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Milton Link Expansion Lands

Employment Land Need Assessment

Milton, Ontario

Prepared for **Tribal Development Management Services Inc.**

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Executive Summary

- urbanMetrics Inc. has been retained by Tribal Development Services Inc. (doing business as "Matthews"), to prepare a Land Needs Assessment Report in support of the Official Plan, and Zoning By-law Amendments required to advance the development of lands located adjacent to the CN Intermodal Hub in the Town of Milton, this development is known as "Milton Link".
- The Town's 2024 Land Needs Assessment ("LNA") reference scenario was completed prior to the approval of the CN Milton Intermodal Terminal, and with limited information in relation to Highway 413. As a result, the scale of industrial demand expected to be located in direct proximity to the terminal and the broader logistics network effects of this infrastructure are not reflected in that baseline.
- Evidence from comparable intermodal hubs across Canada demonstrates that these facilities generate substantial concentrations of industrial floor space demand that are difficult to anticipate in advance of approval and operationalization. Major hubs across Canada have each attracted tens of millions of square feet of logistics and distribution space, with large national and international users consistently seeking adjacency to terminal operations.
- The Town's LNA's land need calculations assume Milton's employment land density will rise to an average of 26 jobs per hectare by 2051. This target would require new development to achieve significantly higher densities to offset older properties, which are estimated to perform at 16 to 19 jobs per hectare. Development between 2021 and 2026 averaged approximately 24.5 jobs per hectare, and the Town did not meet its annualized employment growth targets over this period.
- This gap between assumed and realized densities impacts the land need calculation. Emerging trends in industrial development, including increased automation and data centre construction, point to large-format developments that will generate fewer jobs per unit of floor space than anticipated, placing further downward pressure on achieved densities. The analysis herein uses the more realistic yet still aggressive density assumption of 24.5 jobs per hectare, reinforcing the case for designating additional employment lands.
- In this context, the Town of Milton is expected to require an additional 264 hectares of employment land by 2051 to accommodate approximately 46,843

new employment land jobs from 2026 to 2051. This estimate does not capture the additional demand generated by the CN Intermodal Terminal, which the prior projections could not anticipate; the true land need is likely higher. This data suggests that expanding the settlement area boundary is warranted to increase the available employment land inventory.

- The Subject Lands, previously recognized as part of a Provincially Significant Employment Zone, are located adjacent to the under-construction CN Intermodal Hub and are well-positioned to absorb a considerable share of the industrial demand its completion will generate. Users seeking direct access to rail-served or rail-proximate locations cannot substitute highway-only sites; the intermodal terminal will direct demand specifically to this node.
- At approximately 239 hectares and proposing approximately 8.7 million square feet of industrial space across eleven buildings, the Subject Lands can support approximately 5,000 jobs at full build-out — representing a considerable total of Milton's conservatively forecasted employment land need to 2051 and a significant contribution to the Town's long-term economic development objectives.

1 Introduction

1.1 Purpose

The Proponent, Tribal Development Management Services Inc. (doing business as "Matthews"), is advancing the development of lands located adjacent to the CN Logistics Hub in the Town of Milton (the "Town"). The Project Site is generally located south of Britannia Road, east of Tremaine Road, west of Regional Road 25, and north of No. 2 Side Road (the "Subject Lands"). Official Plan and Zoning By-law Amendments are being pursued to designate the Subject Lands as Industrial Area to be included within the Sustainable Halton Plan (SHP) Urban Area Boundary. The site will seek the entitlements associated with the Employment Zone, with site-specific provisions to support the intended development. This study assesses the Town's current and future employment land needs from the present to the 2051 planning horizon, with a specific focus on a potential urban boundary expansion to include the Subject Lands.

The analysis assesses whether additional employment land is needed to achieve Milton's employment targets and economic development goals, and whether redesignating these currently agricultural lands to permit the development of eleven industrial buildings is an appropriate and efficient use of the Subject Lands in the context of Milton's long-term objectives and the approved CN intermodal hub. In doing so, the report examines how converting the Subject Lands from agricultural use to employment land can better support the movement of goods, supply chain functions, and Milton's emerging economic role within the broader Greater Toronto and Halton Region ("the Region").

The report considers a range of external factors that influence the timing, scale, and location of the employment land supply in Milton, including the planned Highway 413 corridor, other proposed industrial projects within the municipality, and the three existing employment expansion zones identified in the Town and Regional growth frameworks. These elements are assessed alongside evidence from existing intermodal logistics hubs, which typically catalyze substantial industrial and warehousing development in surrounding areas, increasing demand for well-located, serviceable employment lands.

Ultimately, this report is intended to support municipal and regional decision-making by determining whether additional employment lands are required to accommodate Milton's projected employment land needs to 2051 and, if so, whether including the Subject Lands within the urban boundary is the most logical and beneficial option.

1.2 Scope

The scope of this report includes:

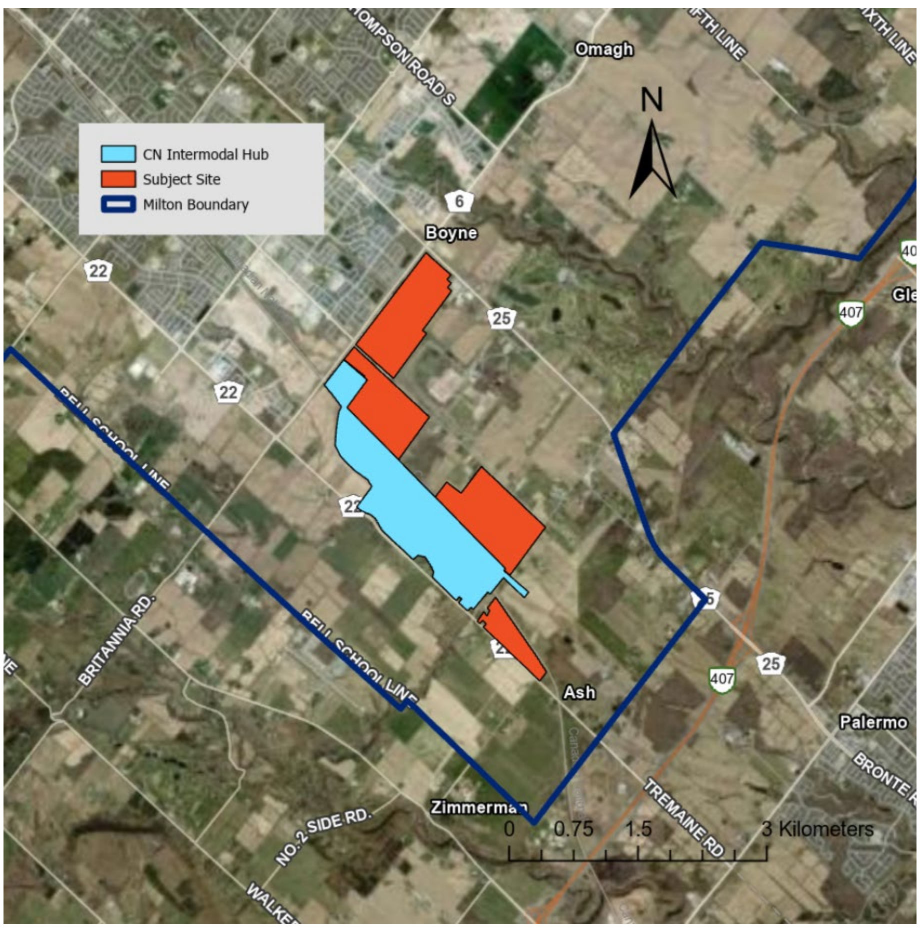
- A comprehensive review of all relevant background documents, technical studies, and planning instruments related to employment land planning in Milton, with a focus on the 2051 planning horizon.
- A land budget analysis to determine whether a settlement area boundary expansion is warranted, including a detailed assessment of occupied and vacant urban land within existing employment areas and new employment areas, as well as an evaluation of future employment densities and intensification targets. This analysis is designed to establish whether sufficient opportunities to accommodate forecast employment growth are currently available within the existing urban structure or whether additional employment land is required.
- A policy evaluation of the updated definition of employment land arising from Bill 97, recognizing that recent changes to the "area of employment" framework narrow the range of uses that may be counted toward employment land supply.
- An examination of the implications of the proposed settlement area boundary expansion in relation to the Town's growth forecasts as set out in Table 1 – Population and Employment Distribution – of the Halton Regional Official Plan (May 2024), and the Town's ability to achieve its employment intensification and density targets as set out in Table 2 – Intensification and Density Targets – of the same Plan.
- An assessment of whether the Subject Lands can contribute to an orderly, phased progression of urban development consistent with the regional growth structure and staging policies.

