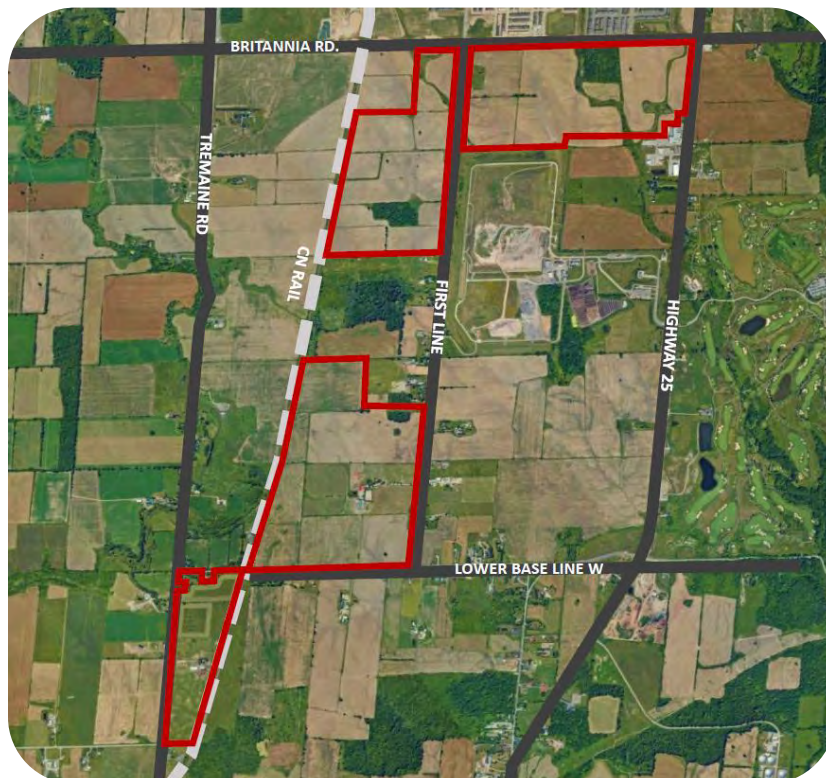


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PLANNING JUSTIFICATION REPORT

MILTON LINK, TOWN OF MILTON



Prepared For:
TRIBAL DEVELOPMENT MANAGEMENT SERVICES INC.
JUNE 18, 2026

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EXECUTIVE SUMMARY

Armstrong Planning & Project Management has prepared this Planning Justification Report on behalf of Tribal Development Management Services Inc (doing business as “Matthews”) in support of Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) applications facilitating the proposed industrial development to be known as “Milton Link”. The Subject Lands are comprised of approximately 240 ha of largely agricultural land generally bounded by Britannia Road, Regional Road 25 (Highway 25), Side Road No. 2, and Tremaine Road in the Town of Milton.

The proposal seeks to redesignate the lands from Prime Agricultural Area / Rural Area to **Industrial Area** and bring them into the Sustainable Halton Urban Area boundary, coupled with its respective rezoning from Agricultural (A1) and Greenlands ‘A’ (GA) to **General Industrial (M2) with site-specific provisions, Natural Heritage (NHS) and Stormwater Management (OS-2)**. At full build out, the proposed development will be delivered in four phases and accommodate 11 industrial buildings (labelled as Buildings 1A-1C, 2A-2C, 3A-3D and 4A on the concept plan) to support warehousing, logistics, and light industrial uses with ancillary office space. The proposed development provides approximately 812,000 m² of industrial GFA, 4,600 vehicle parking spaces, 2,000 loading spaces, and is anticipated to support up to 5,000 jobs. The proposed development’s configuration has been designed to provide for a goods-movement network with multiple truck and car access points, internal circulation and loading docks, and six stormwater management ponds. Existing woodlots, wetlands, and key natural heritage features are retained and buffered, with a strong emphasis on landscaping, an integrated active transportation network, and includes a landscaped berm along Britannia Road to mitigate visual and noise impacts on nearby residential areas.

Economic, Fiscal, and Land Needs Assessments prepared by urbanMetrics conclude that Milton Link will accommodate both planned growth and unaccounted for growth related to the CN Milton Logistics Hub. The proposed development will **generate approximately \$2.8 billion in capital investment, and roughly \$1.1 billion in government revenues, including an estimated \$22.8 million in recurring annual property tax revenues for Milton and Halton Region**. The proposed development positions the lands, in conjunction with the CN Milton Logistics Hub, as a premier, market-ready industrial employment node within the Regional goods-movement network, significantly strengthening Milton’s economic competitiveness.

The proposed development demonstrates strong conformity with the Planning Act and Provincial Planning Statement (2024), while at the local level, the proposed development implements the employment and growth management direction of the Town of Milton Official Plan and the Halton Region Official Plan. The proposed redesignation and urban boundary expansion would significantly contribute to Milton’s 2051 Employment Area targets while meeting and achieving the required criteria for an urban boundary expansion under Section 2.1.1.20 of the Official Plan.

To further support the urban boundary expansion, the Subject Lands were previously recognized as part of a Provincially Significant Employment Zone which signaled the original intent for these lands.

Comprehensive technical studies including economic, fiscal, land needs, agricultural impact, natural heritage, transportation, arborist, urban design brief, stormwater and servicing, noise and vibration, air quality, heritage impact and archaeology reports support both the proposed development and the proposed urban area boundary expansion. Collectively, these reports demonstrate that the proposed development will deliver significant employment and fiscal benefits to the Town and Region, protects key environmental features, and represents a logical, infrastructure efficient expansion of Milton's Urban Area in line with local and Regional policies.

In summary, the Milton Link project complements the CN intermodal operation while providing the range of employment uses required to ensure a strong and economic viable employment zone in the heart of the Greater Toronto Area. This rare opportunity combines all forms of employment uses in one employment logistics area representing a collective benefit to the local municipality, Region and the Province, and thus warrant approval by the approval authorities.

1.0 INTRODUCTION

Armstrong Planning & Project Management have been retained to prepare a Planning Justification Report in support of an Official Plan Amendment and Zoning By-law Amendment application on behalf of the Proponent, Tribal Development Management Services Inc. (doing business as "Matthews"). The Proponent is advancing the development of lands located adjacent to the CN Logistics Hub in the Town of Milton. Official Plan and Zoning By-law Amendments are being pursued to designate the Subject Lands as Industrial Area and 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.

The area comprises several parcels generally bounded by Britannia Road to the north, Highway 25 to the east, No. 2 Side Road to the south, and Tremaine Road to the west, within the Town of Milton (herein referred to as the "Subject Lands" or "site"). **Figure 1** illustrates the site boundaries on an aerial image.

The proposed development represents a significant opportunity to transform largely underutilized lands adjacent to the CN Logistics Hub into an industrial warehousing development. The proposed development leverages the site's location, and its proximity to key transportation corridors including Highway 407, providing an opportunity to strengthen and enhance Milton's goods-movement and logistics network. The overall development is organized into four phases and will accommodate 11 industrial buildings (labelled as Buildings 1A-1C, 2A-2C, 3A-3D and 4A on the concept plan) designed to support a range of warehousing, logistics, and light industrial uses with ancillary office use. Collectively, the buildings will provide approximately 812,000 square metres of industrial Gross Floor Area (GFA) and are anticipated to generate approximately 5,000 jobs. The site layout has been configured acknowledging its proximity to adjacent residential uses, optimize operational efficiency, provide ample vehicular and loading facilities, and integrate six stormwater management ponds while retaining and buffering existing wood lots and wetlands and mitigating impacts on adjacent sensitive uses.

In addition to providing detailed information on the enclosed applications, this report will evaluate the proposed development in relation to the current provincial and municipal policy frameworks, including the Planning Act, Provincial Planning Statement (2024), and Town of Milton Official Plan (Office Consolidation, February 2026). This report provides justification for the proposed development in accordance with the established policies regulating growth and development.

1.1 Location and Surrounding Uses

The Subject Lands are comprised of 16 parcels of land in the Town of Milton, and for the purpose of this application, the municipal addresses of 5122 and 5761 First Line will be used to identify the Subject Lands. The proposed development is also known by the Project name “Milton Link”.

The site is approximately 240 hectares in size comprised of various parcels of land, all generally rectangular in shape. The site’s primary frontages are on the south side of Britannia Road from First Line to Regional Road 25, First Line from Britannia Road to Lower Base Line, and Tremaine Road from Lower Base Line to approximately 1.25 km south of Lower Base Line. The lands currently support largely agricultural-related uses. Surrounding land uses include residential to the north, waste management to the east, agricultural to the south, and the CN Logistics Hub to the west.

1.2 Site Description

The Subject Lands primarily consist of agricultural lands. In addition to agricultural lands, the site contains natural heritage features along the Britannia Road frontage, and disbursed throughout the site. The site is located adjacent to the CN Logistics Hub and abuts the Halton Waste Management Site.

1.3 Character of the Existing and Planned Area

The Subject Lands are situated within a developing urban corridor characterized by existing residential uses, and planned low-high density residential uses (up to 13 storeys) to the north of Britannia Road. The Subject Lands are intersected by the CN Logistics Hub currently under construction.

Within Phase 1, the lands front the south side of Britannia Road and Regional Road 25 (Highway 25). Immediately south of the Phase 1 boundary along Regional Road 25 is the Milton Civic Operations Centre, which establishes an institutional and employment character on the east side of the site. Additionally, the Halton Waste Management Site is directly adjacent to half of Phase 1. Lands on the opposite (east) side of Regional Road 25 remain primarily agricultural.

Along the north side of Britannia Road, the existing context is characterized by low-rise residential neighbourhoods, with permissions in place to accommodate more intensive mixed-use development over time. At the northwest corner of Britannia Road and Regional Road 25, zoning approvals permit a high-density, mixed-use node, including a mid-rise building with a maximum height of 13 storeys. Further west, at the corner of Bronte Street and Britannia Road, the “Milton Elements” project has secured zoning approvals for two mixed-use buildings up to 10 storeys in height, together with back-to-back townhouse dwellings, for a total of

approximately 353 residential units. While no site plan applications have been filed for these mixed-use blocks to date, the permissions signal a planned shift toward a more urban, higher-density built form along Britannia Road.

The Phase 2 lands front First Line and Britannia Road and are currently agricultural use. The lands abut a portion of the Phase 1 lands, additional agricultural lands to the east and the CN Logistics Hub to the west, reinforcing the emerging goods-movement and employment role of the area.

Similarly, the Phase 3 lands are predominantly agricultural and are situated between other agricultural parcels and the CN Logistics Hub to the west, further integrating the Subject Lands into a broader, planned industrial and logistics cluster.

The Phase 4 lands located at 4393 Tremaine Road front Tremaine Road and Lower Base Line, and abut the CN Logistics Hub to the north. The lands are currently used primarily for agricultural uses.

Figure 2 illustrates the existing and planned area surrounding the Subject Lands.

1.4 Formal Pre - Consultation

Armstrong Planning and Project Management initiated a formal pre-consultation request on April 7, 2026, and subsequently met with staff from the Town, Region, and Conservation Halton on June 2, 2026. Formal comments were received on June 16, 2026 from the Region and Town, confirming that an Official Plan Amendment and Zoning By-law Amendment would be required to facilitate the proposed urban boundary expansion, redesignation of the Subject Lands to Industrial Area, and rezoning to the General Industrial Area (M2) Zone to permit the proposed development. Conservation Halton provided comments on June 18, 2026.

As part of the pre-consultation process, staff identified the submission requirements necessary to support the urban boundary expansion request, the proposed industrial redesignation, and the associated rezoning application.

This application has been prepared in direct response to the outcomes of the formal pre-consultation process. All reports and studies requested by staff have been submitted in support of the application, including additional technical documents such as the Economic Benefits Assessment, Air Quality Assessment, Heritage Impact Assessment, and Fluvial Geomorphological Report.

Please refer to **Section 5.0** of this report that provides a brief summary on each supporting report and study submitted as part of this application.

