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July 11, 2025

Via Email

Our File No.: 241902

The Honourable Rob Flack
Minister of Municipal Affairs and Housing
777 Bay Street, 17 Floor
Toronto, ON M7A 2J3

Attention: Kylie Li, Municipal Services Office Centre Ontario

Dear Sirs/Mesdames:

Re: ERO 024-OP-242706
Town of Milton – Approval to Amend a Municipality’s Official Plan
Official Plan Amendment 92

We are counsel to the Milton Phase 4 (West) Landowners Group (the “Group”). The Group is comprised of landowners within the Britannia Secondary Plan, within the Town of Milton (the “Town”), and is identified in the Registered Landowners Summary Table (Schedule A) and illustrated in the Landownership Map (Schedule B) attached to this letter.

The Ministry of Municipal Affairs and Housing recently received Official Plan Amendment 92 (OPA 92) from the Town for a decision. OPA 92 proposes an amendment to the Town’s Official Plan to incorporate new policies and schedules, and to update existing policies. We are writing to the Ministry to set forth concerns with OPA 92 and request modifications to OPA 92 to resolve those concerns.

A. Background

The Britannia Secondary Plan is the product of years of working cooperatively with municipal planning staff, the Town’s consulting team, Region of Halton staff, Conservation Halton and the public, that resulted in the Town approving the Britannia Secondary Plan on January 27, 2025. The Britannia Secondary Plan sets out the vision for the Britannia Secondary Plan area to be developed as a complete, sustainable, connected, attractive and well serviced community providing much needed new housing, retail uses, parks, schools, places of worship and active transportation all within walkable neighbourhoods. The new Britannia community will provide 17,500 new homes for 57,500 new residents with 9,300 total new jobs.



On February 13, 2025, we provided comments on the draft Official Plan (dated November 2024) to the Town and we also met with Staff to discuss our comments on February 18, 2025. Furthermore, on March 17, 2025, the Group, through its planning consultant MHBC, wrote to the Town requesting modifications to OPA 92 to ensure it aligns with the planned vision for the recently approved Britannia Secondary Plan. The requested revisions were not implemented by the Town and we are therefore writing to the Ministry to request modifications to OPA 92 to ensure OPA 92 is not inconsistent with, and does not negatively impact, the recently approved Britannia Secondary Plan. A copy of MHBC's letter is attached.

B. Requested Modifications About Prevailing Policies

Part 1, Section 1, Policy 1.1.4 of OPA 92 currently provides:

- “In the event of a conflict between a policy and schedules in Part 1: New Direction: a Vision to 2051 and a policy that is in the Part 2 – Local Policy Direction or Part 3 – Regional Policy Direction for the Town of Milton, the policy and schedules in Part 1- New Direction: A Vision to 2051 prevail.”

In speaking with Town staff, we understand that the language noted above mistakenly provides that Part 1 – New Direction: a Vision to 2051 will prevail in the event of the conflict. However, it was in fact intended for the Part 2 – Local Policy Direction or Part 3 – Regional Policy Direction for the Town of Milton, to prevail. Accordingly, we request the policy be modified as follows:

- “In the event of a conflict **or inconsistency** between a policy and schedules in Part 1: New Direction: a Vision to 2051 and a policy that is in the Part 2 – Local Policy Direction or Part 3 – Regional Policy Direction for the Town of Milton, the policy and schedules in Part 1- New Direction: A Vision to 2051 prevail, **with the exception of the policies and schedules in Part 2, Section 12, Secondary Plans, which shall prevail.**”

Part 2, Section 11, Policy 11.4.3.6, states that “The Secondary Plans prepared for specific areas of the Town and identified in Section 12, Policy C.1.3 provide a policy framework to guide development and manage growth within the Secondary Plan areas. Where there is a conflict between the policies for these Secondary Plan areas and the policies of this Plan, the Secondary Plan policies shall prevail.”

While Policy 11.4.3.6 provides some comfort to the Group that the Britannia Secondary Plan policies will prevail in the event of a conflict, the Group requests that the following modifications be made:

- Section 12, Policy C.1.3 of OAP 92 be revised to list the Britannia Secondary Plan as “Section C.13 Britannia Secondary Plan” among the other secondary plans listed in C.1.3, so it is clear Policy 11.4.3.6 applies to the Britannia Secondary Plan as well.



- Section 11, Policy 11.4.3.6 be revised so the Secondary Plans shall prevail not only in the event of a conflict, but also in the event of an 'inconsistency', with the parent Official Plan.
- Section 11, Policy 11.4.3.6 should also state that the Secondary Plans prevails in the event of a conflict or inconsistency between the policies 'and schedules' for these Secondary Plan areas and the policies 'and schedules' of the parent Official Plan. Currently, Policy 11.4.3.6 only speaks to conflicts with policies and not with schedules, which reference should be included for comprehensiveness.

Collectively, these requested modifications will ensure that the more detailed and more current policy framework and schedules for the Britannia Secondary Plan area, as approved by the Town earlier this year, will guide the development vision for the Britannia Secondary Plan and will not be frustrated by any policies in the Town's parent Official Plan, which may be dated and may conflict or be inconsistent with the Britannia Secondary Plan.

