

0 & 8673 Eighth Line, Halton Hills

Employment Land Needs Assessment

June 25, 2025



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Employment Land Needs Assessment

Prepared for:

Maple Mist Development Corp.



Keleher Planning & Economic Consulting Inc.

75 Main Street East, Milton ON, L9T 1N4

June 25, 2025

EXECUTIVE SUMMARY

Background

Keleher Planning & Economic Consulting Inc. (KPEC) was retained by Maple Mist Development Corp. c/o Trinison Management Corp to prepare an Employment Land Needs Study in support of an Official Plan Amendment (OPA) application for urban boundary expansion for the properties at 0 & 8673 Eighth Line in the Town of Halton Hills, in the Region of Halton.

The subject lands are located at 0 & 8673 Eighth Line in the Town of Halton Hills, immediately east of Eighth Line, and west of Ninth Line, south of 5 Side Road. The lands are located near Trafalgar Road and Steeles Avenue, which provide connections to Highway 401 and Highway 407. To the immediate south of the subject lands are lands designated for employment uses, in an area known as the Premier Gateway Employment Area.

The OPA is proposing to expand the urban boundary for the purposes of using the subject lands for employment uses. It is envisioned that the proposed development will be consistent with land use permissions for the Premier Gateway Employment Area. A conceptual land use plan is provided in the figure below. The gross land area is 41.12 hectares, with an estimated net developable area of 34.46 hectares.¹

Estimate of Town of Halton Hills Employment Land Needs

The Halton Region LNA added 1,070 hectares of employment lands, of which 400 hectares were located in the Town of Halton Hills. However, based on the Town-specific employment land needs estimated in the Regional Land Needs Assessment to 2051, and adjusting the densities to reflect Regional targets for employment area densities, the Town requires 919 hectares of new employment lands to 2051, **or 519 hectares** over and above the amount estimated by the Region in its Modified Preferred Growth Concept.

If instead the Town's 2020 Employment Land Needs Analysis was updated for the Town's 2051 employment forecast so as to be consistent with the Regional Official Plan horizon, it is estimated that the Town would need 962 hectares of new employment lands, or an additional 761 hectares over and above the existing supply. Assuming that

¹ The net site area is an estimate only at this time, and will be fine-tuned as the development process continues.

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400 hectares have been added through Regional Official Plan amendments, the Town would need **another 361 hectares** relying on the Town's LNA method.

Under either approach, there is a significant shortfall in employment lands in the Town of Halton Hills. In determining where the unmet demand for employment lands could be accommodated through additional employment land designations within the Town, the expansion of the Premier Gateway employment area is a logical location given:

- The existing surrounding employment area that additional lands can help leverage and build upon;
- The existing and planned Regional and Town infrastructure that would support industrial uses in the area, including a widened Trafalgar Road, Steeles Avenue West; and
- The proximity to the future Highway 413, as well as the improved Highway 401 and the existing Highway 407 that can provide access from other parts of the GTA and Ontario through the Provincial highway system, enabling movement of goods and employees to and from the area.

Conclusions

Based on review of the relevant policies, publicly available reports prepared by/for the Town of Halton Hills and Halton Region, analysis of data related to land supply, land demand and the market for non-residential uses in the area, the following are the summary conclusions in assessing the need for additional employment land in the Town of Halton Hills:

- The market for industrial uses has been strong, with vacancy being below long-term trends, absorption continuing to be positive, and asking rents continuing to escalate. The industrial construction pipeline remains at elevated levels due to a long-term decline in vacancy and increases in asking rents improving financial viability of industrial projects in the area. Prospects for new office space are limited.
- The success of the Premier Gateway Employment Area, combined with the strength of the industrial market, the continued advancement of the Highway 413 project, and existing available supportive infrastructure such as major arterial roads and existing Provincial highways, suggests that the subject lands would be a suitable and practical location for the Town to address the Town's estimated shortfall of employment land supply.
- The Premier Gateway Employment Area has steadily been expanding northward from Steeles Avenue towards 5 Side Road, and eastward from Trafalgar Road to

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Winston Churchill Road. The subject lands are located adjacent to the urban area and lands designated for employment uses. Incorporation of the subject lands into the urban boundary and designation for employment uses would help support the viability of the surrounding employment area, and help the Town continue to attract opportunities for large-scale employment users to locate in the Town.

- In order to achieve PPS policies regarding sufficient lands to meet projected need for employment land, the Town will require a substantial amount of additional designated employment areas to ensure it can accommodate projected growth in employment land employment to 2051 and beyond.



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1. INTRODUCTION

Keleher Planning & Economic Consulting Inc. (KPEC) was retained by Maple Mist Development Corp. c/o Trinison Management Corp to prepare an Employment Land Needs Study in support of an Official Plan Amendment (OPA) application for the properties at 0 & 8673 Eighth Line in the Town of Halton Hills, in the Region of Halton.

1.1. Overview of Subject Lands

The subject lands are located at 0 & 8673 Eighth Line in the Town of Halton Hills, immediately east of Eighth Line, and west of Ninth Line, south of 5 Sideroad. The lands are located near Trafalgar Road and Steeles Avenue, which provide connections to Highway 401 and Highway 407. To the immediate south of the subject lands are lands designated for employment uses, in an area known as the Premier Gateway Employment Area.

Figure 1

Location of Subject Site



Source: Google Earth

1.2. Proposed Development

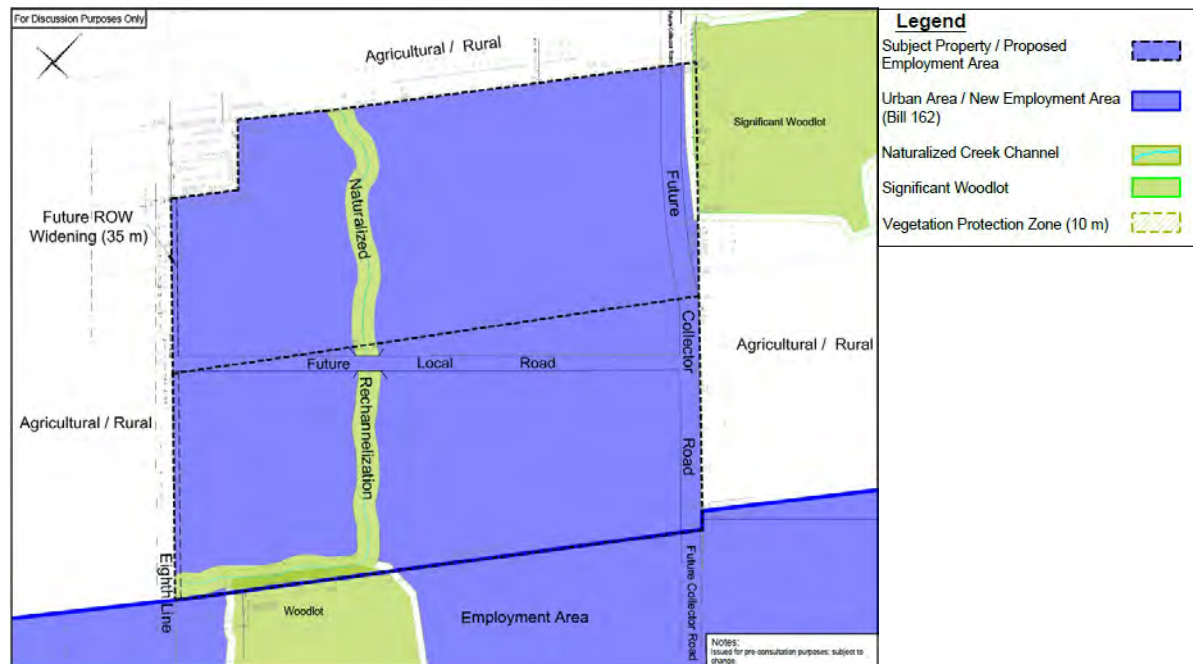
The OPA is proposing to expand the urban boundary for the purposes of using the subject lands for employment uses. It is envisioned that the proposed development will be consistent with land use permissions for the Premier Gateway Employment Area. A



conceptual land use plan is provided in the figure below. The gross land area is 41.12 hectares, with an estimated net developable area of 34.46 hectares.²

Figure 2

Conceptual Land Use Plan



Source: Corbett Land Strategies Inc.

² The net site area is an estimate only at this time and will be fine-tuned as the development process continues.



2. POLICY ANALYSIS

2.1. 2024 Provincial Planning Statement

2.1.1. Planning for Sufficient Employment Lands

Section 2.1, policies 1 and 2 of the 2024 Provincial Planning Statement states that in areas where the Growth Plan applied, municipalities may continue to forecast employment growth using the Growth Plan forecasts

1. As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and may modify, as appropriate.

2. Notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.

Section 2.1, policy 3 requires that sufficient land is to be made available to accommodate an appropriate range and mix of land uses to meet projected needs of at least 20 years, in some cases no more than 30 years, but in the case of employment lands, the provision of land may extend beyond 30 years:

3. At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon.

2.1.2. Settlement Area Boundary Expansion

Section 2.3.2 of the 2024 PPS deals with settlement area boundary expansions and the criteria to be met in considering such an expansion:

2.3.2 New Settlement Areas and Settlement Area Boundary Expansions

1. In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following:

a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;

b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;

c) whether the applicable lands comprise specialty crop areas;



- d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;*
 - e) whether the new or expanded settlement area complies with the minimum distance separation formulae;*
 - f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and*
 - g) the new or expanded settlement area provides for the phased progression of urban development.*
- 2. Notwithstanding policy 2.3.2.1.b), planning authorities may identify a new settlement area only where it has been demonstrated that the infrastructure and public service facilities to support development are planned or available.*

2.1.3. Employment

Section 2.8 of the 2024 PPS deals with the provision of employment, and the need to provide an appropriate mix of employment to meet long-term needs, including providing a range and choice of suitable sites:

2.8 Employment

2.8.1 Supporting a Modern Economy

1. Planning authorities shall promote economic development and competitiveness by:

- a) providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
- c) identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*
- d) encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and*
- e) addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*

2. Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects are encouraged in strategic growth areas and other mixed-use areas where frequent transit service is available, outside of employment areas.



3. In addition to policy 3.5, on lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the longterm economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines.