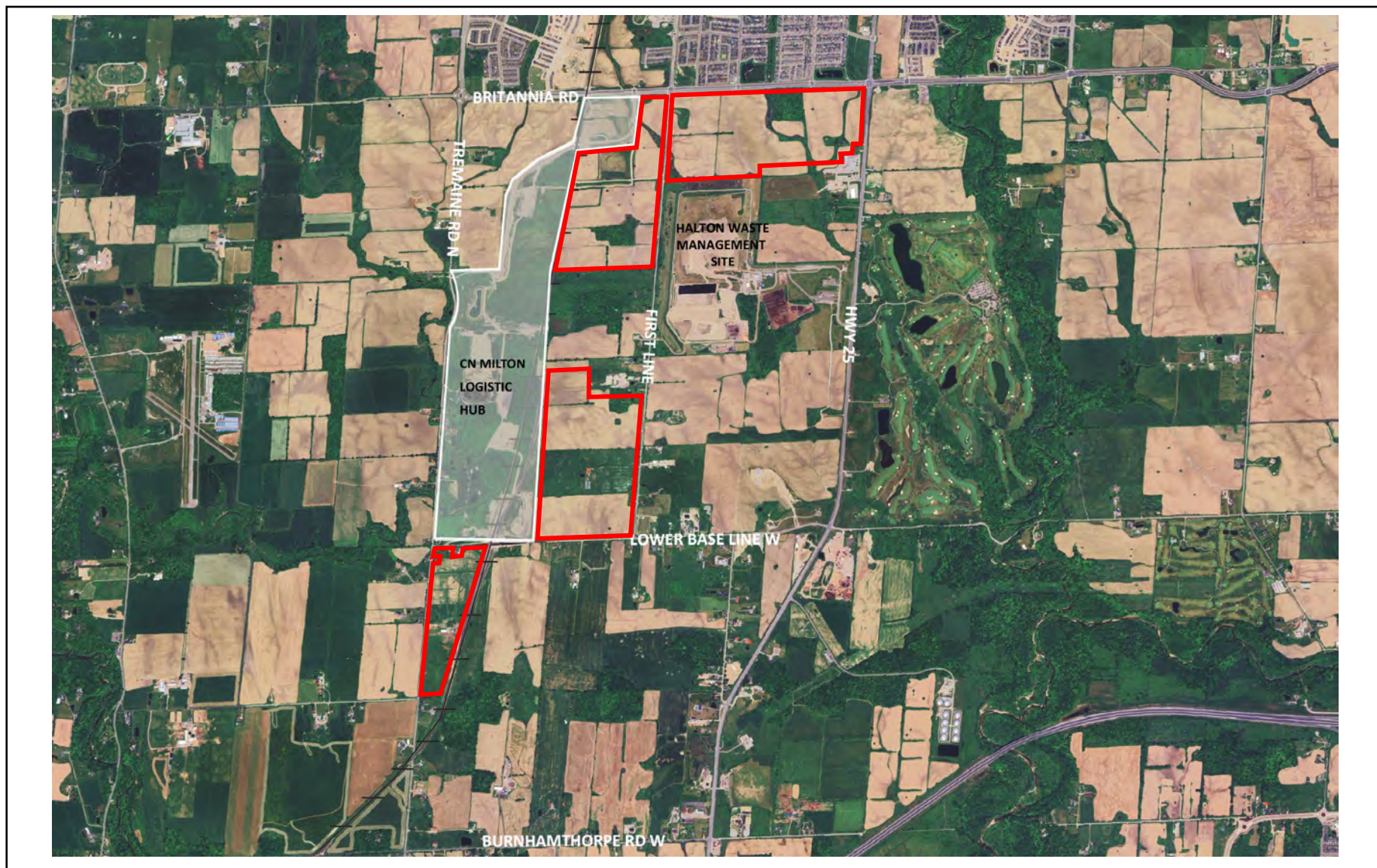


Figure 1: Site Location and Overview
Milton Link

 Subject Site

Date: June 2026



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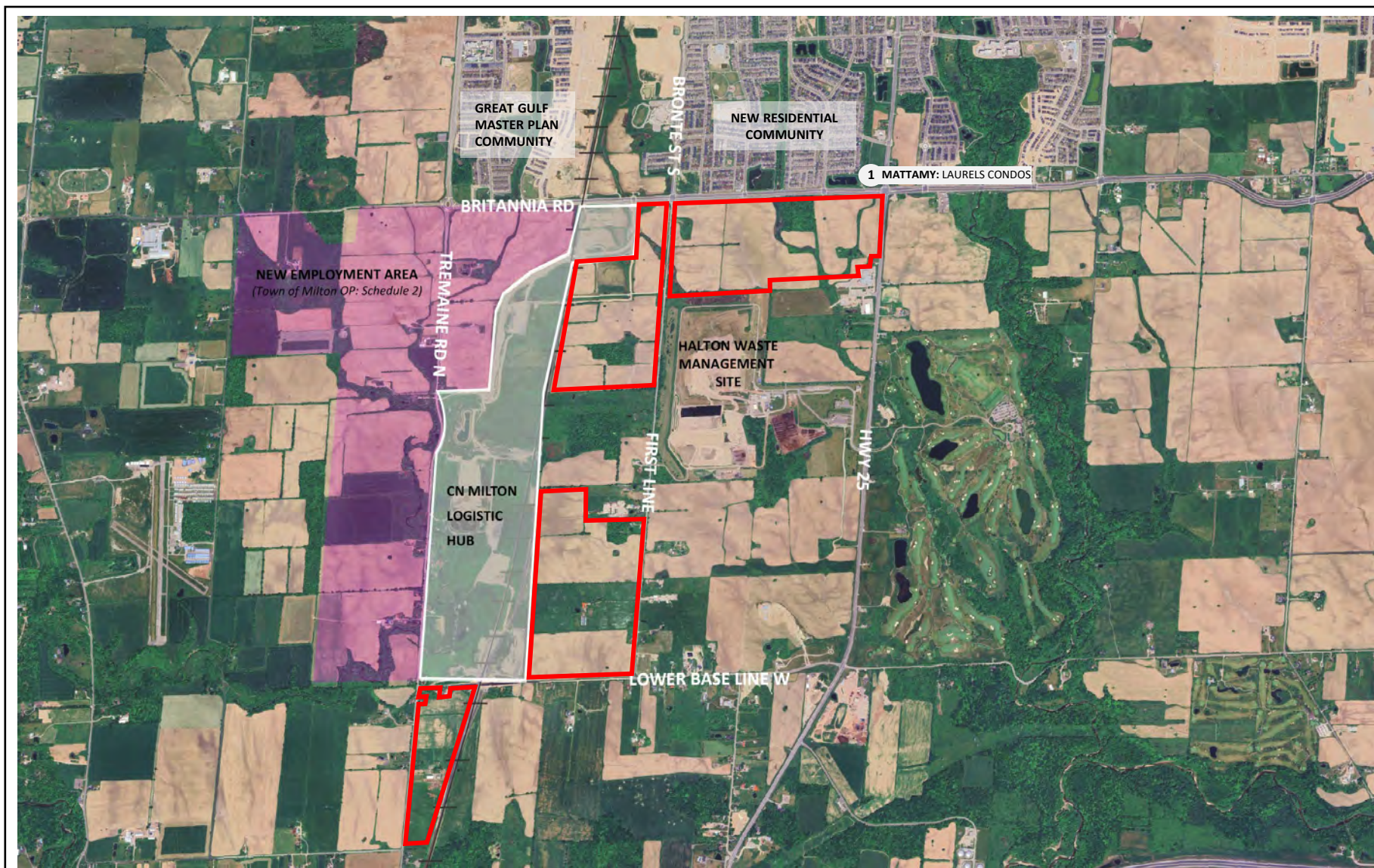


Figure 2: Planned Area Context
Milton Link

 Subject Site

Date: June 2026



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2.0 PROPOSED DEVELOPMENT

2.1 Development Proposal

The Proponent is proposing to redevelop the Subject Lands into a master planned industrial hub that is compatible and complimentary to the surrounding uses such as the CN Logistics Hub and the Halton Waste Management Site, and provides an adequate setback with a landscape buffer along Britannia Road to mitigate impacts on the adjacent residential areas.

The overall development is organized into four phases with 11 industrial buildings (referred to as Buildings 1A-1C, Buildings 2A-2C, Buildings 3A-3D and Building 4A). These buildings have been designed to accommodate a range of warehousing, logistics and light industrial uses with complementary office space. The development provides a generous amount of industrial Gross Floor Area (GFA) with ample parking spaces and loading spaces to support employment-generating uses per building while maintaining flexibility for future tenants.

The timing of each phase will respond to market demand, ensuring a flexible and economically resilient build-out strategy. The site layout considers the environmental context by retaining and framing existing wood lots and wetlands and by incorporating six stormwater management ponds strategically across the lands.

Collectively, the buildings will deliver approximately a total of 812,000 sq.m. of industrial Gross Floor Area (GFA) and is anticipated to deliver approximately 5,000 jobs. **Table 1** below reflects the key statistics of the proposed development alongside the number of anticipated employees each building will generate.

Additionally, as part of the proposed concept plan, a realignment of Tributary 1 of Sixteen Mile Creek is contemplated, specifically in the Phase 1 lands. Details of the proposed realignment and enhancement approach shall be confirmed and refined through updated submissions as the development application progresses, and will require consultation with the Town and Conservation Halton staff.

Table 1: Key Statistics

Building	Industrial GFA (sq.m.)	Vehicle Parking Spaces	Loading Spaces
PHASE 1			
1A	55,164	1,369	119
1B	94,804		203
1C	94,804		203
<i>Subtotal</i>	<i>244,772</i>	<i>1,369</i>	<i>524</i>
PHASE 2			
2A	68,646	1,054	195
2B	67,420		210
2C	45,764		73
<i>Subtotal</i>	<i>181,830</i>	<i>1,054</i>	<i>478</i>
PHASE 3			
3A	71,711	1,761	188
3B	50,667		218
3C	111,589		279
3D	78,452		165
<i>Subtotal</i>	<i>312,419</i>	<i>1,761</i>	<i>849</i>
PHASE 4			
4A	73,039	418	226
OVERALL			
	812,060	4,615	2,077

Notes:

1. Site statistics based on site plan prepared by WW+P Architects dated June 17, 2026.

Phase 1 is situated along Britannia Road and comprises three industrial buildings with a total GFA of approximately 244,790 sq.m. A landscape buffer, including berms along Britannia Road, is provided to mitigate impacts on the residential area to the north. Two stormwater management ponds are included in this phase and are separated by the existing woodlot and creek. There are two access points from Britannia Road, and one on First Line.

Phase 2 is primarily situated along First Line, with a small portion of the northern lands fronting Britannia Road. This phase includes three industrial buildings with a combined GFA of approximately 181,830 sq.m. A single stormwater management pond is provided, located adjacent to the woodlot and the protected pipeline corridor. Two access points are provided from First Line.

Phase 3 is situated along First Line and Lower Base Line to the south. Four industrial buildings are proposed in this phase, with a total GFA of approximately 312,420 sq.m. Two stormwater management ponds are planned to support this development and to protect the on-site woodlot. Two access points are provided from First Line, and one is provided from Lower Base Line West.

Phase 4 is situated south of Lower Base Line West, east of Tremaine Road and generally north of No. 2 Side Road. This phase includes one industrial building with a total GFA of approximately 73,140 sq.m., supported by an associated stormwater management pond. One access point is provided from Tremaine Road, and another from Lower Base Line West.

The development also provides ample vehicular and loading docks to support the industrial uses per phase, with an approximate total of 4,600 parking spaces and 2,000 loading spaces distributed across the site, while meeting the zoning by-law requirements.

Figure 3 illustrates the proposed site plan.

Site Access & Circulation

Site access and circulation have been carefully designed to safely and efficiently accommodate both truck and passenger vehicle movements. Multiple all-movement intersections are provided at strategic locations along the surrounding road network, with specific intersections designated for truck and car access and others limited to cars only, ensuring appropriate routing of heavy vehicles while minimizing impacts on general traffic.

Primary truck access is directed to intersections identified for “All Movement – Trucks / Cars” as noted in the site plan, providing direct connections into the industrial buildings and associated loading areas. Internal drive aisles are configured to facilitate safe and efficient circulation of trucks and trailers around and between buildings, with loading docks generally located on the interior of the blocks to reduce their visibility from public streets, adjacent sensitive uses and reduce visibility from adjacent residential areas. Dedicated areas for truck parking and maneuvering are provided in proximity to loading spaces to support industrial operations.

Passenger vehicle access is accommodated via a network of internal roads and drive aisles, with surface parking distributed throughout the site to serve office and industrial employees. Intersections identified as “All Movement – Cars” focus on accommodating employee and visitor traffic, helping to separate heavier truck movements from general vehicular traffic where feasible.

A coherent active transportation network, including sidewalks, one-way cycle tracks, and a multi-use path, is integrated into the circulation network. These facilities connect key access points, buildings, and open space features, improving walkability and cycling connectivity within the site and to the surrounding area. Overall, the proposed access and circulation strategy supports efficient industrial operations while promoting safety and multi-modal connectivity.

Figure 4 illustrates the site access and circulation of the development.

Environmental Integration

The Subject Lands contain natural heritage features which generally includes significant wetlands, woodlands, valley lands and significant habitat of Endangered and Threaten species and wildlife habitat, while a small portion in Phase 4 is identified as Natural Heritage System of the Protected Countryside of the Greenbelt Area. Based on the Natural Environmental Report prepared in support of this application, natural heritage features are recommended to be retained in-situ with no modifications, aside from the proposed realignment of Tributary 1 of Sixteen Mile Creek. The development limits, incorporated natural heritage features and its respective buffers have been informed through the Natural Environment Report (WSP, 2026).

These areas will be designated as Local Natural Heritage System, while the small portion of the lands in Phase 4 to remain its Greenbelt Plan Protected Countryside designation to restrict future development and ensure long-term protection.

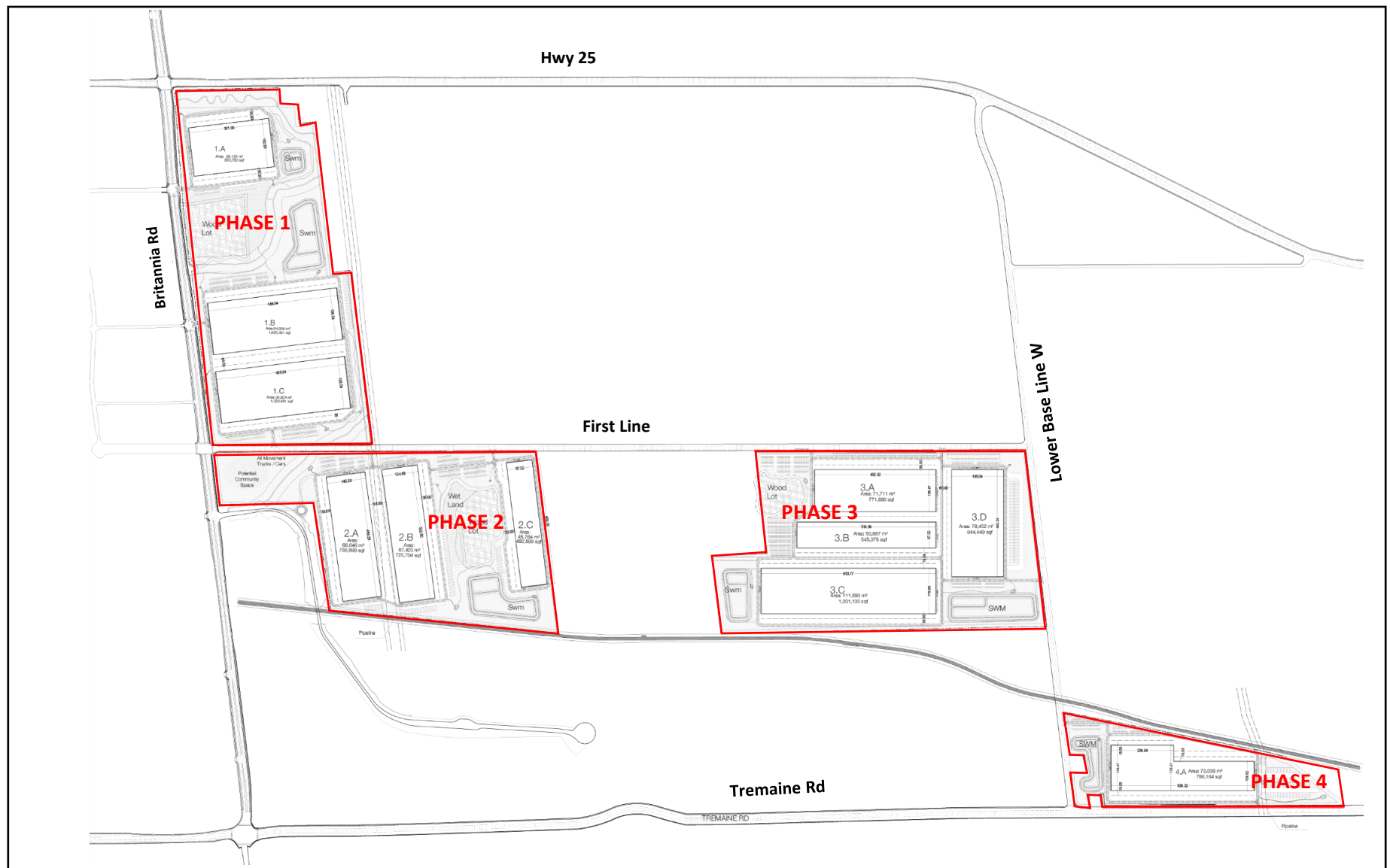


Figure 3: Proposed Site Plan (WW+P, 2026)
Milton Link



Subject Site

Date: June 2026



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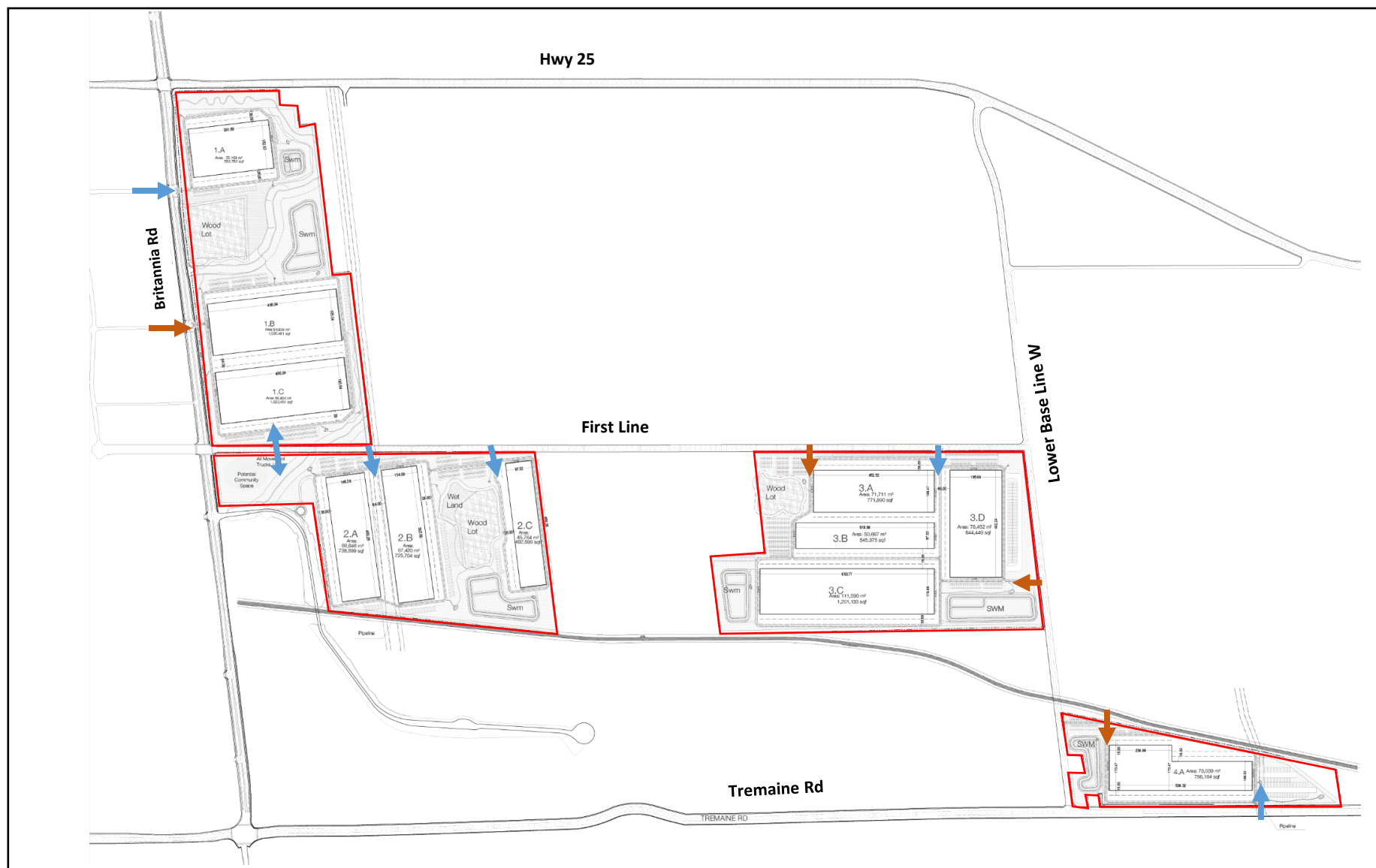


Figure 4: Site Access and Circulation (WW+P, 2026)
Milton Link

- Subject Site
- ← Access for Cars Only
- ← Access for Trucks & Cars

Date: June 2026

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2.2 Economic and Competitive Benefits to the Town of Milton and Region of Halton

The Milton Link project represents a unique and strategic opportunity to integrate an established large-scale employment operation with complementary existing and future employment and industrial uses, creating long-term economic value for all three levels of government, strengthening local and Regional economies, and generating significant employment opportunities for residents. In conjunction with the adjacent CN Logistics Hub, the development will establish a major goods movement and logistics corridor within the Greater Halton Region, positioning the Subject Lands as a premier industrial employment hub and a critical component of the Region's supply chain and economic infrastructure.