C. Secondary Plans and Incorrect Cross-References That Require Correction

OPA 92 proposes an amendment to the Town's Official Plan to incorporate new policies and schedules, and to update existing policies. It implements this objective by:

- adding new policies that form Parts 1, 2 and 3, New Direction A Vision to 2051;
- amending the policies in Part 2, Sections 4 through to 11; and
- adding a new section Part 3, Section 14 Regional Policy Direction.

The Town's Secondary plans are found in Chapter 12 of the Town's Official Plan, which are not proposed to be amended through OPA 92. However, many of those Secondary Plans, including the Britannia Secondary Plan, refer to policies in the Town's parent Official Plan, and because the parent Official Plan is being amended materially through OPA 92, many of the cross-references in existing Secondary Plans are no longer correct. Clearly, the Town must bring forward a housekeeping OPA to address this issue.

In the interim, however, to address this concern, we request that OPA 92 be amended so there is clear language that provides that until the housekeeping OPA is brought forward by the Town to address incorrect cross-references, the policies in the existing Official Plan, as they read on the day before OPA 92 was approved by the Minister, shall continue to apply to the Britannia Secondary Plan (and other Secondary Plans impacted). Alternatively, OPA 92 should not be approved by the Minister until the housekeeping matter noted above is addressed by the Town.

D. South Milton Village Centre Minimum Density Requirements

The *South Milton Village Centre* is defined as Urban Centre and a Strategic Growth Area in OPA 92 and is partially located within the northwest, southeast and southwest quadrants of the Britannia Secondary Plan where Britannia Road intersects with James Snow Parkway.



Part 1, Section 2, Policy 2.1.1.8 has been added and states under Objective 2, “Achieve the minimum development density targets that apply to the ‘Strategic Growth Areas and the Protected Major Transit Station Areas in Table 2 by the 2051 planning horizon of this Plan’. Table 2 on page 24 of OPA 92 proposes a minimum density of **100 residents and jobs combined per hectare** with an **80/20** percentage split of residents to jobs to be provided. In addition, Policy 2.3.3 (specifically 2.3.3.22 and 2.3.3.23) have been revised to require a minimum development **density of 100 residents and jobs combined per hectare** and a **mix of 80 to 20** percent residents to jobs, within Urban Village Centres.

While we recognize that the Strategic Growth Area and Urban Village Centre within the Britannia Secondary Plan will be planned to accommodate higher densities and transit supportive development, the achievement of a minimum density of 100 residents and jobs per hectare will be a long term goal for the overall area and is likely not achievable in the initial stages of development, given the extent of schools and parks that are also currently proposed within the area, and the significant amount of retail and commercial development that is planned to be provided for the area.

For these reasons, we request that Part 1, Section 2, Policy 2.3.3.22 be amended as follows:

2.3.3.22 Achieve a minimum development density target of 100 residents and jobs combined per gross hectare in the South Milton Village Centre, in accordance with the applicable policies of the Britannia Secondary Plan, **recognizing that this will take place over the long term** subject to the availability of appropriate infrastructure **and through the intensification and redevelopment of the initial phases of development**.

In making this request, we note that the Regional Official Plan, in the footnotes to Table 2B, Strategic Growth Area Targets, provides that general targets for an overall proportion of residents and jobs are to be planned for and achieved over the long-term. We also understand, in speaking with City staff, it is Staff’s position that the new South Village Urban Centre minimum density target, as set out in OPA 92, is to be planned for and achieved over the long-term. The requested modification, therefore, is consistent with the planned redevelopment of the Britannia Secondary Plan, but in our view it would nevertheless be beneficial for the requested revision approve to be incorporated into OPA 92 to make clear the minimum development density targets are a long-term objective and development in the near future will not be prohibited as a result of these policies should development, looked at in isolation, not meet the minimum density of 100 residents and jobs combined per hectare and a mix of 80 to 20 percent residents to jobs.

We thank the Minister the Ministry Staff for considering the requested modifications set out in this letter. Our client would be pleased to meet to review these concerns.

