

July 11, 2025

Our Project: Mp4.ML

VIA EMAIL to minister.mah@ontario.ca

Minister Rob Flack
Ministry of Municipal Affairs and Housing
College Park, 17th Flr, 777 Bay Street
Toronto, ON, M7A 2JS

Attention: Kylie Li, Municipal Services Office Centre Ontario

Re: ERO 024-OP-242706 town of Milton, We Make Milton Official Plan – OPA 92

We are writing on behalf of the Milton P4 Trafalgar Landowners Group Inc. which is comprised of the following landowners: 2076828 Ontario Limited, White Squadron Development Corporation, Frontenac Forest Estates Inc., Hannover Trafalgar Farms Limited & Milton Sheva Land Limited O/A Hornby Land, Remington Trafalgar Inc., TRGI West Properties Inc., York Trafalgar Golf Corp., and Comarin Corp.

Together the landowners group owns approximately 415 hectares in the Trafalgar Corridor Secondary Plan Area in the Town of Milton. The secondary plan was approved by the Ontario Land Tribunal on July 22, 2024.

On behalf of landowners group, we are providing comments on OPA 92 regarding two matters where the adopted Official Plan conflicts with the recently approved Trafalgar Corridor Secondary Plan.

1. Policy Hierarchy Concerns

Part 1 Schedule 4 Urban Structure identifies a Local Natural Heritage System. This same Local Natural Heritage System is depicted on Part 1 Schedule 6 Green System. This Natural Heritage System differs from that shown on the Trafalgar Secondary Plan Schedule C.11.B which is a more detailed Natural Heritage System which has been refined through the Subwatershed Study.

Part 1, Section 1, Policy 1.1.4 of OPA 92 currently states that:

- “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.”

This policy as written is a significant concern. However, we understand that the language noted above may have been included in error and that the intended outcome was for the more detailed policies and schedules in 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.”

This revision would align with the intent expressed in Part 2 Policy 11.4.3.6 which states “The Secondary Plans prepared for specific areas of the Town and identified in Section 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.”

This policy provides some comfort to the Landowners Group; however, it would be clearer if the policy were revised to include reference to schedules, as follows:

- “Where there is conflict or inconsistency between the policies and schedules for these secondary plan areas and the policies and schedules of this Plan, the Secondary Plan policies shall prevail.”.

2. Neighbourhood Centre Inconsistencies

We further note that the Trafalgar Secondary Plan contains four Neighbourhood Centres. These Neighbourhood Centres are being classified as Community Nodes in the Part 1 policies and schedules. However, Part 1 Schedule 4 only depicts three of the Neighbourhood Centres as Community Nodes and fails to recognize the designated Neighbourhood Centre at Trafalgar Road and Derry Road. We ask that Schedule 4 Urban Structure be revised to delineate an additional Community Node at Trafalgar Road and Derry Road to be consistent with the Trafalgar Secondary Plan.

We request that through your approval, OPA 92 be modified to implement the above changes and ensure consistency with the approved Trafalgar Secondary Plan. Thank you for your considerations.

Yours very truly,
SGL PLANNING & DESIGN INC.



Paul Lowes, MES, MCIP, RPP
Principal

c.c. John Tjeerdsma, Group Manager, Milton P4 Trafalgar Landowners Group Inc.