The development will deliver approximately 812,000 sq.m of modern industrial Gross Floor Area (GFA) across 11 buildings, to accommodate warehousing, logistics, and light industrial uses with ancillary office space. At full build-out, the project is anticipated to support **approximately 5,000 jobs**, significantly expanding the local employment base and reinforcing Milton's role in the Regional goods-movement and logistics network.

The proponent has retained urbanMetrics to prepare an economic benefit assessment, fiscal and capital impact assessment, and a land needs assessment based on the concept plan (Refer to **Section 5.0** for the summaries). The reports have concluded that at full build out, the development is expected to generate approximately \$2.8 million in capital investment in building construction, creating approximately **\$2.9 billion in value added to the economy**. Over the long term, the development is anticipated to generate in the order of **\$1.1 billion in government revenues, including an estimated \$22.8 million in recurring annual property tax revenues for the Town of Milton and the Region of Halton**.

Overall, these results at full build out demonstrate that the proposed development will deliver significant employment opportunities in the Region, along with substantial and long-term economic and fiscal benefits for local residents and communities.

2.3 Required Planning Approvals

In support of the proposed development as described in **Section 2.1** above, an Official Plan amendment and Zoning By-law amendment applications are required. The applications are being submitted concurrently to expedite the planning approvals needed to support development of the Subject Lands, as well as to make best use of staff and public resources.

The Official Plan Amendment is being sought to amend the Town of Milton Official Plan (Adopted August 1996, last office consolidation date of February 2026) to redesignate the majority of the Subject Lands to Industrial Area and be brought into the Sustainable Halton Plan Urban Area

boundary (Schedule A – Urban Area Land Use Plan) as outlined in **Appendix A**, from its original designation of Prime Agricultural Area (Schedule 5 – Rural Structure).

A Zoning By-law Amendment is being sought to amend Zoning By-law No. 016-2014 (Town of Milton's Urban Zoning By-law) and Zoning By-law No. 144 -2003 (Town of Milton's Rural Zoning By-law) to rezone the Agricultural Zone (A1) and Greenlands 'A' Zone (GA) from the Rural By-law to General Industrial (M2) with site-specific exemptions from the Urban Zoning By-law. The stormwater management ponds will be rezoned to Stormwater Management (OS-2), and the Natural Heritage features will be rezoned to Natural Heritage (NHS) to facilitate the proposed development. A copy of the draft site-specific Zoning by-law Amendment is attached in **Appendix B**.

Finally, a Site Plan Approval Application is required to facilitate the proposed development. The Site Plan Application will be submitted at a later date and include detailed design for the site in support of securing final approvals of the proposed development.

2.4 Public Engagement

WW+P Architects has been engaged to lead the public engagement process. An initial developer-led meeting for the proposed development was held on May 6, 2026, with approximately 120 attendees. A Statutory Public Meeting will be held following submission of the application. The engagement strategy will be undertaken in accordance with the requirements of the Planning Act and the Town of Milton's Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) procedures. Following the meeting, a comprehensive summary of public input and feedback will be compiled and submitted to Town of Milton Planning staff accordingly.

The objective of hosting an open house in advance of the application was to engage with the local residents, hear preliminary feedback, and introduce the project to the public. The proponent is committed to meaningful and ongoing public engagement as it works through advancing its applications.

Please refer to **Section 5.0** for a detailed summary on the Engagement report submitted as part of this application.

3.0 PLANNING FRAMEWORK

3.1 Provincial Policies

The following section discusses provincial documents that guide land use planning in Ontario.

3.1.1 *Planning Act, RSO 1990*

The Planning Act, R.S.O. 1990 (herein referred to as “The Planning Act”) provides legal direction on how land uses are controlled and by whom. It promotes sustainable economic development, provides a land use planning system and framework, and ensures that matters of provincial interest are integrated into planning decisions. The Provincial Planning Statement, 2024 was prepared under the authority of the Planning Act.

Decisions made by planning approval authorities must have regard for matters of provincial interest and be consistent with the Provincial Planning Statement (Section 2 and 3, the Planning Act). The matters of provincial interest relevant to the proposed development include:

- (a) the protection of ecological systems, including natural areas, features and functions;*
- (e) the supply, efficient use and conservation of energy and water;*
- (h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;*
- (k) the adequate provision of employment opportunities;*
- (l) the protection of the financial and economic well-being of the Province and its municipalities;*
- (o) the protection of public health and safety;*
- (p) the appropriate location of growth and development;*
- (q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;*
- (r) the promotion of built form that,*
 - (i) is well-designed,*
 - (ii) encourages a sense of place, and*

(iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;

The proposed development demonstrates alignment with these matters of provincial interest. It preserves ecological and natural heritage features on-site, supports the efficient use of energy and water through the integration of stormwater management ponds, and is phased accordingly which will be dependent on servicing and market conditions. The built form is strategically adjacent to the CN Logistics hub, Britannia Road with a landscaped buffer to mitigate impacts on adjacent residential uses to the north, and is nestled along First Line and Tremaine Road. The proposed development also facilitates the creation of significant employment opportunities (**approximately 4,000 – 5,000 new jobs**) and will generate approximately **\$2.9 billion in value added to the economy**, contributing to the economic vitality of the Town of Milton and the Halton Region.

Furthermore, the Planning Act empowers municipalities to adopt and amend official plans, zoning by-laws, and draft plans of subdivision, provided such decisions reflect provincial interests. The proposed development supports these objectives by advancing employment land uses in a manner that is environmentally responsible, economically beneficial, and contextually sensitive.

3.1.2 Provincial Planning Statement (2024)

The Provincial Planning Statement, 2024 (the “PPS”), was approved by the Minister of Municipal Affairs and Housing and came into effect on October 20, 2024. The PPS replaces both the Provincial Policy Statement, 2020 and A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020, consolidating provincial land use planning policies into a single framework. As Ontario’s primary land use planning policy document, the PPS provides overarching direction to guide growth, development, and land use decision-making across the province.

It is important to note that under the former Growth Plan, certain lands were designated as Provincially Significant Employment Zones (“PSEZs”) to support Regional and provincial economic development objectives. The Subject Lands were previously identified within a PSEZ, reflecting the Province’s original intent to protect and promote these lands for employment-generating uses. However, with the introduction of the PPS 2024, the PSEZ framework has been removed and is no longer part of the provincial planning system.

Pursuant to Section 3 of the Planning Act, all decisions affecting land use planning matters must be consistent with the PPS. The proposed development is consistent with, and advances, the policy objectives of the PPS 2024. A summary of the relevant PPS policies is provided below.

Section 2.3 Settlement Areas and Settlement Area Boundary Expansions

Section 2.3 establishes settlement areas as the primary focus for growth and development. It promotes land use patterns that efficiently use land and infrastructure, support active and freight transportation, and contribute to complete communities through intensification and redevelopment.

The Subject Lands are located immediately adjacent to the Sustainable Halton Plan Urban Boundary, which currently terminates on the north side of Britannia Road. Extending the settlement area boundary southward to include the Subject Lands represents a logical, contiguous, and infrastructure-efficient expansion of the Urban Area. The lands are well positioned to accommodate employment growth and to capitalize on existing and planned transportation infrastructure, including Britannia Road, Regional Road 25, Highway 401/407 connections, and the abutting CN Logistics Hub.

Through this Official Plan Amendment, a settlement area boundary expansion is requested to facilitate the development of a significant employment logistics hub in proximity to existing and planned residential communities north of Britannia Road. The proposal would introduce a significant concentration of employment uses, including warehousing, logistics, light industrial, and ancillary office functions, generating approximately 5,000 jobs. Given that lands to the west are already identified as a Sustainable Growth Area - Employment, the proposed expansion represents a logical extension of the corridor's emerging employment function and supports a coordinated land use pattern. In this regard, the proposal advances orderly, employment focused growth while improving access to jobs close to where people live, consistent with the intent of Section 2.3 of the PPS.

A Land Needs Assessment and Fiscal Impact Analysis prepared by urbanMetrics support the requested expansion. The Land Needs Assessment identifies the Subject Lands as a logical candidate for inclusion within the settlement area boundary and for employment designation. The analysis highlights the site's direct access to the regional transportation network, including Britannia Road and Regional Road 25, that provide connections to Highways 403 and 407. These connections support efficient truck routing, regional accessibility, and the long-term viability of goods-movement-oriented employment uses.

The Land Needs Assessment also recognizes the Region's need to accommodate long-term population and employment growth to 2051, including the need for sufficient employment land in appropriate locations to maintain a balanced residents-to-jobs ratio. In this context, the Subject Lands are particularly suitable because they are contiguous with the existing urban boundary, aligned with Milton's role in the regional economy, and appropriately located to support industrial and logistics uses that depend on access to major transportation corridors. The

proposed employment designation would enable a substantial amount of industrial gross floor area and employment capacity, helping to achieve regional and local employment objectives, including broader job distribution, density, and intensification targets.

The proposal also supports the policy direction of the Provincial Planning Statement, 2024, by locating employment uses in close proximity to major goods movement facilities and transportation corridors. It further supports local economic development objectives, including Milton's "Working in Milton" goals, by protecting and expanding the Town's long-term employment land supply in a strategic location.

The Fiscal Impact Analysis reviewed the capital implications of servicing the proposed development in the context of Halton Region's existing infrastructure and asset management framework. The analysis concludes that, while infrastructure investment and long-term replacement obligations will be required, the projected revenues generated by the development are expected to exceed the associated capital and lifecycle costs. As a result, the proposed Milton Link project is anticipated to generate a positive net fiscal impact for Halton Region over the long term.

Overall, the requested settlement area boundary expansion is justified because of the following reasons:

- are contiguous with the existing Urban Area;
- represent a logical and efficient expansion of the settlement area;
- are well served by the regional transportation network and strategically located for goods movement;
- will deliver a substantial supply of employment land and jobs in support of long-term regional and local growth objectives; and
- are supported by technical analysis demonstrating both land need and a positive fiscal outcome.

Section 2.8 Employment

Section 2.8 of the PPS outlines policies to support a modern economy and protect employment areas. The PPS promotes land use planning that supports employment opportunities and economic development. Specific relevant policies are outlined below.

Section 2.8.1.1 states: *Planning authorities shall promote economic development and competitiveness by:*

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

Section 2.8.2.2 states: *Planning authorities shall protect employment areas that are located in proximity to major goods movement facilities and corridors, including facilities and corridors identified in provincial transportation plans, for the employment area uses that require those locations*

Section 2.8.2.3 states: *Planning authorities shall designate, protect and plan for all employment areas in settlement areas by:*

- a) planning for employment area uses over the long-term that require those locations including manufacturing, research and development in connection with manufacturing, warehousing and goods movement, and associated retail and office uses and ancillary facilities;*
- b) prohibiting residential uses, commercial uses, public service facilities and other institutional uses;*
- c) prohibiting retail and office uses that are not associated with the primary employment use; d) prohibiting other sensitive land uses that are not ancillary to uses permitted in the employment area; and*
- e) including an appropriate transition to adjacent non-employment areas to ensure land use compatibility and economic viability.*

The proposed development aligns with these policies by establishing a significant employment node that delivers a substantial supply of modern industrial GFA for warehousing, logistics, light

industrial, and ancillary office uses. This provides a broad range of employment opportunities, supports a diversified economic base, and maintains a range and choice of flexible, large-format sites for future tenants.

The CN Logistics Hub represents a significant and long-term infrastructure investment with demonstrated capacity to attract national and international logistics and distribution users to the Town of Milton. Given its adjacency to the CN Logistics Hub and the Regional road network, the Subject Lands function as a strategic, market-ready investment location. The project also supports employment intensification and complete communities by concentrating jobs in a compact form next to planned higher-density residential areas (up to 10 storeys), while addressing land use compatibility through setbacks, landscape berms, and the retention of natural heritage features.

As part of this application, the proponent has retained urbanMetrics to prepare an economic benefit assessment, fiscal capital impact assessment and a land needs assessment based on the concept plan as discussed in **Section 2.2** of this report. These reports conclude that the Subject Lands are well positioned to absorb a significant share of the land need estimate in the Town of Milton. The Subject Lands could accommodate approximately 90% of the Town's forecasted employment land needs.

In relation to Sections 2.8.2.2 and 2.8.2.3, the proposal exemplifies how employment areas should be protected and planned near major goods-movement facilities. The lands are immediately adjacent to the CN Logistics Hub and will be redesignated and rezoned as part of this application to permit employment area uses such as warehousing and associated office functions that depend on this proximity while not permitting residential, institutional, or unrelated commercial uses. The development incorporates appropriate transitions and buffering to adjacent non-employment areas, ensuring long-term economic viability of the future employment node and compatibility with surrounding communities, consistent with the PPS direction for orderly, employment supportive growth.

Section 3.3 Transportation and Infrastructure Corridors

Section 3.3 emphasizes the importance of protecting transportation and infrastructure corridors to meet current and future needs. Planning authorities are directed to safeguard rights-of-way for transit, goods movement, and utility infrastructure, and to ensure that adjacent development is compatible with the long-term function of these corridors. Particularly, Section 3.3.3 states: *Planning authorities shall not permit development in planned corridors that could preclude or negatively affect the use of the corridor for the purpose(s) for which it was identified. New development proposed on adjacent lands to existing or planned corridors and transportation facilities should be compatible with, and supportive of, the long-term purposes of the corridor and*

should be designed to avoid, or where avoidance is not possible, minimize and mitigate negative impacts on and adverse effects from the corridor and transportation facilities.

The proposed development conforms to Section 3.3 of the PPS by locating a major employment node in a manner that is inherently compatible with, and supportive of, surrounding transportation and infrastructure corridors. The Subject Lands are directly served by Britannia Road, Regional Road 25, Tremaine Road, First Line and Lower Base Line, and are immediately adjacent to the CN Logistics Hub, a key goods-movement facility. The development program focuses on warehousing, logistics, light industrial and ancillary office uses. These proposed uses rely on and efficiently utilize these corridors for truck and freight movement. No sensitive land uses (such as residential or institutional) are proposed within the employment area that could constrain the long-term function or expansion of these corridors.

In terms of design and mitigation, the site layout, access strategy, and buffering approach ensure that the corridors can continue to operate and evolve as intended. Truck access points are aligned with the Regional road network and the CN Logistics Hub to concentrate heavy vehicle movements in appropriate locations, while internal circulation, loading areas, and generous on-site parking reduce spillover onto public rights-of-way. Landscape berms, setbacks, and the retention of woodlots and wetlands provide visual and noise buffering to nearby residential areas north of Britannia Road, helping to minimize and mitigate potential adverse effects from corridor operations. As a result, the development both protects and leverages existing and planned transportation corridors in a manner consistent with Section 3.3.

Section 3.5 Land Use Compatibility

Section 3.5 emphasizes the importance of planning major facilities and sensitive land uses in a manner that avoids, or where avoidance is not possible, minimizes and mitigates adverse effects such as odour, noise, and contaminants. Particularly, Section 3.5.2 states: *Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.*

The proposed development aligns with these policies by locating the industrial uses in an area that is appropriately separated from existing sensitive land uses, and by incorporating design measures that minimize and mitigate potential adverse effects where proximity does occur, most specifically along Britannia Road as it abuts the residential community.

The Subject Lands are primarily adjacent to the CN Logistics Hub, regional roads, and agricultural lands. Where the site interfaces with planned or existing sensitive uses to the north of Britannia Road, the concept includes substantial landscape berms, setbacks, buffers, and the retention of woodlots and wetlands, which provide visual screening and help attenuate noise, light, and other potential nuisances from truck movements and industrial operations. It's important to note that as part of this application, a noise and vibration study, and an air quality report have been prepared by SLR and has concluded that with appropriate mitigation measures, noise impacts from the proposed development (stationary sources) are not anticipated from the proposed industrial development, and that there are no air quality impacts.

The site's organizational layout considers loading areas and truck courts internal to the buildings and orients building frontages toward public streets while nestling the parking area with a landscape buffer from the public street, further reducing potential impacts on surrounding areas. These measures are consistent with provincial guidelines for land use compatibility and ensure that both the proposed employment uses and nearby sensitive uses can operate with no adverse impacts, in conformity with Section 3.5.