Goodmans^{LLP}

Yours truly,

Goodmans LLP

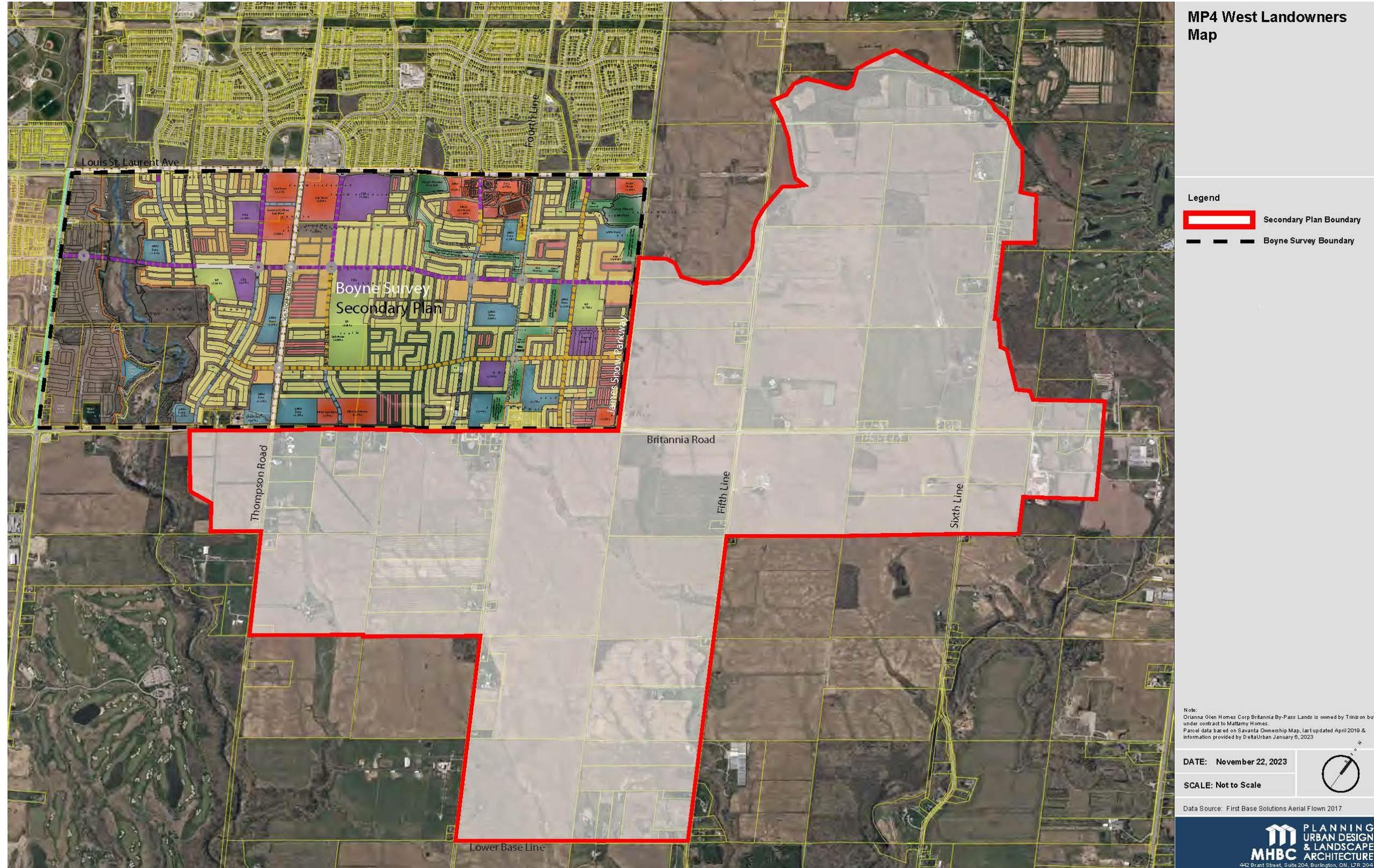


Joe Hoffman
JBH/
Encl.

1380-9852-7768

SCHEDULE – A –
Ownership Summary Table

MP4 (West) Landowners Group - Legal Entities	
Entities	Common Name
Argo Developments (5th Line) Ltd.	Argo Development Corp.
Mil Con Four Britannia Developments Limited Mil Con Four Thompson Developments Limited	Fieldgate Developments Fieldgate Developments
Milton Britannia Development Corp. Milton Fifth Line Development Corp. Fifth Line (5368) Milton Development Corp.	State Building Corp State Building Corp State Building Corp
Laurier Brown Milton East Developments Inc. Cedar Brown South Milton	Cedar City Developments Cedar City Developments
Orianna Glen Homes Corp By-Pass Lands Britannia Farms Inc. Fifth Line Farming Limited (Parcel 1 & Parcel 2) Mattamy (Milton East) Limited	Mattamy Homes Mattamy Homes Mattamy Homes Mattamy Homes
Venturon Development (Milton) Inc. Venturon Development (Milton 46) Inc. Venturon Development (Milton 90) Inc. 12300 Brit Holdings Ltd.	National Homes National Homes National Homes National Homes
Neamsby Investments Inc. Cedarlard Construction Inc.	The Remington Group The Remington Group
Albanella Development Ltd. Orianna Glen Homes Corp. Sempronria Estates Inc. Trebiano Trail Developments Ltd. (includes 5526 Fourt Neutrino Developments Inc. Casape Developments (BT) Inc.	Trinison Management Corp. Trinison Management Corp. Trinison Management Corp. Trinison Management Corp. Trinison Management Corp. Trinison Management Corp.
Milton Ex-EE	Tom Tsampiris
Britannia Sixth Line Holdings Limited	Medallion Corporation
Branthaven (Spina) Branthaven (Reid Lands)	Branthaven Development Branthaven Development
NDB Milton Developments Inc. NDB Fourth Line Developments Inc.	Stanford Homes Stanford Homes
Martino (Milton) Limited Lands	D'Orazio Group of Companies
Tahlequa Holdings Inc. Codroy Developments Inc.	Townwood Homes Townwood Homes

