



URBANTECH®

March 15, 2024

Submitted via ERO website

**Re: New Regulation to Focus Municipal Environmental Assessment Requirements
ERO No. 019-7891**
Submission on behalf of the Milton Phase 4 West Landowner Group Inc.
(Britannia Secondary Plan - Milton, ON)

Thank you for the opportunity to provide input into this proposal. We understand it is the Ministry's intent to revoke the Municipal Class Environmental Assessment (MCEA) and create a streamlined EA regulation for higher-risk municipal infrastructure projects.

On behalf of the Milton Phase 4 (West) Landowner Group Inc. ("the Group"), who have landholdings in the Britannia Secondary Plan (refer to the attached plan) in the Town of Milton, we are supportive of the Ministry's proposal to revoke the MCEA and complete the planning, engineering, and consultation work for lower-risk projects as part of other complimentary processes and technical studies at the municipal level. The changes proposed will assist the Town of Milton in expediting the delivery of critical public works infrastructure necessary to more quickly advance approvals for housing construction in the Britannia Secondary Plan.

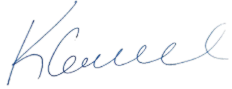
Details regarding the implementation of the proposed regulation, and any resulting changes to infrastructure study requirements at the municipal level, will be important to achieving the objective to more effectively deliver critical public works to support new housing supply. We look forward to any opportunity to provide input on implementation matters and/or direction from the Ministry to ensure that changes or alternative study processes to address design requirements for infrastructure no longer subject to the EA Act are equally focussed on the timely delivery of infrastructure.

Finally, please consider the following two (2) recommended changes to Table 1 (Proposed Part II.4 Project List), provided in the Ministry's *Summary of Requirements* document:

- Referencing Table 1, Item #8 (Sewage Treatment Facilities): For existing wastewater treatment plants, Table 1 outlines that expanding a facility by more than 25% of current rated capacity will trigger the Municipal Project Assessment Process (MPAP). We would recommend that the baseline be increased to 50%. Environmental considerations associated with existing wastewater treatment plant expansions are predictable, well understood, and well controlled through existing regulations and plant design.
- Referencing Table 1, Item #5 (Water Treatment Facilities): Similar to the point above, we would recommend that consideration is also given to including a 50% trigger for existing water treatment plant expansions before the MPAP would apply.

Again, we appreciate the opportunity to provide our feedback and re-iterate our support of the Ministry's proposal. This new regulation will help expedite the construction of much needed housing in the Town of Milton as well as assist the Province in achieving its goal to build 1.5 million homes in Ontario by 2031.

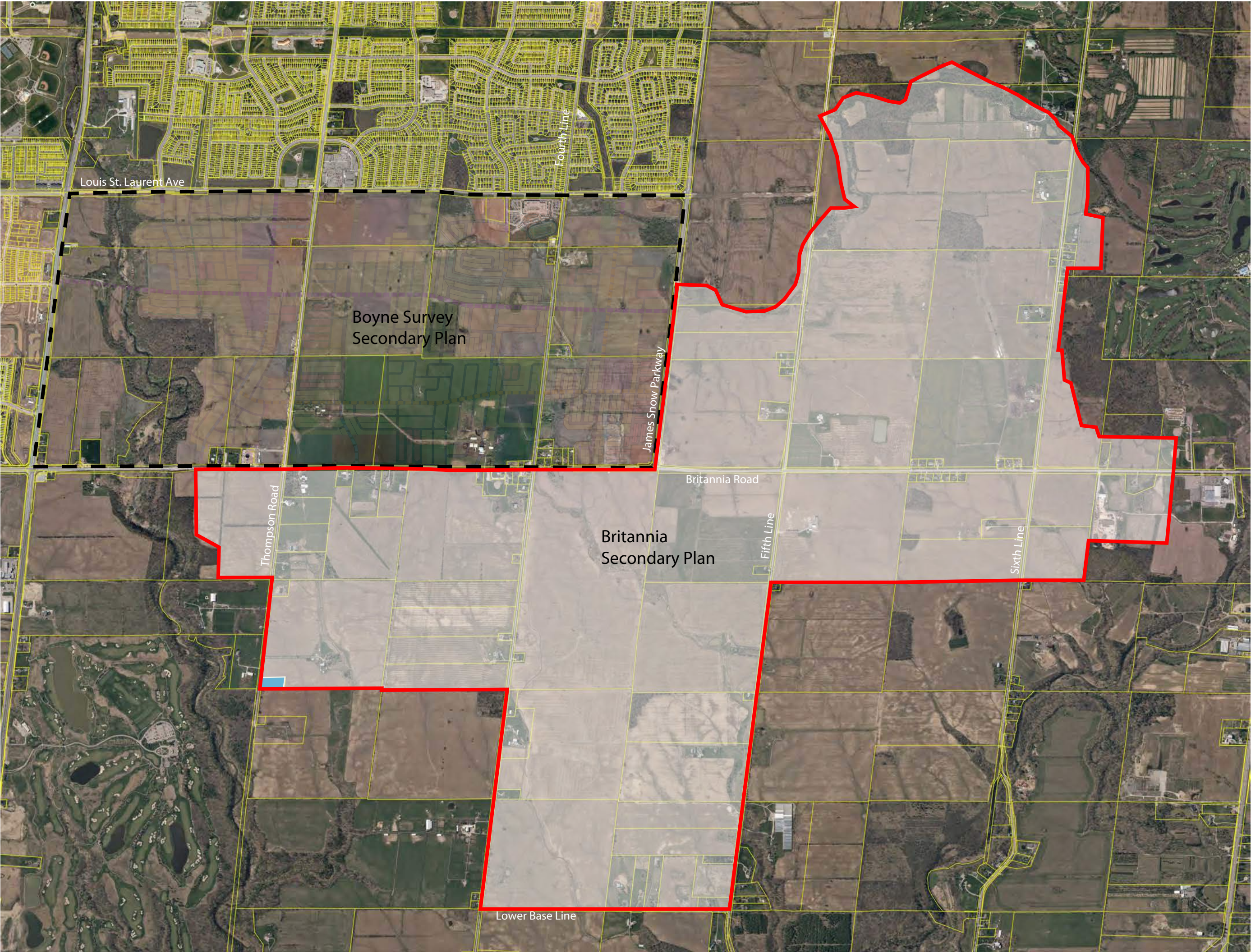
Regards,
Urbantech® Consulting

A handwritten signature in blue ink, appearing to read 'K Connell', is positioned above the printed name.

Kate Connell, P. Eng.
Senior Project Manager

CC: Milton Phase 4 West Landowner Group
Delta Urban Inc.

MP4 West Landowners Map



Legend

Secondary Plan Boundary

Boyne Survey Boundary

Note:
Orianna Glen Homes Corp Britannia By-Pass Lands is owned by Trinison but under contract to Mattamy Homes.
Parcel data based on Savanta Ownership Map, last updated April 2019 & information provided by DeltaUrban January 6, 2023

DATE: November 22, 2023

SCALE: Not to Scale

Data Source: First Base Solutions Aerial Flown 2017