

Submission on the Land Use Planning Framework in Halton

Provided to the Review Panel for the proposed Milton Logistics Hub Project

Prepared by:

Curt Benson, MCIP RPP
Director of Planning and Chief Planning Official
Halton Region for the Halton Municipalities

May 29, 2019

Table of Contents

1. Executive Summary	4
2. Position and Qualifications	5
3. Purpose of Submission	6
4. Land Use Planning Framework in Halton	7
4.1 Legislative Context that Establishes the Land Use Planning Framework in Halton.....	7
4.2 Provincial Policy Statement, 2014	8
4.3 A Place to Grow: Growth Plan for the Greater Golden Horseshoe	9
4.4 Greenbelt Plan.....	9
4.5 Halton Municipal Official Plans, Guidelines and Protocols.....	9
4.6 Best Planning Estimates and Infrastructure Master Plans	10
4.7 Other Municipal Standards and By-Laws	11
5. Halton Region Official Plan	11
5.1 Background and Approach.....	12
5.2 Sustainable Halton Process and Outcome	13
5.3 Halton’s Planning Vision as defined by the Regional Official Plan	13
5.4 Regional Official Plan as a Comprehensive Land Use Framework for Assessing Cumulative Effects.....	15
5.5 The Use of the Terms ‘Goals’, ‘Objectives’ and ‘Policies’ in the Regional Official Plan	15
5.6 Integrating the Provincial-Municipal Land Use Planning Framework with the Federal Environmental Assessment Planning Framework under CEAA	16
5.6.1 Water	17
5.6.2 Natural Heritage.....	18
5.6.3 Transportation.....	18
5.6.4 Agriculture	19
5.6.5 Residential Land Use.....	20
5.6.6 Employment Land Use.....	20
6. Background Information on the CN Milton Lands and Project	21
6.1 2001 Intermodal Proposal	21
6.2 2008 Direct Rail Industrial Park.....	22
6.3 Current Proposal.....	22

7.	Application of Land Use Planning Framework to the CN Proposal.....	23
7.1	Framework for a Planning Opinion.....	23
8.	Conclusion.....	24
9.	Supporting Information.....	25
9.1	List of Attachments to the Submission.....	25
9.2	List of Documents referenced in the submission to be accessed online.....	25

1. Executive Summary

This submission is provided to the Review Panel in response to its request to the Halton Municipalities to provide specific information relative to the interests of the localities. This submission is an important part of the overall material that has been filed with the Panel from the Halton Municipalities. It provides context for the specific technical information from a range of experts engaged by the Halton Municipalities to assist the Review Panel in assessing the information that has been filed by the proponent of the Milton Logistics Hub Project in its relationship to municipal standards.

In this submission I will highlight for the Review Panel the land use planning framework as it applies in Halton Region and the Town of Milton. I will explain the importance of the Regional Official Plan in the land use planning framework, including the significant process undertaken to define a comprehensive vision for Halton through Sustainable Halton. I will also highlight Regional Council's long-standing interest in planning, growth management and the protection of natural and agricultural resources given Halton's context in the greater Toronto-Hamilton area.

Halton takes an integrated approach to planning to ensure that growth only occurs in a coordinated and comprehensive fashion, and that growth includes infrastructure and financial plans to ensure the development pays its share of costs related to growth. Further, the ROP underscores core values of environmental protection, farmland preservation, proper management, coordination and financing of growth, the support for "complete" and healthy communities, and sharing of planning responsibilities with the local municipalities.

The submission will address the integration of the current land use planning framework in Halton with the federal environmental assessment planning framework under CEAA as it relates to project effects and cumulative effects. It elaborates on the municipal interest relating to six key topics: water, natural heritage, transportation, agriculture, residential, and employment.

This submission will provide the overall framework for a planning opinion on the proposed project and its alignment to the standards in the land use planning framework and in particular the Regional Official Plan.

2. Position and Qualifications

1. I am the Director of Planning and Chief Planning Official at the Regional Municipality of Halton (“Halton Region” or the “Region”) and a professional land use planner.
2. My duties as the Director of Planning and Chief Planning Official include providing professional advice on all matters related to growth management and land use planning to Regional Council and senior staff. This includes the responsibility for all statutory planning and development matters for the Region delegated to me by Regional Council as the Chief Planning Official under Regional By-Law No. 6-16.
3. I am a Registered Professional Planner in the Province of Ontario, and a member of the Canadian Institute of Planners. I have been employed as a planner in progressively more responsible planning positions at various municipalities, including Halton Region and Niagara Region, for over 15 years. I have a Bachelor of Environmental Studies (Honours Planning) from the University of Waterloo. I have attached my curriculum vitae as Attachment #1 to this submission.
4. I was made aware of CN’s proposal to develop lands it owns in south Milton for an intermodal terminal in 2015. Since that time I have participated in the review of materials on the project on behalf of the Halton Municipalities and have knowledge in the matters outlined in this submission.
5. In August 2017, together with two others (Ron Glenn, the former Chief Planning Official for Halton Region and John Vickerman, the Halton Municipalities’ expert on intermodal design) I visited two CN intermodal facilities: one facility in Montreal; the other in Calgary. The Region prepared a report summarizing observations from those site visits that was provided to the Panel and catalogued as document CEAR#614.
6. The Canadian Institute of Planners defines planning, and explains what planners do, in the following manner:

WHAT IS PLANNING?

Planning means the scientific, aesthetic, and orderly disposition of land, resources, facilities and services with a view to securing the physical, economic and social efficiency, health and well-being of urban and rural communities. Responsible planning has always been vital to the sustainability of safe, healthy and secure urban environments. As Canada’s population grows, the planning profession must deal with pressures and impacts of urbanization: for instance, the conversion of land from natural habitats to urban built areas, the maintenance and use of natural resources and habitats, environmental protection and the development and renewal of major infrastructure.

WHAT DO PLANNERS DO?

A planner’s activities include designating land use, designing social and community services, managing cultural and heritage resources, creating economic capacity in local communities and addressing transportation and infrastructure. Planners may work for the public or the private sector—but ultimately their work always touches on public policy. They balance various private interests with the public interest and identify viable options. Planners work for the public good, taking health, aesthetics, equity and efficiency into consideration. Planning respects the land as a community resource, contributing to the

conservation of natural and cultural heritage, and promoting healthy communities and improvements to quality of life.

3. Purpose of Submission

The purpose of this submission is to provide information on the land use planning framework to assist the Review Panel in defining the interests of localities.

