

July 11, 2025

Refer To File: 1680-001

Ministry of Municipal Affairs and Housing
Municipal Services Office – Central Ontario
777 Bay Street, 16th Floor
Toronto, ON
M7A 2J3

Attention: Kylie Li

**RE: OPA No. 92 (Town of Milton Official Plan Phase 1)
Adopted March 2025 by Town of Milton Council
Comments for Provincial Consideration Under ERO #025-0557
Ministry Reference Number 24-OP-242706
Town of Milton, Region of Halton**

Glen Schnarr & Associates Inc. (GSAI) are the planning consultants representing the ‘South Milton Landowner Group’. The landowners have interest and own lands generally located in between Thompson Road South and Sixth Line, north and south of Lower Base Line West and north of the southernmost limit of the Town of Milton municipal boundary (*Figure 1*). The landowners are actively advancing an amendment to the recently approved Britannia Secondary Plan in Milton, to assign land use designations and policy directives to help guide future growth and development on these lands. When complete, the Britannia Secondary Plan and South Milton Amendment Area will be comprehensively developed to accommodate a mixture of land uses, built forms and densities, supporting a complete community. The South Milton area is a natural and logical extension of the Britannia Secondary Plan Area and consists of approximately 537 ha (1,328 acres) which are divided into a west pocket (336 ha (831 acres)) and an east pocket (201 ha (497ac)). The attached location plan (*Figure 1*) will assist you in understanding the location of the South Milton lands in the context of the Britannia Secondary Plan.

On behalf of the South Milton Landowners Group, we are pleased to provide this letter to you in relation to the Town of Milton Official Plan Review – the ‘We Make Milton’ initiative. We have reviewed the Town of Milton Official Plan Amendment No. 92 (‘OPA 92’), as adopted by Town Council in March 2025.

Background:

As stated above, the South Milton lands are located in the southern quadrant of the Town of Milton, bounded by Thompson Road South to the west, the Britannia Secondary Plan area to the north, Sixth Line to the east, and the southern limit of the Town of Milton's municipal boundary to the south. Collectively, the Subject Lands are currently occupied by rural residential uses, agricultural uses and natural features.

By way of context, the South Milton lands and others were added to the Halton Regional and Town of Milton Urban Area by way of Halton Regional Official Plan Amendment No. 49 and the subsequent Provincial enactment of Bills 150 and 162. As a result, the lands were identified as being an appropriate location for new community residential and mixed-use development to occur. These lands are included in the recently approved Britannia Secondary Plan and are identified as "Future Community Area" in that Secondary Plan. The vision and intent of identifying the lands as "Future Community Area" is to facilitate an amendment to the Britannia Secondary Plan to assign specific land use designations and policies to the lands to promote the introduction of various uses, built forms and densities to further support the creation of a vibrant, complete community that is an extension of the surrounding context.

The Town of Milton Official Plan Amendment No. 92 further implements the Regional policy directives by identifying South Milton as being within the Town's Urban Area, and within the "Future Complete Neighbourhoods" component of the Town Phasing Structure, and "Complete Neighbourhoods" in the Town's Urban Structure Plan. Notably, Schedule A to the Town's Official Plan (Urban Area Land Use Plan) has not been revised to identify a parent land use designation to the Subject Lands nor any lands added to the Town of Milton Urban Area as a result of ROPA 49 and Bills 150 and 162.

Comments:

We have reviewed OPA 92, as adopted by Town Council. We understand that OPA 92 was crafted as a 'Phase 1' component of the Town's Official Plan Review and as such, our comments are focused on Part 1 (Sections 1 through 4). Based on this focused review of OPA 92, we highlight the following comments:

Mapping:

With respect the adopted Schedules in the new Official Plan, we note that Schedules 1-9 (contained in Part 1 of the Official Plan) represent an accurate depiction of the Town's new Urban Area pursuant to the Regional Official Plan; however, Schedules A-L (contained within Part 2 of the Official Plan) have not been updated to correctly depict the new limits of the Urban Area. We understand from speaking to Town staff that this is a component that the Town is going to update in Phase 2 of the Milton Official Plan Review; however, we note that the referenced date on each of these Schedules of March 2025 may be misleading to the reader. Perhaps the Schedules that have yet to be updated through a subsequent Phase in the Official Plan Review should continue to

reference the date pursuant to the last Office Consolidation of the in-effect Official Plan (December 2024).

Secondary Plan References:

We note that the current in-effect Official Plan (Office Consolidation December 2024) currently contains the following policy as it relates to the applicability of Secondary Plans in Milton:

“1.3 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.”

We note that an equivalent policy providing clarity on the applicability and prevalence of Secondary Plans is currently cited under Section 11.4.3.6 in the new Official Plan, as follows:

“11.4.3.6 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. References to Town-wide growth management and forecasts and targets of this Plan apply to and take into account these secondary plan areas.”

