected by the proposed employment area conversions as per Growth Plan policy 2.2.5.9 d).	Needs Assessment and employment conversion assessments undertaken as part of the Municipal Comprehensive Review.
		9	Map 1h	draft ROPA 48 are located within a PSEZ and outside of a delineated MTSA, which is contrary to policy	The conversion of 2258 Mountainside Drive and 800 Burloak Drive, in the City of Burlington; and the Meritor Lands (partially), in the Town of Milton. can only be undertaken in accordance with Growth Plan policy 2.2.5.9.	Not applicable
		10		conversions (e.g. 238 Sumach Drive in the City of Burlington and others) would appear to result in the	maintained through local official plan designations and zoning.	Not applicable

	esponse
through designations and zoning which provide for jobs, such as mixed-use. 11 83.2 b) 10 better align with the PPS, it is not a criterion supported by the Growth Plan. The Region is encouraged to explore whether the delineations of MTSAs on the priority transit corridor could be broadened to include adjacent low-density neighbourhoods of ensure the delineations are capturing the most appropriate number of potential transit users that are within walking distance to the station, as per Growth Plan policy 2.2.4.2. In through designations and zoning which provide for jobs, such as mixed use areas to maintain land use compatibility. Wording appropriate interface between the Employment Areas and adjacent sensitive land uses mixed use areas to maintain land use compatibility. "c) only permitting development with adjacent sensitive land uses mixed use areas to maintain land use compatibility. "c) only permitting development with adjacent sensitive land uses mixed use areas to maintain land use compatibility. "c) only permitting development with adjacent sensitive land uses mixed use areas to maintain land use compatibility. "c) only permitting development with section 79.3 (12) and (12.1) of this Plan. The Growth Plan supports the achievement of the minimum intensification and density targets by residential units and affordable housing options, including additional residential units (accordance with subsection 16(3) of the Planning Add), semi-detached,	Vording was changed to 'non-employment areas' possistent with the Growth Plan. The compatibility policy in 79.3(12) was updated to clude the needs test, so the cross-reference is opropriate as is. The Region consulted with the local municipalities in the delineation methodology established in the egional Urban Structure paper and draft elineated boundaries of the MTSAs. The ITSAs were supported by local plans and rudies. The Region's methodology excluded stablished areas, including low density mature estidential neighbourhoods that were not inticipated to accommodate growth and tensification. The areas excluded, based on the call context of the station, were not anticipated to mange in a manner that would increase the ermeability, accessibility and connectivity to the lation. The areas excluded were often constrained due to the existing block patterns are. In long blocks with few connections) and built form conditions (e.g. rear lotting). In some cases, cluding stable residential neighbourhoods that were rear lotted to the station, with no ermeability and accessibility would result in a alk greater than a 10-minute walking distance as lentified by the Growth Plan.

No. Source	e Su	Submission		Response
	13	The MTSA density targets established by the Growth Plan (policy 2.2.4.3) are the minimum density in residents and jobs combined per hectare ("r&j/h") required to be planned for MTSAs located along priority transit corridors or existing subway lines. The Region's priority transit corridor, shown on Schedule 5 to the Growth Plan, is the Lakeshore West GO Transit line, which includes 4	the Ministry for consideration prior to the adoption of ROPA 48 or as part of the Region's submission of adopted ROPA 48 to the Ministry for	Housing policy directions supporting the provision of a diverse range and mix of housing options, in conformity with Provincial Plans and policies, will be developed to inform a subsequent ROPA for the purposes of the Municipal Comprehensive Review. The supporting rationale for the alternative target request for the Appleby GO MTSA is Included as Attachment #5 to Report No. LPS60-21,
		4 81.2 (2.1) To ensure that any changes to minimum density targets for MTSA's are subject to provincial approval in accordance with the Planning Act and Growth Plan. 5 Map 1H and Map 6 and 81.3 Section 81.3 and Table 2b provide policy direction for Proposed Major Transit Station "Areas" and reference both Map 1H and Map 6.	individual Major Transit Station Area may be revised prior to the completion of the municipal comprehensive review, to address recommendations of the municipal comprehensive review and/or Local Municipal planning studies." If a delineation for Trafalgar GO is not planned at this time, it is recommended that Section 81.3 and Table 2b remove reference to Map 6. Further, the Region is encouraged to clarify between Proposed Major Transit Stations and Proposed Major Transit Station "Areas" in the Regional Official Plan to ensure that	This policy has been modified to clarify the intent of future change through the current MCR, which would be subject to Provincial approval as the approval authority. The numbering (2.1) indicates that this is intended as a temporary/placeholder policy to be removed in the next ROPA. Policy has been modified to differentiate between
		policy direction for Proposed Major Transit Station "Areas" and reference both Map 1H and Map 6.	clarify Transi Transi Regior	between Proposed Major it Stations and Proposed Major it Station "Areas" in the