In a letter to the Halton Municipalities dated April 25, 2019, the Review Panel invited the Halton Municipalities to attend the public hearing to present their views and analysis to the Review Panel in relation to the proposed CN Milton Logistics Hub Project (the “Project”). The Review Panel asked the Halton Municipalities to present their technical review of the potential environmental effects of the Project, proposed mitigation measures and follow-up programs and provide the Review Panel with any other relevant information and recommendations related to the Halton Municipalities’ expertise and mandate. It was noted specifically that the Panel is interested in expertise related to the following:

- The magnitude, geographic extent, timing, frequency, duration, reversibility, and ecological and social context of the Project’s anticipated adverse environmental effects;
- the predicted effectiveness of the proposed mitigation measures,
- the appropriateness of the proposed follow-up programs,
- the extent to which concerns raised by Halton Municipalities during their review of the proposed project have been addressed, and
- recommendations as to how best to address any uncertainty regarding the predicted project effects and the effectiveness of proposed mitigation measures, as well as any remaining concerns.

Additionally, and specific to Halton Municipalities, the Review Panel has asked that the Halton Municipalities provide expertise related to municipal interests and standards in water, natural heritage, transportation, agriculture, residential, and employment matters.

In order to understand municipal interests related to the matters identified above, it is important to understand the role the land use planning framework has in defining standards for managing and assessing growth and development in Halton. In this regard, this submission highlights the following information to address:

- the land use planning framework as it applies in Halton Region and the Town of Milton;
- the importance of the Regional Official Plan in the land use planning framework, including the significant process undertaken to define a comprehensive vision for Halton through Sustainable Halton;
- Regional Council’s long-standing interest in planning, growth management and the protection of natural and agricultural resources given Halton’s context in the greater Toronto-Hamilton area;
- The integrated nature of planning in Halton and the approach taken to ensure that growth only occurs in a coordinated and comprehensive fashion, and that growth includes infrastructure and financial plans to ensure the development pays its share of costs related to growth; and
- The core values found throughout the Regional Official Plan of environmental protection, farmland preservation, proper management, coordination and financing of growth, the

support for “complete” and healthy communities, and sharing of planning responsibilities with the local municipalities.

This submission will provide the overall framework for a planning opinion on the proposed project and its alignment to the standards in the land use planning framework and in particular the Regional Official Plan. I look forward to participating in the Panel Hearing and reviewing the evidence provided to the Review Panel in order to provide my planning opinion as part of the Hearing process.

4. Land Use Planning Framework in Halton

The Regional Municipality of Halton was created through the *Regional Municipality of Halton Act*, 1973. Among other things, this Act required the Region to prepare and implement an official plan for the Regional area. Other provisions of the Act gave the Region sole responsibility for a regional road system, the supply and distribution of water, and the collection and disposal of all wastewater in the Regional area. These authorities are continued in the *Municipal Act*, 2001. S.O. 2001, c. 25 (the “*Municipal Act*”).

The following sections highlight the legislative context of the land use planning system, provincial plans and policies, local municipal official plans, master plans, guidelines, protocols and by-laws that together make up the land use planning framework in Halton.

4.1 Legislative Context that Establishes the Land Use Planning Framework in Halton

Since the 1940s, the Province of Ontario has governed the use of land across Ontario through the Planning Act. Over the years the Province has enacted many important amendments to guide and structure municipal decisions. Under this Act, municipalities have exclusive power to designate and zone for land uses, approve the severance or subdivision of lands, and enact site plan controls.

The Planning Act establishes a comprehensive land use planning system by, among other things:

- Defining matters of Provincial interest in planning (s.2);
- Issuing policy statements relating to municipal planning that further define provincial interests (s.3);
- Requiring that municipal decisions be “consistent” with any provincial policy statement approved by Cabinet, and (2) municipal decisions “conform” with all designated provincial plans (s.3(5));
- Directing municipalities to prepare Official Plans that include goals, objectives and policies established primarily to manage and direct physical change and the effects on the social, economic, built and natural environment of the municipality (s.16);
- Requiring that Official Plans must be “consistent” with any provincial policy statement approved by Cabinet, and (2) municipal decisions “conform” with all designated provincial plans (s.3(5));
- Requiring that Official Plans of lower-tier municipalities conform with approved upper-tier municipal Official Plans (s.27);

- Requiring that no public work be undertaken that does not conform with the Official Plan (s.24);
- Enabling the passing of zoning by-laws for regulating land use across the municipality (s.34);
- Requiring that zoning by-laws conform to approved Official Plans (s.26(9));
- Enabling the use of site plan control to regulate site development (s.41); and
- Enabling the subdivision of land (s.51 and s.53) and identifying criteria that must be considered through the subdivision or severance process (s.51(24)).

The Planning Act works together with other Provincial statutes that enable other Provincial Plans and policies. Notably in the Halton context:

- The *Places to Grow Act*, 2005 provides the legal framework for the Growth Plan. It directs municipalities to amend all land use plans and related planning documents to conform with the Growth Plan.
- The *Greenbelt Act*, 2005 provides the legal framework for the Greenbelt Plan. It directs municipalities to amend all land use plans and related planning documents to conform with the Greenbelt Plan.

Since 2005, municipal official plans and zoning by-laws across most of Ontario are largely based on binding provincial policy. This is because, in 2005, the Province changed the Planning Act standard that is applicable to planning decisions. The standard went from requiring that decisions "shall have regard to" provincial policy to requiring that decisions "shall be consistent with" provincial policy. In 2006, the Province further amended the *Planning Act* to require that decisions "shall conform with" existing "provincial plans".

The relevant planning legislation can be accessed online here:

- *Planning Act*: <https://www.ontario.ca/laws/statute/90p13#BK46>
- *Places to Grow Act*: <https://www.ontario.ca/laws/statute/05p13>
- *Greenbelt Act*: <https://www.ontario.ca/laws/statute/05g01#BK6>

4.2 Provincial Policy Statement, 2014

The Provincial Policy Statement, 2014 (the "PPS") sets out the Province's vision for land use across Ontario. It includes policies on how we settle our landscape, create our built environment, and manage our land and resources over the long term to achieve livable and resilient communities.

The PPS is issued under the authority of Section 3 of the *Planning Act* and came into effect on April 30, 2014. In respect of the exercise of any authority that affects a planning matter, section 3 of the *Planning Act* requires that decisions affecting planning matters "shall be consistent with" policy statements issued under the *Act*.