Section 3.6 Sewage, Water and Stormwater

Section 3.6 provides direction for the planning and provision of sewage, water, and stormwater services to support growth while protecting public health, the environment, and long-term infrastructure viability.

The proposed development responds to this policy framework through a comprehensive, integrated stormwater strategy. Six stormwater management ponds are distributed across the site to provide quality and quantity control for the majority of drainage areas, while low impact development (LID) measures including bioretention facilities and infiltration galleries are proposed for smaller, isolated catchments that do not drain to the ponds. These LID practices are particularly important for areas contributing to the retained woodlots and wetlands, where they help preserve pre-development recharge volumes and maintain the hydrologic function of natural features, as well as for areas discharging to smaller downstream watercourses.

Detailed Stormwater Management Report and Functional Servicing Reports have been prepared by EnVision Consultants Ltd. and discusses the servicing approach and has guided the planning of stormwater, water, and sanitary services for the site. As summarized in **Section 5.0** of this report, the recommended system is designed to meet applicable municipal and provincial standards, ensuring that the proposed development is appropriately serviced while minimizing impacts on surrounding natural and built environments in accordance with Section 3.6 of the PPS.

Section 4.1 Natural Heritage

Section 4.1 provides direction for the long-term protection of Ontario's natural heritage features and systems. It emphasizes maintaining ecological connectivity, biodiversity, and the integrity of surface and groundwater features. Particularly development and site alteration shall not be permitted in significant natural features such as wetlands, woodlands... unless it has been demonstrated that there will be no negative impacts on the natural features or their functions (Section 4.1.5). Section 4.1.2 states: *The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.*

Section 4.1.8 states: *Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions*

The proposed development conforms to these policies by protecting the Natural Heritage features on the Subject Lands with its Local Natural Heritage designation in the Official Plan, and natural heritage zone in the Zoning by-law. These development limits have been guided by the Natural Heritage Report prepared by WSP. The development has been designed to avoid impacts on significant natural features and adjacent lands, consistent with provincial requirements for fish habitat, endangered species habitat, and other sensitive ecological areas.

Stormwater management measures, including the proposed pond, further support ecological function by managing runoff and protecting water quality. The site layout incorporates landscape buffers and vegetative surfaces to minimize disruption and maintain ecological linkages.

Section 4.3 Agriculture

Section 4.3 outlines policies for protecting Ontario's agricultural system and prime agricultural areas. Section 4.3.4.1 states: *Planning authorities may only exclude land from prime agricultural areas for expansions of or identification of settlement areas in accordance with policy 2.3.2.*

The proposed development requires a redesignation of the Subject Lands from Prime Agricultural Area to Industrial Area through the requested Official Plan Amendment.

Although currently designated Prime Agricultural Area, the lands are identified on Schedule C – Future Strategic Employment Areas of the Official Plan with a Future Strategic Employment Area Overlay. As outlined in Section 7.6 of the Official Plan (and discussed further in **Section 3.2.1** of

this report), this overlay signals that the Subject Lands have been strategically identified and protected for their future employment uses. In other words, the Official Plan already anticipates that these lands will be removed from the prime agricultural designation and redesignated for employment purposes once appropriate planning applications such as this OPA are brought forward. The requested redesignation therefore implements the Official Plan's long-term intent for the area and conforms with Section 4.3 by effecting a settlement area expansion consistent with policy 2.3.2.

Additionally, the proponent has retained Clark Consulting Services to prepare an Agricultural Impact Assessment in support of the settlement area boundary expansion and redesignation from Prime Agricultural Lands.

Section 4.6 Cultural Heritage and Archaeology

Section 4.6 requires that significant cultural heritage and archaeological resources be identified early and conserved. Protected heritage properties, including built heritage and cultural heritage landscapes, must be preserved, and any development or site alteration on these lands or on adjacent lands can only proceed if heritage attributes are conserved. Similarly, development on lands with archaeological resources or potential is not permitted unless those resources are properly conserved.

Planning authorities are encouraged to adopt archaeological management plans and proactive strategies for conserving built heritage and cultural heritage landscapes. They must also engage early with Indigenous communities and ensure their interests are considered in identifying, protecting, and managing archaeological, built heritage, and cultural heritage resources.

The Subject Lands includes four properties listed on the Town of Milton's Heritage List including 4259 and 4393 Tremaine Road, 5122 First Line, and 5694 Regional Road 25, as such a Heritage Impact Assessment (HIA) has been prepared in support of the application (Stantec, 2026). The HIA evaluated the listed properties under O. Reg. 9/06 and concluded that none of the three properties assessed as potentially containing cultural heritage value or interest met the threshold for designation. Notwithstanding this finding, the residence and barn at 5122 First Line were identified as containing materials with potential salvage value. The Proponent will work with Stantec to salvage these materials where feasible. In addition, a Stage 2 Archaeological Assessment has been completed for the Subject Lands to ensure that archaeological resources are appropriately identified and conserved, in keeping with the requirements of Section 4.6.

Section 5.1 General Policies for Natural and Human-Made Hazards

Section 5.1 states that development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.

The proposed development has been designed with consideration of the natural hazards which have been guided by the Natural Environmental Report prepared by WSP (2026), and will not create new or aggravate existing hazards.

Section 5.2 Natural Hazards

Section 5.2 discusses policies to protect public safety and property from natural hazards, including flooding, erosion, dynamic beach hazards, and other hazardous lands and sites. These policies direct development away from hazardous areas wherever possible and prohibit development within floodways, dynamic beach hazard areas, and other high-risk locations where safe access cannot be maintained during hazard events.

Planning authorities will need to identify and manage hazardous lands in consultation with conservation authorities to consider the impacts of climate change on natural hazard risks. Any permitted development must demonstrate safe access, avoid creating or worsening hazards, and prevent adverse environmental impacts. In summary, these policies will aim to minimize risk to public safety while allowing carefully managed development in areas where natural hazards can be appropriately addressed.

As noted in comments received from Conservation Halton on June 18, 2026, a review of PPS policies 5.2.1 through 5.2.8 was requested. The Subject Lands contain natural heritage features and hazard lands. As part of the proposed concept plan, the realignment of Tributary 1 is contemplated and will require further consultation and approval from both the Town and Conservation Halton. The proposed realignment is intended to mitigate existing erosion hazards affecting the development area and surrounding lands.

A review of Conservation Halton's regulated area mapping (2026) indicates that portions of the Subject Lands are regulated due to the presence of floodplain hazards, wetlands, watercourses and their associated meander belt allowances, and stable top-of-bank hazards. To support the evaluation of these constraints, a Fluvial Geomorphological Assessment has been prepared by GeoMorphix, and a Natural Environment Report has been prepared by WSP. The Fluvial Geomorphological Assessment includes an erosion hazard evaluation and a desktop meander belt width analysis, which has been identified as the appropriate methodology for assessing erosion hazards associated with Tributary 1.

Overall, the proposed development concept has been informed by the findings and recommendations of the Natural Environment Report and Fluvial Geomorphological Assessment. The developable limits have been established to avoid and protect significant hazard features and associated regulatory setbacks, with the exception of the proposed creek realignment. The acceptability of the realignment and any associated impacts will be further evaluated through ongoing consultation with Conservation Halton and the Town of Milton and addressed through subsequent planning, environmental, and regulatory approval processes.

SUMMARY:

The proposed development demonstrates strong overall conformity with the Provincial Planning Statement (2024). The development would direct growth to a logical expansion of the Sustainable Halton Urban Boundary, creating a significant employment node immediately adjacent to the CN Logistics Hub and the Regional road network. The overall proposed development will deliver over 800,000 m² of modern industrial GFA and create approximately 4,200–5,300 jobs by providing a diversified range of warehousing, logistics, light industrial and ancillary office uses on strategic, market-ready employment lands, while excluding sensitive and non-employment uses. The development's design supports major goods-movement facilities, protects the long-term function of transportation corridors and incorporates appropriate buffering, setbacks and site organization to ensure land use compatibility with nearby the residential uses north of Britannia Road.

The servicing and environmental strategy further align the proposal with the PPS. Six stormwater management ponds, low-impact development measures, and a servicing approach guided by detailed stormwater and functional servicing reports, protecting public health, natural features, and downstream systems. The development avoids impacts to significant natural heritage features and maintains ecological functions and linkages in accordance with Section 4.1 (Natural Heritage). Redesignation from Prime Agricultural Area to Industrial Area is supported by the Future Strategic Employment Area overlay (Schedule C in the Town of Milton Official Plan), an Agricultural Impact Assessment, and the settlement area expansion policies of Section 4.3 (Agriculture). Finally, a Heritage Impact Assessment and Stage 2 Archaeological Assessment ensure that cultural heritage resources are identified and conserved consistent with Section 4.6 (Cultural Heritage and Archaeology). Overall, these elements demonstrate that the proposed development implements the PPS's direction for complete, economically resilient, and environmentally responsible community building.

3.2 Local Policies and Plans

The following section provides a detailed summary of the local policies in effect on the Subject Lands.

3.2.1 Town of Milton Official Plan (February 2026 Consolidation)

The Town of Milton Official Plan (Milton OP) is the primary land use document guiding growth and development of all urban and rural lands in the municipality to 2051. The current in-force OP is the February 2026 Office Consolidation, which incorporates phases of the *We Make Milton* (the Town's multi-year OP review) together with a series of phased updates. A final, fully updated Official Plan will be brought forward for Council adoption at a future date.

Official Plan Amendment No. 92, approved by the Ministry of Municipal Affairs and Housing with modifications, on December 19, 2025, introduced 72 modifications to bring the Milton OP into conformity with provincial plans and policies, respond to updated population and employment forecasts, and clarify how the Town and Halton Region will coordinate on matters of Regional interest. These policies establish the strategic framework for accommodating growth to 2051. This Planning Justification Report relies on the in-force February 2026 Consolidation, including OPA 92.

On Schedule 3: Municipal Structure, the Subject Lands are identified within the Rural Area, immediately outside the Urban Area boundary, and include portions of the Local Natural Heritage System (**Figure 5**). Schedule 4: Urban Structure (**Figure 6**) shows Employment Areas directly to the west and east of the site, with lands to the north identified as Complete Neighbourhoods and a Community Node at First Line and Britannia Road West. Schedule 5: Rural Structure (**Figure 7**) designates the Subject Lands as Prime Agricultural Area, while Schedule 6: Green System (**Figure 8**) identifies most of the lands as Rural/Local Natural Heritage System (key features, enhancement areas, linkages and buffers) and a small portion of Phase 4 as Greenbelt Natural Heritage. From a transportation perspective, Britannia Road, Tremaine Road and Regional Road 25 are identified as Major Arterial Roads, and First Line and Lower Base Line West are identified as Collector Roads, reinforcing the area's strategic accessibility for employment uses.

The sections that follow summarize the key Milton OP policies applicable to the proposed industrial development and the requested urban boundary expansion.

Chapter 2: Sustainable Growth Management

Section 2 of the Town of Milton Official Plan sets the growth and land use framework to 2051. It directs most population and employment growth to the Urban Area, with density, intensification,

and phasing targets in order for infrastructure, and services to be provided in a coordinated manner.

Section 2.1: Town-Wide Growth Management Framework

To manage population and employment growth, the Town of Milton has set an employment target for 2051 is 156,300 jobs (Table 1A from the OP), and the targeted employment growth in 15-year periods is 51, 100 from 2036 to 2051 (Table 1c from Section 2 of the OP). The Town's objective is to *Apply the population and employment projections contained in Table 1 to inform land use planning decisions, infrastructure planning and service delivery*. The Town must ensure a minimum 5-year supply of serviced Employment Areas at all times to meet market needs, and are to be monitored regularly to ensure the Town can meet its employment growth forecasts.

The Town's policy permits for urban boundary expansions based on the following criteria:

- a) need to designate additional land to accommodate the distribution of population and employment growth as presented in Table 1a, 1b and 1c and the intensification and development density targets as presented in Table 2;*
- b) the need to designate and plan for additional land to accommodate an appropriate range and mix of land uses;*
- c) if there is sufficient capacity in existing or planned infrastructure, public service facilities and human services required to accommodate the proposed expansion and can be provided for in a financially and environmentally sustainable manner, based on a financing plan, demonstrating financial viability over the full life cycle of these assets subsequently approved by Council;*
- d) the proposed expansion is informed by applicable sewage and water services master plans or the equivalent, and stormwater master plans or the equivalent, as appropriate;*
- e) the proposed expansion, including associated water, wastewater and stormwater servicing, are planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the Water Resource System, including the quality and quantity of water;*
- f) 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;*
- g) whether the new or expanded area complies with the minimum distance separation formulae;*
- h) 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;*

- i) the expanded Urban Area provides for the logical phased progression of urban development;*
- j) the proposed expansion avoids key hydrologic areas.*
- k) the proposed expansion is consistent with the Provincial Planning Statement;*
- l) the proposed expansion is located outside of and will meet the requirements of the Niagara Escarpment Plan and the Greenbelt Plan, and will meet the requirements of the applicable source protection plans; and*
- m) the proposed expansion is consistent with the fiscal impact analysis of the new growth on the Town and the Region;*

The proposed development assists the Town of Milton in achieving the goals set out by Section 2.1 noted above. The site's location is strategically positioned near key infrastructure and the CN Milton Logistics Hub that will support the planned function of the proposed development. To support the site, the development will include six stormwater management ponds which will optimize servicing and servicing capacity for the site.

In support of the application, urbanMetrics has been retained to prepare an economic benefit assessment, fiscal capital impact assessment and a land needs assessment. These reports conclude that the Subject Lands are well positioned to absorb a significant share of the land need estimate in the Town of Milton. The Subject Lands could accommodate approximately 90% of the Town's forecasted employment land needs, and will generate approximately 4, 200 – 5,300 new jobs. This proposed development will be a significant landmark framing Milton's employment area.

As part of this application, the proponent is seeking an Urban Boundary Expansion. To meet the criteria listed above, an Agricultural Impact Assessment report has been prepared to analyze the impacts on the loss of agricultural lands. A functional servicing report and stormwater management report has also been prepared by EnVision concluding that with the proposed recommendations, there will be sufficient servicing and infrastructure to support the proposed development.

Overall, the proposed development is supported by key technical reports prepared by professionals that conclude that this proposed development will be a key benefit to the Town of Milton and Halton Region's revenue, generate new jobs to meet the employment targets, and warrant an Urban Boundary Expansion.

Section 2.3 The Urban Structure

Section 2.3.6 of the OP discusses Employment Areas and the Town's policies and objectives in order to accommodate the growth of jobs, and to ensure there is sufficient land and services available. These lands are designated to accommodate a cluster of businesses and economic uses such as manufacturing, research and development, warehousing and goods movement. These areas will provide jobs for residents and longer-term development opportunities in support of the local and Regional economy.

Key policies include:

2.3.6.1 Identify and protect Employment Areas for long-term employment use.

2.3.6.2 Ensure the availability of sufficient land to accommodate the forecasted employment growth established in Table 3 to support Milton's economic competitiveness.

2.3.6.3 Plan Employment Areas at development density targets that contribute towards achieving the job targets established in Table 3b, optimizing land use and infrastructure.

2.3.6.4 Maintain a range of Employment Areas to support a wide range of economic activities to meet the current and future needs of businesses.

2.3.6.5 Plan and design Employment Areas to be easily accessible by a range of transportation modes, including active transportation, transit, and the automobile.

2.3.6.6 Ensure the necessary infrastructure is provided to support the development of the Employment Areas in accordance with policies of this Plan.

2.3.6.7 Promote the sustainable development of Employment Areas for long term viability.

2.3.6.8 Encourage sustainable practices including low impact development, district energy and water conservation measures in Employment Areas.

2.3.6.10 Consider the introduction of additional Employment Areas within the Urban Area by amendment to this Plan.

As part of the OP amendment being sought here in, is to designate the lands as Employment Areas on Schedule 4: Urban Structure as the proposed development falls within this definition. The proposed development is being planned to accommodate warehousing and goods movement uses, and will generate a significant number of jobs (4,200 – 5,300 jobs).

The proposed development aligns with the policies noted above as the lands needs assessment report prepared by urbanMetrics confirms that this proposed development is needed in order

for Milton to meet its employment targets. These lands are also being zoned to permit various uses such as light industrial, warehousing, manufacturing and similar uses providing a range of economic activities. Design details will be confirmed at the site plan approval stage. The development layout has considered the active transportation being planned along the surrounding road network, and continues those trails. A functional servicing and stormwater management report have been prepared in support of this development, and have confirmed that there is necessary infrastructure available to support the use, and have recommended low impact development. Section 2.3.6.10 specifically states to consider the introduction of additional Employment Areas, although the lands are not within the Urban Area yet, this OP amendment is requesting the urban boundary expansion, which then this policy would apply to the lands.