2 Background

2.1 The Subject Lands

The Subject Lands are approximately 239 hectares in size and are in the southwestern part of Milton, to the south of the Boyne Secondary Plan Area and the Milton Education Village Secondary Plan Area and to the northeast and south of the under-construction CN Intermodal Logistics Hub. The proposal for the Subject Lands seeks to deliver a phased industrial development plan that provides direct access to the new intermodal hub for industrial users.

Figure 1: The Subject Lands



SOURCE: urbanMetrics Inc., 2026 with ESRI Basemap

In total, the proposal includes eleven industrial buildings with a combined gross floor area of approximately 8.7 million square feet, forming an employment-focused precinct integrated with the under-construction CN intermodal logistics hub. Figure 1 identifies the Subject Lands as well as the CN lands.

2.2 Surrounding Land Uses

The Subject Lands are located within a transitioning rural context where agriculture remains the predominant land use, but where planned urban growth and major infrastructure investments are reshaping the broader area.

To the north, existing and planned residential areas are situated within Milton's designated community structure.

To the east, the Halton Waste Management Site and surrounding agricultural lands establish an employment and utility-oriented character that is generally compatible with industrial and logistics uses. The presence of this regional facility, together with existing transportation infrastructure, supports the positioning of the Subject Lands as part of a broader cluster of service, industrial, and infrastructure-related activities.

To the south, agricultural lands extend into Oakville. Just beyond the Milton municipal border, Highway 407 runs through the agricultural lands.

To the west of the Subject Lands, the lands are owned by CN and will be the heart of the intermodal hub. Behind these lands lies the Burlington Executive Airpark Airport, along with more agricultural lands.

2.3 The Proposed Development

The proposed development comprises eleven industrial buildings across four phases with a total gross floor area of approximately 8.7 million square feet, arranged to function as a cohesive, rail-oriented employment precinct. The buildings are organized into four sequential phases, enabling a logical build-out that responds to market demand and infrastructure delivery while maintaining an efficient overall site layout.

Buildings 1A, 1B, and 1C will be delivered as Phase 1, followed by Buildings 2A, 2B, and 2C in Phase 2, Buildings 3A, 3B, 3C, and 3D in Phase 3, all on the east side of the track; and Phase 4 on the west side of the track, includes Building 4A. This phasing structure supports early activation of the lands with a critical mass of industrial floor space adjacent to the CN rail infrastructure, while preserving flexibility to bring additional buildings online as servicing, transportation improvements, and tenant demand evolve. Figure 2 presents the detailed GFA breakdown for each of the eleven buildings, illustrating the range of building sizes and the development's cumulative employment-generating capacity.

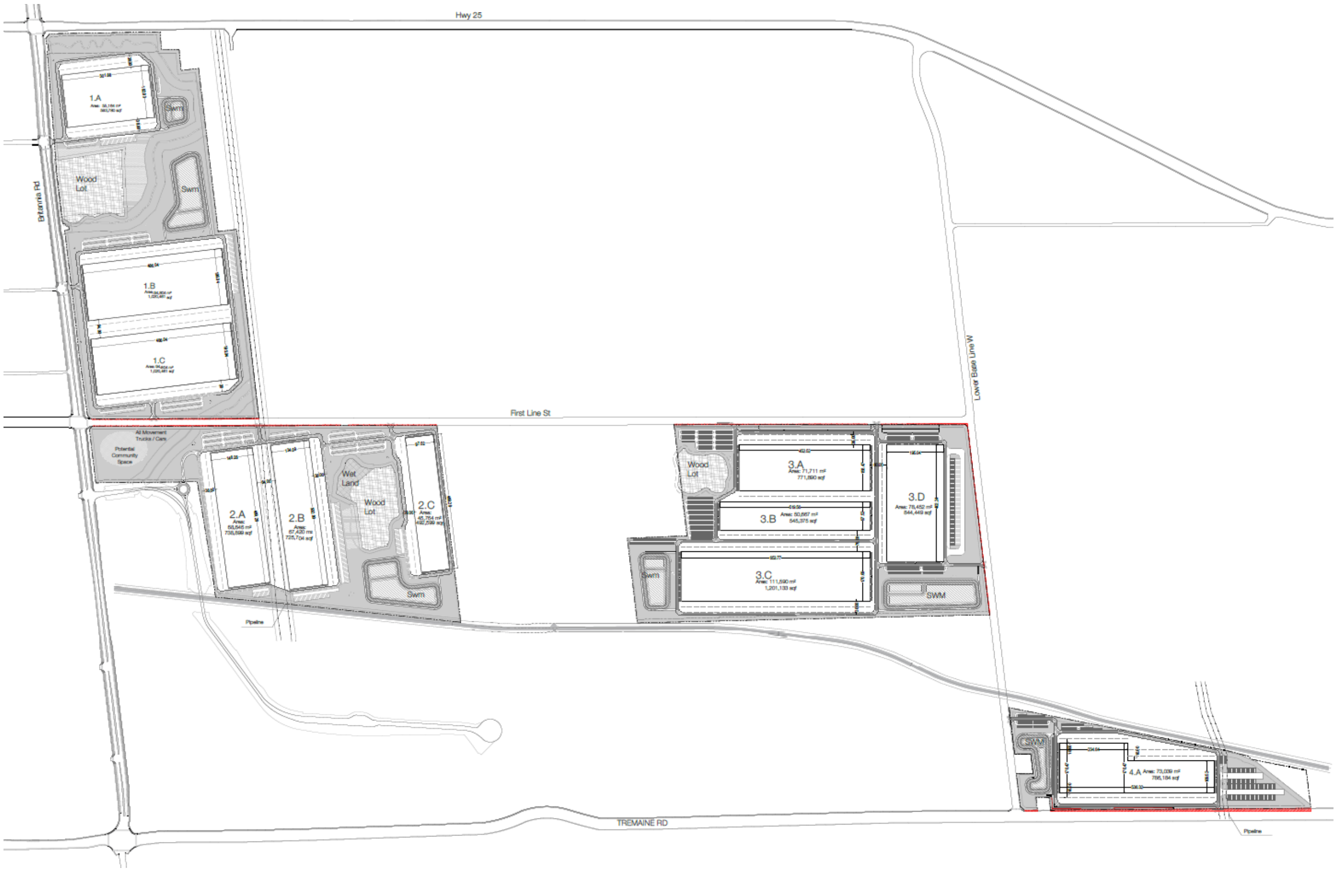
Figure 2: Building GFA's and Employment Potential

Development Phase	Building	GFA SF	Job Potential
1	1A	593,780	339
	1B	1,020,461	583
	1C	1,020,461	583
2	2A	738,899	422
	2B	725,704	415
	2C	492,599	281
3	3A	771,890	441
	3B	545,375	312
	3C	1,201,133	686
	3D	844,449	483
4	4A	786,184	449
Total		**8,740,950**	**4,994**

SOURCE: SvN/WW+P, 2026; urbanMetrics Inc., 2026

Beyond the building program, the site plan incorporates stormwater management ponds, preserved woodland and wetland areas, and a comprehensive supply of truck and passenger vehicle parking to support modern industrial and logistics operations. Figure 3 illustrates the overall site plan, including the phasing, circulation pattern, stormwater facilities, and retained natural heritage areas that together establish a functional, market-ready and policy-responsive industrial node.