The PPS, 2014 can be accessed online here:

<http://www.mah.gov.on.ca/AssetFactory.aspx?did=10463>

4.3 A Place to Grow: Growth Plan for the Greater Golden Horseshoe

The Province established the Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) in 2006 and has provided an update as recently as May 16, 2019. The Growth Plan establishes growth targets and policies to manage growth to the year 2041. Municipalities must plan to accommodate the targeted growth by considering the distribution of growth through intensification and greenfield development. Numerous policies provide direction on achieving these distributions in the development of complete communities.

The Growth Plan applies to all lands within the Region and contains binding targets, policies, and mapping. The purpose of the Plan is to curtail ad hoc, piecemeal development and infrastructure collectively contributing to urban sprawl. In place of sprawl, the Plan advances planned, integrated public and private sector investment, infrastructure, and development known as smart growth.

The Growth Plan (2019) can be accessed online here: <https://www.ontario.ca/document/place-grow-growth-plan-greater-golden-horseshoe>

4.4 Greenbelt Plan

The Province approved the Greenbelt Plan in 2005 to create a permanent agricultural and natural area protection around the Greater Toronto Area. The Greenbelt Plan applies to nearly 800,000 hectares, and was created to limit the expansion of urban area and provide for the permanent protection of agriculture land and the natural environment.

The Greenbelt Plan can be accessed online here: <http://www.mah.gov.on.ca/Page13783.aspx>

4.5 Halton Municipal Official Plans, Guidelines and Protocols

In accordance with the *Planning Act*, Halton Region has an approved in-force Official Plan. The Regional Official Plan (the “ROP”), its history, purpose and intent is discussed in Section 5 of this submission further below. All local municipalities in Halton Region, including the Town of Milton, have approved in-force local municipal Official Plans. In accordance with the Planning Act, the Region is approval authority of the Official Plans of the local municipalities in Halton.

As noted in Section 47 of the Regional Official Plan, “*Local Official Plans, covering the whole of each Local Municipality, are necessary extensions of The Regional Plan, and are intended to direct development in accordance with local desires while adhering to policies of this Plan.*” Information related to the Town of Milton Official Plan is addressed in a submission to the Review Panel provided by the Town’s Commissioner of Planning, Ms. Barbara Koopmans.

In addition to identifying goals, objectives and policies, the Regional Official Plan, in Section 192 calls for the preparation of “*certain guidelines or protocols to provide more detailed directions in the implementation of its policies. They guide processes and outline approaches including studies and methodologies that would satisfy the relevant policies of this Plan.*”

Some of the relevant Guidelines prepared and adopted by the Region include:

- Agricultural Impact Assessment (AIA) Guidelines;
- Access Management Guideline;
- Air Quality Guidelines;
- Development Design Guidelines for Source Separation of Solid Waste;
- Environmental Impact Assessment Guidelines;
- Golf Course and Recreational Facilities Best Management Guidelines;
- Guideline for Coordinated Municipal Responses to Renewable Energy Proposals
- Healthy Communities Guidelines;
- Highway Dedication Guidelines;
- Hydrogeological Studies & Best Management Practices for Groundwater Protection Guidelines;
- Land Use Compatibility Guidelines;
- Livestock Facility Guidelines;
- Noise Abatement Guidelines;
- On Farm Business Guidelines;
- Preparing a Community Infrastructure Strategy;
- Protocol for Reviewing Development Applications with Respect to Contaminated or Potentially Contaminated Sites;
- Transportation Impact Study Guidelines; and
- Urban Services Guidelines;

The Regional Official Plan and the Guidelines related to the Regional Official Plan can be found on the Region's website here: [https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-\(ROP\)/About-Regional-Official-Plan-\(ROP\)/Regional-Official-Plan-Guidelines](https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)/About-Regional-Official-Plan-(ROP)/Regional-Official-Plan-Guidelines)

4.6 Best Planning Estimates and Infrastructure Master Plans

In managing growth the Region takes an integrated approach in planning for population and employment, determining infrastructure needs based on growth forecasts and determining financial impact in providing infrastructure to accommodate growth. Halton Regional Council has long subscribed to the principle that "growth must pay for growth". As an important part of implementing this integrated approach, the Region prepares master plans for infrastructure under Ontario's Municipal Class Environmental Assessment framework. The following master plans address the timing and delivery of infrastructure projects to align with the phased growth prescribed by the Official Plan, including:

- Transportation Master Plan: <https://www.halton.ca/For-Residents/Roads-Construction/Infrastructure-Master-Plans/Transportation-Master-Plan-to-2031-The-Road-to-C>
- Active Transportation Master Plan: <http://www.halton.ca/For-Residents/Roads-Construction/Infrastructure-Master-Plans/Active-Transportation-Master-Plan>
- Water and Wastewater Master Plan: <http://www.halton.ca/For-Residents/Roads-Construction/Infrastructure-Master-Plans/Sustainable-Halton-Water-Wastewater-Master-Plan>

Each master plan has been developed to meet the population and employment growth of the Region to 2031. To assist with the development of master plans, among other things, the

Region has prepared Best Planning Estimates of Population, Occupied Dwelling Units and Employment to 2031. The “Best Planning Estimates” is a planning tool used to identify where and when development is expected to take place across the Region and assist the Region and the Local Municipalities in planning complete healthy communities including; the establishment of the supply of housing, type of housing and jobs across the Region. They also provide direction in determining the timely provision of both hard infrastructure (roads, water and wastewater) and community infrastructure (schools, community recreation etc).

The Best Planning Estimates are included as Attachment #2.

4.7 Other Municipal Standards and By-Laws

There are several other municipal standards and by-laws that are important parts of the land use planning framework in managing and regulating growth and development across the Region. For example:

- Halton By-law 32-17 (Access to the Regional Road System), passed under the authority of the *Municipal Act*, 2001, regulates access to Regional Roads;
- Halton By-law 36-17 defines development charges required for residential and non-residential water and wastewater, roads and general services, under the *Development Charges Act*, 1997 S.O. 1997, c 27, as amended;
- Halton By-law 63-17 defines fees and charges, passed under the authority of Part XII of the *Municipal Act*, 2001, and under Ontario Regulation 586/06, as amended; and
- Halton By-law 121-05, as amended, provides for the protection of trees within woodlands greater than 1 hectare, under the authority of Part III of the *Municipal Act*, 2001.

The above Regional By-Laws can be accessed online here: <https://www.halton.ca/The-Region/About-Halton-Region/By-Laws>

5. Halton Region Official Plan

Since the inception of the Regional Municipality of Halton in 1974, Regional Council has expressed a strong interest in land use planning and followed closely as well as provided significant input to the Provincial planning regime over time. This long standing history of interest in planning is reflected in the actions and decisions with respect to the Region’s official plans over the last four decades, together with parallel planning initiatives introduced and put into effect at the Provincial level.