While this policy is providing the clarity we need to ensure that Secondary Plans that are in effect shall prevail, and while Section C.1.3 provides a list of the Secondary Plans in Milton, Section C.1.3 does not reference the Britannia Secondary Plan. The Britannia Secondary Plan should be added to Section C.1.3 in the new Official Plan so it is clear Policy 11.4.3.6 applies to the Britannia Secondary Plan as well.

We also request that 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. As well, Section 11, Policy 11.4.3.6 should also state that the secondary plans prevail 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.

Further, to ensure clarity, consistency, and ease for the reader, we recommend that similar language confirming that Secondary Plans (including policies and schedules) shall prevail in the event of conflict or inconsistency should be added to the **Introduction and Overview Section** of the new Milton Official Plan, as follows:

“1.1.7 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 **or schedules for these secondary plan areas and the policies **or schedules** of this Plan, the Secondary Plan policies shall prevail.”**

As well, we recommend that the **second paragraph** under Section 1.1.4 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.**”**

These proposed changes are particularly helpful in light of the fact the new Milton Official Plan that was adopted is representative of the Phase 1 component of the Town’s work program related to the Official Plan Review and does not represent a complete and exhaustive review of the Official Plan.

Policy Cross References

We note that most, if not all, in-effect Secondary Plans (including the Britannia Secondary Plan) were developed with specific policy cross references to certain sections of the Town’s in-effect Official Plan. We note that the Town’s new Official Plan (OPA 92) does not carry forward the exact numbering system for policies and sections and, accordingly, once the new Official Plan is approved, references found in current Secondary Plans to the in-effect Official Plan will no longer be relevant. We understand this has been brought to the attention of the Town of Milton and the Town intends on advancing a Housekeeping Amendment to update these references in Secondary Plans so that they align with the new Official Plan as part of Phase 2 of the Official Plan Review. With timing of the Housekeeping Amendment depending on the advancement of Phase 2 of the Official Plan Review, which is currently planned for 2026, we believe it is important that there is clear language that provides that until the housekeeping OPA is brought forward by the Town to address incorrect cross-references, the existing 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).

In this regard, we recommend the following policy language be inserted into the Introduction and Overview Section:

“1.1.8 In the preparation of the new ‘We Make Milton’ Official Plan, it is recognized that there are certain policy cross-references contained within in-effect Secondary Plans (which preceded ‘We Make Milton’) in the Town which rely and make reference to the in-effect Official Plan. Until such time as an amendment is advanced by the Town to correct or update those cross-references, all policy references made in secondary plans for the Town of Milton will refer directly to the December 2024 in-effect Office Consolidation of the Milton Official Plan”.

Density

Table 2 (*Intensification and Development Density Targets*) of the new Official Plan identifies density targets for lands across Milton, based on their location within the Growth Management Structure and Town Structure, respectively. Given that the South Milton Lands are located within a ‘Future Complete Neighbourhoods’ component of the Growth Management and Town Structure, Table 2 states that a minimum gross density of 75 residents and jobs combined net hectare and a net density of 95 residents and jobs combined per hectare shall apply. In the footnotes to Table 2, net density is specified as to be measured as excluding the land area attributed to Local Natural Heritage System, rights-of-way for hydro corridors, energy transmission pipelines, freeways and railways, Employment Areas and cemeteries. While these exclusions are appropriate, the gross and net minimum density targets are concerning. These density targets are significantly higher than required by the Provincial Planning Statement (2024) which requires a minimum density of 50 residents and jobs combined per hectare for designated growth areas in fast and growing municipalities, such as the South Milton lands in the Town of Milton.

Further, this is significantly higher than the 59 people and jobs density target for lands across Milton’s Designated Greenfield Area established by the Halton Regional Official Plan. While compact development is supported, the identified minimum densities are restrictive and may be difficult to achieve, particularly when the unit projections identified in Table 3a (*Phasing and Growth: Number of Units*) are considered. Specifically, Table 3a establishes that the majority of new housing units are to be in the form of low and medium density units across the ‘Future Complete Neighbourhood’ areas (anticipating 16,900 low and medium density units by 2051, versus 500 high density units by 2051). Given the Town’s vision for predominantly low and medium density units in ‘Future Complete Neighbourhoods’ as noted in Table 3a, achieving an elevated minimum density will be challenging. Furthermore, South Milton is located on the periphery of Milton’s Urban Area and municipal boundary and is bound on the west, south and east sides by components of the Greenbelt Plan and natural heritage systems. Accordingly, given the geography and character of the surrounding area for South Milton, seeking flexibility in the minimum density target for ‘Future Complete Neighbourhoods’ such as South Milton is appropriate. A revised minimum density target that is consistent with the Provincial and Regional minimum density targets is requested.

Further, it is notable that Table 3a (*Number of Units*) anticipates that growth of low, medium and high density units will commence in ‘Future Complete Neighbourhoods’ in 2032. Flexibility to allow for the timing for delivery of dwelling units in ‘Future Complete Neighbourhoods’ to commence sooner (i.e. 2027) is requested and is particularly appropriate in the midst of our current housing crisis.