Figure 3: Site Plan



SOURCE: SvN/WW+P, 2026

Using a conservative general industrial employment density of 1,750 square feet per employee, as identified in both the Town of Milton's 2021 development charges background study and the draft 2026 development charges background study ("DCBS"), the development of the Subject Lands is estimated to support approximately 4,994 direct jobs at full buildout. This level of employment-generating floor space positions the Subject Lands as a significant contributor to Milton's long-term employment objectives and to meeting the Region's employment density targets for designated employment areas.

2.4 Access Characteristics

Access to the proposed development is organized to align each building with the surrounding arterial and collector road network, supporting efficient site circulation and direct connections to regional goods-movement corridors. Buildings 1A, 1B, and 1C will be accessed from Britannia Road, while Buildings 2A, 2B, 2C, 3A, 3B, 3C, and 3D will be accessed from First Line, and Building 4A will be accessed from Tremaine Road, distributing traffic across multiple frontages and reducing pressure on any single access point. This access strategy also allows different phases of the development to be brought online in a coordinated manner as external road improvements are implemented.

At the broader network level, the Subject Lands benefits from proximity to Regional Road 25 (Highway 25) and Britannia Road, two key arterial routes that intersect at the northern edge of the lands and provide direct connections to Highway 407 and Highway 403, with Highway 401 also located nearby.

These connections enable efficient truck routes between the development and the 400-series highway system, are consistent with expected transit routes for the CN Milton Intermodal Hub and planned Britannia Road and Tremaine Road improvements. In addition, the future Highway 413 corridor is expected to further enhance regional accessibility, positioning the Subject Lands to capitalize on improved east–west and north–south travel times once the new infrastructure is in place.

2.5 Policy Context

Three key planning frameworks apply to the evaluation of new and expanded employment areas and settlement area boundary expansions in Milton:

- the Provincial Planning Statement, 2024 (“PPS, 2024”)
- the Halton Regional Official Plan as applied to Milton (the “Regional Plan”), and
- the Town of Milton Official Plan (“Milton OP”), each as amended.

As of July 1, 2024, Halton Region was designated an upper-tier municipality without planning responsibilities, with the Regional Official Plan deemed to form part of the local official plans for Burlington, Halton Hills, Milton and Oakville until revoked or amended by each municipality; in Milton, the Regional Plan now operates in tandem with the Milton OP, and the Town of Halton Hills Official Plan does not have independent authority over the Subject Lands.

The PPS, 2024 introduces a more flexible framework for both settlement area boundary expansions and employment planning. It permits privately initiated applications to identify new settlement areas or expand existing settlement area boundaries at any time, outside of a municipal comprehensive review while emphasizing the protection and long-term viability of employment areas for industrial-type uses. Further, it aligns the new definition of “employment area” with the revised “area of employment” in the Planning Act.

Provincial Planning Statement

The Provincial Planning Statement, 2024 sets the tests for expanding settlement area boundaries and planning new employment lands in locations such as the Subject Lands. It establishes the criteria that this report must meet to justify redesignating agricultural lands at the urban edge as employment lands capable of accommodating long-term industrial and goods-movement uses in Milton.

PPS, 2024 Policy 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.”*

Complementary employment policies in Section 2.8 direct municipalities to plan for, protect and preserve sufficient employment areas for industrial and goods-movement uses, particularly in proximity to major goods movement facilities and corridors, and to ensure that employment lands are available in appropriate locations to accommodate forecast employment growth. Together, these provisions frame the baseline against which any proposal to add new employment lands through a boundary expansion must demonstrate quantitative need and strategic fit.

Matters such as detailed noise, odour, and environmental impacts, as well as site-specific mitigation, are addressed in the respective technical studies submitted as part of this OPA/ZBA application.

This report is structured to respond directly to the PPS, 2024 tests on demonstrated employment land need, infrastructure and locational efficiency, and the sufficiency and strategic distribution of employment lands across Milton, and to demonstrate that the Subject Lands are a logical candidate for redesignation to employment.

Halton Regional Plan

The Halton Regional Official Plan, now deemed to form part of the Milton Official Plan, establishes the regional growth structure, population and employment distribution, and intensification and density targets that frame Milton's long-term employment land requirements to 2051.

With Halton's transition to an upper-tier municipality without planning responsibilities as of July 1, 2024, these regional policies now operate within Milton's local policy framework and will guide the Town in evaluating additional employment lands and settlement area boundary adjustments.

Regionally, there is already recognition that modest urban boundary expansions in municipalities such as Milton are required to accommodate long-term population and employment growth to 2051, and that sufficient employment lands must be available in appropriate locations to support a balanced residents-to-jobs ratio.

Within that framework, this report positions the Subject Lands as a logical candidate for an employment designation:

- It is adjacent to the under-construction CN intermodal hub;
- It is well-connected to the regional transportation system;
- It can deliver a substantial quantum of industrial GFA and employment that directly supports Halton's growth management and employment objectives.

Town of Milton Official Plan

The Town of Milton Official Plan sets the local framework for how and where Milton will accommodate population and employment growth to 2051.

Recent employment-focused amendments also align Milton's "employment area" policies and mapping with the revised "area of employment" definition in the Planning Act and PPS, 2024, thereby emphasizing the protection of industrial and goods movement functions while enabling strategic expansions where justified.

Milton has consistently taken the position that the forecast population and employment growth to 2051 cannot be fully accommodated within the existing settlement area boundary and current inventory of employment lands, and that strategic urban boundary expansions are needed to provide sufficient, well-located employment capacity. Within that local policy context, this report establishes the Subject Lands as a logical candidate for redesignation to employment based on their ability to deliver a substantial amount of industrial GFA employment, leverage direct adjacency to the CN intermodal hub and strong regional access, and align with the Town's emerging Official Plan policies.

Collectively, the PPS 2024, Halton Regional Official Plan and the Milton OP amendments translate into a focused set of tests for the proposed expansion of the urban boundary and redesignation of the Subject Lands from agricultural to industrial. For the purposes of this report, the key expectations are to:

- Support the need for additional employment lands required to meet the Town's expected employment growth to 2051 and maintain the appropriate residents-to-jobs balance while demonstrating that the employment forecast can not be met through the existing urban area and designated employment-based lands through the land budget and policy analyses undertaken as part of this report.
- Establish that the inclusion of the Subject Lands as employment-based land supports the objectives of the Regional Urban Structure, preserves the functionality of the employment land system, and maintains sufficient employment land across Milton and Halton Region to accommodate projected long-term employment needs.
- Show that the Subject Lands is a logical, efficient location for new employment-based lands: contiguous with the existing urban boundary, aligned with Milton's role in the regional economy, and well-located with

respect to infrastructure for goods-movement-oriented industrial and logistics uses.

- Confirm that the added employment capacity contributes to achieving regional and local employment density and intensification targets by providing a large-format, goods-movement-oriented employment precinct that supports broader job distribution objectives.
- Demonstrate conformity with PPS 2024 and local employment policy directions by aligning employment uses with major goods-movement facilities and corridors and supporting Milton's "Working in Milton" objectives to protect and grow the Town's long-term employment base.

2.6 Previous Land Needs Assessments

Watson & Associates Economists Ltd. prepared a comprehensive Residential and Non-Residential Needs Analysis Study for the Town of Milton that began in 2022 and was updated in 2024 ("Watson LNA"). This study includes a detailed land needs assessment for employment uses to the 2051 planning horizon. That work provides baseline employment forecasts, employment land supply metrics (including vacancy and occupancy by employment area), and density assumptions, which this report adopts as a starting point and uses to benchmark the employment land need analysis and results presented in later sections.

As of 2023, the Watson LNA identified approximately 3,070 hectares of designated employment land in Milton. The largest share of this supply was in the Milton 401 Industrial/Business Park, at roughly 940 hectares, although only about 4% of that area was vacant at the time.

The next-largest employment area was the new Milton 407 expansion area, with approximately 740 hectares of designated employment land, all of which was vacant, making it the single largest concentration of vacant employment land within a single employment area.