There have been 4 comprehensive updates to the Regional Official Plan, resulting in the following (the year in the square brackets denotes the date of approval of the official plan):

- The first Regional Official Plan [1980];
- Regional Official Plan [1995];
- Regional Official Plan Amendment No. 25 [2008] (“ROPA 25”); and
- Regional Official Plan Amendment No. 38 [2009] (“ROPA 38”).

5.1 Background and Approach

The Region has always taken a disciplined and open process in its preparation of the Regional Official Plan and updates. This process involves the following steps:

- A series of wide-ranging technical background studies by experts on topics of public interest such as protection of the natural environment, preservation of farmlands, provision of affordable housing, and expansion of infrastructure to support new population and employment growth.
- Extensive public and agency consultation on the results of these studies;
- Analyses by staff of the comments received on these studies from the public and agencies which were presented to Council together with the original comments verbatim;
- Preparation by staff of a report presenting the planning vision and directions the Official Plan should take based on public and agency input;
- Following public and agency consultation on this “Directions” report, Council endorsement of those directions as the basis for preparing a draft Official Plan;
- Extensive public and agency consultation on the draft Official Plan;
- Analyses by staff of the comments received on the draft Official Plan from the public and agencies, which were presented to Council together with the original comments verbatim; and
- Based on these analyses and further input by delegations to Committee and Council, adoption by Council, with necessary modifications, of the Official Plan.

Throughout the Official Plan process, members of the public including the development industry, individual landowners, and other special interest parties, as well as representatives of public agencies, are able to discourse with staff on their concerns over or support for the documents under consultation and had the opportunity to appear as a delegation to Committee and/or Council to further express their views on the matter prior to a decision by Council. Overall, this process results in many modifications to the draft document before the final version is adopted by Council, reflecting the collective input of the community on Official Plan matters.

As an illustration, the public consultation process for ROPA 38 is described in detail in a report entitled “Public Consultation on Proposed ROPA 38”, being Attachment #2 to Staff Report No. LPS114-09 that can be found here:

<http://sirepub.halton.ca/agdocs.aspx?doctype=agenda&itemid=11628>

A full list of comments submitted throughout the review is also provided on the above webpage as Attachment #3 to Report LPS114-09. These attachments demonstrate the extent to which opportunities were afforded to members of the public and agencies to provide input in the process and Regional staffs practice to catalogue and respond to input received throughout the process.

Now and in the past, Regional Council has made planning decisions or adopted policies in the Regional Official Plan that represented a careful and delicate balance between interests expressed by many diverse parties. There is inherent complexity in making planning decisions and the Official Plan allows Council to take a broader and longer-term approach to land use planning rather than through the perspective of individual interests. This is mirrored in language provided in the very beginning of the PPS under its Part III:

- *“The provincial policy-led planning system recognizes and addresses the complex interrelationships among environmental, economic and social factors in land use*

planning. The Provincial Policy Statement supports a comprehensive, integrated and long-term approach to planning, and recognizes linkages among policy areas.”

The Regional Official Plan similarly recognizes the complex interrelationships among environmental, economic and social factors in land use planning and attempts to balance these factors in advancing Halton’s Planning Vision (described further in Section 5.3).

5.2 Sustainable Halton Process and Outcome

Following the 2006 approval of the Provincial Growth Plan, the Region commenced a multi-year, multi-stakeholder, planning and regulatory process to amend its Official Plan. The review which was entitled "Sustainable Halton" sought to determine the appropriate locations for all residential and employment growth across the Region, the required infrastructure services (roads, water, wastewater) to accommodate this growth, the protection of prime agricultural lands and sensitive environmental features, the location of appropriate urban boundary expansions into rural areas, and the timing, phasing, and financing of growth.

The process included a series of wide-ranging technical background studies by experts on topics of public interest such as protection of the natural environment, preservation of farmlands, provision of affordable housing, and expansion of infrastructure to support new population and employment growth. An index of the background and technical reports generated through the Sustainable Halton process is provided as Attachment #3 to this submission.

Sustainable Halton culminated in the preparation of Regional Official Plan Amendment No. 38 (ROPA 38). Through this process hundreds of comments from private landowners, developers, stakeholders, agencies and members of the Halton community were provided, including comments from the Canadian National Railway (“CN”). Several modifications were made to reflect a Plan that had the collective input of the community.

The resulting Regional Official Plan Amendment (ROPA 38) received approval from the Province in 2011. Upon issuing its Notice of Approval, the Province received over 40 appeals to ROPA 38. As part of hearing the appeals, the Ontario Municipal Board undertook its hearing in phases from 2013 to 2015 resulting in a series of approval decisions over various parts of the Amendment from 2013 to 2016. It was determined by the Ontario Municipal Board that ROPA 38 integrates and addresses all provincial requirements. As a result, ROPA 38 sets out a clear vision for future growth and development in the Region, and directs all new infrastructure and development in the Region to the year 2031.

5.3 Halton’s Planning Vision as defined by the Regional Official Plan

There are competing interests in shaping the future landscape and building communities in Halton. The Regional Official Plan advocates, at the beginning of Part II (Basic Position, Halton’s Planning Vision) a balanced approach to land use planning. Section 25 of the ROP states:

- “Regional Council supports the concept of "sustainable development”, which meets the need of the present without compromising the ability of future generations to meet their

own need. (“Our Common Future, The World Commission on Environment and Development, 1987”) Planning decisions in Halton will be made based on a proper balance among the following factors: protecting the natural environment, preserving Prime Agricultural Areas, enhancing its economic competitiveness, and fostering a healthy, equitable society. Towards this end, Regional Council subscribes to the following principles of sustainability: that natural resources are not being over-used; that waste generated does not accumulate over time; that the natural environment is not being degraded; and that this and future generations’ capacity to meet their physical, social and economic needs is not being compromised. The overall goal is to enhance the quality of life for all people of Halton, today and into the future.”

The emphasis of this statement of core value is on “quality of life” and the focus is on not only this but also future generations. The Plan elaborates on the Region’s approach to and its position on growth in Section 26:

- “Halton recognizes its strategic location within the Greater Toronto and Hamilton Area and the importance of population and employment growth to the social and economic life of its residents. Halton expects further urbanization and changes to its landscape within the planning period between now and 2031. In this regard, Halton will undertake the necessary steps to ensure that growth will be accommodated in a fashion that is orderly, manageable, yet sensitive to its natural environment, heritage and culture. To maintain Halton as a desirable and identifiable place for this and future generations, certain landscapes within Halton must be preserved permanently. This concept of “landscape permanence” represents Halton’s fundamental value in land use planning and will guide its decisions and actions on proposed land use changes accordingly.”