Section 2.5: Environmental System

This section of the OP discusses the natural heritage system and resources including the Greenbelt and Niagara Escarpment Plan within the Town of Milton. The Subject Lands identifies most of the lands as Rural/Local Natural Heritage System (key features, enhancement areas, linkages and buffers) and a small portion of Phase 4 as Greenbelt Natural Heritage as per Schedule 6: Green System. The Town's objective is to implement a system approach to protecting and enhancing a healthy natural environment, and to maintain, restore or where possible, improve features and areas as protected greenspaces. Key policies in relation to the Local Natural Heritage System include:

2.5.1.11 Apply a systems approach to identifying and protecting the Local Natural Heritage System's features, areas, and their functions.

2.5.1.12 Maintain and enhance the unique ecologic areas of the Niagara Escarpment Plan.

2.5.1.13 Recognize the following features and areas as components of the Local Natural Heritage System:

a. Key Features including:

- i) significant habitat of endangered and threatened species*
- ii) significant wetlands*
- iii) significant woodlands*
- iv) significant valleylands*
- v) significant wildlife habitat*
- vi) significant areas of natural and scientific interest*
- vii) fish habitat*

b. Enhancement areas to key features

c. Linkages

d. Buffers

- e. Watercourses within the Conservation Authority regulation limit or watercourses that provide a linkage to a wetland or a significant woodland*
- f. Wetlands other than those considered significant under Section iii. a. above.*

2.5.1.14 Require proponents of development to carry out an Environmental Impact Assessment in accordance with policies of this Plan and, undertake where appropriate, studies to protect, improve or restore such features and areas.

2.5.1.15 Recognize the parts of the Agricultural System, that are within the Local Natural Heritage System as areas where agricultural uses are promoted and supported as compatible and complementary uses in accordance with the policies of this Plan.

2.5.1.16 Support and promote existing and new agriculture, agricultural related and on-farm diversified uses, and normal farm practices on those parts of the Local Natural Heritage System that are also a part of the Agricultural System.

As part of this application, a Natural Heritage Environment Report was prepared by WSP in support of the proposed development. The development boundaries based on this report's findings were used which details the significant features and its respective boundaries. The Greenbelt portion that is approximately 3.7 acres (15,155 sq.m.) in area has been protected for as well in the development plan.

Section 3 Livable Communities

Section 3.6 discusses Integrated Employment and highlights that land use planning policies can complement and support Milton's economic development strategy and help to create local jobs. One of the key objectives is to ensure the successful integration of employment uses into the community. Key policies include:

3.6.1.8 Provide opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses outside of Employment Areas, which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses.

3.6.1.9 Provide lands that create appropriate transitions from Employment Areas that can accommodate employment uses that may not be appropriate in Employment Areas or Strategic Growth Areas.

3.6.1.10 Achieve land use compatibility by ensuring that the planning and development of sensitive land uses avoids, minimizes or mitigates the adverse effects and impacts from industrial, manufacturing or other uses that are vulnerable to encroachment. 3.6.1.11 Support opportunities for shared location including intensification of employment uses, such as office and retail, in compact, mixed-use developments. 3.6.1.12 Support the

Economic Development Strategy by providing places for job creation and a destination for diverse talent.

Another key objective is to encourage a sustainable employment environment, and its policies are as follows:

3.6.1.13 Encourage and support the sustainable design and development of employment uses including the use of low impact development features such as green roofs and water conservation measures.

3.6.1.14 Explore opportunities to use sustainable energy solutions for employment uses.

3.6.1.15 Enable green development practices through the locating and designing of employment uses.

3.6.1.16 Ensure employment uses are accessible by transit and active transportation infrastructure.

3.6.1.17 Promote the sustainable use of land including the rehabilitation of brownfield sites.

The proposed development and its development program will contribute to the Town of Milton's integration of employment use into the community as the development will support employment generating uses such as warehousing, light industrial uses with ancillary office use, and due to its location to the CN Milton Logistics hub, it creates a logical transition. Appropriate mitigation measures are proposed to limit impact to the residential community to the north of the site. At full build out, the project is anticipated to generate approximately 4,200–5,300 jobs, contributing significantly to local employment growth and the Town's economic development goals.

In addition, the development incorporates low impact development features, six stormwater management ponds, and an internal circulation system that connects to sidewalks, multi-use trails, ensuring that employment uses are both environmentally responsible and accessible by active and transit modes.

Section 5: Sustainable Environment

Section 5 establishes the sustainable environment framework, setting out how natural systems is to be managed by the Town. The Green system comprises of Local Natural Heritage System and Greenbelt Natural Heritage System.

Section 5.2 Local Natural Heritage System

Section 5.2 discusses the Local Natural Heritage System and its policies. The Town shall apply a systems-based approach to implementing the Local Natural Heritage System by:

- a. Prohibiting development and site alteration within significant wetlands, significant habitat of endangered and threatened species and fish habitat except in accordance with Provincial and Federal legislation or regulations;*
- b. Prohibiting development or site alteration within significant woodlands, significant valley lands , significant wildlife habitat and significant areas of natural and scientific interest, unless it has been demonstrated that there will be no negative impacts on the feature or its ecological functions.*
- c. Prohibiting development or site alteration within lands adjacent to significant wetlands, significant woodlands, significant valley lands, significant wildlife habitat, significant areas of natural and scientific interest, and fish habitat, unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.*
- d. Not permitting the alteration of any components of the Local Natural Heritage System unless it has been demonstrated that there will be no negative impacts on the natural features and areas or their ecological functions ; in applying this policy, agricultural operations are considered as compatible and complementary uses in those parts of the Local Natural Heritage System under the Agricultural System and are supported and promoted in accordance with policies of this Plan;*
- e. Refining the boundaries of the Local Natural Heritage System in accordance with Section 5.2.3.12; and,*
- f. Introducing such refinements at an early stage of the development or site alteration application process and in the broadest available context so that there is greater flexibility to enhance the ecological functions of all components of the system and hence improve the long -term sustainability of the system as a whole.*

Additionally, it's the Town's policy that: *Lands located within the Local Natural Heritage System will be zoned Local Natural Heritage System in the implementing Zoning By -law except within the Niagara Escarpment Plan Area, where zoning does not apply. New construction and the expansion or replacement of existing non -conforming uses within hazard lands, and significant habitat of endangered or threatened species shall be prohibited except where specifically exempted by the Town, in consultation with the appropriate Conservation Authority, the Ministry of Natural Resources and the Ministry of Municipal Affairs and Housing. Special Policy Areas including any policy or boundary changes thereto, must be approved by the Minister of Municipal Affairs and Housing prior to municipal adoption.*

The Natural Heritage Environment Report (WSP, 2026) has confirmed the location and function of significant wetlands, woodlands, valleylands, wildlife habitat and other key features found on site, as well as their required buffers. These features and buffers have formed the development

limits. The only modification proposed is the realignment of a tributary of Sixteen Mile Creek, designed in consultation with the environmental team to avoid negative impacts on hydrologic and ecological functions. Six stormwater management ponds and low-impact development measures (e.g., bioretention and infiltration facilities) are sited and designed to maintain pre-development recharge, protect downstream water quality and quantity, and support the retained woodlots and wetlands.

In accordance with Section 5.2, the application is supported by the Natural Heritage Environment Report which demonstrate that development and site alteration outside and adjacent to these features will not result in negative impacts on those features or their ecological functions. The Official Plan Amendment and Rezoning application propose to zone all retained features and their required buffers as Local Natural Heritage System (NHS), and to zone stormwater facilities as OS-2 (Stormwater Management), thereby embedding long-term protection and appropriate setbacks in the implementing zoning by-law.

5.3 Greenbelt Natural Heritage System

Section 5.3 discusses the Greenbelt Natural Heritage System and its system to protect natural features and functions within the Greenbelt Plan Area. Policies include:

5.3.1.5 Refinements to the boundaries of the Greenbelt Natural Heritage System are not permitted unless as a result of amendments to the Greenbelt Plan but refinements to the boundaries of the key features within the Greenbelt Natural Heritage System may be considered through a Subwatershed Study, an individual Environmental Impact Assessment, or similar studies accepted by the Town and Region.

5.3.1.6 In accordance with the policies of the Greenbelt Plan and the policies of this Plan, the Town shall:

a. Prohibit development or site alteration within the key features of the Greenbelt Natural Heritage System, except in accordance with policies of this Plan.

b. Prohibit development or site alteration on lands adjacent to the key features of the Greenbelt Natural Heritage System unless the proponent has evaluated the ecological functions of these lands through an Environmental Impact Assessment in accordance with Section 5.3.1.6 .d).

c. Notwithstanding Sections 5.3.1.6 .a) and b), permit the following uses within key features, subject to the applicable policies of this Plan:

i) forest, fisheries and wildlife management that is carried out in a manner that maintains or, where possible, improves these features and their functions;

- ii) conservation and flood or erosion control projects if they have been demonstrated to be necessary in the public interest and after all alternatives have been considered;*
- iii) archaeological activities*
- iv) essential transportation and utility facilities;*
- v) non -intensive recreation uses such as nature viewing, pedestrian trails and small -scale structures (such as boardwalks, footbridges, fences, docks, and picnic facilities), where negative impacts are minimized;*
- vi) existing uses , including existing agricultural uses ; and,*
- vii) mineral aggregate resource extraction, subject to the policies of Section 9.4.3 of this Plan.*

A small portion of the Phase 4 lands are situated within the Greenbelt Plan (15,155 sq.m. in area) As part of this proposed development, no alteration of the Greenbelt is proposed, and the same policies would apply.

Section 7: Liveable Communities

Section 7 provides an overview what liveable communities comprise of, and the Town's policies to meet the objectives on housing, urban design, communities, cultural heritage resources and future strategic employment areas.

Section 7.6 Future Strategic Employment Areas

The Subject Lands contain a Future Strategic Employment Overlay as per Schedule C: Future Strategic Employment Areas (**Figure 9**). The purpose of these areas is to identify and protect from incompatible uses certain lands that are strategically located with respect to major transportation facilities and existing Employment Areas and are best suited for employment purposes beyond the planning horizon of this Plan. The policies are as follows:

- a. Prohibit the re -designation of lands within the Future Strategic Employment Areas to uses that are incompatible with employment uses in the long term, especially non -farm uses such as institutional and recreational uses;
- b. Investigate, as part of the Region's Joint Infrastructure Staging Plan, the feasibility and costs to service the Future Strategic Employment Areas; and,
- c. Consider the inclusion of any land within the Future Strategic Employment Areas into the Urban Area by amendment to this Plan, on the basis of the following:
 - i) demonstration that the Town will not be able, through intensification and development outside the Urban Area to meet the employment targets set out in this Plan.

The proposed development is consistent with the objectives of the Future Strategic Employment Areas. The requested Official Plan Amendment would redesignate the Subject Lands to *Industrial Area*, enabling employment supportive uses such as light industrial operations, warehousing, and ancillary office functions. Policy 7.61.2(c) further supports the inclusion of these lands within the Urban Area through an amendment to the Plan. Approval of this Official Plan Amendment would therefore facilitate this urban boundary expansion and support the long-term employment vision established for these lands.

Section 8: Urban Land Use Policies

Section 8 discusses urban land use policies that provide direction for lands within the Urban Area.

Section 8.7 Employment

Employment areas are intended to provide industrial, business and economic activities which will be the main drivers of employment opportunities within the Town of Milton. Employment Areas permit a wide range of business and economic activities that include uses in relation to manufacturing, research and development, warehousing, including uses related to the movement of goods, retail and offices uses associated with manufacturing and warehousing and facilities that are ancillary to manufacturing and warehousing. Employment areas are defined by two specific employment land use designations: Business Park, and Industrial Area, which provide for compatible employment uses in appropriate locations with a variety of form, scale, and intensity of development.

The Industrial Area designation on Schedule A is an employment designation which applies to areas where the full range of light industrial and general industrial uses will be permitted. Policies in relation to Industrial Areas are as follows:

8.7.5.6 Development within areas designated "Industrial Area" shall be permitted subject to:

- a. the provisions of the Secondary Plan as outlined within Part C of this Plan, where applicable;
- b. the submission of a Development Plan which demonstrates that the proposed development can be physically integrated with existing and proposed uses of adjacent lands, including lands outside the Industrial Area designation;
- c. the proposed development complies with the Community -wide policies of Section 2.0 of this Plan; and,
- d. applicants can demonstrate that there is adequate wastewater and water treatment capacity to accommodate the proposed use.

As part of the Official Plan Amendment application, the Subject Lands are proposed to be redesignated from “Prime Agricultural Area” to “Industrial Area” on Schedule A of the Official Plan. The proposed development consists of light industrial, warehousing, and ancillary office uses, which are consistent with the range of permitted uses within the Industrial Area designation.

While no Secondary Plan is proposed to be undertaken as part of the subject application, the Subject Lands represent a logical and contiguous extension of the existing urban employment area, which currently terminates north of Britannia Road. The proposal has been supported by comprehensive technical studies, including a Functional Servicing Report and Stormwater Management Report, confirming that adequate municipal servicing capacity exists to accommodate the proposed development.

The contents of a Development Plan as described in Section 11.4.3.9 of the OP are generally provided in this application which includes a concept plan for the proposed development which has been formed by the findings of the technical studies presented in this application such as a landscape plan, traffic impact study, a photometrics for Phase 1 (the remaining photometrics plans to be provided at site plan level), market reports prepared by urbanMetrics, and a noise and vibration study. In addition, an Urban Design Brief prepared by WW+P Architects demonstrates how the proposed development can be appropriately integrated with existing and planned uses on adjacent lands through the coordinated organization of buildings, access, circulation, and buffering.

As outlined throughout this Planning Justification Report, the proposed development has been evaluated in the context of the community-wide policies contained in Section 2.0 of the Official Plan and is considered to conform to the applicable policy framework.

Accordingly, the proposed development satisfies the intent of the Industrial Area policies and represents an appropriate and efficient expansion of the Town’s employment lands.

SUMMARY:

Based on the policy review of the Town of Milton’s Official Plan, the proposed Official Plan Amendment and Urban Boundary Expansion are consistent with and support the overall intent and policy framework of the Town of Milton’s Official Plan. The proposed development represents a logical and efficient expansion of Milton’s Employment Areas and will make a significant contribution toward achieving the Town’s long-term employment and economic development objectives to the 2051 planning horizon.

The Subject Lands are strategically located adjacent to planned Employment Areas to the west and major transportation infrastructure, including Britannia Road West, Tremaine Road, Regional

Road 25, and the CN Milton Logistics Hub, making them particularly well suited for warehousing, goods movement, light industrial, and ancillary office uses. The proposal supports the Town's objectives under Sections 2.1 and 2.3 of the Official Plan by contributing to the supply of employment lands necessary to accommodate forecasted job growth, while providing a diverse range of employment opportunities in a highly accessible location. Supporting studies prepared by urbanMetrics conclude that the Subject Lands are well positioned to accommodate a significant portion of Milton's future employment land needs and are anticipated to generate approximately 4,200 to 5,300 jobs at full build out.

The proposed Urban Boundary Expansion satisfies the evaluation criteria established under Section 2.1 of the Official Plan. The application is supported by comprehensive technical studies, including an Agricultural Impact Assessment, Functional Servicing Report, Stormwater Management Report, Natural Heritage Environment Report, Urban Design Brief, Economic Benefit Assessment, Fiscal Capital Impact Assessment, and Land Needs Assessment. These studies collectively demonstrate that the proposed development can be serviced, represents a logical phased extension of the Urban Area Boundary, and will minimize impacts on agricultural lands and the natural heritage system.

The proposal further conforms with the Employment Area policies of Sections 3.6, 7.6, and 8.7 of the Official Plan by protecting and expanding lands intended for long-term employment purposes (Schedule C: Future Strategic Employment). The proposed Industrial Area designation will permit a range of employment generating uses consistent with the Town's vision for employment development. The development has been designed to support active transportation and sustainable design objectives through the incorporation of low impact development measures, stormwater management facilities, multi-use trails, and coordinated internal circulation systems.

In addition, the application appropriately recognizes and protects the environmental features identified within the Local Natural Heritage System and Greenbelt Natural Heritage System. The Natural Heritage Environment Report prepared by WSP has informed the development limits and confirms that retained natural heritage features, buffers, and ecological functions will be protected. All retained natural heritage features and associated buffers are proposed to be protected through implementing zoning and appropriate setbacks.

Overall, the proposed development represents good land use planning, is appropriate for the site and surrounding context, and implements the Town of Milton's long-term vision for sustainable employment growth. The proposed Official Plan Amendment and Urban Boundary Expansion are therefore considered appropriate, justified, and in conformity with the applicable policies of the Town of Milton Official Plan.