In total, across all employment areas, Watson identified approximately 1,840 hectares of vacant employment land in Milton in 2023, forming the baseline supply against which this report evaluates the need for additional employment lands. Figure 4 reproduces Watson's Figure 5-8, which summarizes these figures by employment area and supply status.

Figure 4: Town of Milton Employment Areas (2023)

Employment Area	Total Size (ha)	Developed (ha)[1]	Vacant (ha)	% Vacant
Milton 401 Industrial/Business Park	940	900	40	4%
Derry Green Business Park	600	260	340	56%
401 Industrial/Business Park Expansion (North Porta)	140	<5	140	99%
Southwest Milton	320	20	310	95%
Agerton Employment Area	240	30	210	89%
Bronte Triangle Employment	20	20	<5	5%
Town of Milton Total Designated Employment Lands	**2,260**	**1,230**	**1,040**	**46%**
Milton 407 Expansion Employment	740	0	740	100%
Sixth Line Expansion Employment	30	0	30	100%
Rattlesnake Expansion Employment	40	0	40	100%
Town of Milton Total Employment Area Expansion Lands	**800**	**0**	**800**	**100%**
Town of Milton Total Employment Land Inventory	**3,070**	**1,230**	**1,840**	**60%**

SOURCE: Figure 5-8 in the Watson LNA, 2024

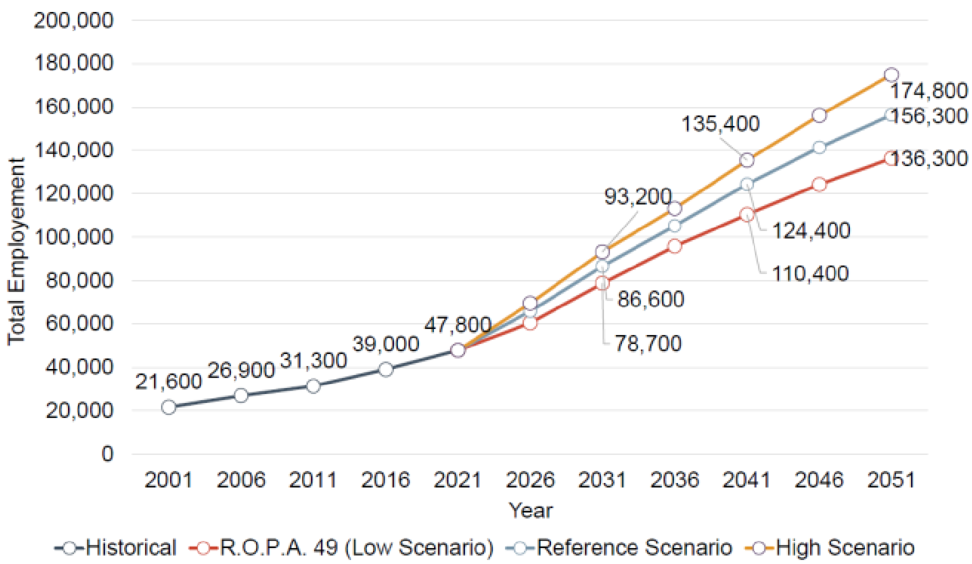
The Watson LNA developed multiple scenarios of total employment growth to 2051:

- In the high scenario, total employment in Milton is forecast at approximately 174,800 jobs by 2051,
- The reference (medium) scenario forecasts about 156,300 total jobs by 2051, which includes an existing employment base of roughly 47,800 jobs in 2021.

The high scenario implies average growth of about 4,000 jobs per year (approximately 4.4% annually), while the reference scenario implies average growth of about 3,600 jobs per year (around 4.0% annually), with total new jobs over the 2021–2051 period on the order of 127,000 in the high scenario and 108,500 in the reference scenario. Figure 5 illustrates these trajectories over time.

Figure 5: Town of Milton Total Employment, 2023

Figure ES-3
Town of Milton
Total Employment, 2001 to 2051



	2021	2051	2021 to 2051	Annual Growth	Annual Growth Rate
R.O.P.A. 49 (Low Scenario)	47,800	136,300	88,500	3,000	3.6%
Reference Scenario	47,800	156,300	108,500	3,600	4.0%
High Scenario	47,800	174,800	127,000	4,000	4.4%

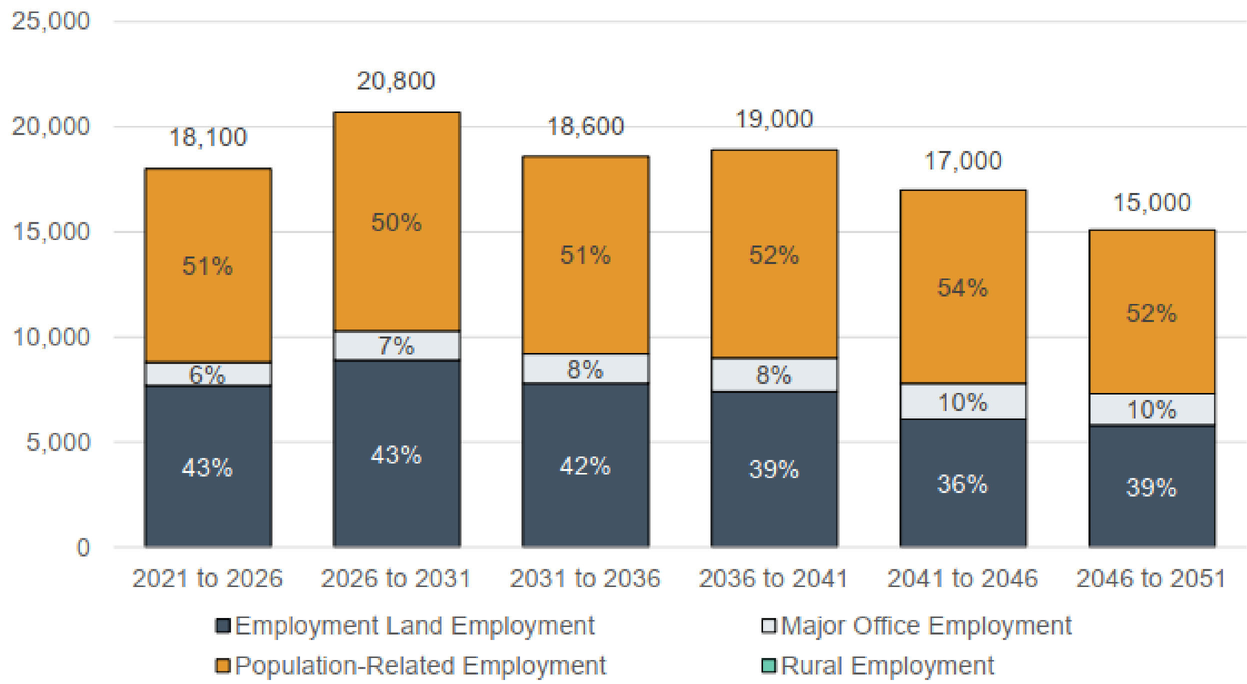
Note: Figures have been rounded.
Source: Historical data derived from Statistics Canada Place of Work data; forecast prepared by Watson & Associates Economists Ltd.

SOURCE: Figure ES-3 in the Watson LNA, 2024

Within these totals, Watson breaks down forecast employment growth by category and five-year period from 2021 to 2051 (Figure 6). The distribution indicates that approximately 17% of total employment growth is expected between 2021 and 2026, 19% between 2026 and 2031, 17% between 2031 and 2036, 18% between 2036 and 2041, 16% between 2041 and 2046, and 14% between 2046 and 2051, under the reference scenario. These proportions, when applied to the total forecast job growth (108,500 new jobs in the reference scenario and 127,000 new jobs in the high scenario), provide the profile this report uses to assess whether additional employment lands will be required to support Milton's employment growth.