The concept of “landscape permanence” is a proactive way of dealing with land use changes—advocating a gradual pace of incremental changes in the landscape over time, such that Halton will remain recognizable and maintain its character. In the end, there will be a balance of different land uses co-existing in harmony on Halton’s landscape. Section 27 of the ROP states:

- “In Halton’s vision, its future landscape will always consist of three principal categories of land uses in large measures:
 - 27(1) settlement areas with identifiable communities,
 - 27(2) a rural countryside where agriculture is the preferred and predominant activity, and
 - 27(3) a natural heritage system that is integrated within settlement areas and the rural countryside, to preserve and enhance the biological diversity and ecological functions of Halton.”
- The land uses in these categories are complementary to each other and will together move Halton towards the goal of sustainability. Each will always exist in large measures over time, both during and beyond the planning period.”

The planning vision for Halton, as stated in the above sections of the Plan, originated from extensive community consultations in the early 1990’s as part of the process leading to Council adoption of the second Regional Official Plan [1995]. It continues, with refinements over the years and renewed support by Council and the Halton community, to represent the foundation for land use planning in Halton Region.

To assist in explaining the construct of the Official Plan, a presentation designed for staff Education and Training (Module 01: Overview of the Halton Region Official Plan) is provided as Attachment #4 to this submission.

5.4 Regional Official Plan as a Comprehensive Land Use Framework for Assessing Cumulative Effects

The concept of landscape permanence described above, coupled with the ROP approach of identifying categories of land uses and setting out clear objectives and policies to define planning expectations for each category, provides a comprehensive land use framework. This land use framework can be described as a 'zero-sum' framework, where all land has an identified planned function, and any change to the planned function of land that engages a loss or impact to the planned function of another land use category, represents a cumulative effect.

The following example is provided:

The ROP provides for 3 categories of land use:

1. *Settlement Area*
2. *Rural and Agricultural*
3. *Natural Heritage*

For a proposal to expand a settlement area for a new residential development, it will ultimately result in the net loss of land in the Rural and Agricultural category or the Natural Heritage category. Based on the ROP as a comprehensive land use framework, the loss of land in these categories itself represents a cumulative effect. Further, the ROP requires a careful assessment of a range of impacts given the significant nature of a proposal to expand a settlement area. For example, the ROP requires an assessment to determine impacts on: agricultural land and resources, the natural heritage system and ecological functions, water resources, demand on municipal infrastructure, transportation, fiscal impacts, to name a few, etc.

To summarize, a development that does not conform with an applicable official plan, where approval would require changes to other planned, proposed or future activities represents a cumulative effect. This point is an important consideration in understanding how the current land use framework integrates with federal environmental assessment, as addressed further in Section 5.6.

5.5 The Use of the Terms 'Goals', 'Objectives' and 'Policies' in the Regional Official Plan

Over the decades and through the four versions of the Regional Official Plan, the structure and themes of the Plan have remained very similar. Over time some of the topics have been reorganized to reflect the evolving perspective of land use planning in Ontario, however the core values of environmental protection, farmland preservation, proper management, coordination and financing of growth, inclusion of social and health matters (the concept of "complete" communities), and sharing of planning responsibilities with the local municipalities have been the hallmark of Halton's Official Plan.

Sections 1-3 of the ROP, which have their origin dating back to Regional Official Plan [1980], best capture the character, intent and purpose of the Official Plan:

- "1. This Regional Official Plan, or commonly referred to as The Regional Plan, is adopted by the Council of the Regional Municipality of Halton to solidify decisions taken in the past and to give clear direction as to how physical development should take place

in Halton to meet the current and future needs of its people. It is also intended to reflect their collective aims and aspirations, as to the character of the landscape and the quality of life to be preserved and fostered within Halton. Finally, the Plan clarifies and assists in the delivery of Regional services and responsibilities as set out in the Planning Act, the Municipal Act, and other pertinent Provincial legislation.

- 2. This Plan outlines a long term vision for Halton's physical form and community character. To pursue that vision, it sets forth goals and objectives, describes an urban structure for accommodating growth, states the policies to be followed, and outlines the means for implementing the policies within its property tax base and other financial resources.
- 3. Policies of this Plan indicate positions to which Regional Council is committed or which Council will work towards attaining. They also describe processes to be followed in arriving at decisions, changes to be sought in Provincial legislation, and policy positions to be required in the Official Plans and Zoning By-laws of Burlington, Oakville, Milton and Halton Hills.”

The words ‘goals’, ‘objectives’ and ‘policies’ are italicized under Sections 2 and 3 of the ROP as they have specific meanings under Part VI Definitions of the Plan, reflecting a hierarchy in application to development and other matters:

- “241. GOAL means an idealized end state of the social, economic, and/or physical environment, towards which the Plan must strive but for which it may not be possible to apply a test of fulfilment.”
- “262. OBJECTIVE means a statement about the social, economic, and/or physical environment derived from a goal and for which the degree of attainment is in some way measurable. It may be conceived as an "attainable goal" or part of a goal.”
- “264. POLICY means a statement which guides the use of the municipality's powers in the pursuit of its goals and objectives.”

‘Policies’ are meant to be applied directly to a specific development proposal and indicate Regional Council’s position on general planning matters, while ‘objectives’, and at a higher level ‘goals’, provide intent or guidance to the application of the policies and represent states to be achieved or approached through the application of the appropriate policies.

In relation to the CEAA Framework, discussed in greater detail below, it is important that as part of this submission, when discussing municipal ‘standards’, it is the policies that are the operative parts of the ROP that must be applied, rather than the goals or objectives.

5.6 Integrating the Provincial-Municipal Land Use Planning Framework with the Federal Environmental Assessment Planning Framework under CEAA

In December 2016, the Halton Municipalities filed with the Review Panel a detailed brief that describes how to integrate the current land use planning framework in Halton with the federal environmental assessment planning framework under CEAA (“Halton Municipalities’ Brief”). The Halton Municipalities’ Brief (CEAR#405) used six general effects-based headings to set out the key municipal land use standards applicable to this Project, drawing support from provincial plans and the applicable provincial policy statement.