No.	Source	Submission	Response
		outlined under 81.3 pertain to the Trafalgar GO as identified in Map 1H. "81.3 The objectives of the Proposed Major Transit Station Areas as identified on Map 1H and Map 6 are:"	Proposed Major Tranist Station that has not yet been delineated.
16	Halton District School Board E-mail dated June 16, 2021	June 16, 2021 Curt Benson Director, Planning Services and Chief Planning Official Legislative & Planning Services Region of Halton 1151 Bronte Road Oakville ON L6M 3L1 Dear Curt: Subject: Regional Official Plan Amendment No. 48: Halton District School Board Support Letter for Star Oak Developments & Sixth Oak Inc Employment Land Conversion (Request O-17) to facilitate the development of the Oakville NE #1 HS In January of 2021, the Halton District School Board (HDSB) initiated a due diligence process in order to identify an alternate secondary school site in the North East Oakville Secondary Plan area, after discovering that its initial site that is located northwest of Neyagawa Boulevard and Dundas Street West was no longer viable to accommodate the required Oakville North East #1 high school (Oakville NE #1 hs). As part of its due diligence review, the Board commissioned a study to identify potential sites within the North Oakville East Secondary Plan area that could accommodate a secondary school site of +/- 15.0 acres with access to servicing to achieve a targeted school year opening date of 2024/2025. It should also be noted that the Board has already received approval to proceed from the Ministry to select an architect and begin design.	

No.	Source	Submission	Response
No.	Source	A total of three (3) potential sites were identified as part of the due diligence process, and were evaluated based on their developability, serviceability with regards to targeted opening date, and ability to meet the Board's long-term accommodation needs in North Oakville. The properties reviewed included: (i) the second designated secondary school site located southeast of Trafalgar Road and Burnhamthorpe Road; (ii) assembled properties southwest of Trafalgar Road and Burnhamthorpe Road; and (iii) a property northwest of Burnhamthorpe Road and Sixth Line. After completing the analysis, which included meeting with representatives of the Town of Oakville, the Region of Halton, Conservation Halton, and other agencies in the Region, the Board concluded that the third site which is located northwest of Burnhamthorpe Road and Sixth Line (referred to as the "Sixth Line Property" hereafter) is most optimal in meeting secondary school needs in the North East Oakville Secondary Plan area. However, as part of the due diligence process for the Sixth Line Property, we identified a concern regarding the designation of the northern +/- 4.9 acre portion of such property, which is designated Employment Land and Provincially Significant Employment Zone (PSEZ). These designations do not permit a secondary school use. Without the benefit of this 4.9 acre portion of the Sixth Line Property, the Board will face significant challenges in providing	This request was identified and supported in the Growth Concepts Discussion Paper, but was recommended to be advanced as part of the Preferred Growth Concept. A submission from the HDSB received June 16, 2021 indicated that HDSB's initial site for a secondary school in the North East Oakville Secondary Plan was no longer viable and that in January 2021 HDSB began a due diligence process to identify an alternate site. Given the public interest in providing and advancing community facilities in
		the necessary secondary school programming on site for a 1200+ pupil place secondary school. In short, the Board requires that these designations be amended in order to permit non-employment uses so that the property will be viable for educational purposes.	the North East Oakville Secondary Plan area and the lack of impact to the overall land supply, it is recommended that this conversion be advanced as part of ROPA 48. More information on how this conversion conforms to the principles of the
		We understand that a request has been submitted to the Region to remove the Employment designation from the Sixth Line Property to permit non employment uses thereon (Town of Oakville and Star Oak Developments Sixth Oak Inc Employment Land Conversion Request - Request O-17). Request O-17 includes the 4.9 acre portion referred to above that the Board requires to meet its programming requirements on site.	Region's employment conversion assessment criteria is available in Appendix C of the Growth Concepts Discussion Paper.
		The Board fully supports the conversion as proposed in Request O-17, and therefore requests that such conversion be incorporated into ROPA 48 as part of the first phase of employment land conversions.	
		The lands in question have a strategic importance in advancing elements of the local urban structure, specifically the establishment of a secondary school	