Figure 6: Total Employment Growth Forecast by Category, 2021 to 2051

Figure 6-17
Town of Milton
Total Employment Growth Forecast by Employment Category, 2021 to 2051



Note: Figures include work at home and N.F.P.O.W. employment. Numbers may not add up precisely due to rounding.
Source: Watson & Associates Economists Ltd.

SOURCE: Figure 6-17 in the Watson LNA, 2024

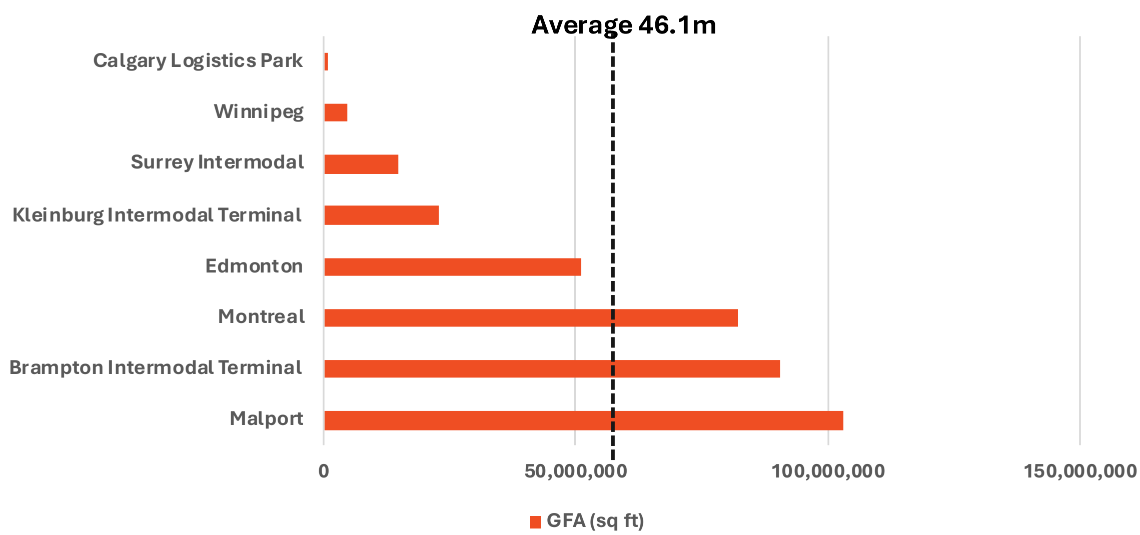
3 Demand for Employment Areas

3.1 Intermodal Hubs

Across Canada, major intermodal rail facilities are consistently associated with substantial concentrations of warehouse, logistics and distribution space in their immediate vicinity. The eight benchmark hubs reviewed for this study accommodate approximately 370 million square feet of industrial gross floor area (GFA) within their associated industrial parks and surrounding business districts, with an average of 46 million square feet of industrial space in each node and with individual hubs ranging from roughly 900,000 square feet to more than 102 million square feet of GFA.

Several of these hubs, including facilities in the Greater Toronto Area, Winnipeg, and Calgary, also have additional space under construction and significant inventories of as-yet-unbuilt industrial land, indicating that intermodal-oriented employment growth is ongoing rather than complete.

Figure 7: Intermodal Hubs Across Canada



SOURCE: urbanMetrics Inc., 2026

Figure 7 illustrates the spatial distribution of major Canadian intermodal hubs and the scale of industrial development that has clustered around them. The hubs range from approximately 900,000 square feet to more than 102 million square feet. This chart shows that intermodal facilities in the Greater Toronto Area, Calgary, Winnipeg, Edmonton, Montreal, and other markets serve as focal points for large concentrations of warehouse, logistics, and distribution uses, often exceeding 50 million square feet of GFA in a single node. Significant industrial development is expected for the Calgary Logistics Park in the coming years.

In the Greater Toronto Area, the Kleinburg, Brampton and Malport intermodal terminals illustrate how these facilities anchor large-scale industrial clusters. Together, the business parks surrounding these three hubs accommodate over 216 million square feet of distribution and logistics space, with large single-tenant buildings commonly exceeding 500,000 square feet of GFA. Independent market analysis of the Brampton Intermodal Terminal reports approximately 47 million square feet of industrial space in buildings of at least 100,000 square feet within 5 kilometres of the facility[1], and notes that intermodal infrastructure has been a key driver of sustained industrial construction in this part of the GTA.

The tenant profile around these hubs underscores the extent to which rail-served locations are attractive to major national and international firms. Surrounding businesses include large-format distribution centres and warehouses for retailers and manufacturers such as The Home Depot, Costco, Canadian Tire, Loblaws, Princess Auto, Dollarama, Tim Hortons, Whirlpool, Suncor and other well-known brands, as well as leading third-party logistics providers and freight companies.

The scale of industrial GFA already developed around comparable facilities, together with the presence of high-profile, high-impact logistics users, demonstrates that a modern intermodal terminal functions as a catalyst for sustained employment-oriented development rather than as a standalone infrastructure project.

The scale of industrial demand generated by comparable terminals underscores a critical planning challenge: because this demand materializes in the years following terminal approval and operationalization, it is difficult to forecast. The Watson LNA reflects employment land demand conditions that predate the terminal and does not account for the logistics and industrial interest that evidence from other hubs consistently shows follows major intermodal infrastructure investment. In this

[1] Avison Young (2018). "Intermodal Logistics in the Greater Toronto Area: The Relevance of Intermodal in the E-commerce Age."

respect, the reference scenario can be understood as a floor, not a central estimate, for the purposes of long-term employment land planning in Milton

The in-development CN Milton Logistics Hub would extend this established pattern into Milton, leveraging CN's national intermodal network while creating a new focal point for large-format industrial development and related employment within the Town's expanding employment land base. The inclusion of the Subject Lands within the urban boundary and redesignation to an industrial-supportive employment-based land use will support expected industrial growth while leveraging its proximity to the intermodal hub.

3.2 Employment Forecasts

The Halton Regional Official Plan (May 2024) allocates 136,270 total jobs to Milton by 2051[2]. However, during the Regional OP process, Milton categorized this allocation as understating Milton's long-term employment potential and risking an imbalance between residents and jobs, with independent analysis recommending that Milton's 2051 employment allocation be increased to an alternative allocation of 155,000 jobs to maintain a more appropriate residents-to-jobs ratio and a complete community structure[3].

Considering these concerns, this report relies on the higher, Milton-specific employment forecasts prepared by Watson & Associates, which align more closely with the alternative employment allocation of approximately 155,000 jobs by 2051. This high scenario projects total employment growth in Milton at 127,000 new jobs from 2021 to 2051.

Using Watson's growth-by-employment-category distributions (their Figure 6-17), this study isolates the subset of that growth occurring in the employment land employment ("ELE") category, yielding 43,919 new ELE jobs between 2021 and 2051 in the reference scenario and 51,409 new ELE jobs over the same period in the high scenario. Figure 8 summarizes these scenario-based ELE forecasts and the stepwise growth expected across the six five-year periods to 2051.

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[2] Table 1 – Population and Employment Distribution
[3] The Corporation of the Town of Milton. (2021, June 21). *Supplementary Report to DS-028-21 and DS-039-21 regarding Halton Regional Official Plan Review – Milton's Response to the Growth Concepts Discussion Paper* (Report No. DS-055-21).