The EIS Guidelines require the EIS identify relevant land use plans and government policy to assess this Project. As set out in the Halton Municipalities' Brief (p.13), the CEA Agency has provided similar guidance in its current Operational Policy Statement on how to determine whether a designated project is likely to cause significant adverse environmental effects.

Based on this Guidance, the Halton Municipalities' Brief provides an objective framework to assess the significance of adverse effects on six key topics: water, natural heritage, transportation, agriculture, residential, and employment. Each of these topics aligns with the CEEA framework, but also addresses concerns common to all levels of government—federal, municipal and provincial. These topics also provide the organizing framework for numerous effects-based standards of general application identified in the Halton Municipalities' Brief.

These topics are also relevant for both project effects and cumulative effects. For cumulative effects several standards in the ROP relate to the 'zero-sum' framework described above. Where development does not conform to the ROP and requires changes to other planned proposed or future activities, this is considered to be directly relevant to assessing cumulative significant adverse effects.

More detailed information on the effects based standards relevant to land use and Federal environmental assessment are provided below.

5.6.1 Water

The Project is proposed on lands that include or are in close proximity to water features. The project is proposing to alter drainage patterns and relocate a watercourse. In addition, the Project proposes to meet its water supply needs through one or more private wells drawing groundwater from aquifers, and its wastewater discharge needs through one or more private sewage works.

Since 2005, the PPS has required planning authorities to protect, improve, or restore the quality and quantity of water. Among other things, Ontario requires authorities, such as the Region, to use the watershed as the ecologically meaningful scale for integrated and long-term planning and to identify the water resource features and functions necessary for the ecological and hydrological integrity of the watershed (PPS 2005 2.2.1a) & c)). The required water resource features and functions consist of groundwater and surface water features, natural heritage features and areas, and hydrologic functions.

The Halton Municipalities' Brief identified four effects-based water standards of general application. It is these standards that are relevant to assessing whether this Project will result in significant adverse environmental effects.

The Halton Municipalities have retained technical expertise related to water to provide the Review Panel with their findings on whether the project is likely to cause significant adverse environmental effects related to water. The Brief submitted by the Halton Municipalities provides details on these findings and will be addressed in future presentations.

5.6.2 Natural Heritage

The ROP recognizes natural heritage through a region-wide system known as the Regional Natural Heritage System (“RNHS”). ROP standards protect natural features, linkages and enhancement areas and their ecological functions from any negative impacts due to development or site alteration. The Project is proposed for lands that include and are in proximity to the RNHS.

Natural heritage protection has been a central component of the PPS since 1994. Since 2005, the Greenbelt Plan has provided permanent protection to features within the provincial natural heritage system, which includes features within the Region. Also since 2005, the PPS has demanded that the ecological function and biodiversity of all natural heritage systems be maintained and that natural features and areas be protected for the long term. Provincial standards govern and protect significant wetlands, woodlands, valleylands, wildlife habitat, and areas of natural and scientific interest.

The PPS also recognizes provincial standards to protect the habitat of endangered species and federal standards to protect fish habitat.

The systems approach to natural heritage adopted in the ROP includes all provincially-protected features, and adds protection to aspects important to the Region’s ecological system. This protection relies on current science that a natural heritage system is essential to protect and preserve individual natural heritage features within an area of concern.

The Halton Municipalities’ Brief identified two effects-based natural heritage standards of general application. It is these standards that are relevant to assessing whether this Project will result in significant adverse environmental effects.

The Halton Municipalities have retained technical expertise related to natural heritage to provide the Review Panel with their findings on whether the project is likely to cause significant adverse environmental effects related to natural heritage. The Brief submitted by the Halton Municipalities provides details on these findings and will be addressed in future presentations.

5.6.3 Transportation

The ROP, as elaborated through the Transportation Master Plan, provide a policy and implementation framework for a regional transportation system that promotes options and a multi-modal transportation approach and seeks to carefully plan major transportation facilities to meet present and future needs.

The trucking aspect of the Project is relevant to the ROP and the Region’s transportation system because the Project location is adjacent to two regional roads. This Project location also raises issues for on-road and off-road transportation (e.g., walking and cycling) due to its proximity to existing and planned residential communities north of Britannia Road and the Milton Education Village to the west.

The 2005 PPS initiated provincial standards for transportation systems and their relationship to sensitive land uses. The 2019 Growth Plan covers all transportation modes and purposes and offers an integrated vision of transportation growth and transportation management. The Growth Plan gives priority to the development of complete communities by intensifying residential and

employment uses within urban boundaries. Key transportation priorities include the safe movement of people and goods.

As it concerns the movement of people, provincial policy seeks to limit the expansion of roads in favour of moving people within and across urban areas by transit and active transportation (e.g., walking, cycling). Consistent with provincial policy, the ROP identifies the Region's transportation system. It also promotes safety, accessibility, efficiency, and a balance of transportation options to promote public transit and active transportation, while reducing both dependency on vehicular travel and environmental impacts.

Project effects on transportation build on requirements for federal regulatory approval: CN requires railway line approval under the *Canada Transportation Act* ("CTA"), and may also require approval for noise effects from the railway, as these are regulated by the CTA. Transportation effects also include the matters required to be addressed by the July 20, 2015 EIS Guidelines, which require that the EA take into account land use and human safety in relation to motor vehicle safety and pedestrian/bicycle safety. The Halton framework for transportation effects engages municipal controls over road access, road improvements, and truck use of municipal roads.

The Halton Municipalities' Brief identified three effects-based transportation standards of general application. It is these standards that are relevant to assessing whether this Project will result in significant adverse environmental effects.

The Halton Municipalities have retained technical expertise related to transportation to provide the Review Panel with their findings on whether the project is likely to cause significant adverse environmental effects related to transportation. The Brief submitted by the Halton Municipalities provides details on these findings and will be addressed in future presentations.

5.6.4 Agriculture

Some of the physical activities and future works related to the project are within, and adjacent to, lands that are designated Agricultural Area in the ROP. Policy 101(1.6) of the ROP states that it is the policy of the Region to, "Recognize and protect lands within the Agricultural System as an important natural resource to the economic viability of agriculture and to this end:

- (a) Direct non-farm uses to the Urban Area, Hamlets and Rural Clusters unless specifically permitted by policies of this Plan."

Project effects on lands used and designated for agriculture fit within the CEAA definition of the "environment":

- these effects also engage Ontario's plans and municipal controls to preserve rural agricultural lands by limiting growth outside urban boundaries.
- The Project, and the CN lands on which it is to be built, sits on both sides of the Halton boundary between urban and rural lands.