4. Major office and major institutional development should be directed to major transit station areas or other strategic growth areas where frequent transit service is available.

2.1.4. Settlement Area Boundary Expansions

Section 2.3.2 of the 2024 PPS includes the following considerations that planning authorities are to consider when reviewing whether to allow a settlement area boundary expansion:

2.3.2 New Settlement Areas and Settlement Area Boundary Expansions

1. In identifying a new settlement area or allowing a settlement area boundary expansion, planning authorities shall consider the following:

a) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;

b) if there is sufficient capacity in existing or planned infrastructure and public service facilities;

c) whether the applicable lands comprise specialty crop areas;

d) the evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;

e) whether the new or expanded settlement area complies with the minimum distance separation formulae;

f) whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and

g) the new or expanded settlement area provides for the phased progression of urban development.

2. Notwithstanding policy 2.3.2.1.b), planning authorities may identify a new settlement area only where it has been demonstrated that the infrastructure and public service facilities to support development are planned or available.

2.2. Halton Region Official Plan

As of July 1, 2024, the Regional Official Plan will no longer be an official plan for the Regional Municipality of Halton. Instead, it will be deemed an official plan for each of the



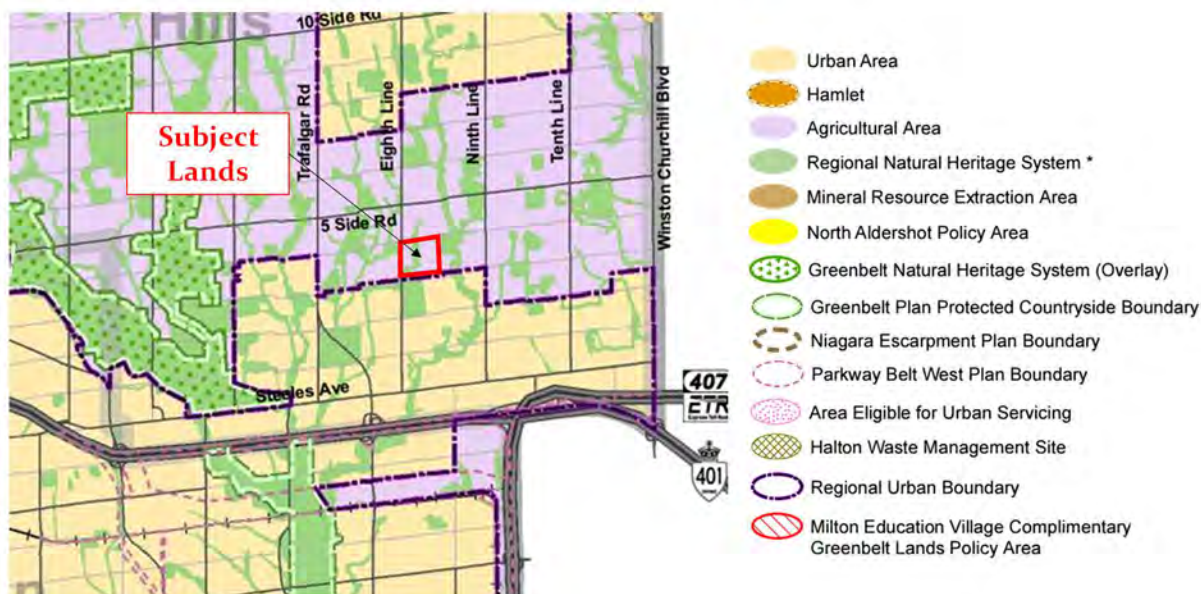
local municipalities within the Region of Halton until such time it is revoked or amended by the respective municipality.

The Regional Official Plan (ROP) review, through ROPA48 expanded the Region's urban boundary to include additional employment lands. ROPA49 set out the employment forecast and allocation to the lower-tier municipalities in Table 1 of the ROP and includes a forecast of 65,460 jobs in the Town of Halton Hills to 2051.

The subject lands are currently designated Agricultural Area. With expansion, the subject lands are now on the edge of the urban area, with the urban boundary expansion for additional employment lands moved northward from Steeles Avenue towards 5 Side Road.

Figure 3

Halton Region Official Plan

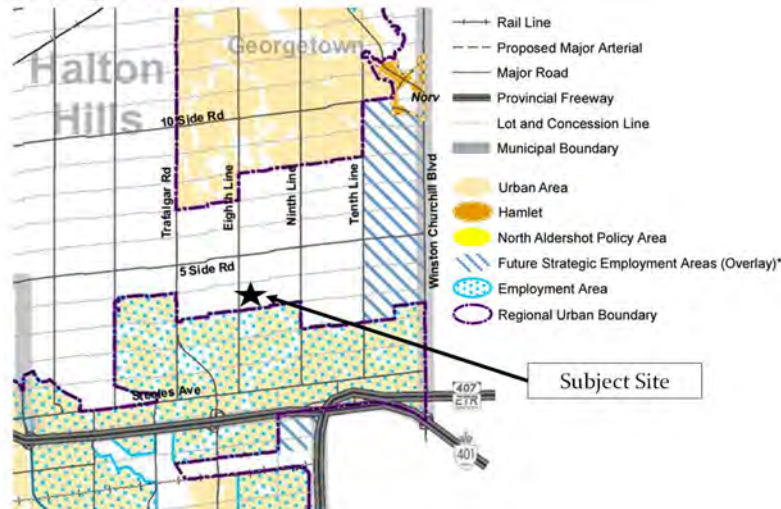


Source: Halton Region Official Plan, Map 1



Figure 4

Town of Halton Hills, Employment Areas in Regional OP



Source: Region of Halton OP, Map 1C

Table 2 of the Regional Official Plan sets out the minimum densities for employment areas, including 19 jobs per hectare for employment areas in the Town of Milton and 24 jobs per hectare for employment areas in the Town of Halton Hills:



Figure 5 – Table 2, Halton Region Official Plan

TABLE 2 INTENSIFICATION AND DENSITY TARGETS					
Target	Municipality				
	Halton Region	Burlington	Oakville	Milton	Halton Hills
<i>Intensification Target</i>					
<i>Housing Units in Built-Up Area¹</i>	53,300	20,500	19,400	9,800	3,600
<i>Community Area Density Targets</i>					
<i>People and Jobs per Hectare in the Designated Greenfield Area²</i>	62	76	70	59	53
<i>Employment Area Density Targets</i>					
<i>Jobs per Hectare in the Employment Areas³</i>	26	33	36	19	24

¹ Target for the number of new housing units occurring within the Built-Up Area as shown on Map 1H between 2022 and 2041 and representing 45% of all new units during this period.

² Target for the number of people and jobs per hectare in the *Designated Greenfield Area* by 2041, consisting of the lands within the Regional Urban Boundary and outside of the *Built-Up Area* as shown on Map 1H and measured in accordance with Section 227.1 of this Plan.

³ Target for the number of jobs per hectare in the *Employment Areas* by 2041, as shown on Map 1H and measured in accordance with Section 227.1 of this Plan.

According to the definition of “Development Density”, the employment area density target in Table 2 is “measured across the lands within Employment Areas that are designated Urban Area”.

Policy 77(10) states that the Region may expand the Regional Urban Boundary through an amendment to the Official Plan in advance of a municipal comprehensive review provided that:

- a) the lands that are added to the Regional Urban Boundary are planned to achieve or exceed the minimum density target for the Designated Greenfield Area or Employment Areas as identified in Table 2, as appropriate;
- b) the location of the lands that are added to the Regional Urban Boundary satisfy the applicable requirements of Section 77(8);
- c) the location of any lands added to the Regional Urban Boundary is outside of the Greenbelt Plan area;
- d) the settlement area is serviced by municipal water and wastewater systems and there is sufficient reserve infrastructure capacity to service the lands added to the Regional Urban Boundary;
- e) the additional lands added to the Regional Urban Boundary and the associated forecasted growth will be fully accounted for in the land needs assessment associated with the next municipal comprehensive review; and



f) the amount of land to be added to the Regional Urban Boundary is no larger than 40 hectares.

Table 2A of the ROP sets out the Regional phasing over the 2022-2041 period and Table 1 shows the total employment growth by local municipality over the full 2021-2051 period. Employment growth in Halton Hills is forecast to increase by 167% and see its share of Region-wide employment increase from 9% to 13% by 2051.

The Town's share of Region-wide employment growth will increase from 16% of growth in the first 10-year period to 22% in the final 10-year period (2042-2051), surpassing the Town of Oakville as the second-largest source of employment growth Region-wide.

Figure 6

Regional Phasing, Employment by Municipality, 2022-2051

Municipality	2021	2051	% Growth	2022-2031	2032-2041	2042-2051
Oakville	111,980	181,120	62%	27,800	22,800	18,540
Burlington	98,340	124,390	26%	8,200	8,500	9,350
Milton	44,390	136,270	207%	24,200	28,300	39,380
Halton Hills	24,510	65,460	167%	11,400	10,500	19,050
Total Region	279,220	507,240	82%	71,600	70,100	86,320
Share of Region						
Oakville	40%	36%		39%	33%	21%
Burlington	35%	25%		11%	12%	11%
Milton	16%	27%		34%	40%	46%
Halton Hills	9%	13%		16%	15%	22%
Total Region	100%	100%		100%	100%	100%

Source: Region of Halton Official Plan, Tables 1 and 2A

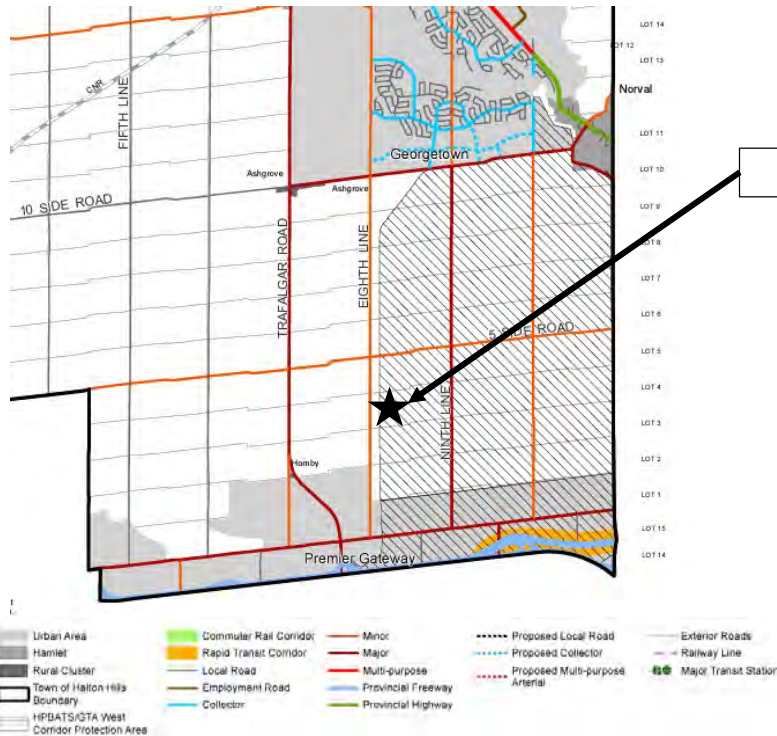
2.3. Town of Halton Hills Official Plan

Under the Town of Halton Hills Official Plan, the subject lands are designated as Agricultural Area in Map A1. The subject lands are within the HPBATS/GTA West Corridor Protection Area.