No.	Source	Submission	Response
		that will serve the current and future residents of the North East Oakville Secondary Plan area. To supplement the above request, we also attach a technical memorandum completed by the Board's consultant, Strategy 4, which provides additional information concerning the Board's needs and the policy framework that further supports the conversion to permit the proposed Oakville NE #1 high School. Should you have any questions regarding our comments, please contact the undersigned. Sincerely, Frederick Thibeault General Manager of Planning cc Stuart Miller, Director of Education - Halton District School Board Roxana Negoi, Superintendent of Business - Halton District School Board lan Gaudet, Executive Officer of Facility Services - Halton District School Board Mike Wildfong, Manager - Capital Projects - Halton District School Board Laureen Choi, Senior Analyst Planning - Halton District School Board Gabe Charles, Acting Director - Planning Services - Town of Oakville Jeff Kenny, Partner - Strategy 4	
17	Halton Catholic District School Board E-mal dated June 18, 2021	June 18, 2021 Karyn Poad Senior Planner Halton Region 1151 Bronte Road Oakville, ON L6M 3L1 Dear Karyn: RE: Draft Regional Official Plan Amendment No. 48 Amendment to Define a Regional Urban Structure Your File No.: ROPA 48 Thank you for the opportunity to provide comments on Draft Regional Official Plan Amendment (ROPA) No. 48 – "An Amendment to Define a Regional	

No.	Source	Submission	Response
		Urban Structure". It is understood that this amendment identifies non-discretionary components of a Regional Urban Structure through policies and mapping, including minimum density targets and proportional mix targets for residents and jobs, updates municipal growth allocations to reflect Schedule 3 of the Growth Plan, 2019, and advances certain employment land conversions.	
		The Halton Catholic District School Board (HCDSB) delivers high quality Catholic education programs at 45 elementary and 9 secondary schools in the Region of Halton. Together, these Public Service Facilities serve approximately 36,480 students, which represents a growth of 23% since 2010 when the enrolment was a total of 29,597 students. With ongoing growth, it is anticipated that enrolment will increase by an additional 26% by 2030, to approximately 46,086 students. This growth in enrolment considers approved secondary plans in the Region to date and development applications circulated to the Board.	
		To address increasing enrolment demands, the HCDSB has one (1) planned elementary school for 2022 in the Town of Milton and one (1) planned elementary school in the Town of Oakville, as well as one (1) secondary school currently under construction and scheduled to open in the 2023-2024 school year in the Town of Milton. The Board releases a Long-Term Capital Plan (LTCP) on an annual basis, which provides detailed enrolment forecasts over a 15-year planning horizon; identifies accommodation pressures due to new residential development, changing demographics, and program pressures; and identifies proposed capital projects and other recommendations to address accommodation pressures. The following comments are provided on Draft Amendment No. 48 to the Regional Plan, February 2021, circulated on March 9, 2021. The comments pertain to education and other matters of interest as it relates to the HCDSB.	
		PART II – Basic Position	
		 The Board acknowledges the change in the planning horizon from 2031 and 2051. Note that the Board typically projects student enrolment for a 15-year planning horizon through the Long-Term Capital Plan and the Education Development Charges By-law background studies. The Board acknowledges that the Region's primary role is to provide broad policy directions on strategic matters such as land and natural resources, growth strategies, housing, transportation, water and wastewater services, solid waste management, transportation, and health 	