SCHEDULE – B –
Landownership Map




March 17, 2025

Mayor Krantz and Members of Council
Town of Milton
150 Mary Street
Milton, ON
L9T 6Z5

Dear Mayor Krantz and Members of Council:

RE: WE MAKE MILTON OFFICIAL PLAN

Amendment 92 to the Town of Milton Official Plan – Council Meeting March 17, 2025

REPORT No. DS-019-25

MP4 WEST LANDOWNER GROUP COMMENTS

OUR FILE: 18186A

We are writing to you as the planning consultants for the Milton Phase 4 (West) Landowners Group (the "Group") with regard to Amendment 92 which is the first comprehensive amendment in the We Make Milton Official Plan review and update project for revisions to the Town of Milton's Official Plan which is to be considered for adoption by Town Council at its meeting on March 17, 2025. Amendment 92 to the Town of Milton Official Plan is hereafter referenced as the new Interim Official Plan.

The Group is comprised of registered landowners within the Britannia Secondary Plan, which was approved by Town Council on January 27, 2025. The Group is identified in the enclosed Registered Landowners Summary Table (Schedule A) and illustrated in the attached Landownership Map (Schedule B).

We provided comments on the draft of the Interim Official Plan (dated November 2024) to Staff on February 13, 2025, a copy of which is attached hereto as Schedule C. We also had the opportunity to meet with Staff to discuss our comments on February 18, 2025.

During our meeting with Staff, it was confirmed that the conflicting policies that specifically related to the *South Milton Village Centre* minimum density requirements would be addressed. We have also reviewed the Comment Response Table provided with the Staff Report and note that several of our comments have been addressed.



South Milton Village Centre and Britannia Secondary Plan Urban Village Centre

The *South Milton Village Centre* is defined as a *Strategic Growth Area* in the new Interim Official Plan and is partially located within the northwest, southeast and southwest quadrants of the Britannia Secondary Plan where Britannia Road intersects with James Snow Parkway. In the Britannia Secondary Plan this area is designated as *Urban Village Centre*. The Britannia Secondary Plan, approved by Council on January 27, 2025, has no defined minimum density specific to the *Urban Village Centre*. The *Urban Village Centre* is situated within the *Central Neighbourhood* that spans a much larger area north and south of Britannia Road in the Britannia Secondary Plan and has a density target of 84 residents and jobs per hectare as set out in Policy C.13.5.2. The overall density target for the entire Britannia Secondary Plan has been planned for 75 residents and jobs per hectare as set out in Policy C.13.3.1.

In the new Interim Official Plan, the new urban structure mapping (Schedule 4) shows the *South Milton Village Centre* proposed as a *Strategic Growth Area*. Policy 2.1.1.8 has been added and states under Objective 2, *"Achieve the minimum development density targets that apply to the 'Strategic Growth Areas and the Protected Major Transit Station Areas in Table 2 by the 2051 planning horizon of this Plan"*. Table 2 on page 24 of the new Interim Official Plan proposes a **minimum density of 100 residents and jobs combined per hectare** with an **80/20** percentage split of residents to jobs to be provided.

New policies for *Urban Village Centres* are found in Section 2.3.3 of the Plan as follows:

2.3.3 Urban Village Centres

Milton's Urban Village Centres are distinctive local destinations and gathering areas at various locations within the Urban Area that contribute to create a strong sense of place. They are primary centres focused around a unique feature such as an academic institution, an inter-regional transit facility, or retail and service road.

Residential, retail and service commercial uses, public service facilities, related employment uses, public squares and open spaces are integrated in the Urban Village Centres to promote walkability and social interaction, and contribute to the vitality of the area.

Three Urban Village Centres are identified on Schedule 4 - Urban Structure: the Education Village Centre, Milton Trafalgar GO Village, and South Milton Village Centre.

The policies found in Section 2.3.3 (specifically 2.3.3.22 and 2.3.3.23) have been revised to now also state that the area should achieve a **minimum development density of 100 residents and jobs combined per hectare** and a **mix of 80 to 20** percent residents to jobs, as discussed during our meeting with staff on February 18, 2025. This was previously defined as a minimum density of 150 residents and jobs per hectare with a mix of 65 to 35 percent residents to jobs. We also note that

the policy preamble for the South Milton Village Centre notes that it is identified on Schedule 4 – Urban Structure as a conceptual overlay.

Through our review of the background reports prepared to support the new Interim Official Plan, there has not been an identified minimum density provided for the *Urban Village Centre* in the Britannia Secondary Plan. The reports specifically reference the Britannia Secondary Plan as being “in progress” with no assigned density targets.