Figure 7

Town of Halton Hills, Plan of Major Transportation Facilities



Source: Town of Halton Hills, Schedule B1

The Town's Official Plan in Table A1A still provides an employment forecast to the year 2031.

The Town's OP policy D3.3 seeks to ensure that an adequate supply of employment lands are available at all times in the Town, noting that the only area that could accommodate 'large-scale' employment growth in the Town is within the Premier Gateway Employment Area:

It is the intent of this Plan that an adequate supply of employment land is available at all times in the Town. At the time this Plan was adopted by Council, almost all of the employment land in Georgetown was developed. In Acton, additional development was feasible, but the amount of development that could occur was limited by servicing constraints. The only area that could accommodate large-scale employment growth is located within the Premier Gateway Employment Area.



2.3.1. Premier Gateway Secondary Plan

The boundaries of the Premier Gateway Employment Area as per the Town of Halton Hills' Official Plan are found in Schedule A8 of the Official Plan, reproduced in the figure below, which includes Phase 1B and Phase 2B lands.

Figure 8

Premier Gateway Employment Area, Land Use Plan



Source: Town of Halton Hills, Schedule A8

In October 2023, the Town adopted OPA 50 for the Premier Gateway Phase 2B Secondary Plan. Schedule H8 of the Secondary Plan provides the land use mapping for the Secondary Plan. Though the subject lands are not included in the Phase 2B Secondary Plan area, the land use plan for the lands, generally between Eighth Line and Winston Churchill, along the Steeles Avenue West frontage is instructive in understanding the availability of infrastructure in the area.



Figure 9

Boundaries of Premier Gateway Phase 2B Secondary Plan



Source: Town of Halton Hills, Schedule H8

Policy H8.6.1.1 of the Secondary Plan sets out that the employment target for the Secondary Plan area at full build-out is 3,570 jobs, assuming a build-out density of 25 jobs per net hectare.

The Phase 2B lands are generally designated for Prestige Industrial uses, which as per the Town Official Plan includes the following permitted uses:

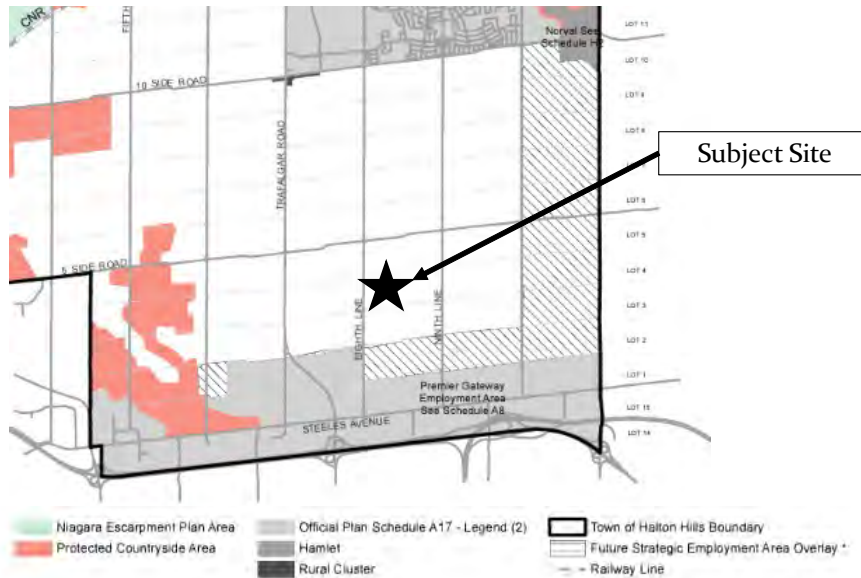
- Business and professional offices in free-standing buildings or as part of an industrial mall;
- Industrial uses, such as manufacturing, assembling, processing, fabricating, warehousing, and distribution facilities;
- Computer, electronics and data processing facilities;
- Research and development facilities;
- Printing and associated service establishments;
- Industrial malls, containing one or more of the main permitted uses.

Schedule A17 of the Town Official Plan shows the location of lands identified as Future Strategic Employment Areas.



Figure 10

Town of Halton Hills, Future Strategic Employment Areas



Source: Town of Halton Hills, Schedule A17



3. ANALYSIS

3.1. Town Employment Land Needs Assessment Phase 1 & 2 Final Report (January 2020)

The January 2020 Town LNA, prepared by Watson & Associates found the following:

- The Town will need approximately 338 gross hectares of additional designated employment land to 2041;
- The Town would require 70% of the gross land area of the Future Strategic Employment lands directly adjacent to the Premier Gateway Employment Area;
- Close to 90% of the overall employment growth forecast for employment lands is anticipated for the Premier Gateway Employment Area;
- As the more mature areas of the GTHA build-out, increasing growth pressure will be placed on the remaining vacant greenfield Employment Areas;
- Halton Hills' share of employment lands absorption in the Region has risen from 22% over the 2008-2012 period (48 hectares) to 29% in the 2013-2017 period (60 hectares); and
- The share of Town building permit activity in the industrial sector has risen from 55% to 77%, with the amount of industrial building permit activity in the Town increasing by 260% between the 2008-2012 to 2013-2017 periods.

Figure 11

Non-Residential Building Permit Activity, GFA by Sector, 2008-2017, by 5-year Periods, Halton Hills

GFA by Type (m2)	2008-2012	2013-2017	% Change
Industrial	84,400	303,500	260%
Commercial	58,300	69,000	18%
Institutional	11,300	22,100	96%
Total	154,000	394,600	156%
<hr/>			
Share of GFA			
Industrial	55%	77%	
Commercial	38%	17%	
Institutional	7%	6%	
Total	100%	100%	

Source: Watson & Associates, Halton Hills Employment Land Needs
Assessment - Phase 1 and 2, (January 2020)



The Town LNA found that certain employment uses in employment areas can require unique site characteristics such as highway access or exposure, site sizes and configuration, and future expansion potential that cannot be accommodated in many other areas of the Town.

The Town LNA is based on a distribution of 50% of employment to the employment areas, 48% to community areas, and 2% to rural areas.

The Town LNA estimates that there was a demand for 646 net hectares, and based on the available supply of 376 net hectares, for a residual need of 270 net hectares to 2041, which equates to approximately 338 gross hectares (based on a net-to-gross ratio of 80%).

The Town LNA states that it has been carried out in accordance with the Provincial Land Needs Assessment Methodology (LNA^M). However, compared to the LNA^M, the Town LNA ignores the incorporation of a vacancy factor “to account for lands that may not develop to the Plan horizon”. It is typical that a factor of 5% is applied to the existing employment land supply. If the 5% vacancy adjustment was made against the existing supply, the available supply falls to 357 hectares, and the residual need increases to 289 net hectares (+19 net hectares from Town LNA) or 361 gross hectares (+23 hectares from Town LNA).

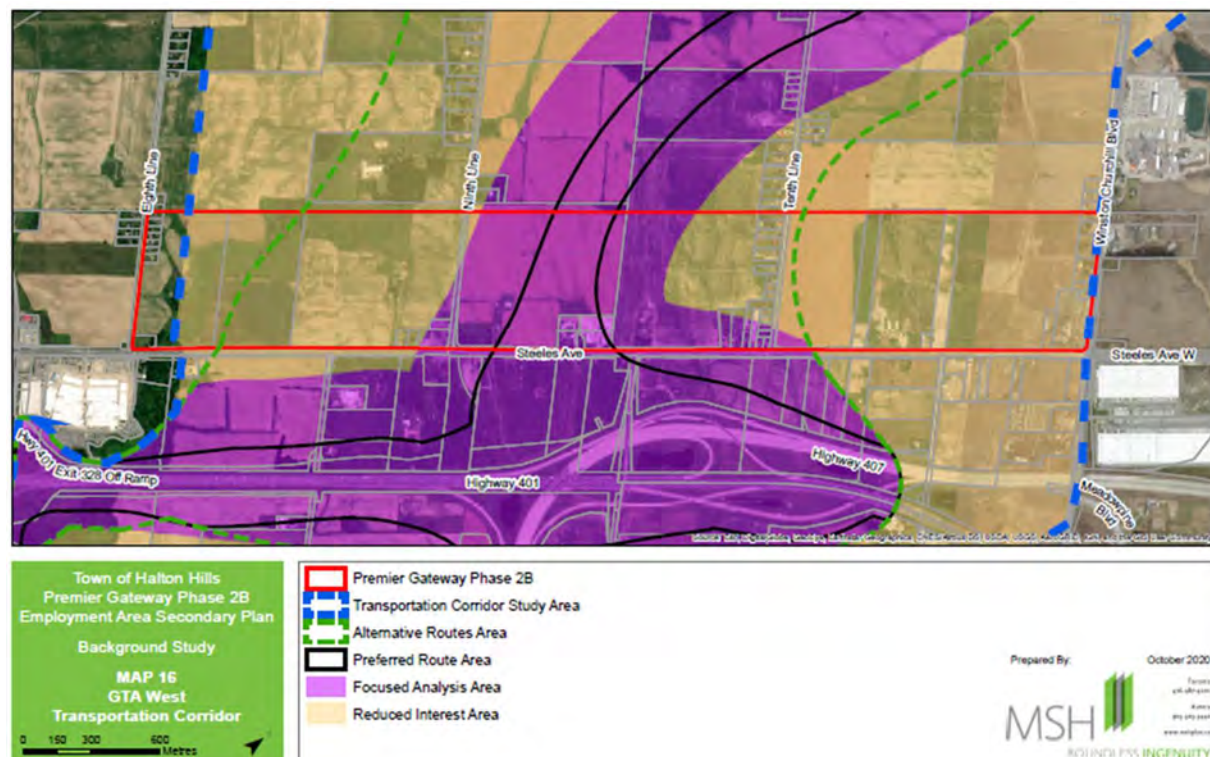
3.2. Phase 2B Employment Area Integrated Planning Project (December 2020)

A December 2020 Background Report titled “Premier Gateway Phase 2B Employment Area Integrated Planning Project” was intended to develop a detailed local development framework, including land use designations and policies to accommodate employment lands needed for the 2031 horizon.