The Halton Municipalities Brief identified two effects-based agriculture standards of general application. It is these standards that are relevant to assessing whether this Project will result in significant adverse environmental effects.

The Halton Municipalities have retained technical expertise related to agriculture to provide the Review Panel with their findings on whether the project is likely to cause significant adverse

environmental effects related to agriculture. The Brief submitted by the Halton Municipalities provides details on these findings and will be addressed in future presentations.

5.6.5 Residential Land Use

The ROP, together with the Local Official Plan and related standards and guidelines contain policy and guidance related to residential communities and residential lands. These are relevant to the Project because the Project influence area includes existing and planned residential communities north of Britannia Road.

Provincial law requires attention to avoid adverse effects related to air and noise emissions. The PPS provides broader guidance to promote healthy communities. It seeks to ensure land use compatibility between sensitive land uses like homes, schools, and hospitals, and major facilities such as transportation works. It covers noise and air quality effects and, in general, addresses a broader range of adverse effects than do the current numeric standards published by the Province. Additional effects include night-time lighting levels and the cumulative effects of existing and proposed emission sources.

Project effects on residents and lands designated for new urban residential uses: these effects fit within the CEAA framework for:

- air, noise, and night-time lighting effects from new railway lines and operations,
- the CEA Agency July 20, 2015 guidance (through the EIS Guidelines) that the panel take into account municipal land use, including present and approved land uses, and human health, including potential changes in air quality, drinking water quality, and noise exposure, and
- the CTA s. 98 requirement to take into account the “interests of the localities” in considering whether to approve new railway lines.

This topic also engages municipal controls for effects caused by expanded road use and truck operations arising from the Project and future use of CN lands.

The Halton Municipalities’ Brief identified three effects-based standards of general application to impacts on residents and residential land uses. It is these standards that are relevant to assessing whether this Project will result in significant adverse environmental effects.

The Halton Municipalities have retained technical expertise related to land use compatibility, noise, air quality, health, safety and light to provide the Review Panel with their findings on whether the project is likely to cause significant adverse environmental effects related to residential land uses. The Brief submitted by the Halton Municipalities provides details on these findings and will be addressed in future presentations.

5.6.6 Employment Land Use

Employment and employment land use standards are relevant to the Project because the majority of the physical activities proposed for the Project take place on lands that are designated for employment use and subject to minimum employment density targets.

Provincial policy targets urban areas and imposes numerical targets on municipalities to intensify their employment land use and promote mixed land use with residential and other compatible land uses.

Based on provincial law and policy, a municipality may expand its urban boundary into a rural area only where it has no realistic alternative.

The approved ROP represents the result of an eight-year process undertaken by the Region to address employment growth targets with minimal intrusion into rural areas. The ROP sets out clear urban boundaries across the Region to the year 2031 and requires that each local municipality provide its future employment within these boundaries. The Province has also established employment density targets to be met by all municipalities, including the Region and the Town of Milton. All of the lands designated as employment lands within the ROP represent the Region's response to provincial targets.

Ontario provides municipalities with a range of financial tools to facilitate growth in a fiscally sustainable way. The ROP also represents the Region's solution to growth in a sustainable way. Sustainable financing of growth involves substantial contributions from developers, with preference to infill over greenfield development.

The Halton Municipalities' Brief identified six effects-based standards of general application to impacts on employment and employment uses. It is these standards that are relevant to assessing whether this Project will result in significant adverse environmental effects.

The Halton Municipalities have retained technical expertise related to employment lands and fiscal impact to provide the Review Panel with their findings on whether the project is likely to cause significant adverse environmental effects related to employment lands. The Brief submitted by the Halton Municipalities provides details on these findings and will be addressed in future presentations.

6. Background Information on the CN Milton Lands and Project

CN owns lands for its existing railway line as well as approximately 485 contiguous hectares of land south of Britannia Road and east of Tremaine Road located within the geographic limits of Halton and Milton. CN proposes the Project to be on 160 hectares of these lands, centred on the existing railway lines that cross Tremaine Road to the south and Britannia Road to the north.

CN proposes to build an intermodal terminal in the Town of Milton that includes the construction of a new loading and unloading facility alongside CN's existing railway line, the construction of new railway lines, the construction of new buildings, the construction of internal roads and an on-site overpass over the railway lines, and the construction of road access onto one or more municipal roads.

Over the past 20 years, there have been different proposals brought forward by CN that has influenced the overall planning for these lands. These different proposals are explained below.

6.1 2001 Intermodal Proposal

CN first proposed an intermodal terminal on the CN Lands to Halton's Regional Council in February 2001. At the time, CN sought to locate the terminal largely east of the existing CN railway line (in contrast to the current proposed Development which is largely west of this line). A subsequent report to Halton Region's Planning and Public Works Committee from its Commissioner of Planning and Public Works summarizes the proposal at that time:

- The reasons for the terminal were that CN's Brampton intermodal terminal was at capacity, CN was experiencing "significant growth in the container transfer business", and CN thus required "a site adjacent to their main lines over 10,000 feet in length".
- The proposed terminal would result in 1,000 additional truck movements per day; that is, 500 trucks per day, moving to and from the terminal.
- CN had options to purchase 800 acres of nearby land to accommodate the terminal.

Initially, the Halton Municipalities received without comment CN's position that the proposed terminal would require approval for some aspects of the project from the Canadian Transportation Agency (the "CTA"), but was exempt from provincial planning and development legislation. However, a September 2001 letter from the Region to CN provided the following:

"With respect to that location, you appreciate that industrial development such as proposed by CN is contrary to both the Regional and Town Official Plans. As public bodies, we are bound by statute and by political mandate to act consistently with those Official Plan documents. While we are prepared as staff to consider with an open mind any proposal which might require an amendment to those Official Plan documents, those amendments have yet to be proposed, or made."

6.2 2008 Direct Rail Industrial Park

CN participated in the Sustainable Halton exercise in providing planning reports and input in the development of the CN lands. In 2008 CN advanced, through a Planning report prepared by Bousfields Inc., a proposal for a rail based industrial park. CN stated in 2008 that there was no need for an intermodal facility.