Figure 8: Employment Land Employment Growth 2021 to 2051

Reference Scenario					
	Employment Land Employment Growth Forcast (reference Scenario)	Annual growth	Actual Annual Growth	Total Actual Growth	Percent of Growth Estimate Achieved
2021 to 2026	7,783	1,557	913	4,566	59%
2026 to 2031	8,944	1,789			
2031 to 2036	7,812	1,562			
2036 to 2041	7,410	1,482			
2041 to 2046	6,120	1,224			
2046 to 2051	5,850	1,170			
Total	**43,919**				

High Growth Scenario					
	Employment Land Employment Growth Forcast (High Growth Scenario)	Annual Growth	Actual Annual Growth	Total Actual Growth	Percent of Growth Estimate Achieved
2021 to 2026	9,110	1,822	913	4,566	50%
2026 to 2031	10,469	2,094			
2031 to 2036	9,144	1,829			
2036 to 2041	8,674	1,735			
2041 to 2046	7,164	1,433			
2046 to 2051	6,848	1,370			
Total	**51,409**				

SOURCE: Data from Watson LNA, 2024; urbanMetrics Inc., 2026

As this report is being prepared in 2026, we have compared Watson's forecasts for the 2021–2026 period against observed development outcomes. Using Watson's percentage allocations for each period, the high scenario projected 9,110 new employment land jobs between 2021 and 2026. Calculated employment values for 2021–2026 show that approximately 4,566 ELE jobs have been created to date, representing about 50% of the forecasted growth under the high scenario.

This variance between forecast and realized ELE growth is a critical finding for the balance of the analysis. It confirms that, while the long-term 2051 employment targets remain in place, Milton is currently underperforming both the reference scearnio and high scenario trajectories for ELE employment growth. To close this emerging gap and remain on course to achieve the 2051 ELE targets, the Town will need to facilitate the acceleration of industrial and logistics development over the remaining 25 years.

3.3 Density Targets

There are a variety of relevant density targets or calculations to consider when planning for long-term employment land needs in Milton.

- **The Halton Regional Official Plan (May 2024) identifies an employment area density target for Milton of approximately 19 jobs per hectare by 2041[4].**

  Given Milton's existing and emerging industrial base, and observed performance in recent years, this report does not adopt that density target for land needs purposes, as it is materially lower than what is already being achieved in some of the Town's employment areas and would overstate the land required to accommodate realistic industrial and logistics development outcomes.

- **The forecasts in the Watson LNA (their Figure 7-10) assume an employment density of approximately 26 jobs per hectare for Milton's employment lands by 2051.**

  This provides a more appropriate benchmark for long-term planning. However, using observed data for the 2021–2026 period—4,566 new employment land employment jobs and approximately 186 hectares of newly developed employment land— urbanMetrics calculates a realized employment land employment density of 24.5 jobs per hectare over the first five-year period.

- **The 2021 Milton DC Background Study reported approximately 15,600 industrial jobs, and the Watson LNA identified about 1,230 hectares of developed industrial land in 2023, corresponding to 12.68 jobs per hectare.** Considering the higher-density development completed since 2021, we estimate Milton's current employment land job density at approximately 16.25 jobs per hectare.

[4] Table 2 – Intensification and Density Targets

To test the sensitivity of land needs to employment-density assumptions, this report carries forward three density scenarios into the land-budget analysis in Section 3.4.

- Scenario A applies Watson's 2051 density estimate of 26 jobs per hectare;
- Scenario B applies the recent-period realized density of 24.5 jobs per hectare from 2021 to 2026;
- Scenario C uses a conservative density of 19 jobs per hectare which still exceeds the cumulative Town-wide density observed to date.

These three density assumptions (Scenarios A-C) are then combined with the employment land employment forecasts from Section 4.1 to calculate the range of additional employment land area required to meet Milton's 2051 ELE targets, and to evaluate how much of that need could logically be accommodated on the Subject Lands.

3.4 Land Need

The employment land need calculations in this report combine the employment land employment forecasts from Section 4.2 with the density assumptions outlined in Section 4.3 to estimate the additional employment land area required by 2051 under both the reference and high scenarios.

For each scenario, the number of new ELE jobs is divided by an assumed jobs-per-hectare density to determine the gross hectares of additional employment land needed to accommodate that growth. This approach allows the analysis to test how sensitive Milton's land need is to the three different evidence-based density outcomes drawn from recent performance and the Watson LNA's longer-term projections.

As summarized earlier, the Watson LNA projects total ELE growth of 43,919 jobs from 2021 to 2051 under the reference scenario and 51,409 jobs under the high scenario. Adjusted for the 4,566 jobs supported through development between 2021 and 2026, this results in growth from 2026 to 2051 of 46,843 ELE jobs under the high-growth scenario. Three density assumptions are carried forward:

- Scenario A: 26 jobs per hectare, consistent with the Watson LNA 2051 employment density assumption for Milton's employment lands.

- Scenario B: 24.5 jobs per hectare, reflecting the realized density of 4,566 employment land employment jobs over the approximately 186 hectares developed between 2021 and 2026.
- Scenario C: 19 jobs per hectare, approximating the cumulative Town-wide density to date, based on 20,166 employment land jobs over 1,241 hectares of developed employment land by 2026.

Applying these densities to the forecast employment land employment growth yields a range of land needs, as shown in Figure 9. Under the high projection of 46,843 jobs, the corresponding land needs range from:

- approximately 1,802 hectares (Scenario A)
- to 1,912 hectares (Scenario B)
- and 2,465 hectares (Scenario C).

Figure 9 illustrates how the land requirement increases as assumed densities decline, reinforcing the importance of both supporting higher-intensity industrial formats where feasible and ensuring that sufficient land is designated to accommodate growth even under more conservative density outcomes. The total land warranted accounts for portions of employment land that are undevelopable for various reasons and includes a 10% increase in each density scenario. This ensures that the amount of land budgeted for employment use will accommodate the expected growth.

Figure 9: Land Need by Density Assumption, 2021 to 2051

High Growth Scenario								
	ELE Growth Forcast (High)	Annual Growth	Actual Annual Growth	Total Actual Growth	% of Growth Estimate Achieved	Land Warranted (ha) for 2026-2051 - 26 jobs/ha	Land Warranted (ha) for 2026-2051 - 24.5 jobs/ha	Land Warranted (ha) for 2026-2051 - 19 jobs/ha
2021 to 2026	9,110	1,822	913	4,566	50%	175	185	239
2026 to 2031	10,469	2,094				403	427	551
2031 to 2036	9,144	1,829				352	373	481
2036 to 2041	8,674	1,735				334	354	457
2041 to 2046	7,164	1,433				276	292	377
2046 to 2051	6,848	1,370				263	280	360
Total	**51,409**					**1,802**	**1,912**	**2,465**
Total Land Warranted (with 10% undevelopable land assumption)						**1,982**	**2,103**	**2,712**

SOURCE: Data from Watson LNA, 2024; urbanMetrics Inc., 2026

In the following sections, these land need ranges are compared with Milton's existing vacant employment land supply to determine whether a shortfall exists under each scenario and, if so, to assess the extent to which the proposed redesignation of the Subject Lands can address that shortfall and support the timely delivery of additional industrial and logistics capacity.

As stated previously, the Watson LNA did not directly account for employment growth associated with the development of the CN intermodal hub. As a result, it is reasonable to consider that the land-needs reference scenario is on the low end of what can be expected over the long term. Therefore, moving forward in this report, the high-growth scenario will be used to predict land needs in Milton.

This is not simply a conservative choice between two scenarios: it reflects a judgment that a significant piece of infrastructure will create employment-generating conditions that could not be accurately modelled at the time the LNA was completed. Section 4.1 provides additional context for this conclusion by examining the scale of industrial development clustered around comparable intermodal facilities across Canada.

4 Land Supply

Since the completion of Watson's 2024 land needs work, Milton's vacant employment land supply has been reduced slightly. Our review of development identified approximately 11 hectares that have been developed between 2024 and the start of 2026.

In addition, several industrial projects identified in or before the Watson analysis have now been completed, with most having already broken ground by 2023. Beyond these completions, an evaluation of future supply includes a cluster of new buildings under construction on a large employment land parcel, along with a smaller set of other industrial developments at various stages of approval.

Within this evolving but still supply-constrained context, the Subject Lands—immediately adjacent to the CN intermodal lands and well connected to the 400-series highway network—stands out relative to other identified expansion areas in terms of its locational advantages and its potential to build out earlier in the planning horizon, which is a central consideration in the subsequent assessment of whether additional employment lands are required and where they should be directed.