Map 16 of the IPP Study shows the location of the Preferred Route for the Highway 413 right-of-way, as well as the “Focused Analysis Area”, each of which are located immediately east and south of the subject lands.



Figure 12 – Map of GTA West Corridor Area within South Georgetown, Premier Gateway



3.3. Commercial Needs Assessment Study

A Commercial Needs Assessment Study for the Phase 2B Lands was prepared by Tate Economic Research Inc., dated February 2021. The Study addresses the market demand for supportive commercial uses in the employment area. These supportive uses include business-supportive retail and services, accommodation/lodging, dining establishments, entertainment uses, recreational uses, warehouse and wholesale retailing, among other uses.

The Commercial Needs Assessment Study found that between 40,000 and 80,000 square feet of supportive commercial space would be needed to support the 269 acres of employment lands in the Phase 2B area, and would require between 4-8 acres, which amounts to 2-3% of the total employment land area in the Phase 2B area.

3.4. Region of Halton Land Needs Assessment

The Region of Halton retained Hemson Consulting to prepare a Regional Land Needs Assessment – in March 2022, a LNA for the Modified Preferred Growth Concept was released, which supported the Region's Growth Management Strategy and Regional Official Plan update. The Regional LNA estimated land needs to the 2051 horizon,



consistent with the Growth Plan for the Greater Golden Horseshoe (applicable at the time of its completion).

Of the forecasted growth in jobs within the Region to 2051, it is estimated that 118,000 jobs would locate within Employment Area, which includes growth of 43,000 jobs in the Major Office sector, and another 75,000 jobs in employment lands. The Regional LNA estimated that 1,070 gross hectares of new employment lands will be needed in the Region to 2051 over and above what has been provided to achieve 2041 forecasts.

The Regional LNA does not provide any allocation of employment to 2051 to the lower-tier municipalities.

The Regional LNA is based on the following assumptions:

- A factor for long-term vacancy of 3% is applied to the total occupied and vacant lands, which accounts for parcels that do not develop due to challenging access or configuration issues, or are 'regular' parcels not brought to market or never sold to an end user;
- Local employment land employment densities were applied based on densities at full build-out. Table 24A and 24B of the Regional LNA uses an assumed future average net density for both Milton and Halton Hills of 29 jobs per net hectare. However, the LNA notes that the calculation of density in accordance with the Growth Plan is like UGC/MTSA densities where there are no deductions for Natural Heritage System or large infrastructure that happen to be within employment areas, resulting in densities that are not comparable to other measures of employment densities which are typically based on net private land area or on the developable area.
- The LNA notes that 'policies and a proposed target will be prepared for the Regional Official Plan Amendments'. Table 25 of the LNA provides the calculated densities for existing designations for each local municipality in 2021 and 2041. As per Table 2 of the Regional Official Plan, the density targets for Milton and Halton Hills are 19 jobs per hectare and 24 jobs per hectare, respectively.

Based on the estimated need for 1,070 gross hectares, the Region chose to add 670 hectares within the Town of Milton and 400 hectares within the Town of Halton Hills. Had the Regional LNA used the densities that were incorporated into Regional policies and density targets, the amount of employment land area that would be required would be greater than estimated in the LNA.



Figure 13

Summary of Employment Land Needs Analysis, March 2022 Regional LNA

Year	Formula	Total Halton Region	Major Office	Population Related	Employment Land	Rural
2021		278,200	33,000	119,600	116,800	8,800
2026		318,000	41,600	134,700	132,400	9,400
2031		350,000	48,500	146,800	144,900	9,800
2036		384,000	56,600	161,600	155,800	9,900
2041		420,000	65,100	177,300	167,400	10,000
2046		460,000	77,500	192,500	179,900	10,000
2051		500,000	85,800	207,600	196,600	10,000
Growth 2021-2051		221,800	52,800	88,000	79,800	1,200
% of Growth		100.0%	23.8%	39.7%	36.0%	0.5%

Year	Total Halton Region	Burlington	Oakville	Milton	Halton Hills
2021	278,200	98,400	110,800	44,400	24,600
2031	349,700	106,700	138,500	68,600	35,900
2041	419,800	115,300	161,000	97,200	46,300
2051	500,000	Not allocated			
Growth 2021-2041	141,600	16,900	50,200	52,800	21,700
Growth 2021-2051	221,800	Not allocated			
% of Growth 21-41	100.0%	11.9%	35.5%	37.3%	15.3%
% of Growth 21-51		Not allocated			

Employment Land Inventory for LNA						
Occupied	A	3,509.0	1,023.6	1,340.7	809.1	335.6
Vacant	B	2,250.5	169.5	633.2	868.1	579.7
Total	C=A+B	5,759.5	1,193.1	1,973.9	1,677.2	915.3
Vacancy (3%)	D	172.8	35.8	59.2	50.3	27.5
Net Vacant	E=B-D	2,077.7	133.7	574.0	817.8	552.2
Major Office Employment Growth 2021-2051	F	56,800	14,200	27,700	8,900	6,000
75% Share in Employment Areas	G=Fx0.75	42,600	10,650	20,775	6,675	4,500
Land Area @ 180 Jobs/Ha	H=G/180	236.7	59.2	115.4	37.1	25.0
Net Supply of Employment Land	I=E-H	1,841.0	74.5	458.6	780.7	527.2
Employment Land Employment Growth 2021-2051	J	79,800				
Plus: Relocated Employment Land Development	K	4,900				
Less: Flex Office into Mixed Use Areas	L	4,000				
Total Employment Land Employment	M=J+K+L	80,700				
Density (Jobs/Ha)	N		35	35	29	29
Jobs on Vacant Land Supply	O=IxN	56,589	2,609	16,050	22,640	15,290
Remaining Jobs to be Accommodated	P=M-O	24,111				
Density (Jobs/Ha)	Q	29				
Additional Land Needs (net)	R=P/Q	831				
Additional Land Needs w/ 3% Vacancy (net)	S=Rx1.03	856				
Additional Land Needs (gross)	T=S/0.8	1,070	-	-	670	400

Source: KPEC based on Hemson Consulting, Region of Halton Land Needs Assessment, (March 2022)



4. UPDATED TOWN EMPLOYMENT LNA FOR 2051 HORIZON

4.1. Updating Regional LNA for 2051 Allocations by Municipality

The March 2022 Regional LNA identified a need for 1,070 additional gross hectares of employment to 2051 within the Region. However, several changes were made to the calculations presented in the Region's LNA:

- The 2051 forecasts of employment as allocated to the lower-tier municipalities was used in estimating the amount of growth by employment type;
- The density for employment lands in each municipality was adjusted to reflect Table 2 of the Regional Official Plan; and
- It was assumed that while 2041 employment land needs can be met in part through vacant lands in each of the four lower-tier municipalities and expansions to employment areas in Halton Hills and Milton, that any additional expansion necessary to accommodate 2041-2051 employment land needs would, similar to where the expansions to 2041 were located, necessarily have to be in the Town of Milton and the Town of Halton Hills.

In total, it is estimated that a total of 2,079 gross hectares of employment land would be required to accommodate employment land employment over the 2021-2051 horizon, based on the target densities in Table 2 of the Regional Official Plan.

The Region's Official Plan review added 1,070 gross hectares of employment land based on presumed higher densities than those contained in Table 2. Based on the achievement of densities contained in the Region's policies and employment area density targets, there would be a need of an additional 1,009 hectares of gross land area.



Figure 14

Summary of Employment Land Needs Analysis, March 2022 Regional LNA, Based on ROPA 49 and ROP Forecasts and Density Assumptions to 2051

Year	Formula	Total Halton Region	Major Office	Population Related	Employment Land	Rural
2021		278,200	33,000	119,600	116,800	8,800
2026		318,000	41,600	134,700	132,400	9,400
2031		350,000	48,500	146,800	144,900	9,800
2036		384,000	56,600	161,600	155,800	9,900
2041		420,000	65,100	177,300	167,400	10,000
2046		460,000	77,500	192,500	179,900	10,000
2051		500,000	85,800	207,600	196,600	10,000
Growth 2021-2051		221,800	52,800	88,000	79,800	1,200
% of Growth		100.0%	23.8%	39.7%	36.0%	0.5%

Year		Total Halton Region	Burlington	Oakville	Milton	Halton Hills
2021		278,200	98,400	110,800	44,400	24,600
2031		349,700	106,700	138,500	68,600	35,900
2041		419,800	115,300	161,000	97,200	46,300
2051 (Table 1 ROP)		500,000	124,390	181,120	136,270	65,460
Growth 2021-2041		141,600	16,900	50,200	52,800	21,700
Growth 2021-2051		221,800	25,990	70,320	91,870	40,860
% of Growth 21-41		100.0%	11.9%	35.5%	37.3%	15.3%
% of Growth 21-51		156.6%	11.7%	31.7%	41.4%	18.4%