While the *South Urban Village Centre* was not identified as a *Strategic Growth Area* in the Town’s background reports or in the Region’s Official Plan Amendment No. 49 as approved by the Minister, Staff have noted that they are including it as a *Strategic Growth Area* in the new Interim Official Plan. Staff further note that in the Regional Official Plan, in the footnotes to Table 2B, Strategic Growth Area Targets, it states:

** For Urban Growth Centres, planned to be achieved by 2031; for Major Transit Station Areas and Regional Nodes, planned to be achieved beyond the 2051 planning horizon of this Plan.*

*** To be planned for and achieved across the entire Strategic Growth Area over the long-term and in accordance with Section 55.3 of this Plan*

55.3 The Regional Structure also sets out targets that apply to Strategic Growth Areas as contained in Table 2b, including:

a) specific minimum density targets, planned to be achieved by 2031 or earlier for Urban Growth Centres and beyond the 2051 planning horizon of this Plan for other Strategic Growth Areas; and

b) general targets for an overall proportion of residents and jobs to be planned for and achieved over the long-term.

Staff believe this language carried forward will be applicable to its defined Strategic Growth Areas. Staff have also noted that Section 2.1.3 of the new Provincial Policy Statement states that *“planning for strategic growth areas may extend beyond the 20 to 30 year planning horizon.*

We understand it is Staff’s position that the new *South Village Urban Centre* minimum density target, as set out in the new Interim Official Plan, is to be planned for and achieved over the long-term by 2051. We are pleased to see that in both the new Policy 2.1.1.8 and in footnote (3) to Table 2 our recommended revisions have been added to convey this intent which is consistent with our view of the targets being addressed as the community evolves over time.

We recognize the *Urban Village Centre* within the Britannia Secondary Plan will be the directed location for higher densities and transit supportive development, but the achievement of a minimum density of 100 residents and jobs per hectare will be a long term goal for the overall area and is likely **not achievable** in the initial stages of development, given the extent of schools and parks that are also currently proposed within the area, and the significant amount of retail and commercial development (34,000 square metres) that is to be provided as set out in policy C.13.6.2.3 of the Secondary Plan.

Through the Tertiary Plan process, we will best be able to address all of the planning policies applicable to the *Urban Village Centre* including refining the amount of retail and commercial development. We are currently commencing the Tertiary Plan work for the *Central-East Tertiary Plan* which includes the *Central Neighbourhood*, and our work will be based on the Britannia Secondary Plan density and growth targets recognizing there will be further growth and redevelopment over time with future transit infrastructure.

For these reasons, we recommend the following further policy revision be made to the new Interim Official Plan language, following policy 2.3.3.22, to reflect the context and the Council approved density targets in the Britannia Secondary Plan for the Central Neighbourhood:

2.3.3.22 Achieve a minimum development density target of 100 residents and jobs combined per gross hectare in the South Milton Village Centre, in accordance with the applicable policies of the Britannia Secondary Plan, recognizing that this will take place over the long term subject to the availability of appropriate infrastructure and through the intensification and redevelopment of the initial phases of development.

Official Plan vs Secondary Plan Policies

We further note that the current Milton Official Plan, Section 1.3 states:

The Bristol Survey, Sherwood Survey, Boyne Survey and Derry Green Corporate Business Park Secondary Plans have been prepared to provide a policy framework to guide development and manage growth within these secondary plan areas. Where there is a conflict between the policies for these secondary plan areas and this Plan as amended by Official Plan Amendment 31, the Secondary Plan policies shall prevail. References to Town-wide growth management forecasts and targets including those found in Section 2.1.4 and 2.1.5 of this Plan apply to and take into account these secondary plan areas.

While this Section has not been updated to refer to the most recently approved Secondary Plans, namely Trafalgar, Milton Education Village and Britannia, we assume the specific policies on density in each Secondary Plan will prevail while the Town wide population and employment forecasts, to be updated, will continue to apply as stated in Section 1.3.

We recommend a similar policy to Section 1.3 be reflected in the new Interim Official Plan through a modification of the **second paragraph** in Part 1, Policy 1.1.4 as follows:

In the event of ~~a conflict~~ an inconsistency between a policy and schedules in Part 1: New Direction: a Vision to 2051 and a policy that is in the Part 2 – In-Effect Policies or Part 3 – Regional Policy Direction for the Town of Milton, the policy and schedules in Part 2 – In-Effect Policies and Secondary Plans shall ~~Part 1 – New Direction: A Vision to 2051~~ prevail.

Schedules

With respect to the proposed schedules, we note that within *Schedule 9 – Transportation*, it is unclear the typology depicted for the extension of both Fourth Line and Fifth Line. Each are depicted in blue; however, the legend should be revised to include the corresponding colour.

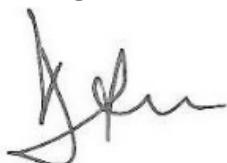
Policy Cross References

We also note that the Britannia Secondary Plan while not yet consolidated into the new Interim Official Plan has several policy references to the Town's current Official Plan which will no longer be relevant once the new Interim Official Plan is approved. These references will need to be updated in the next phase of the Town's Official Plan update. We have provided a list of these references to Staff and have advised staff that we will work with them on these updates/housekeeping amendments to the Secondary Plan, as part of the next update, to align these references with the new Interim and Final Official Plan once finalized.