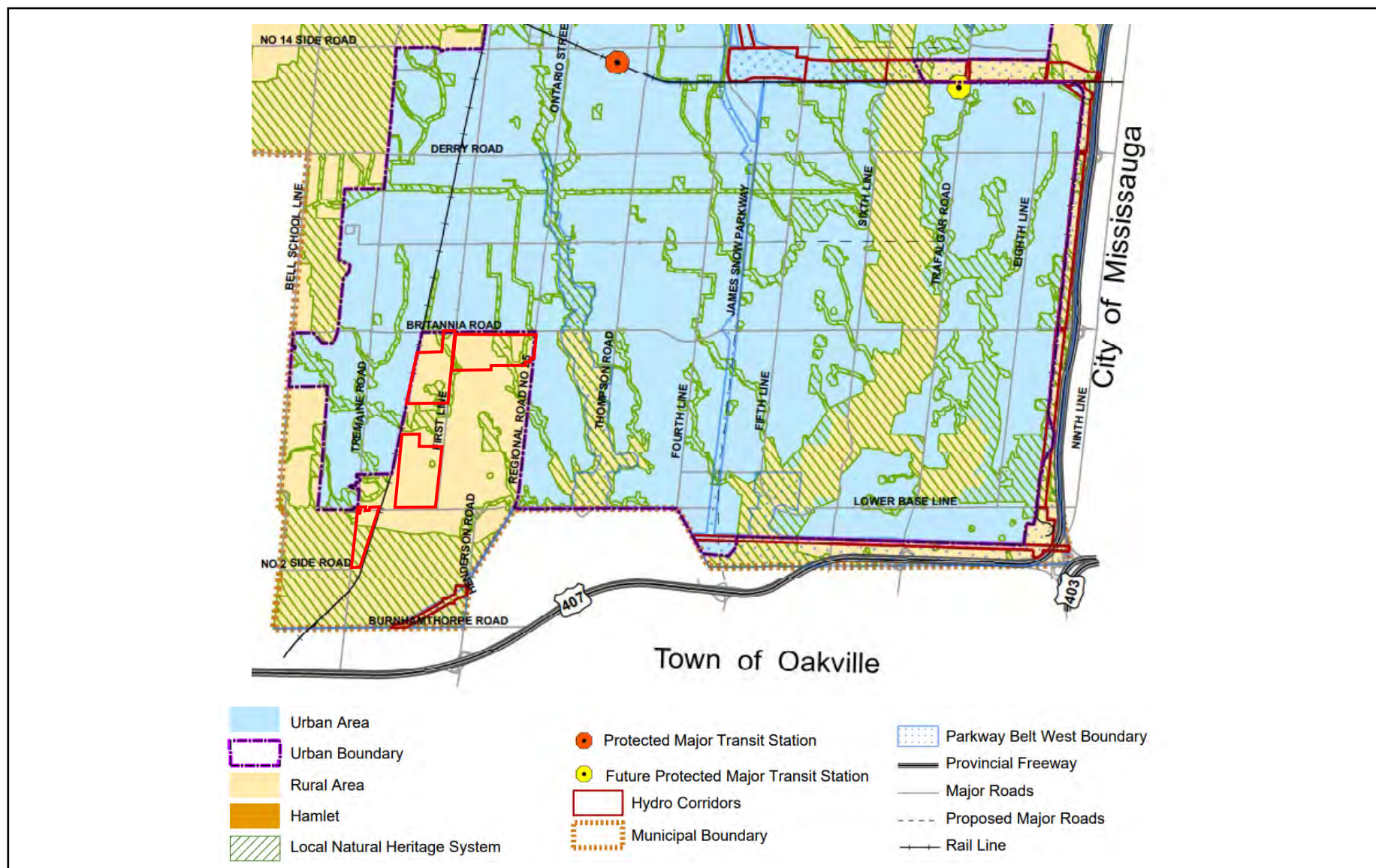


Figure 5: Town of Milton Official Plan (Feb 2026)
Schedule 3: Municipal Structure
 Milton Link

Subject Site

Date: June 2026



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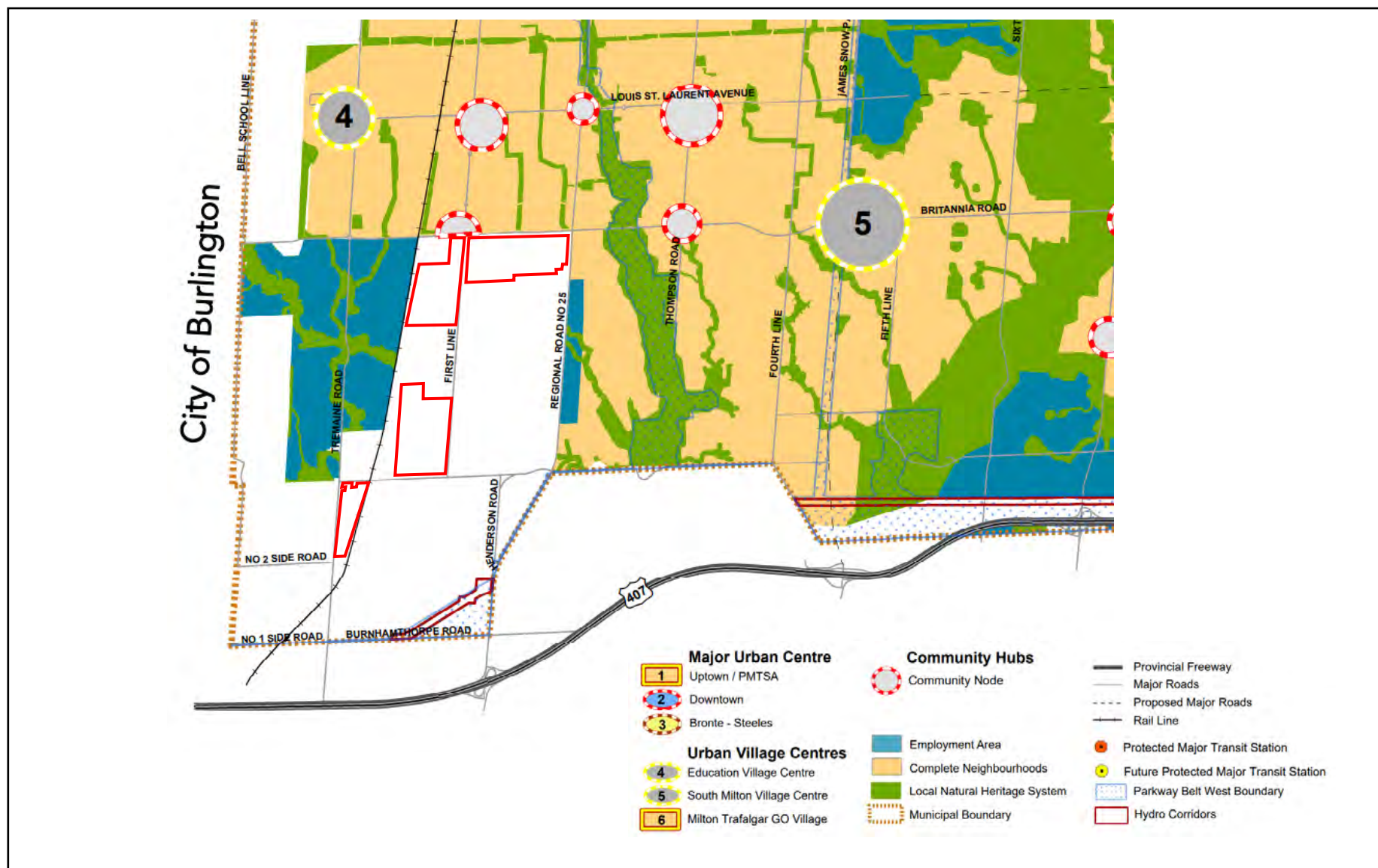


Figure 6: Town of Milton Official Plan (Feb 2026)
Schedule 4: Urban Structure
 Milton Link

 Subject Site

Date: June 2026



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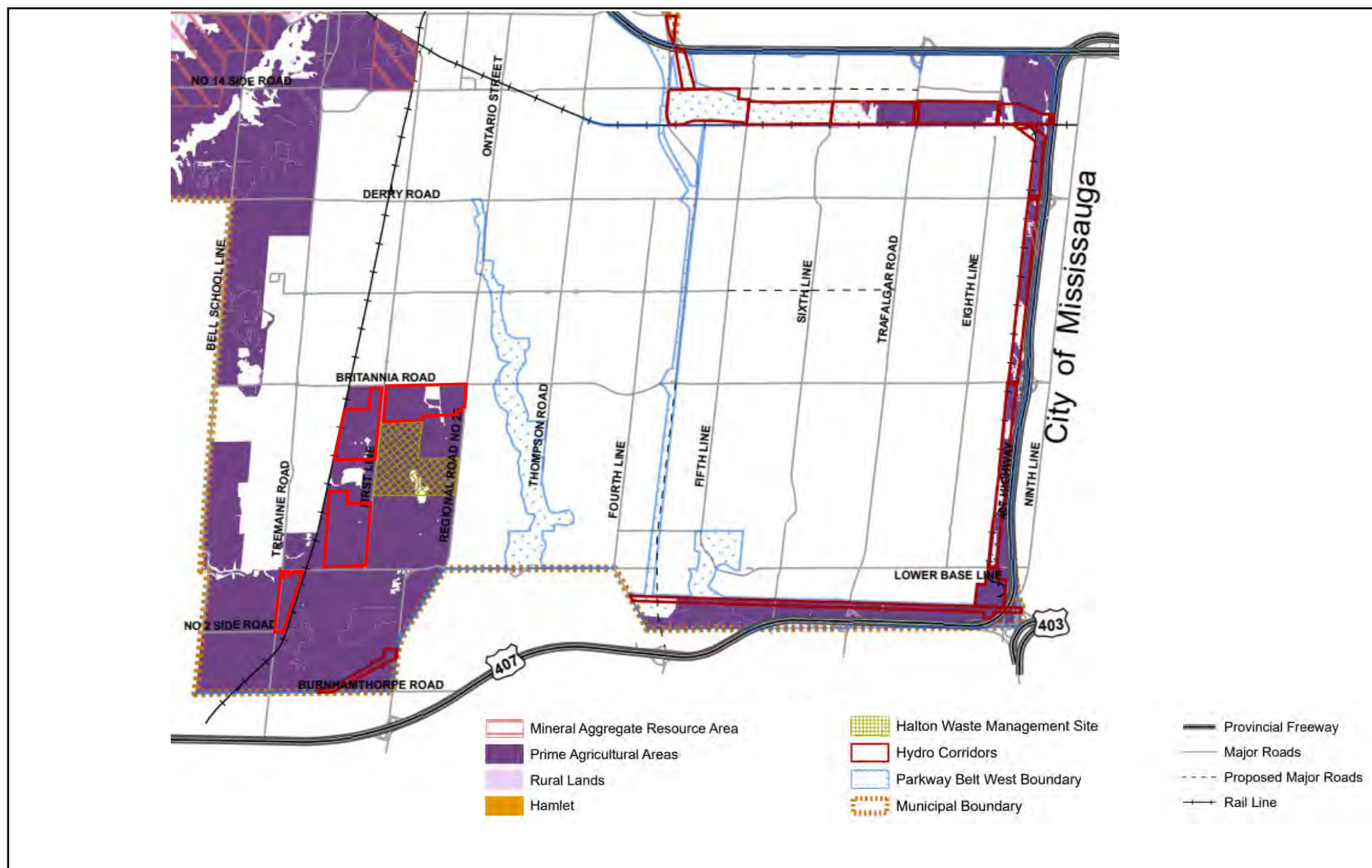


Figure 7: Town of Milton Official Plan (Feb 2026)
Schedule 5: Rural Structure
 Milton Link

Subject Site

Date: June 2026



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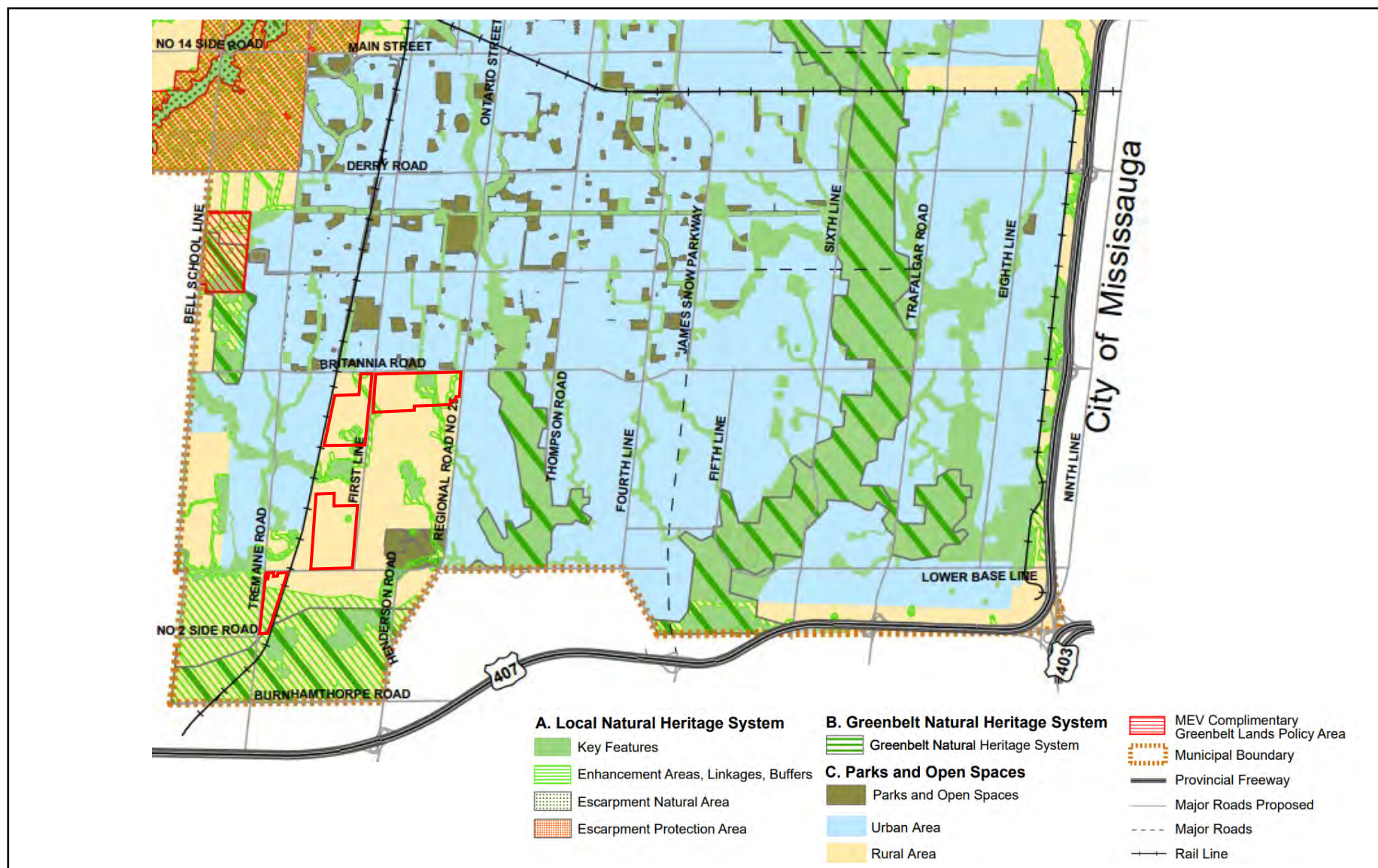


Figure 8: Town of Milton Official Plan (Feb 2026)
Schedule 6: Green System
 Milton Link