Employment Land Inventory for LNA						
Occupied	A	3,509.0	1,023.6	1,340.7	809.1	335.6
Vacant	B	2,250.5	169.5	633.2	868.1	579.7
Total	C=A+B	5,759.5	1,193.1	1,973.9	1,677.2	915.3
Vacancy (3%)	D	172.8	35.8	59.2	50.3	27.5
Net Vacant	E=B-D	2,077.7	133.7	574.0	817.8	552.2
Major Office Employment Growth 2021-2051	F	56,800	14,200	27,700	8,900	6,000
75% Share in Employment Areas	G=Fx0.75	42,600	10,650	20,775	6,675	4,500
Land Area @ 180 Jobs/Ha	H=G/180	236.7	59.2	115.4	37.1	25.0
Net Supply of Employment Land	I=E-H	1,841.0	74.5	458.6	780.7	527.2
Employment Land Employment Growth 2021-2051	J	79,800				
Plus: Relocated Employment Land Development	K	4,900				
Less: Flex Office into Mixed Use Areas	L	4,000				
Total Employment Land Employment	M=J+K+L	80,700				
Density (Jobs/Ha) - Table 2 ROP	N		33	36	19	24
Jobs on Vacant Land Supply	O=IxN	46,455	2,460	16,508	14,833	12,654
Allocation of Remaining Jobs (Note 1)	P		0%	0%	50%	50%
Remaining Jobs to be Accommodated	Q=M-O	34,245	-	-	17,122	17,122
Total Employment Land Employment 2021-2051	R=P+Q	80,700	2,460	16,508	31,956	29,776
Density (Jobs/Ha)	S=N		33	36	19	24
Additional Land Needs (net)	T=Q/S	1,615	-	-	901	713
Additional Land Needs w/ 3% Vacancy (net)	U=Tx1.03	1,663	-	-	928	735
Additional Land Needs (gross)	V=U/0.8	2,079	-	-	1,160	919
Less: ROPA48/49 expansions		1,070	-	-	670	400
Additional Land Needs above ROPA48/49		1,009	-	-	490	519

Note (1): Assuming Oakville and Burlington's employment lands are built-out by 2041 with no potential for expansion beyond 2041
Source: KPEC based on Hemson Consulting, Region of Halton Land Needs Assessment, (March 2022), ROPA 49



4.2. Updating Town of Halton Hills 2041 Employment LNA for 2051 Regional Forecasts

The Town completed an employment land needs assessment for the 2041 horizon in a January 2020 report completed by Watson & Associates ("Town 2041 LNA"). The Town 2041 LNA found that to accommodate forecasted employment lands employment growth, in addition to the existing supply of 376 hectares, the Town would need an additional 338 gross hectares of employment land. The approach taken in the Town 2041 LNA did not account for long-term vacancy, which based on application of a 3% vacancy factor amounts to an updated need for ELE to 2041 of 357 hectares.

Figure 15 – Summary of 2041 Town of Halton Hills LNA

Summary of Town of Halton Hills Employment Land Needs Assessment, 2019-2041							
Sector	Total	Employment Area Share	Employment Areas	Community Areas	Rural		
Primary	-	0%	-	-	-		
Industrial	10,583	95%	10,072	-	511		
Commercial/Pop'n Related	15,632	16%	2,483	13,091	58		
Major Office	1,295	100%	1,295	-	-		
Total	27,510		13,850	13,091	569		
Total excl. Major Office			12,555				

	Employment on EL	7% Intensification on EL	Employment Lands	Density	Land Demand	Absorption
2019-2021	1,032	69	963	20	48	16
2019-2026	4,375	294	4,081	20	204	26
2019-2031	8,102	544	7,558	20	378	29
2019-2036	11,918	800	11,118	20	556	31
2019-2041	13,850	930	12,920	20	646	28

Area	Employment Growth	Share	Intensification	EL Growth	Density (net)	Land Demand (net)	Annual Absorption
Premier Gateway	11,762	85%	-	11,762	21	560	24
Georgetown	855	6%	800	55	35	2	0
Acton	704	5%	130	574	20	29	1
Mansewood	528	0%	-	528	12	44	2
Total	13,850	100%	930	12,920	20	646	28

Supply						376
Surplus / (Shortfall) - Net						(270)
Surplus / (Shortfall) - Gross					80%	(338)
Additional Adjustment for Vacancy				as % of total demand		19
Additional Land Need						(357)

Source: KPEC based on Town of Halton Hills Employment Land Needs Analysis

The table below relies upon the methodology employed in the Town 2041 LNA, but with the planning horizon extended to 2051. In total, to 2051 the Town needs 761 hectares of additional employment lands, or 403 hectares than to 2041.



Figure 16

Summary of Town of Halton Hills Employment Land Needs Assessment, 2019-2051

Sector	Total	Employment Area Share	Employment Areas	Community Areas	Rural
Primary	-	0%	-	-	-
Industrial	15,753	95%	14,993	-	761
Commercial/Pop'n Related	23,269	16%	3,696	19,515	58
Major Office	1,928	100%	1,928	-	-
Total	40,950		20,616	19,515	819
Total excl. Major Office			18,689		

	Employment on EL	Intensification on EL	Employment Lands	Density	Land Demand	Absorption
2019-2021	1,032	69	963	20	48	16
2019-2026	4,375	294	4,081	20	204	26
2019-2031	8,102	544	7,558	20	378	29
2019-2036	11,918	800	11,118	20	556	31
2019-2041	13,850	930	12,920	20	646	28
2021-2051	20,616	1,384	19,232	20	962	32

Area	Employment Growth	Share	Intensification	EL Growth	Density (net)	Land Demand (net)	Annual Absorption
Premier Gateway	17,524	85%	-	17,524	21	834	28
Georgetown	1,237	6%	1,191	46	35	1	0
Acton	1,031	5%	194	837	20	42	1
Mansewood	825	4%	-	825	12	69	2
Total	20,616	100%	1,384	19,232	20	962	32

Supply		376 ha
Surplus / (Shortfall) - Net		(586) ha
Surplus / (Shortfall) - Gross	80%	(732) ha
Additional Adjustment for Vacancy	as % of total demand	29 ha
Additional Land Need		(761) ha

Source: KPEC based on Town of Halton Hills Employment Land Needs Analysis

Relying on the approach used in the January 2020 Town Employment LNA, with the added assumption regarding land vacancy, and relying on the supply data in that report of 376 net hectares, the residual employment land need to 2051 is as follows:

Figure 17

	2041 LNA	2051 LNA – Updated
Land Demand (net)	646 net hectares	962 net hectares
Land Supply (net)	376 net hectares	376 net hectares
Deficit	270 net hectares	586 net hectares
Land Need	338 gross hectares	732 gross hectares
Land Need w/ Vacancy	357 gross hectares	761 gross hectares



4.3. Conclusions Regarding Regional Land Needs

The Halton Region LNA added 1,070 hectares of employment lands, of which 400 hectares were located in the Town of Halton Hills. However, based on the Town-specific employment land needs estimated in the Regional Land Needs Assessment to 2051, and adjusting the densities to reflect Regional targets for employment area densities, the Town requires 919 hectares of new employment lands to 2051, **or 519 hectares** over and above the amount estimated by the Region in its Modified Preferred Growth Concept.

If instead the Town's 2020 Employment Land Needs Analysis was updated for the Town's 2051 employment forecast to be consistent with the Regional Official Plan horizon, it is estimated that the Town needs 962 hectares of new employment lands, or an additional 761 hectares over and above the existing supply. Assuming that 400 hectares have been added through Regional Official Plan amendments, the Town would need **another 361 hectares** relying on the Town's LNA method.

Under either approach, there is potential for a significant shortfall in employment lands in Halton Hills. In determining where the unmet demand for employment lands could be accommodated through additional employment land designations within the Town, the expansion of the Premier Gateway employment area is a logical location given:

- The existing surrounding employment area that additional lands can help leverage and build upon;
- The existing and planned Regional and Town infrastructure that would support industrial uses in the area, including a widened Trafalgar Road, Steeles Avenue West; and
- The proximity to the future Highway 413, as well as the improved Highway 401 and the existing Highway 407 that can provide access from other parts of the GTA and Ontario through the Provincial highway system, enabling movement of goods and employees to and from the area.



5. INDUSTRIAL AND OFFICE MARKET ANALYSIS

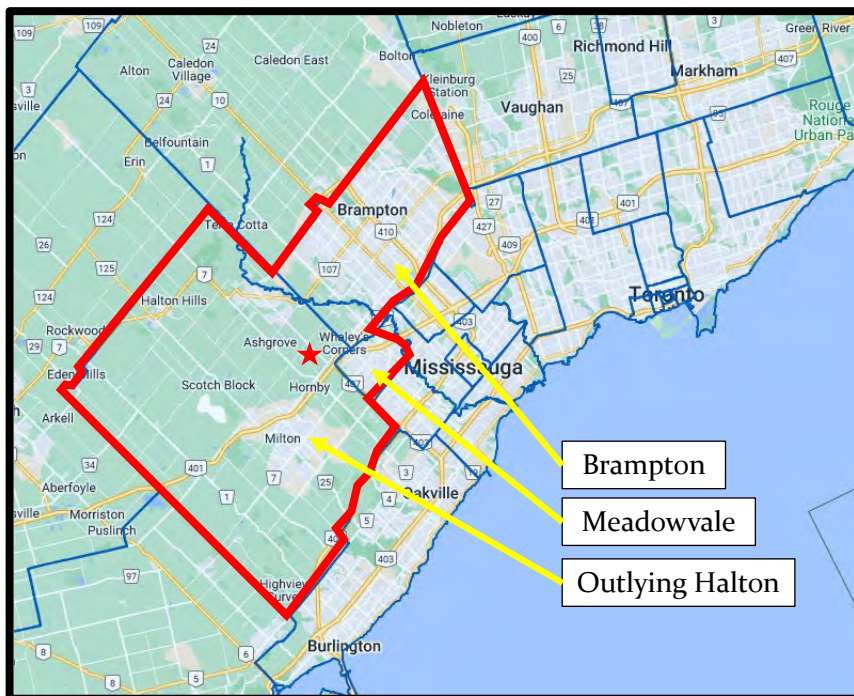
5.1. Office Market

5.1.1. Study Area

The study area for the office market analysis is based on a combination of three office submarkets – 1) Brampton, 2) Meadowvale and 3) “Outlying Halton” which consists of Town of Halton Hills and Town of Milton. For the purposes of this report, the combined Brampton, Meadowvale and “Outlying Halton” area will be considered the “Study Area” to provide a thorough and balanced analysis of how the office market in the area surrounding the subject lands.