We trust the additional modifications as noted herein can be made to the new Interim Official Plan to address our concerns. Should you have any further questions, please do not hesitate to contact the undersigned.

Yours truly,

MHBC



Dana Anderson, FCIP, RPP
Partner

Cc: MP4 Landowners Group
D. Twigg, Director of Planning, Town of Milton
M. Ghassan, M. Marano and O. Alade, Delta Urban

Enclosed:

Schedule A – Registered Landowners within the Milton Phase 4 (West)
Landowners Group

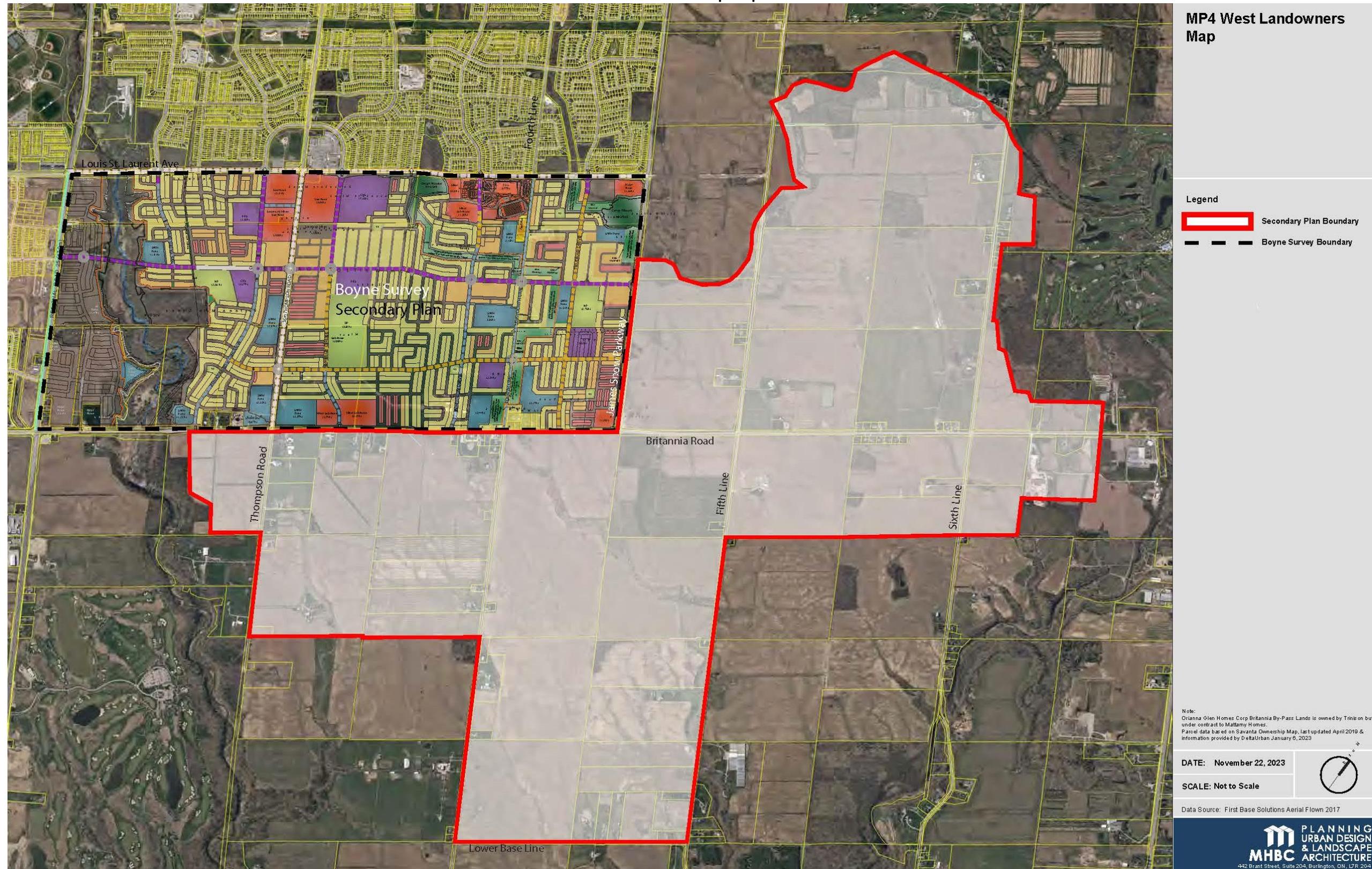
Schedule B – Milton Phase 4 (West) Landowners Ownership Map

Schedule C – Letter to Gail Anderson dated February 13, 2025.