 Subject Site

Date: June 2026



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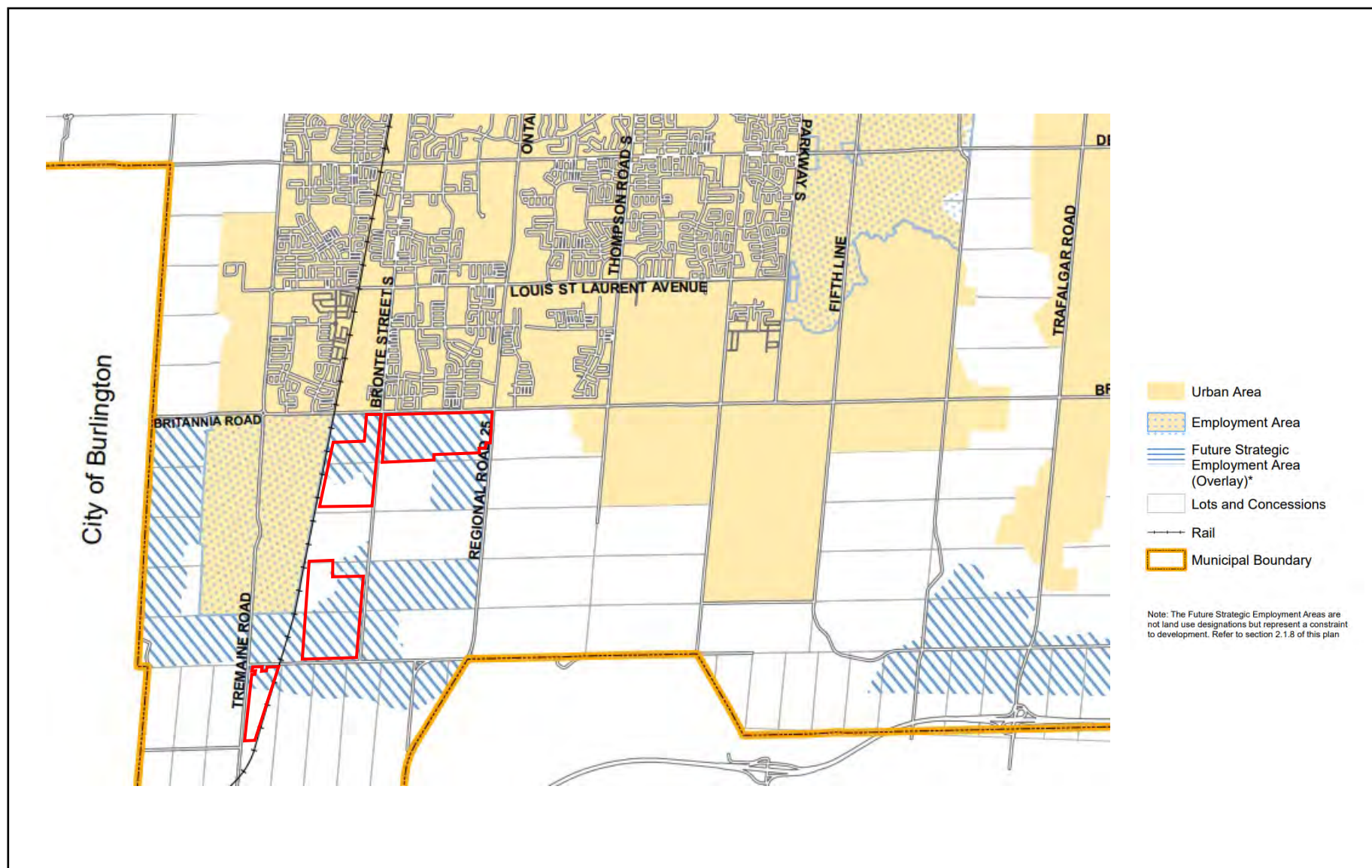


Figure 9: Town of Milton Official Plan (Feb 2026)
Schedule C: Future Strategic Employment Areas
 Milton Link

Subject Site

Date: June 2026



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4.0 PROPOSED OFFICIAL PLAN AND ZONING BY-LAW AMENDMENTS

4.1 Official Plan Amendment

The site is currently designated as Prime Agricultural Area and within the Rural Area (Schedule 5: Rural Structure) in the Town of Milton Official Plan (February 2026 Consolidation).

An Official Plan Amendment is being sought to amend the Town of Milton Official Plan (February 2026 Consolidation) to redesignate the majority of the Subject Lands to Industrial Area and be brought into the Sustainable Halton Plan Urban Area boundary (Schedule A – Urban Area Land Use Plan) as outlined in **Appendix A**, from its original designation of Prime Agricultural Area (Schedule 5 – Rural Structure).

The following schedules are being proposed to be amended to align with the proposed development and its intent:

- **Schedule A: Urban Area Land Use Plan**, the Subject Lands are proposed to be included within the SHP Urban Area Boundary and to redesignate the Subject Lands as Industrial Area, and Local Natural Heritage System.
- **Schedule C: Future Strategic Employment Areas**, the Subject Lands contain a Future Strategic Employment Area Overlay. It is proposed to amend Schedule C to identifying the Subject Lands as Urban Area and to have an Employment Area overlay.
- **Schedule E: Urban Districts and Neighbourhoods**, the Subject Lands are outside of the urban boundary. It is proposed to identify the Subject Lands as Urban Area.
- **Schedule F: Identified Mineral Resource Areas and Mineral Resource Extraction Areas**, the Subject Lands are outside of the urban boundary. It is proposed to identify the Subject Lands as Urban Area.
- **Schedule I: Known Landfill Sites**, the Subject Lands are outside of the urban boundary. It is proposed to identify the Subject Lands as Urban Area.
- **Schedule K: Rural Area Special Policy Areas**, the Subject Lands are designated as Rural Area. It is proposed to remove the Subject Lands from this Schedule.
- **Schedule L: Urban Area Special Policy Areas**, the Subject Lands are proposed to be identified as Urban Area.
- **Schedule 3: Municipal Structure**, the Subject Lands are currently identified within the Rural Area, immediately outside the Urban Area boundary, and include portions of the Local Natural Heritage System. It is proposed to amend Schedule 3 to designate the Subject Lands as Urban Area and to be included the Urban Boundary.
- **Schedule 4: Urban Structure** shows Employment Areas directly to the west and east of the site, with lands to the north identified as Complete Neighbourhoods and a Community

Node at First Line and Britannia Road West. It is proposed to amend Schedule 4 to designate the lands as Employment Area and Local Natural Heritage System.

- **Schedule 5: Rural Structure** designates the Subject Lands as Prime Agricultural Area. It is proposed to remove the Subject Lands from this Schedule as the lands will be within the urban area if approved.
- **Schedule 6: Green System** identifies most of the lands as Rural/Local Natural Heritage System (key features, enhancement areas, linkages and buffers) and a small portion of Phase 4 as Greenbelt Natural Heritage. It is proposed to designate the Lands as Urban Area with the respective Local Natural Heritage System and Greenbelt Natural Heritage System designation in place.
- **Schedule 7: Water Resources System** identifies the Subject Lands as Rural Area. It is proposed for the lands to be shown within the Urban Area.
- **Schedules 8a: Source Water Protection – Wellhead Protection Area** identifies the Subject Lands as Rural Area. It is proposed for the lands to be shown within the Urban Area.
- **Schedule 8b: Source Water Protection – Highly Vulnerable Aquifers**, identifies the Subject Lands as Rural Area. It is proposed for the lands to be shown within the Urban Area.
- **Schedule 8c: Source Water Protection – Significant Groundwater Recharge Areas**, identifies the Subject Lands as Rural Area. It is proposed for the lands to be shown within the Urban Area.
- **Schedule 9: Local Transportation Plan**, identifies the Subject Lands as Rural Area. It is proposed for the lands to be shown within the Urban Area.

Revised schedules form part of the Official Plan Amendment, and can be found in **Appendix B**.

4.2 Zoning By-law Amendment

The site is currently zoned as Agricultural Zone (A1) and Greenlands 'A' Zone (GA) as per Zoning By-law No. 144 -2003 (Town of Milton's Rural Zoning By-law) as shown in **Figure 10**.

A Zoning By-law Amendment is being sought to amend Zoning By-law No. 016-2014 (Town of Milton's Urban Zoning By-law) and Zoning By-law No. 144 -2003 (Town of Milton's Rural Zoning By-law) to rezone the Agricultural Zone (A1) and Greenlands 'A' Zone (GA) from the Rural By-law to **General Industrial (M2)** under the Urban Zoning By-law to allow for employment (industrial uses), with site-specific standards to support the proposed industrial development. As part of the proposed development, six stormwater management ponds are proposed, these facilities will be zoned to **Stormwater Management (OS-2)**. The natural heritage features and its respective

buffers guided by the Natural Heritage Environment Report are zoned as **Natural Heritage (NHS)**. The lands within the greenbelt area in Phase 4 will also be zoned as Natural Heritage (NHS).

The proposed amendment meets the intent of the Town of Milton's Official Plan and the Urban Zoning by-law and will facilitate efficient the proposed development. A copy of the draft site-specific Zoning by-law Amendment is attached in **Appendix B**.

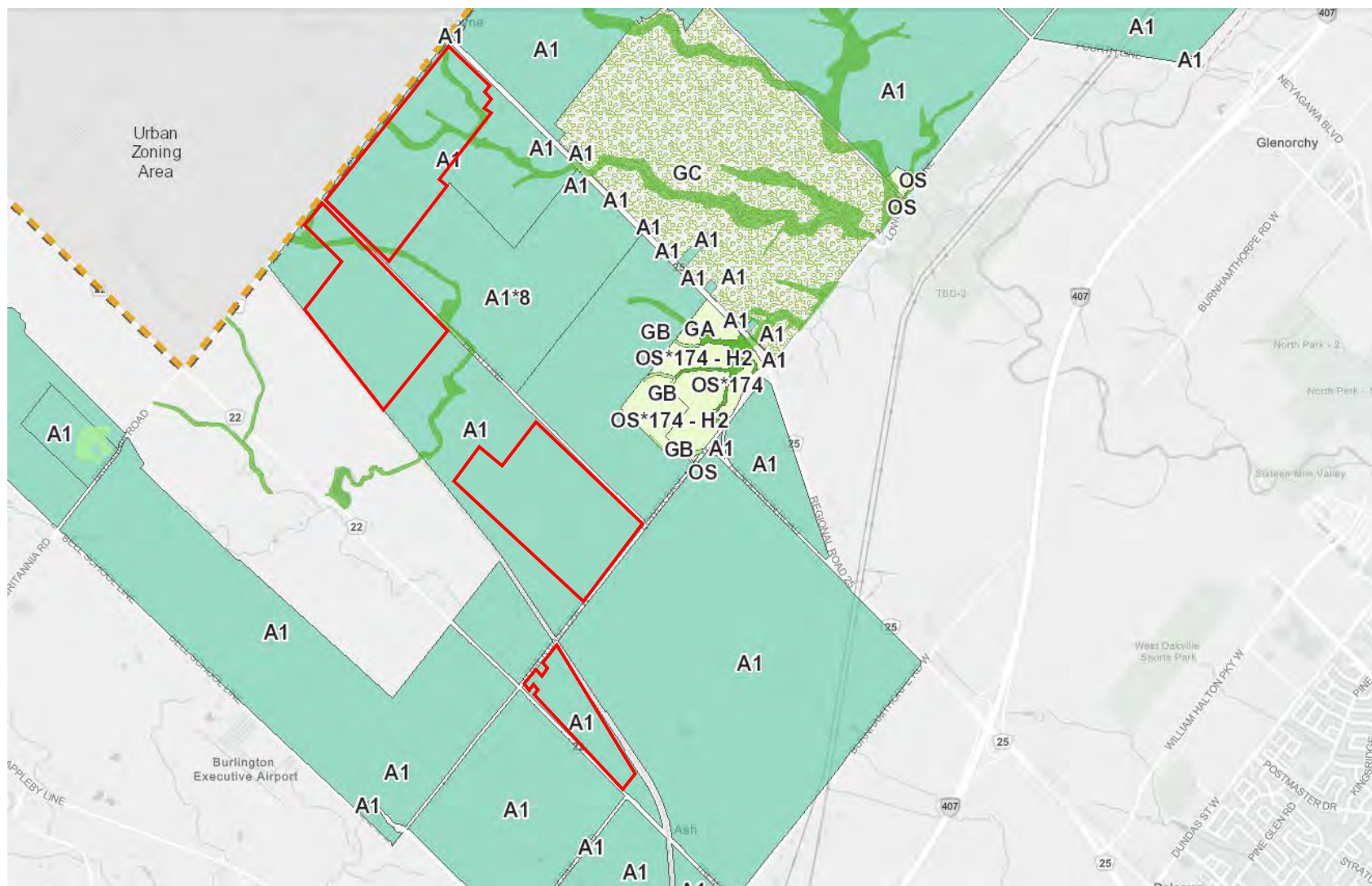


Figure 10: Town of Milton – Rural Zoning By-law Map
Milton Link

 Subject Site

Date: June 2026



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5.0 SUPPORTING DOCUMENTATION AND STUDIES

In support of this planning report and application the following reports were relied upon when reaching our conclusion.

Land Needs Assessment, urbanMetrics

urbanMetrics Inc. prepared a Land Needs Assessment Report in support of the urban boundary expansion and redesignation to industrial use to permit the proposed development. The Report analyzed planning policies, the Town's 2024 Land Needs Assessment, comparable intermodal hubs across Canada, and the Town's Development Charges Background Study (2026).

Based on the Town's Land Needs Assessment calculations, Milton's employment land density will rise to an average of 26 jobs per hectare by 2051. It's important to note that 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. Based on this, the Town is expected to require an additional 264 hectares of employment land by 2051 to accommodate approximately 46,843 new employment land jobs from 2026-2051. 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 are anticipated to support approximately 5, 000 industrial jobs at full build-out. The lands could accommodate roughly 90% of the Town's forecasted employment needs under the 24.5 jobs per hectare density scenario. Under this scenario, the Town would require an additional 264 hectares of employment land to 2051 to support the project growth of approximately 46,843 jobs from 2026-2051.

The report concluded that the Subject Lands being positioned within the urban boundary will ensure 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. In doing so, the Town would be able to meet the majority of its long-term employment land needs and advance its goal of achieving approximately 51,400 new employment land employment (ELE) category jobs from 2021 to 2051.

Economic Benefits Study, urbanMetrics

urbanMetrics Inc. prepared an Economic Benefits Study to provide the potential financial, employment and economic development-related benefits which would be generated through the proposed development, and identify how the development supports provincial and Regional policy direction and economic growth.

The study concluded the following key findings for the proposed development:

- Support approximately **5,000 industrial related jobs**. This would increase Milton's industrial employment base by 33%, which would represent a significant boost to the economy
- Generate approximately **\$282 million in one-time development charges** to the Town of Milton and Halton Region (*based on current 2026 rates*)
- Generate approximately **\$22.8 million in annual property tax revenue** which would benefit the Town, and Region.
- Generate approximately **\$2.9 billion in value** overall

Fiscal & Capital Impact Assessment, urbanMetrics

urbanMetrics Inc. prepared a Fiscal and Capital Impact Assessment for the proposed development to measure the financial impact on the capital and operation budgets of the Town of Milton that would be generated by the proposed development. As part of the analysis, one-time revenues (i.e. development charges, building permit fees and community planning fees), and ongoing revenues and costs were reviewed.

The assessment concluded the following for the proposed development:

- Generate approximately the following development charge revenues:
 - o \$53.7 million for the Town of Milton,
 - o \$205.3 million for Halton Region, and
 - o \$14.0 million in building permits for the Town of Milton
- The proposed development would require the completion of several DC-funded projects for servicing, including \$2.8 million in water infrastructure and \$22.1 million in wastewater infrastructure. These costs are lower than the \$44.4 million in water development charges and \$59.8 million in wastewater development charges that the proposed development would generate.
- Generate annual additional costs of \$2.3 million for the Town of Milton and \$3.2 million for Halton Region

Overall, based on the ongoing costs and revenues summarized above, the proposed development at full build out would generate an annual surplus of \$5.4 million for the Town of Milton and \$5.1 million for Halton Region.

Noise and Vibration Study, SLR

SLR prepared a Noise and Vibration Study to examine the potential for noise and vibration impacts from the proposed development and the effect on its surroundings. The study reviewed the proposed development against the D-6 guidelines requirements, and NPC-300 Guidelines. Additionally, SLR conducted a site visit to observe the acoustic environment and ran noise modelling. The recommended noise mitigation measures are as follows:

- Noise barriers for Phases 3 and 4
- Limit coupling and uncouple of tractor and trailer to a maximum of 15 km/hr
- Emergency generators must at a minimum be fitted with industrial grade silencers

In regards to the vibration assessment, the proposed development is not anticipated to contain any significant industrial vibration sources, and therefore a detailed vibration assessment is not required. Landscape berms have been provided along Britannia for protective measures although not required as part of the noise and vibration report.

Based on the analysis, with the inclusion of the buffer separation distances, physical mitigation measures and onsite policies, no adverse impacts from noise or vibration are anticipate. The operation of the proposed buildings are predicted to meet the applicable sound level limits, and meet the requirements of MECP Guideline D-6 and Publication NPC-300.

Air Quality Study, SLR

SLR prepared an Air Quality Study to identify existing and potential land use compatibility issues and evaluate options to achieve appropriate design, buffering, and/or separation distances between the proposed development and nearby sensitive uses. The study reviewed the planning policies, D-series guidelines, MECP's draft policies on odour impacts and assessment, and Ontario Regulation 419/05: *Air Pollution – Local Air Quality* and its associated air quality standards and assessment requirements.

Based on the review completed, there are no significant air quality sources emissions associated with the proposed development, and is anticipated to be compatible with the surrounding land uses from an air quality perspective.