Figure 18

Map of Office Submarkets in Study Area



Source: CoStar Canada

5.1.2. Vacancy and Absorption Trends

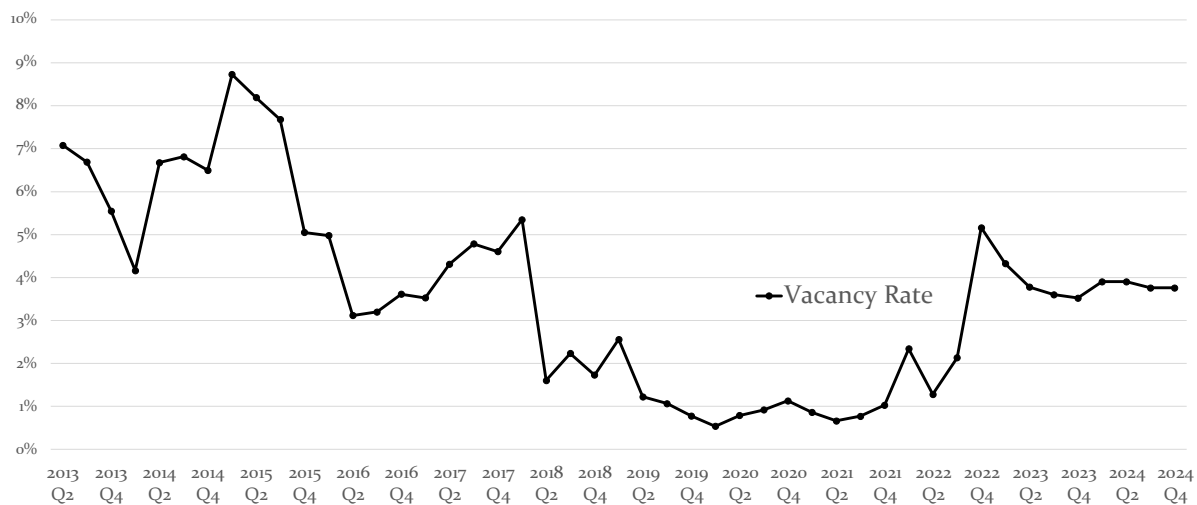
The vacancy rate for the Study Area had been falling to historic lows over the 2013 to 2019 period, but since early 2020, has increased to the 4% range. However, the stable



vacancy rate is being held relatively lower than GTA-wide averages due to the lack of new space being constructed – the amount of gross floor area (GFA) in the Study Area has remained stagnant in the 13.0 and 14.0 million square feet range over the entirety of the 2015-2024 period, with the Study Area seeing only 9.5% more space than was available over 10 years ago, and 1.1% less space than 2018. At the same time, the amount of occupied space has declined since mid-2018.

Figure 19

Vacancy Rate, Office Study Area, 2013-2024



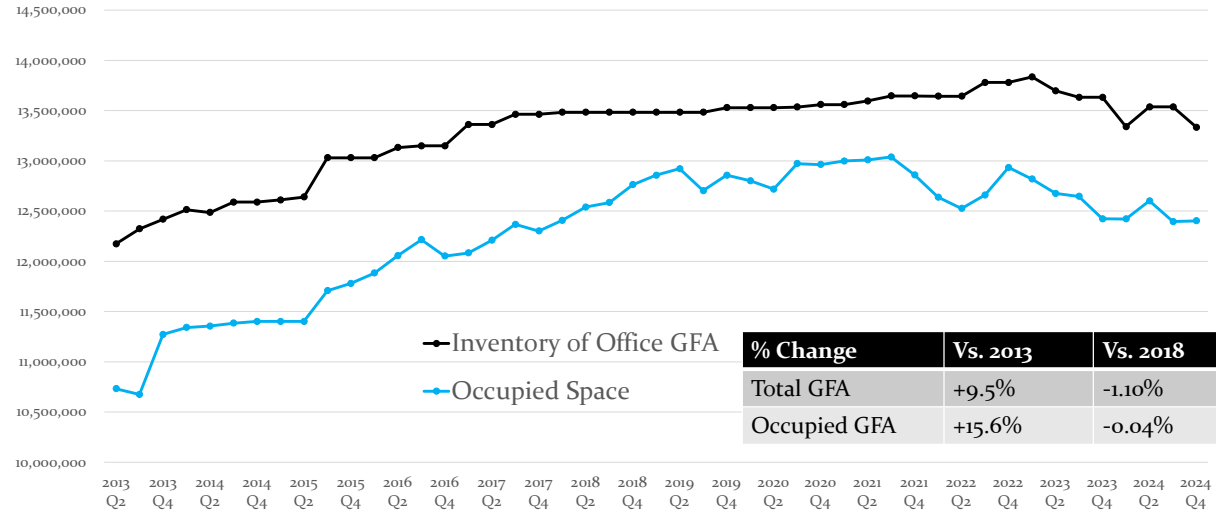
Source: CoStar Canada

Since 2013, approximately 1.67 million square feet of office space has been absorbed, which equates to an average annual rate of occupied office space in the Study Area of 145,300 square feet per year. However since mid-2019, there has been a decline of 518,200 square feet of occupied space, or an annual average decline of 94,200 square feet of absorbed office space in the Study Area.



Figure 20

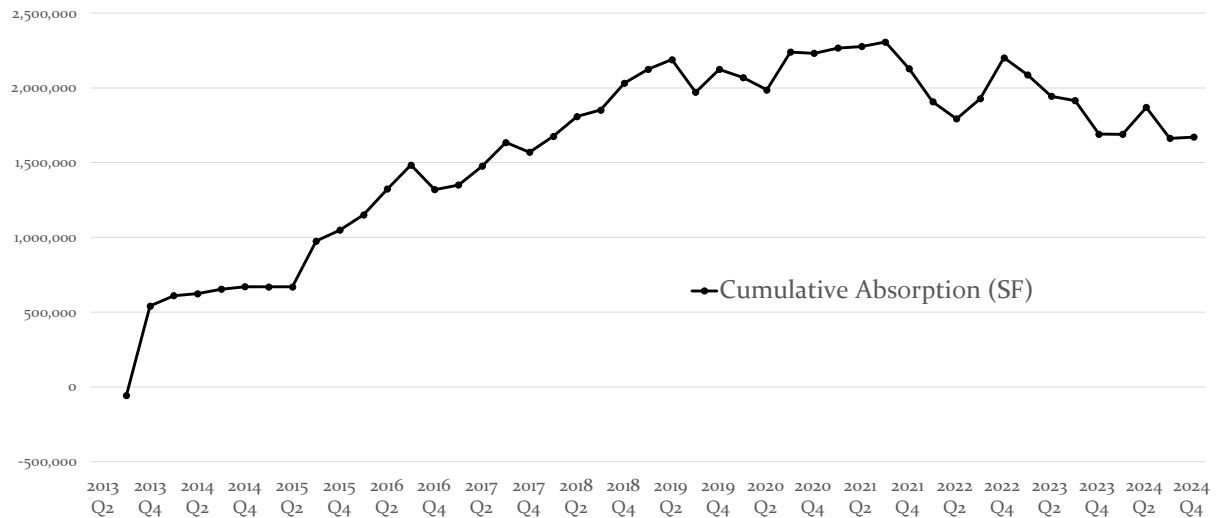
Total Space and Total Occupied Space, Office Study Area, 2013-2024