No.	Source	Submission	Response
		 and social services, and that local municipalities will deal with their local environments as long as the overall planning vision for Halton and policies within the Regional Official Plan are adhered to. The Board will continue to provide comments to lower-tier municipalities on specific policies as it relates to matters of interest to the Board. It is indicated in Section 56, Table 1 Population and Employment Distribution that the distribution of the 2051 population forecasts to the Local Municipalities is to be determined through the municipal comprehensive review. Please circulate the Board when this information is available. Section 56, Table 2A Regional Phasing indicates the number of units in Designated Greenfield Areas categorized by low-density, and medium and high-density units. The Board uses two separate student yields for medium density units and high-density units to project student enrolment as the Board has historically seen a higher number of students from medium-density units than high-density units. As such, the Board encourages the separation of these two (2) unit types, where possible. 	Updates to Table 2a are outside the scope of ROPA 48 and could be considered as part of the next Regional Official Plan Amendment to implement the Region's Growth Strategy.
		PART III – Land Stewardship Policies The Board is supportive of phasing of growth that ensures a logical and orderly progression of development (Section 72.1(5)), as it ensures that there is projected to be a sufficient student population in a community when the Board seeks funding for new schools from the Ministry of Education. This also ensures that new development areas are "complete communities" with most students having access to a school within walking distance.	Comment noted.
		 Section 77 mentions a number of reports such as the "Annual Intensification Monitoring Report" made to Regional Council and the "Joint Infrastructure Staging Plan" to ensure that infrastructure and human services to support development is planned and financing is secured in advance of need. The Board requests that these reports be circulated. The Board understands that the Regional Urban Structure, which consists of Strategic Growth Areas, Regional Employment Areas, Built-up Areas, and Designated Greenfield Areas. It is also understood that there is a hierarchy of Strategic Growth Areas delineated in Map 1H, which includes Urban Growth Centre/Major Transit Station Area (MTSA), Major Transit Station Area (MTSA), Proposed Major Transit Station Area (MTSA), 	Comment noted. Implementation tools and updates to guidelines and annual reporting will be considered as part of the next phase of the Municipal Comprehensive Review

No.	Source	Submission	Response
		Primary Regional Node, Secondary Regional Nodes, and Regional Corridors. The Board is supportive of the integration of Strategic Growth Areas with surrounding areas, as identified in Section 79.3 (6). Students from these areas may attend a school outside of the community due to optional/alternate programming and/or need to access places of employment and community services. It is understood that a "Community Planning Permit System" is being encouraged to be implemented by local municipalities within Strategic Growth Areas. The Board requests more information on this permit system. The Board is generally supportive of the parking standards within Strategic Growth Areas that promote the use of active transportation. The Board is supportive of ensuring that land use compatibility is achieved between employment uses and sensitive land uses, such as schools, within or adjacent to Strategic Growth Areas by minimizing and mitigating any adverse effects, and minimizing the risk to public health and safety. It is understood that Urban Growth Centres are focal areas for investment in institutional and region-wide public services, and where a significant share of population and employment growth will be accommodated. The Board understands that the Region requires local municipalities to prepare detailed official plan policies or an Area-Specific Plan for a Major Transit Station Area that also provides infrastructure that supports active transportation. In general, the Board is supportive of measures that encourage students and families to travel to/from school through active transportation methods, where safely possible. The Board is supportive of providing a mix of housing types. However, the Board will require residential housing details by unit type and phasing information for the study area in order to determine school accommodation needs.	Community Planning Permit System, also known as a Development Permit System, is a <i>Planning Act</i> tool identified under Sections 70.2 and 70.2.1. This tool can be used to streamline development approvals by combining zoning, site plan and minor variance processes into one process with shorter approval timelines. To enable a Community Planning Permit System, municipalities must pass an Official Plan Amendment and associated by-law which together address matters such as permitted uses and standards, review procedures, potential conditions of approval, and the areas to which the Permit System applies. Comments noted.

No.	Source	Submission	Response
		The Board intends to participate in the development of Area-Specific Plans for Strategic Growth Areas by the local municipalities. This provides an opportunity for the Board to review school accommodation needs and review other matters of interest for the Board as it relates to school facilities.	
		The Board will continue to provide comments through on future updates to this Regional Official Plan Amendment and future reviews of the Regional Official Plan. If you have any questions regarding the aforementioned, please contact the undersigned.	
		Yours truly, Dhilan Gunasekara Planning Officer	
		cc: A. Lofts, Superintendent of Business Services and Treasurer of the Board B. Vidovic, Senior Manager of Planning Services, Planning Services C. Palucci, Planning Clerk, Planning Services	