4.1 Employment Land Inventory

Figure 10 presents the breakdown of the existing land supply. There was no change observed across any of the three expansion lands, as well as the Southwest Milton, Agerton Employment Area, and Bronte Triangle Employment areas, from the reported values in the Watson LNA 2024 report.

Figure 10: Current Employment Land Inventory

Employment Area	Total Size (ha) (2026) (includes recently completed & under deveopment)	Developed (ha)	Vacant (ha)	% Vacant	Jobs created (2021-2026)	Jobs to be created 2026 (under development)	Total Job Growth (2021-2026)
Milton 401 Industrial Business Park	940	901	39	4%	**979**	0	979
401 Industrial/ Business Park Expansion (North Porta)	140	<5	140	99%	0	0	0
Derry Green Business Park	600	**270**	**330**	55%	**3352**	**235**	3587
SouthWest Milton	320	20	310	95%	0	0	0
Agerton Employment Area	240	30	210	89%	0	0	0
Bronte Triangle Employment	20	20	<5	5%	0	0	0
Town of Milton Total Designated Employment Lands	2,260	1,241	1,029	46%	4,331	235	4,566
Milton 407 Expansion Employment	740	0	740	100%	0	0	0
Sixth Line Expansion Employment	30	0	30	100%	0	0	0
Rattlesnake Expansion Employment	40	0	40	100%	0	0	0
Town of Milton Total Employment Area Expansion Lands	800	0	800	100%	0	0	0
Town of Milton Total Employment Land Inventory	**3,070**	**1,241**	**1,839**	**60%**	**4,331**	**235**	**4,566**

SOURCE: Watson LNA, 2024; urbanMetrics Inc., 2026

As of 2026, we estimate that Milton has approximately 1,241 hectares of developed employment land (including sites under construction) and 1,839 hectares of vacant employment land, before accounting for active development applications. Within this supply, the Milton 401 Industrial Business Park and Derry Green Business Park remain the primary locations for industrial and logistics activity, accommodating the majority of the 4,566 new ELE jobs created between 2021 and 2026.

When the current pipeline of employment land applications is included, the amount of vacant land decreases slightly to 1,798 hectares, reflecting the fact that a portion of the vacant inventory is now effectively committed. Included in this figure are a proposed conversion application to remove 21 hectares of employment land and another to add 2 hectares of employment land. In total, the current pipeline of development activity on employment lands is expected to support approximately 5,050 ELE jobs, comprising 4,566 jobs created between 2021 and 2026 and roughly 484 additional jobs associated with projects at various stages of approval and development.

When these updated supply figures are compared with the land needs ranges generated in section 3.4, even under optimistic density assumptions, Milton will require additional employment lands to accommodate forecasted ELE growth to

2051. The Subject Lands, therefore, need to be evaluated not against a backdrop of surplus employment land, but in the context of a constrained and increasingly committed employment land inventory in which strategic, well-located expansions are necessary to meet long-term employment objectives.

Under the 26 jobs-per-hectare scenario, there is a land requirement of 143 hectares beyond the existing supply. Under the 24.5 jobs per hectare scenario, the land requirement is 264 hectares beyond the existing supply; under the 19 jobs per hectare scenario, the land requirement is 873 hectares beyond the existing supply (Figure 11).

Figure 11: Land Need vs. Land Supply – Current

	Land Warranted (ha) 2026-2051	Land Supply (2026) (ha)	Land Deficit (ha)
26 jobs/ha	1,982	1,839	**143**
24.5 jobs/ha	2,103	1,839	**264**
19 jobs/ha	2,712	1,839	**873**

SOURCE: Watson LNA, 2024; urbanMetrics Inc., 2026

If all development applications that impact employment land are approved, the remaining land need will be further reduced. In this case, under the 26 jobs-per-hectare scenario, there would be a land requirement of 184 hectares beyond the existing supply. Under the 24.5 jobs per hectare scenario, there would be a land need of 305 hectares beyond the existing supply, and under the 19 jobs per hectare scenario, there would be a land need of 914 hectares beyond the existing supply. Figure 12 below shows these calculations.

Figure 12: Land Need vs. Land Supply - Including Development Pipeline

	Land Warranted (ha) 2026-2051	Land Supply (2026) (ha)	Land Deficit (ha)
26 jobs/ha	1,982	1,798	**184**
24.5 jobs/ha	2,103	1,798	**305**
19 jobs/ha	2,712	1,798	**914**

SOURCE: Watson LNA, 2024; urbanMetrics Inc., 2026

4.2 Future Employment Lands

Beyond the existing urban employment areas, Milton's long-term supply includes three designated Employment Area Expansion Lands identified in recent planning work: the Milton 407 Expansion Employment Area, the Sixth Line Expansion Employment Area, and the Rattlesnake Expansion Employment Area.

Collectively, these lands are intended to accommodate a significant share of future industrial and logistics growth; however, their relative locations, access characteristics, and market readiness differ from those of the Subject Lands and have important implications for the sequencing and likelihood of near-term build-out.

The Milton 407 Expansion Employment Area is situated along the Highway 407 corridor to the east. While this corridor has strong long-range potential, industrial developers are expected to focus most intensely on it once Highway 413 construction is sufficiently advanced or operational, as the corridor's full goods-movement advantages will only be realized at that stage.

The Rattlesnake Expansion Employment Area is relatively isolated from existing industrial clusters and major goods movement infrastructure, making it a less intuitive and less attractive near-term focus for large-format industrial investment.

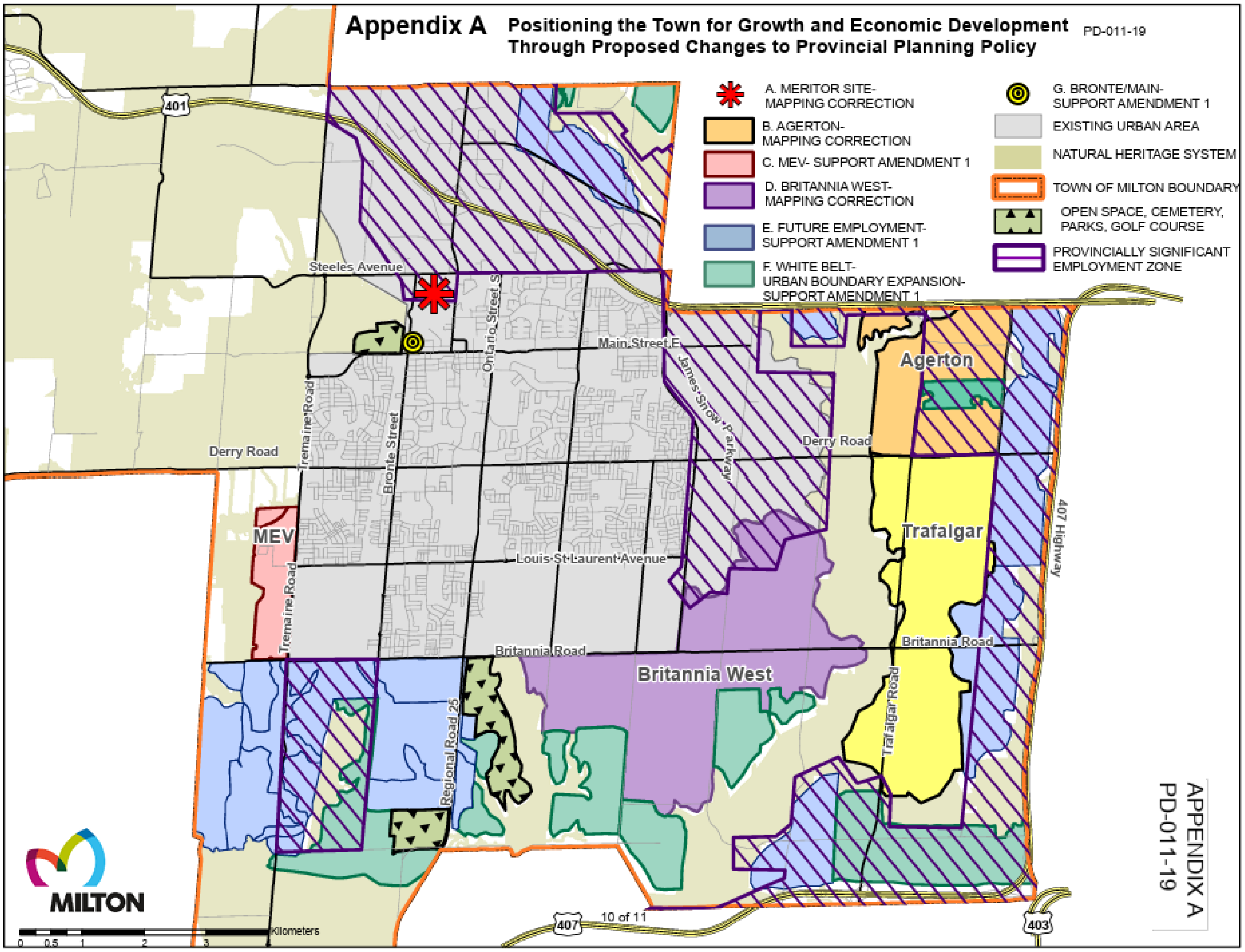
The lands surrounding the in-development CN Milton Intermodal Hub, including the Subject Lands, represent a categorically different kind of opportunity than the other expansion areas. While highway access is a precondition for industrial logistics development, proximity to an active intermodal terminal is the locational attribute that drives the most significant concentration of warehouse and distribution investment, as demonstrated by other hubs across Canada.