Source: CoStar Canada

Figure 21

Cumulative Net Absorption, Office Study Area, 2013-2024

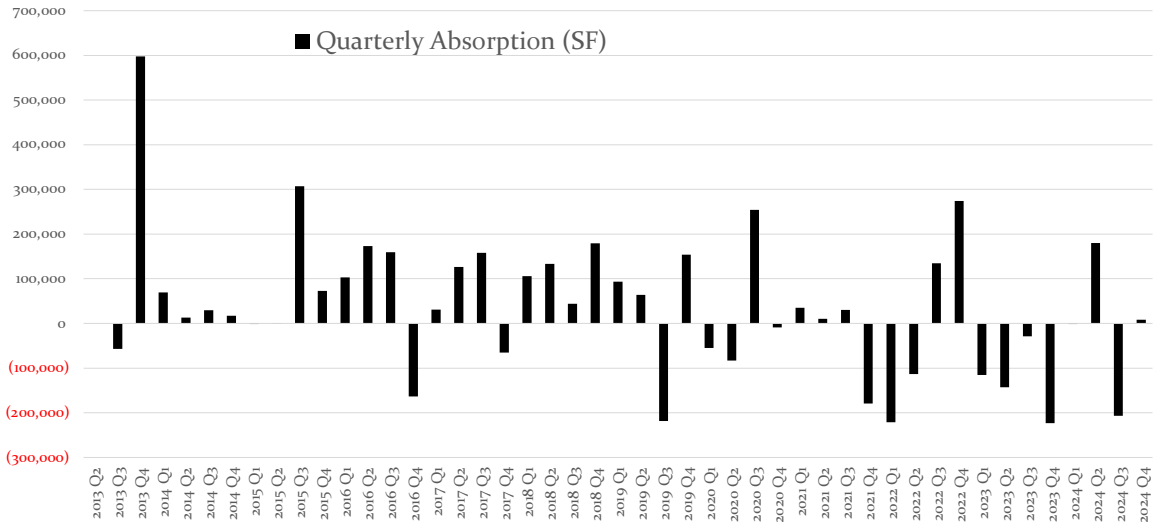


Source: CoStar Canada



Figure 22

Net Absorption, Quarterly, Office Study Area, 2013-2024



Source: CoStar Canada

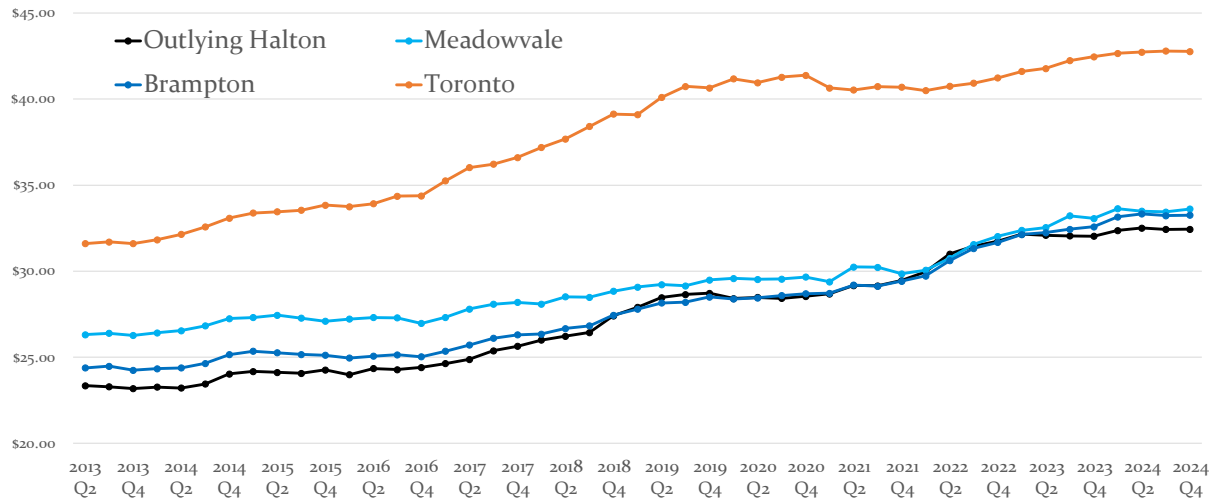
5.1.3. Asking Rents

The asking rents for the three areas within the Study Area have increased at similar rates and have ranged between \$30.00 and \$35.00 per square foot over the past several years. Compared to Toronto office market averages, the asking rents for office space in the Study Area are generally \$10.00 per square foot lower, hindering financial feasibility prospects for new office space compared to other areas (such as Downtown Toronto) where higher rents can be obtained to offset capital costs associated with construction of new office supply.



Figure 23

Asking Rents, Components of Office Study Area, 2013-2024



Source: CoStar Canada

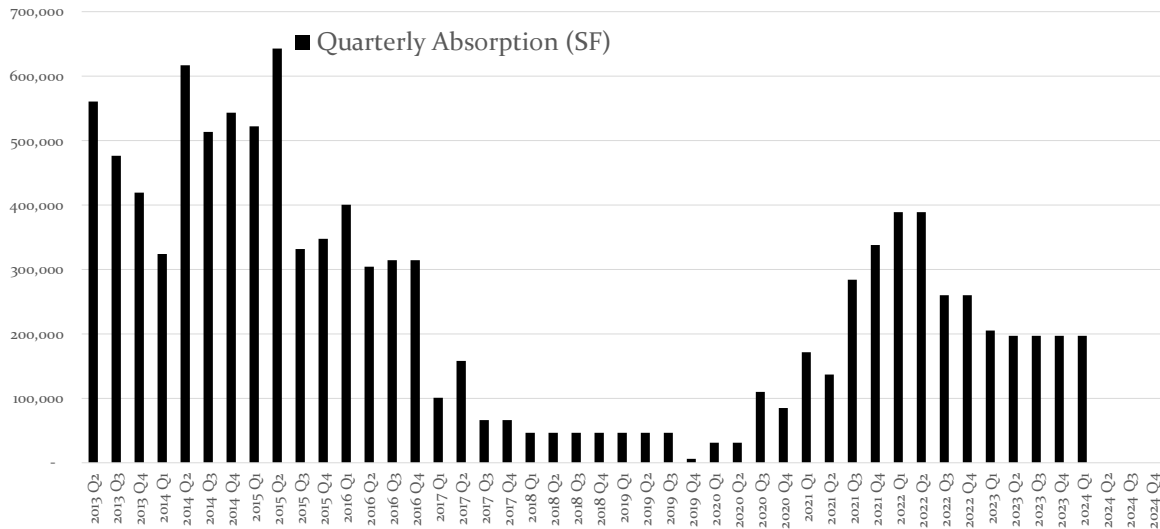
5.1.4. Prospective New Office Supply

The amount of office space under construction in the Study Area has reached highs of over 600,000 square feet in the 2013-2015 period, but since then has not exceeded 400,000 square feet at any point, and as of mid-2024, no new office space is under construction in the entirety of the Study Area. The lack of new supply may put downward pressure on vacancy rates if annual absorption rates return to positive amounts. However, the long-term historic trend of little new space being constructed and/or absorbed combined with the relatively low asking rates relative to GTA-wide averages, suggests that the prospects for new office growth in the Study Area are limited in the short-term and medium-term.



Figure 24

Office Space Under Construction, Office Study Area, 2013-2024



Source: CoStar Canada

5.2. Industrial Market

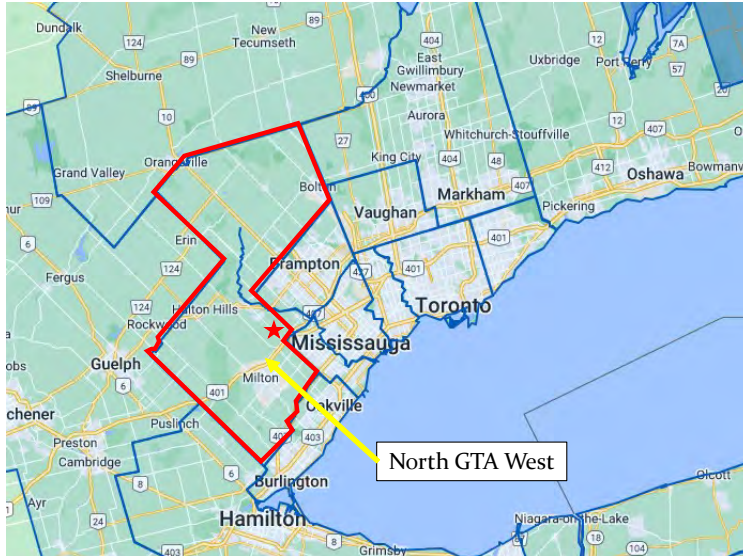
5.2.1. Study Area

For purposes of analysis of the industrial market, the below map shows the boundaries of the “North GTA West” industrial submarket, which includes the entirety of the Town of Milton, Town of Halton Hills, and the Town of Caledon.



Figure 25

Map of Industrial Submarkets



Source: CoStar Canada

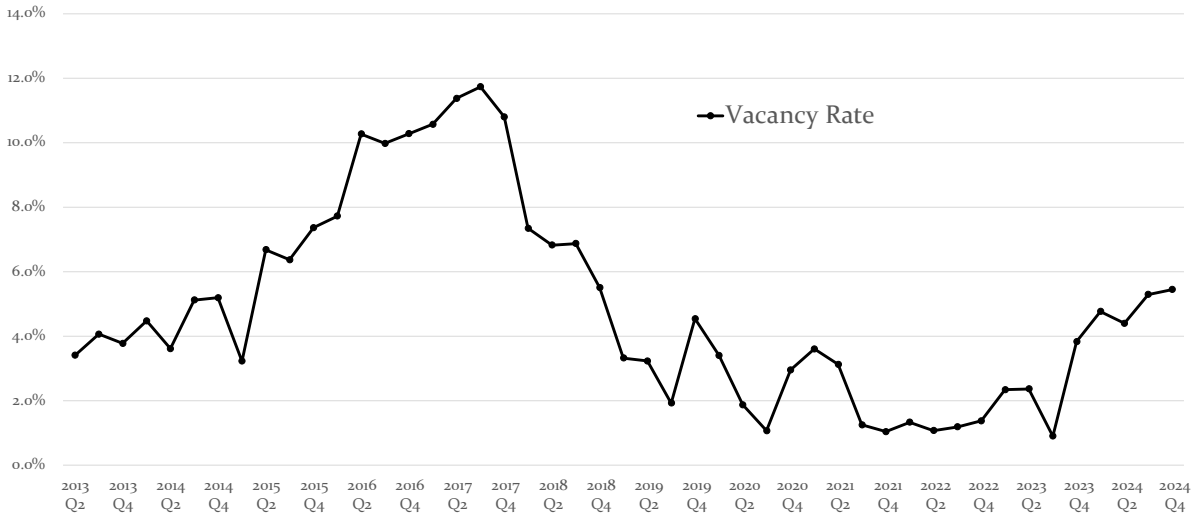
5.2.2. Vacancy and Absorption Trends

While the industrial submarket was below 4% over the 2019-2023 period, it has recently increased to above 4% and is approaching 6% for the first time since 2018. However, the 6% vacancy level is still in normal range, and below the 10-year highs of 12% reached in late 2017.



Figure 26

Vacancy Rate, Northwest GTA Industrial Submarket, 2013- 2024

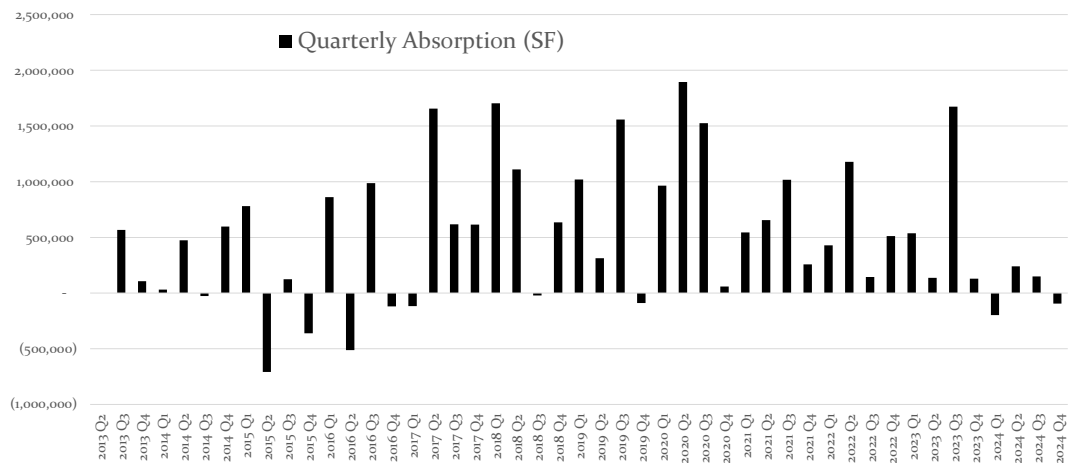


Source: CoStar Canada

Absorption in the Northwest GTA Industrial submarket has been strong, with quarterly absorption rates being positive in 27 of the last 31 quarters.