Schedule D – Proposed Policy Modifications

SCHEDULE – A –
Ownership Summary Table

MP4 (West) Landowners Group - Legal Entities	
Entities	Common Name
Argo Developments (5th Line) Ltd.	Argo Development Corp.
Mil Con Four Britannia Developments Limited Mil Con Four Thompson Developments Limited	Fieldgate Developments Fieldgate Developments
Milton Britannia Development Corp. Milton Fifth Line Development Corp. Fifth Line (5368) Milton Development Corp.	State Building Corp State Building Corp State Building Corp
Laurier Brown Milton East Developments Inc. Cedar Brown South Milton	Cedar City Developments Cedar City Developments
Orianna Glen Homes Corp By-Pass Lands Britannia Farms Inc. Fifth Line Farming Limited (Parcel 1 & Parcel 2) Mattamy (Milton East) Limited	Mattamy Homes Mattamy Homes Mattamy Homes Mattamy Homes
Venturon Development (Milton) Inc. Venturon Development (Milton 46) Inc. Venturon Development (Milton 90) Inc. 12300 Brit Holdings Ltd.	National Homes National Homes National Homes National Homes
Neamsby Investments Inc. Cedarland Construction Inc.	The Remington Group The Remington Group
Albanella Development Ltd. Orianna Glen Homes Corp. Sempronria Estates Inc. Trebbianio Trail Developments Ltd. (includes 5526 Fourt Neutrino Developments Inc. Casape Developments (BT) Inc.	Trinison Management Corp. Trinison Management Corp. Trinison Management Corp. Trinison Management Corp. Trinison Management Corp. Trinison Management Corp.
Milton Ex-EE	Tom Tsampiris
Britannia Sixth Line Holdings Limited	Medallion Corporation
Branthaven (Spina) Branthaven (Reid Lands)	Branthaven Development Branthaven Development
NDB Milton Developments Inc. NDB Fourth Line Developments Inc.	Stanford Homes Stanford Homes
Martino (Milton) Limited Lands	D'Orazio Group of Companies
Tahlequa Holdings Inc. Codroy Developments Inc.	Townwood Homes Townwood Homes

SCHEDULE – B –
Landownership Map




February 14, 2025

Gail Anderson, RPP, MCIP
 Senior Planner, Planning Policy and Urban Design
 Town of Milton
 150 Mary Street
 Milton, ON
 L9T 6Z5

Dear Ms. Anderson;

**RE: WE MAKE MILTON OFFICIAL PLAN REVIEW AND UPDATE - STATUTORY
 PUBLIC MEETING OF DECEMBER 9, 2024
 MP4 WEST LANDOWNER GROUP COMMENTS**

OUR FILE: 18186A

Thank you for the opportunity to provide comments on the new draft Official Plan presented to the Town of Milton Council at the Statutory Public Meeting on December 9, 2024. The Milton Phase 4 (MP4) West Landowners Group and its consulting team are continuing to review the new draft interim Official Plan and may have further comments.

At this time, we wanted to clarify policies that specifically relate to the *South Milton Village Centre* minimum density requirements. The *South Milton Village Centre* is defined as a *Strategic Growth Area* in the new Official Plan and is partially located within the north-east, south-east and south-west quadrants of the Britannia Secondary Plan where Britannia Road intersects with James Snow Parkway. In the Britannia Secondary Plan this area is designated as *Urban Village Centre*. The Britannia Secondary Plan, as you know, was approved by Council on January 27, 2025. Within the approved Britannia Secondary Plan there is no defined minimum density for the *Urban Village Centre*. The *Urban Village Centre* is within the *Central Neighbourhood* which has a density target of 84 residents and jobs per hectare as noted in the policies of the Britannia Secondary Plan. We are currently commencing the Tertiary Plan work for the *Central-East Tertiary Plan* which includes the *Central Neighbourhood* and other Neighbourhoods in the Britannia Secondary Plan. Our work for the Tertiary Plans will be based on the Britannia Secondary Plan density and growth targets.

In the proposed new Official Plan, the new urban structure mapping shows the *South Milton Village Centre* proposed as a *Strategic Growth Area*. Table 2 on page 29 of the draft Official Plan proposes a **minimum density of 100 residents and jobs per hectare** with an **80/20** percentage split of residents to jobs to be provided.

New policies for *Urban Village Centres* are found in Section 2.3.3 of the Plan as follows:

2.3.3 Urban Village Centres

Milton's Urban Village Centres are distinctive local destinations and gathering areas at various locations within the Urban Area that contribute to create a strong sense of place. They are primary centres focused around a unique feature such as an academic institution, an inter-regional transit facility, or retail and service road.

Residential, retail and service commercial uses, public service facilities, related employment uses, public squares and open spaces are integrated in the Urban Village Centres to promote walkability and social interaction, and contribute to the vitality of the area.

Three Urban Village Centres are identified on Schedule 3 - Urban Structure: the Education Village Centre, Milton Trafalgar GO Village, and South Milton Village Centre.

The policies found in Section 2.3.4 (specifically 2.3.2.20) appear to conflict with the earlier minimum densities in Table 2 as they state that the area should achieve a **minimum development density of 150 residents and jobs per hectare** and a **mix of 65 to 35** percent residents to jobs.