Users seeking rail-served or rail-proximate locations cannot substitute highway-only sites. As such, the demand generated by the intermodal terminal will seek out the Subject Lands and the immediate surrounding area, specifically, not simply the nearest available employment lands in the region. Given these potential demand pressures, the intermodal area is likely to undergo earlier and more concentrated industrial development than in more peripheral expansion zones, supporting the case for designating the Subject Lands as employment land to ensure Milton's future employment supply aligns with where market demand will first materialize.

It is important to note that the majority of the Subject Lands were previously identified as a Provincially Significant Employment Zone. The remainder of the Subject Lands not covered by this designation fall under the Future Employment

Designation. Figure 13 shows the land in the Make It Possible Report (2019) towards the bottom left.

Figure 13: 2019 Make it Possible Land Use Map



SOURCE: The Town of Milton Make it Possible Report, Appendix A, 2019

The most up-to-date land use plans from the Town of Milton show that the entirety of the Subject Lands is not included in the designated employment lands. However, the CN-owned lands to the west of the railway are designated as the Milton Southwest Employment Area. The Subject Lands are a natural extension of these employment lands and would complement the growth expected to follow once the CN intermodal hub is in operation.

5 Conclusions

The land needs analysis prepared by uMi demonstrates that, in the likely scenario that long-term industrial demand exceeds previous projections, the Town of Milton will require the addition of between 143 and 914 hectares of new employment lands to accommodate forecasted employment land growth to 2051. Even using the Town's reference employment projections, performance against employment and density targets between 2021 and 2026 indicates a need for additional employment lands over the projection period.

The exact requirement depends on the employment density achieved and the status of current development applications. The most likely outcome is that future growth will continue at a pace and density generally consistent with the past five years (2021–2026), reflecting an employment land density of approximately 24.5 jobs per hectare. Under this scenario, the Town would require an additional 264 hectares of employment land to 2051 to support the projected growth of approximately 46,843 jobs from 2026 to 2051.

The Subject Lands are well-positioned to absorb a significant share of the estimated land need. With a total area of approximately 239 hectares, the Subject Lands could accommodate roughly 90% of the Town's forecasted employment land needs under the 24.5 jobs per hectare density scenario. Based on the 2021 Development Charges Background Study (which identifies an average density of 1,750 square feet per industrial job) and current observed densities, the Subject Lands could support approximately 5,000 industrial jobs.

The CN Milton Intermodal Hub presents the Town with a strategic opportunity to capture future industrial growth by extending the urban boundary to include the Subject Lands.

The CN Milton Intermodal Terminal represents a significant and long-term infrastructure investment with demonstrated capacity to attract national and international logistics and distribution users to the Town. Evidence from comparable facilities across Canada is consistent: intermodal terminals generate sustained concentrations of industrial development in their immediate area, with the largest users specifically seeking adjacency to terminal operations. This demand was not reflected in prior employment projections and constitutes an additional basis — beyond the land budget analysis — for designating employment lands adjacent to the terminal without delay.

Positioning the Subject Lands within the urban boundary ensures that Milton can leverage this infrastructure investment to advance its long-term economic development objectives and provide the employment base needed to support a complete community through 2051.

Doing so would allow the Town to meet most of its long-term employment land needs and advance its goal of achieving approximately 51,400 new ELE jobs from 2021 to 2051.

A1 Active Industrial Developments

Ward	Address	Building Number	Street	Lat	Long	Employment Land Area	Parcel Size (ha)	Size of building(s) (sq m)	Size of Building (sqft)
2	11801	A	Derry Road	43.54467	-79.82107	Derry Green Corporate Business Park (Milton Gates Business Park)	**7.6**	5,084 sq m	**54,724**
2	11801	C	Derry Road	43.54508	-79.82226	Derry Green Corporate Business Park (Milton Gates Business Park)	part of ^ parcel	10,641 sq m	**114,539**
2	11801	B	Derry Road	43.54391	-79.82189	Derry Green Corporate Business Park (Milton Gates Business Park)	part of ^ parcel	4,151 sq m	**44,681**
2	11801	D	Derry Road	43.5451	-79.82427	Derry Green Corporate Business Park (Milton Gates Business Park)	part of ^ parcel	8,302 sq m	**89,362**
2	11801	E	Derry Road	43.54426	-79.82356	Derry Green Corporate Business Park (Milton Gates Business Park)	part of ^ parcel	3,555 sq m	**38,266**
2	11801	F	Derry Road	43.54468	-79.82316	Derry Green Corporate Business Park (Milton Gates Business Park)	part of ^ parcel	6,499 sq m	**69,955**

A2 Future Industrial Supply

Ward	Address	Street	Lat	Long	In Employment Lands?	Size of Parcel (hectares)	Parcel Size within Employment Lands	Industrial GFA (Sq m)	Industrial GFA (sqft)	Status	Current Zoning	Proposed Zoning	adding or removing employment/industrial lands?
1		150 Steeles Avenue East, 248, 250 and 314 Martin Street	43.51851	-79.89704	**401 Industrial/Business Park**	**20.8**	**154,500 sq m**	**0 sq m**	**-**	Under Review	M1	MX	Removing
2	8465	Boston Church Road	43.53809	-79.89337	**401 Industrial/Business Park**	**2.02**	**20,200 sq m**	**71.3 sq m**	**768**	public meeting held on jan 26th 2026	I-B	M2	Adding
2	7072	Sixth Line	43.54606	-79.82305	**Derry Green Corporate Business Park**	**1.07**	**10,700 sq m**	**720 sq m**	**7,750**	Under Review	FD	M2*349-H82	Neither
3		Part of Lot 9, Concession 6 NS, Formerly Trafalgar Township	43.53386	-79.81995	**Derry Green Corporate Business Park**	**12.9**	**128,500 sq m**	**52,520 sq m**	**565,321**	Under Review	FD	M1	Neither
3		Part of Lot 10, Concession 6 NS, Trafalgar Township	43.53398	-79.82454	**Derry Green Corporate Business Park**	**2.7**	**27,300 sq m**	**12,400 sq m**	**133,473**	Under Review	FD	M1	Neither
2	8329	Esquesing Line	43.54883	-79.88574	**401 industrial park extension**	**1.05**	**10,475 sq m**	**1,200 sq m**	**12,917**	approved	FD	M2	Neither
2	8283	Esquesing Line	43.54839	-79.88475	**401 industrial park extension**	**2.0**	**19,969 sq m**	**7,500 sq m**	**80,730**	Under Review	FD	M1	Neither

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