In a September 12, 2008 letter, CN's consultants told the Region that CN's proposal was for a direct rail-serviced industrial park. In support of this proposal, CN's planning consultants provided four reports to Halton Region. One of these reports addressed the "Planning Rationale" for this proposal and distinguished it from the earlier intermodal proposal as follows:

- Owing to improvements at CN's Brampton Intermodal Terminal, "CN no longer intends to proceed with its first purpose [i.e. an intermodal terminal] in south Milton."
- CN's proposed industrial park "requires municipally-sponsored Official Plan amendments redesignating it to Employment Lands within an expanded urban area boundary."
- CN's project should be included in Halton Region's ROPA that was then "in preparation in response to the Province's 'Places to Grow' Act."
- The proposed project "should be included in any land use plan for long term Employment Lands expansion in the Region and in the Town of Milton"
- For the proposal "to have validity," CN would require "endorsement by the Town of Milton which [would] need to sponsor parallel Town Official Plan and implementing zoning amendments."

Based on the above information, the Region advanced the ROPA 38 process and defined the future vision of these lands on the understanding of CN's intent in 2008.

6.3 Current Proposal

In early 2015, CN contacted the Region to meet and discuss a new proposal. In a January 2015 meeting, CN informed the Region that it was again proposing an intermodal facility on its lands, although with a location and design that is largely west of the existing railway line. CN also

indicated that it did not believe that it required approval from the CTA, or either provincial or municipal approval for its project.

7. Application of Land Use Planning Framework to the CN Proposal

The Region and the Town of Milton are the two localities most affected by the CN Project. Since early 2015, these two municipalities have worked with the City of Burlington, the Town of Oakville, and the Town of Halton Hills to provide a coordinated response to the CN Project as the Halton Municipalities. This coordinated response has resulted in detailed input to the Minister, the Canadian Transportation Agency, the CEA Agency, and this joint panel.

From the start, the Halton Municipalities have sought a cooperative, federal-municipal approach to the present environmental assessment. In response, the July 2015 decision by the federal Minister of the Environment to require panel review included specific direction that the panel take into account municipal land use, human safety in relation to motor vehicle safety, and human health including air quality, water quality, and noise exposure. In December 2016, the joint agreement between the Minister and the CT Agency expressly added CEAA requirements that this panel review take into account the concerns of localities. A similar requirement exists under the CTA.

A key concern of the five Halton localities is ensuring that this panel review take into account all applicable municipal standards. The EIS Guidelines provide specific direction on this topic:

“The EIS will identify:

...

- the environmental and other regulatory approvals and legislation that are applicable to the project at the federal, provincial, regional and municipal levels;
- government policies, resource management, planning or study initiatives pertinent to the project and/or EA and their implications;

...

- any relevant land use plans, land zoning, or community plans; and
- regional, provincial and/or national objectives, standards or guidelines that have been used by the proponent to assist in the evaluation of any predicted environmental effects.”
(EIS Guidelines, p.13)

7.1 Framework for a Planning Opinion

Sections 4 and 5 of this submission provides information on the key components of the land use planning framework as it applies in Halton Region and the Town of Milton.

The Halton Municipalities’ Brief as provided to the Review Panel in December 2016 highlights the key municipal land use standards applicable to this Project, drawing support from provincial plans.

The Halton Municipalities’ Brief provides an objective framework to assess the significance of adverse effects on six key topics: water, natural heritage, transportation, agriculture, residential, and employment. Each of these topics aligns with the CEAA framework, but also addresses concerns common to all levels of government—federal, municipal and provincial. These topics

also provide the organizing framework for numerous effects-based standards of general application identified in the Halton Municipalities' Brief.

The overall framework for a planning opinion should be based on the Halton Municipalities' Brief together with information profiled in this submission. I look forward to participating in the Panel Hearing and reviewing the evidence provided to the Review Panel in order to provide my planning opinion as part of the Hearing process.

8. Conclusion

This project affects many interests of the localities and I look forward to participating in the Panel Hearing and providing more details on these interests and how they are affected by the Project, and cumulatively, throughout the Hearing.

Respectfully Submitted,

<Original signed by>

Curt Benson, MCIP, RPP
Director of Planning Services and Chief Planning Official
Halton Region for the Halton Municipalities

9. Supporting Information

9.1 List of Attachments to the Submission

The following documents are attached to this submission:

- Attachment #1: Curriculum Vitae of Curtis C. Benson
- Attachment #2: Best Planning Estimates of Population, Occupied Dwelling Units and Employment to 2011-2031 (June 2011)
- Attachment #3: Index of the Background and Technical Reports related to Sustainable Halton
- Attachment #4: Halton Region Official Plan Education and Training - Module 01: Overview of the Official Plan

9.2 List of Documents referenced in the submission to be accessed online

The following documents support this submission and can be accessed online:

1. *Planning Act*: <https://www.ontario.ca/laws/statute/90p13#BK46>
2. *Places to Grow Act*: <https://www.ontario.ca/laws/statute/05p13>
3. *Greenbelt Act*: <https://www.ontario.ca/laws/statute/05g01#BK6>
4. The Provincial Policy Statement, 2014:
<http://www.mah.gov.on.ca/AssetFactory.aspx?did=10463>
5. A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019):
<https://www.ontario.ca/document/place-grow-growth-plan-greater-golden-horseshoe>
6. The Greenbelt Plan (2017): <http://www.mah.gov.on.ca/Page13783.aspx>
7. Halton Region Official Plan: [https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-\(ROP\)/About-Regional-Official-Plan-\(ROP\)/Regional-Official-Plan-Viewer](https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)/About-Regional-Official-Plan-(ROP)/Regional-Official-Plan-Viewer)
8. The Regional Official Plan Guidelines: [https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-\(ROP\)/About-Regional-Official-Plan-\(ROP\)/Regional-Official-Plan-Guidelines](https://www.halton.ca/The-Region/Regional-Planning/Regional-Official-Plan-(ROP)/About-Regional-Official-Plan-(ROP)/Regional-Official-Plan-Guidelines)
9. Halton Region Transportation Master Plan (2011): <https://www.halton.ca/For-Residents/Roads-Construction/Infrastructure-Master-Plans/Transportation-Master-Plan-to-2031-The-Road-to-C>
10. Halton Region Active Transportation Master Plan (2015): <http://www.halton.ca/For-Residents/Roads-Construction/Infrastructure-Master-Plans/Active-Transportation-Master-Plan>
11. Halton Region Water and Wastewater Master Plan (2011): <http://www.halton.ca/For-Residents/Roads-Construction/Infrastructure-Master-Plans/Sustainable-Halton-Water-Wastewater-Master-Plan>
12. Halton Region By-Laws: <https://www.halton.ca/The-Region/About-Halton-Region/By-Laws>
13. Report No. LPS114-09 “Public Consultation on Proposed ROPA 38”:
<http://sirepub.halton.ca/agdocs.aspx?doctype=agenda&itemid=11628>