While these two policies related to minimum densities in the Urban Village Centre conflict with one another, we understand the minimum density target was not studied through any of the background studies completed for the new Official Plan. We further understand that the South Urban Village Centre was not identified in the Region's Official Plan Amendment No. 49 which was approved by the Minister.

In both the *Living Milton: Background and Information Report* and in the *Living in Milton: Big Questions Report*, all references to the Britannia Secondary Plan note that the Britannia Secondary Plan is "in progress" and there is no specific minimum density target discussed or reviewed in relation to the *Urban Village Centre* within the Britannia Secondary Plan. Similarly in the *Moving in Milton Background Report*, there is support for higher density and transit supportive development in the *Downtown GO MTSA* at 200 residents and jobs per hectare, within the *Milton Education Village* and *Trafalgar GO MTSA* at 150 residents and jobs per hectare, and in the *Trafalgar Road Strategic Growth Area* at 130 residents and jobs per hectare. There has been no assessment or justification for a defined minimum density for the *Urban Village Centre* in the Britannia Secondary Plan. The report entitled *Growing in Milton* also specifically references the Britannia Secondary Plan as being "in progress" with no assigned density target.

We recognize the *Urban Village Centre* within the Britannia Secondary Plan will be the directed location for higher densities and transit supportive development but the achievement of a minimum density of 100 residents and jobs per hectare would be a long term goal for the overall area and is likely not achievable in the initial stages of development, given the extent of schools and parks that are currently proposed within the area, and the significant amount of retail and commercial

development (34,000 square metres) that is to be provided as set out in C.13.6.2.3 of the Secondary Plan.

Through the Tertiary Plan process, we will best be able to address all of the planning policies applicable to the Urban Village Centre and refine the amount of retail and commercial gross floor area. The initial stages of development for the Urban Village Centre will be planned to achieve the density target as approved in the Britannia Secondary Plan of 84 residents and jobs per hectare and may well slightly exceed that target for the Central Neighbourhood. As the area evolves over time and with future transit support, a higher overall density for the area will likely follow.

We further note that the current Milton Official Plan, Section 1.3 states:

The Bristol Survey, Sherwood Survey, Boyne Survey and Derry Green Corporate Business Park Secondary Plans have been prepared to provide a policy framework to guide development and manage growth within these secondary plan areas. Where there is a conflict between the policies for these Secondary Plan areas and this Plan as amended by Official Plan Amendment 31, the Secondary Plan policies shall prevail. References to Town-wide growth management forecasts and targets including those found in Section 2.1.4 and 2.1.5 of this Plan apply to and take into account these Secondary Plan areas.

While this Section has not been updated to refer to the most recently approved Secondary Plans, namely Trafalgar, Milton Education Village and Britannia, we assume the specific policies on density in each Secondary Plan will prevail while the Town wide population and employment forecasts, to be updated, will continue to apply as stated in Section 1.3.

We recommend a similar policy to Section 1.3 be added to the new Official Plan and the following revision to the new Official Plan language be provided to reflect the context and Council approved density target in the Britannia Secondary Plan for the Central Neighbourhood:

Notwithstanding Table 2 and policies 2.3.2.20, while the objective for the area will be to evolve as part of a Strategic Growth Area, the minimum density target within the Urban Village Centre and within the Britannia Secondary Plan area will be planned to meet the minimum density target as provided in the Britannia Secondary Plan.

We also note that the Britannia Secondary Plan has several policy references to the Town's current Official Plan. As we have noted, we will work with the Town to prepare a housekeeping amendment to the Secondary Plan to align these references with the new Interim and Final Official Plan once finalized.

We look forward to the opportunity to meet with Town Staff to discuss these matters. Should you have any further questions, please do not hesitate to contact the undersigned.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read "Dana", is positioned above a solid red horizontal line.

Dana Anderson, FCIP, RPP
Partner

Cc: MP4 Landowners Group
D. Twigg, Director of Planning, Town of Milton
M. Ghassan, M. Marano and O. Alade, Delta Urban

Schedule D – Proposed Policy Modifications

1. Modification to Policy 2.3.3.22 as follows:

2.3.3.22 Achieve a minimum development density target of 100 residents and jobs combined per gross hectare in the South Milton Village Centre, in accordance with the applicable policies of the Britannia Secondary Plan, recognizing that this will take place over the long term subject to the availability of appropriate infrastructure and through the intensification and redevelopment of the initial phases of development.

2. Modification of the **second paragraph** in Part 1, Policy 1.1.4 as follows:

In the event of ~~a conflict~~ an inconsistency between a policy and schedules in Part 1: New Direction: a Vision to 2051 and a policy that is in the Part 2 – In-Effect Policies or Part 3 – Regional Policy Direction for the Town of Milton, the policy and schedules in Part 2 – In-Effect Policies and Secondary Plans shall ~~Part 1 New Direction: A Vision to 2051~~ prevail.

3. *Schedules*

Schedule 9 – Transportation, while the extension of both Fourth Line and Fifth Line is depicted in blue, the legend should be revised to include the corresponding colour.