Figure 27

Net Absorption, Quarterly, Northwest GTA Industrial Submarket, 2013-2024



Source: CoStar Canada

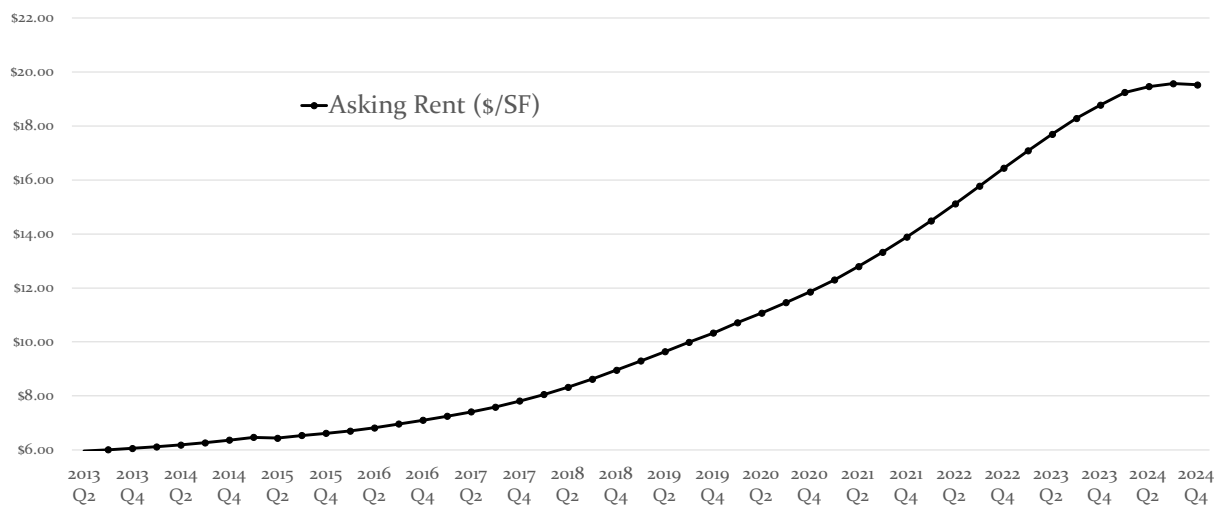


5.2.3. Asking Rents

Asking rents for industrial space in the Northwest GTA industrial submarket have increased steadily over the past 10 years from \$6.00 per square foot in 2013 to nearly \$20.00 per square foot in 2024, equivalent to a 215% increase, or an average annual growth rate of 10.6%. However, industrial rents have stabilized with only a 4% increase over the past 12 months.

Figure 28

Asking Rents, Northwest GTA Industrial Submarket, 2013-2024



Source: CoStar Canada

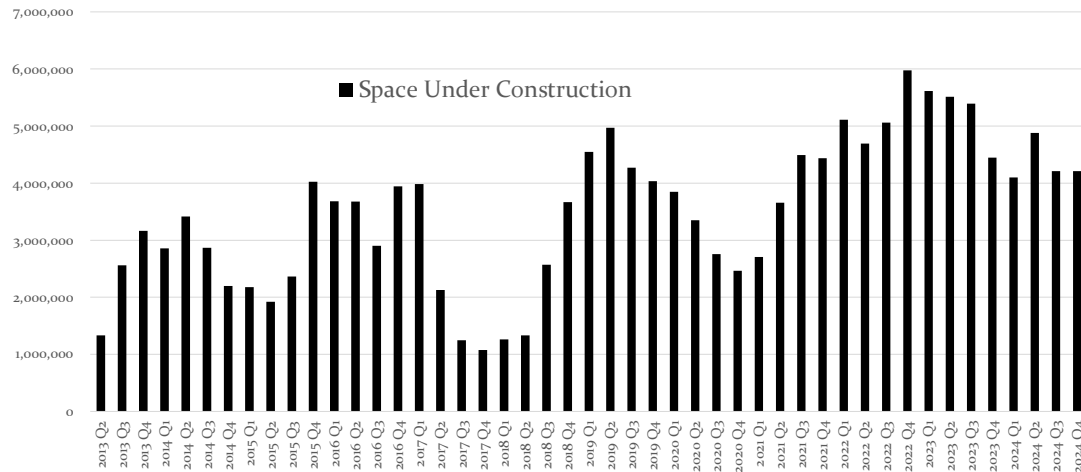
5.2.4. Prospective New Supply

The amount of industrial space under construction in the Northwest GTA industrial submarket has remained high at over 4.0 million square feet, despite numerous buildings being completed that have increased the inventory of space from 36.2 million square feet in mid-2013 to 61.9 million square feet as of late-2024.



Figure 29

Space Under Construction, Northwest GTA Industrial Submarket, 2013-2024

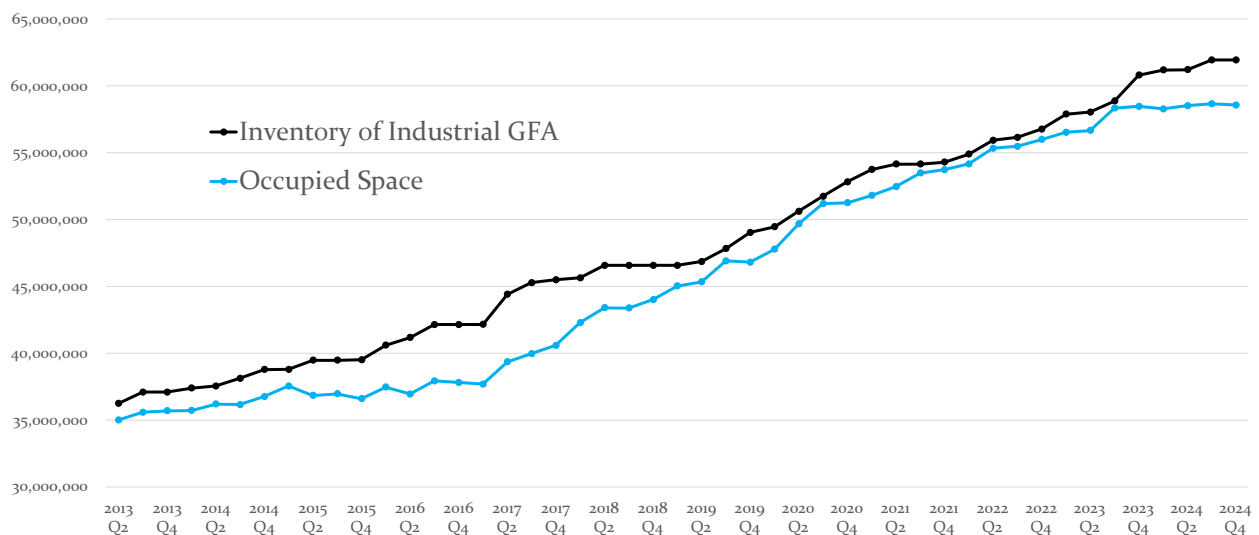


Source: CoStar Canada

Despite the amount of space being constructed, the amount of vacant space still remains below recent highs, and after a period of vacancy rates of 2-3%, they have returned to a normal range of 4-7%.

Figure 30

Total Space and Total Occupied Space, Northwest GTA Industrial Submarket, 2013- 2024



Source: CoStar Canada



6. CONCLUSIONS

Based on review of the relevant policies, publicly available reports prepared by/for the Town of Halton Hills and Halton Region, analysis of data related to land supply, land demand and the market for non-residential uses in the area, the following are the summary conclusions in assessing the need for additional employment land in the Town of Halton Hills:

- The market for industrial uses has been strong, with vacancy being below long-term trends, absorption continuing to be positive, and asking rents continuing to escalate. The industrial construction pipeline remains at elevated levels due to a long-term decline in vacancy and increases in asking rents improving financial viability of industrial projects in the area. Prospects for new office space are limited.
- Based on modified and/or extended versions of employment land need estimates prepared by/for Halton Region (relying on target employment densities from Table 2 of the Regional OP) and the Town of Halton Hills (extending the 2041 land needs analysis to 2051), there is likely to be a substantial shortfall for employment lands in the Town, in the range of 376 to 519 hectares over and above the lands added to the Town's employment lands through the urban boundary expansion authorized through the Region's recent MCR and ROPA 49.
- The success of the Premier Gateway Employment Area, combined with the strength of the industrial market, the continued advancement of the Highway 413 project, and existing available supportive infrastructure such as major arterial roads and existing Provincial highways, suggests that the subject lands would be a suitable and practical location for the Town to add the needed employment lands to the Town's inventory of employment areas.
- The Premier Gateway Employment Area has steadily been expanding northward from Steeles Avenue towards 5 Side Road, and eastward from Trafalgar Road to Winston Churchill Road. The subject lands are located adjacent to the urban area and lands designated for employment uses. Incorporation of the subject lands into the urban boundary and designation for employment uses would help support the viability of the surrounding employment area, and help the Town continue to attract opportunities for large-scale employment users to locate in the Town.
- In order to achieve PPS policies regarding sufficient lands to meet projected need for employment land, the Town will require a substantial amount of additional designated



employment areas to ensure it can accommodate projected growth in employment land employment to 2051 and beyond.

6.1. Review of Considerations in Allowing Settlement Boundary Expansion

Figure 31

Policy	Analysis
The need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;	The analysis presented finds that there is a need to designate 376 to 519 additional hectares of employment land.
If there is sufficient capacity in existing or planned infrastructure and public service facilities;	The subject site is surrounded by existing and planned Provincial 400-series highways and by numerous major arterial roads
Whether the applicable lands comprise specialty crop areas;	Not reviewed
The evaluation of alternative locations which avoid prime agricultural areas and, where avoidance is not possible, consider reasonable alternatives on lower priority agricultural lands in prime agricultural areas;	Not reviewed
Whether the new or expanded settlement area complies with the minimum distance separation formulae;	Not reviewed
Whether impacts on the agricultural system are avoided, or where avoidance is not possible, minimized and mitigated to the extent feasible as determined	Not reviewed



Policy	Analysis
through an agricultural impact assessment or equivalent analysis, based on provincial guidance; and	
The new or expanded settlement area provides for the phased progression of urban development.	The subject lands are adjacent to existing planned employment areas and would represent a logical extension of urban employment lands in the Town.