Conclusion

In summary, we are supportive of many of the policy directives and directions contained in OPA 92 as adopted. However, we request the Province to consider our comments related to the above noted adopted policy directives and to consider our suggested modifications through the Provincial Approval of OPA 92.

Thank you for the opportunity to provide these comments. We would be happy to meet to discuss our comments at your convenience. We ask that we be provided with notice of any decision that you make on the Town of Milton's Official Plan Amendment No. 92.

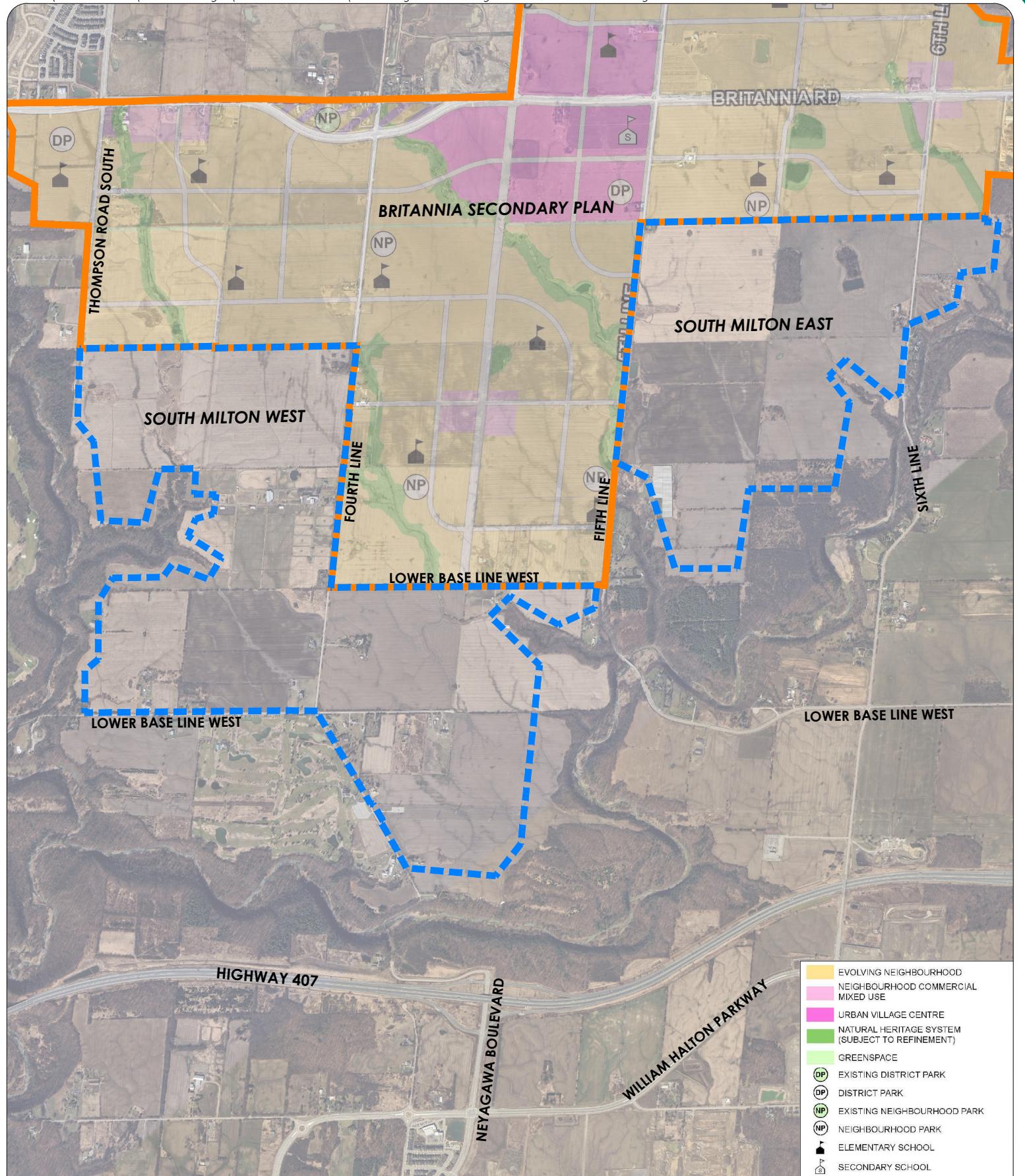
Yours very truly,

GLEN SCHNARR & ASSOCIATES INC.



Karen Bennett, MCIP, RPP
Partner

Cc: Hon. Robert Flack, Minister of Municipal Affairs and Housing
South Milton Landowners Group
Jill Hogan and Gail Anderson, Town of Milton Planning Department



SOUTH MILTON SECONDARY PLAN AMENDMENT AREA

SOUTH MILTON, TOWN OF MILTON

LEGEND

Britannia Secondary Plan Boundary

South Milton (Lands Subject to Britannia Secondary Plan Amendment)



SCALE NTS
JUNE 23, 2025

GSAI
Glen Schnarr & Associates Inc.