Transportation Impact Study, LEA Consulting

LEA Consulting Ltd prepared a Transportation Impact Study in support of the OPA/ZBA application. The assessment reviewed the existing transportation infrastructure in the surrounding area, and assessed traffic impact of the proposed development.

As the proposed development is scheduled to be constructed in 4 phases (to be market dependent) within 10 years, the study assessed the following:

- three (3) horizon years; a five-year horizon to the year 2031 (Phase 1 & 2), a 10-year horizon to the year 2036 (Phase 3 & 4) and a 15-year horizon to the year 2041 (Full Built Out + 5 years).

The assessment concluded the following for the proposed development at full build out:

- Upon full build-out, the Subject Lands is anticipated to generate 700 two-way vehicular trips and 175 two-way truck trips during AM peak hour, and 875 two-way vehicular trips and 88 two-way truck trips during PM peak hour respectively.
- The intersection capacity analysis shows that all intersections will operate within capacity throughout the horizon years except for the intersection at Britannia Road & Regional Road 25 as well as Regional
- Road 25 & Lower Base Line W. For the Britannia Road & Regional Road 25 critical intersection, modifications to signal timing plan would be required in horizon year 2031 in order to accommodate future traffic volumes.

Agricultural Impact Assessment, Clark Consulting Services

Clark Consulting Services prepared an Agricultural Impact Assessment in support of the urban boundary expansion and for the redesignation to Industrial from Agricultural use. The report assessed the potential impacts of the proposed non-agricultural use on the agricultural system, address considerations related to avoidance, and to recommend way to minimize and mitigate potential adverse impacts.

The assessment concluded the following:

- The proposed development is uniquely situated to capitalize on synergies of proximity between the federally approved Milton Logistics Hub under construction by CN, and acknowledge that the soils on the Subject Lands are largely isolated pocket of agricultural land of lower priority owing to the nature of current and future land use, and the degree of fragmentation.

- It's suggested that the support of these lands to significant agricultural investment has generally been diminished over time through fragmentation and non-agricultural uses. The proposed development will contribute a further non-agricultural use to the area.
- Mitigation such as incorporating vegetative buffers, installation of signage, and fencing have been recommended to assist in mitigating direct and indirect impacts associated to the proposed development which will be reviewed as the development progresses.

Heritage Impact Assessment, Stantec Consulting

Stantec Consulting Ltd. has prepared a Heritage Impact Assessment (HIA) for the Subject Lands as the site contains four properties listed on the Town of Milton's Heritage List, including 4259 and 4393 Tremaine Road, 5122 First Line and 5694 Regional Road 25.

The property at 4393 Tremaine Road was excluded from the HIA, as it is subject to conditions issued under Section 54 of the *Canadian Environmental Assessment Act*, 2012.

The findings concluded that none of the three properties (4259 Tremaine Road, 5122 First Line and 5694 Regional Road 25) met the threshold for the cultural heritage value or interest (CHVI) based on the recent legislative changes. Therefore, mitigative measures for the proposed development are not required.

Notwithstanding the findings of the CHVI in the HIA, following the Town's terms of reference, the residence and barn at 5122 First Line were determined to have materials that may be worthy of salvage. The Proponent may consider salvage materials, either for reuse on the site if feasible, or for provision to a salvage company.

Engagement Summary, WW+P Architects and Planners

WW+P Architects and Planners prepared an Engagement Summary Report documenting consultation activities completed as of June 17, 2026, and identifying key themes, interests, and concerns raised by the public, stakeholders, Indigenous communities, and agency staff. The engagement program includes public open houses, meetings with municipal and regional staff, Indigenous consultation, stakeholder outreach, and an online public survey, with additional consultation planned throughout the approvals process.

Engagement activities completed to date include Public Open House #1, meetings with municipal and regional staff, discussions with the Mississaugas of Credit First Nation (MCFN), outreach to other Indigenous communities, and meetings with local stakeholders. Key concerns raised by participants related to truck traffic, congestion, air quality, noise, environmental impacts, cumulative effects associated with the adjacent CN Milton Logistics Hub, infrastructure capacity, flooding, wildlife, and potential impacts on nearby residential areas. Supportive

feedback emphasized the project's potential to generate employment, attract economic investment, improve infrastructure, and incorporate sustainability and environmental restoration initiatives.

The report concludes that the engagement process has provided valuable input to inform the ongoing refinement of the proposal. Consultation will continue throughout the planning approvals process, with future activities including additional public open houses, continued Indigenous and stakeholder engagement, coordination with municipal and regional staff, and ongoing communication through the project website.

Archaeology Assessments, Irvin Heritage

A Stage 1 Archaeological Assessment Report has been prepared by Irvin Heritage Inc for the overall Subject Lands. Given the results of the completed Stage 1 report, portions of the study area retain archaeological potential and are subject to a Stage 2 Archaeological Assessment Survey.

A Stage 2 Archaeological Assessment Report has been prepared by Irvin Heritage Inc for Phase 1 lands. A Stage 3 Archaeological Assessment Excavation is recommended for five sites (AiGw-1138, AiGx-497, AiGx-501, AiGx-500 and AiGw-1134) that retains Cultural Heritage Value or Interest.

A Stage 2 Archaeological Assessment Report has been prepared by Irvin Heritage Inc for Phases 2 and 3. The study concluded that a Stage 3 archaeological assessment excavation is recommended for a site (AiGw-1135) located within the Phase 2 lands that retains Cultural Heritage Value or Interest.

Please note that these reports are being reviewed by the Indigenous communities, and will be submitted to the Ministry shortly after this submission (June 2026). Indigenous engagement that has occurred is summarized in the Engagement Summary provided as part of this application.

Natural Environment Report & Environmental Impact Assessment, WSP

WSP Canada Inc. prepared a Natural Environment Report & Environmental Impact Assessment for the Subject Lands. The report documents existing natural heritage conditions on the Subject Lands based on available background information and results of field surveys completed in 2024 and 2025. In addition to the field surveys, policy documents (i.e. Halton Region Official Plan and Town of Milton Official Plan), and online database tools (i.e. Conservation Halton Online Regulation Mapping, Natural Heritage Information Centre, Geospatial Ontario Database, and more) were reviewed as part of the assessment.

Based on the assessment, the following findings were presented:

- Features included within the recommended Natural Heritage System are to be retained in-situ, with no modifications, aside from the proposed realignment of Tributary 1 of Sixteen Mile Creek.
- Development setbacks and buffer management are proposed and have been identified for retention.
- The proposed realignment of Tributary 1 of Sixteen Mile Creek and enhancement of the agricultural field between the Significant Woodland and Tributary 2 of Sixteen Mile Creek will increase the size of the NHS in the Subject Lands and result in an improvement over the existing conditions. Details of the proposed realignment and enhancement approach shall be confirmed and refined through updated submissions as the development application progresses.

This report has guided the delineation of the Natural Heritage System on the concept plan which has been reflected in the mapping for the proposed Official Plan and Zoning.

Stormwater Management Report, EnVision Consultants

EnVision Consultants prepared a Stormwater Management Report in support of the proposed development. Based on the report, the following findings were presented:

- The majority of the site lies within the Indian Creek watershed, with the eastern portion of the Phase 1 development area draining to Sixteen Mile Creek and insignificant portions of the Phase 3 and Phase 4 development areas within the Fourteen Mile Creek watershed.
- Unitary release rates and storage volumes for extended detention and peak flow control were established for Indian Creek and Sixteen Mile Creek through previous watershed modelling for development of the Boyne Survey neighbourhood on the north side of Britannia Road. Analyses have been completed to demonstrate that the unit rate approach results in much lower release rates relative a traditional approach of providing extended detention of the runoff from a 25 mm storm event and controlling post-development peak flow rates to pre-development levels for the 2 year through 100 year and Regional storm events. The more conservative unit rate approach has been adopted for the design of the stormwater management facilities for the Site.
- Wet detention ponds are proposed to treat the runoff from the majority of the Site. The facilities have been sized to achieve Enhanced water quality protection and meet or exceed the storage requirements established through the unit rate approach. Additional analyses will be completed during future stages of design to validate or refine this approach with the aid of the Town of Milton's watershed hydrology models.

- Low impact development practices, including but not limited to bioretention facilities and infiltration galleries, are proposed to provide water quality and quantity treatment for small, isolated areas not tributary to the stormwater management ponds, and to maintain pre-development recharge volumes across the Site. These practices are needed for areas draining to the retained woodlots and wetlands to preserve their hydrologic function, and for areas draining to smaller outlets from the Site to maintain drainage to the downstream watercourses.
- Improvements are required for the drainage systems south of the Phase 2 lands and west of the Phase 3 lands to adequately and safely convey treated runoff from the Site to the defined reaches of Indian Creek. Additional consultation with CN and Halton Region will be required to establish the preferred form and alignment of the downstream systems.
- Guidance has been provided for Erosion and Sediment Control Plan, which will be prepared for each phase of development during future stages of design.

Functional Servicing Report, EnVision Consultants

EnVision Consultants prepared a Functional Servicing Report in support of the proposed development. Based on the report, the following findings were presented for water supply, sanitary drainage and storm servicing:

Water Supply:

- Municipal watermain upgrades are required to service Phases 2, 3 and 4 of the development. 400mm watermain are proposed on First Line, Lower Base Line W and Tremaine Road which will connect to the existing 400mm watermain (Zone M4L) on Britannia Road W and a future 400mm watermain (Zone M4L) on Tremaine Road (Halton Region capital project 6657). Coordination with the Region is required to confirm the timing and potential alternative project delivery for capital project 6657
- Phase 1 will be serviced by an existing 750mm CPP transmission watermain (Zone M4L) on Britannia Road, Phases 2 and 3 will be serviced by a proposed 400mm watermain on First Line and Phase 4 will be serviced by a proposed 400mm watermain on Lower Base Line W
- There is expected to be sufficient water supply in the existing watermain network on Britannia Road to service each development phase. The Region's watermain infrastructure model will need to be updated to validate the available water supply, confirm the watermain sizing and arrangement to adequately service the full build-out of the area within which the proposed development is located.

Sanitary Drainage:

- Municipal sanitary sewer upgrades are required on First Line and Lower Base Line W to service Phases 2, 3 and 4 of the development. Halton Region capital project 6554, 6555 and 6556 which propose sanitary infrastructure on Tremaine Road and Lower Base Line W capture a portion of the municipal sanitary infrastructure required to service Phases 3 and 4 of the development. Coordination with the Region is required to confirm the timing and potential alternative project delivery for the capital projects
- Phase 1 of the development will be serviced by the existing 1200mm sanitary sewer on Britannia Road W. Phase 2 will be serviced by a proposed sanitary sewer system, ranging in size from 375mm to 525mm in diameter, on First Line which will discharge to the existing 1200mm sanitary sewer on Britannia Road W. Phase 3 will be serviced by a proposed 525mm on First Line which will discharge to the existing 2400mm sanitary sewer on Regional Road 25 via a proposed 750mm sanitary sewer on Lower Base Line W (Halton Region Capital Project 6554). Phase 4 will be serviced by a proposed 300mm sanitary sewer on Lower Base Line W which will discharge to the planned sanitary pump station on Tremaine Road (Halton Region Capital Project 6555) which ultimately discharges to the existing 2400mm sanitary sewer on Regional Road 25 via a twinned 300mm sanitary forcemain system (Halton Region Capital Project 6556) and a proposed 750mm sanitary sewer on Lower Base Line W (Halton Region Capital Project 6554)
- There is sufficient capacity in the existing sanitary sewer system to accommodate flows from the development. The Region's sanitary infrastructure model will need to be updated to validate the available sanitary sewer system capacity.

Storm Servicing:

- Each development phase is proposed to have separate storm servicing system(s) which will direct runoff to the respective stormwater management facilities. The storm servicing systems and stormwater management facilities will be designed to ensure that runoff from events up to and including the 100-year storm event will be captured, treated and attenuated on-site and released at a controlled rate within the allowable post-development limits to approved outlet locations in accordance with the Town's control requirements.
- The municipal infrastructure sizing and arrangement required to adequately service the ultimate build-out for the area within which the proposed development is located will be required to be completed at a later design stage; and
- The stormwater management requirements and constraints for the portions of the Bronte Creek and Sixteen Mile Creek watersheds within which the development is located will need to be confirmed.

Tree Inventory and Preservation Plan, Kuntz Forestry Consulting

Kuntz Forestry Consulting has prepared a tree preservation study that review the existing inventory of trees, and evaluate potential tree preservation opportunities that tie into the landscape plan and site plan.

In summary, a total of 943 individual trees and 16 tree polygons are located on the Subject Lands. The removal of 463 individual trees will be required to support the proposed development, which includes dead trees that are recommended to be removed due to safety concerns. The remaining 475 individual trees and 6 tree polygons can be saved provided appropriated tree protection measures are installed prior to construction.

As part of these findings, recommendations have been suggested which have been reflected into the landscape plan and will need to be assessed prior to construction.

CONCLUSION

The proposed development, Milton Link, responds to a need for additional employment growth in the Town of Milton, in a strategic location adjacent to the CN Milton Logistics Hub. As outlined in this Planning Justification Report, the proposed development represents a strategic transition that brings the Subject Lands into the urban boundary and permits for industrial uses in alignment with the Town's long-term employment objectives.

The proposed Industrial Area designation would permit a range of employment-generating uses consistent with the Town's vision for sustained economic development. The project is expected to deliver substantial economic benefits to both the Town and the Region.

At full build-out, the project is anticipated to support approximately 5,000 permanent jobs, and generate approximately \$22.8 million in annual property tax revenue, providing a significant and ongoing fiscal contribution to support municipal services and infrastructure throughout the Town of Milton, Halton Region and the Province.

Further, as reviewed in the Employment Land Needs Assessment, prepared by urbanMetrics, the Town's 2024 Land Needs Assessment was completed and approved ahead of Federal approval of the CN Milton Logistics Hub, resulting in an employment and land needs forecast which does not accurately reflect the needs of the Town and the Logistics Hub. The proposed development responds directly to this need.

The Official Plan Amendment proposes to redesignate the lands from Prime Agricultural Area within the Rural Area to Industrial Area and Local Heritage System, along with incorporating the Subject Lands within the Sustainable Halton Plan Urban Area boundary. As identified in the Town's Official Plan (last office consolidation date of February 2026), the site is subject to the Future Strategic Employment overlay as identified on Schedule C. The purpose of this overlay is to identify and protect strategically located lands from incompatible uses specifically those in proximity to major transportation facilities and existing Employment Areas that are best suited for employment purposes beyond the current planning horizon of the Plan. The proposed Official Plan Amendment is rational and reflective of policy, and will redesignate the lands to permit industrial uses, while protecting the natural heritage system located on the site.

The Zoning By-law Amendment proposes to rezone the lands from Agricultural Zone (A1) and Greenlands 'A' Zone (GA), as per Zoning By-law No. 144 -2003 (Town of Milton's Rural Zoning By-law), to General Industrial (M2), as per Zoning By-law No. 016-2014 (Town of Milton's Urban Zoning By-law), to allow for employment (industrial uses), with site-specific standards to support the proposed industrial development. As part of the proposed development, six stormwater management ponds are proposed, these facilities will be zoned as Stormwater Management (OS-

2). The natural heritage features and the associated buffers will be zoned as Natural Heritage (NHS).

Detailed studies in support of the proposed development were completed including investigations related to engineering (servicing availability, stormwater management), soils (geotechnical and hydrogeological), environment and ecology (geomorphological), traffic and land use compatibility (traffic, noise, and air quality), employment analysis, heritage, and archaeology. The findings of these studies conclude that the proposed development is compatible with, and can be built with no adverse impact to, the adjacent existing and planned land uses.

In summary, the proposed development leverages the Subject Lands' strategic location adjacent to the CN Milton Logistics Hub and the Halton Waste Management Site to accommodate employment uses that are highly compatible with the surrounding industrial and logistics network. The proposal will strengthen the long-term viability and economic importance of this strategically significant employment area within the Greater Toronto Area.

The proposal represents an efficient and appropriate use of land, facilitating significant employment growth, economic investment, and enhanced goods movement opportunities while simultaneously protecting, restoring, and enhancing valuable natural heritage features and ecological functions on the Subject Lands.

The proposed development is consistent with and supports the objectives of applicable provincial, Regional, and municipal planning policy frameworks, including the Provincial Planning Statement, the Region of Halton Official Plan, and the Town of Milton planning policies.

The applications advance broader economic development, employment, and environmental stewardship objectives while contributing to the creation of a complete and sustainable employment area. Accordingly, the applications represent good planning, are appropriate for the Subject Lands, and are in the public interest. As such, we recommend approval in support of the proposed development.



Davin McCully, MCIP RPP