



The Corporation of the Town of Milton

Report To: Council

From: Jill Hogan, Commissioner, Development Services

Date: December 8, 2025

Report No: DS-067-25

Subject: Technical Recommendation Report: Official Plan Amendment and Zoning By-law Amendment by Slessor Square LP Inc. applicable to lands known as 388 Main Street East, 389, 395, 399, 405 and 409 Pearl Street and 17 Prince Street, Milton (Town Files: LOPA-07/25 and Z-18/25).

Recommendation: THAT Staff Report DS-067-25 outlining applications for amendments to the Town of Milton Official Plan and Town of Milton Urban Zoning By-law 016-2014, as amended, to facilitate the development of a high-density mixed-use building, **BE DENIED**.

EXECUTIVE SUMMARY

Applications have been submitted for an Official Plan Amendment and Zoning By-law Amendment for the lands located at 388 Main Street East and 389, 395, 399, 405 and 409 Pearl Street and 17 Prince Street ('subject lands'). The proposed development is to redevelop the subject lands to a high-density mixed-use building with two towers (16- and 18-storeys) on a six-storey podium. A total of 570 residential units are proposed as well as 815 square metres of ground floor commercial area along the frontages of Main Street East and a portion of Bruce Street. The proposed density includes a floor space index of 9.37. Three levels of underground parking are proposed to accommodate 417 parking spaces for residents and visitors.

Conclusions and Recommendations

Staff recommends that the Official Plan Amendment and Zoning By-law Amendment applications **BE DENIED** for the following reasons:

1. The proposed amendments are not consistent with the Provincial Planning Statement, do not conform to the Region of Halton Official Plan and do not conform to the Town of Milton Official Plan as:

EXECUTIVE SUMMARY

- a) The proposed development does not conform to, and disregards, the Town's planned urban structure developed over years through a series of studies including the Town's 2016 Downtown Study, 2020 Mature Neighbourhoods Character Study and 2022 Major Transit Area/Mobility Hub Study and incorporated into the Town's Official Plan, proposing building heights between three to eight times the maximum permitted heights in the Town's Official Plan designation for the subject lands and at significantly higher densities than planned;
- b) The applicant's Planning Justification Report does not provide justification for deviating to such a high degree from the Town's planned vision other than conclusionary statements regarding compact built form, transit-supportive densities and intensification - factors the Town already took into account in developing its Official Plan policies;
- c) The proposed development does not include an appropriate level of intensification or built form for the subject lands in accordance with the planned vision for growth in the Urban Growth Centre and Major Transit Station Area as established in the Town's Official Plan policy framework for the area, which was developed in conformity to the Region of Halton Official Plan and consistent with the Provincial Planning Statement;
- d) the proposed development does not preserve, promote or enhance the function of the historic Downtown area and is not sensitive to the existing character of the Downtown area in accordance with the requirements of the Town's Official Plan policies;
- e) the proposed development is not sensitive to and does not provide transition to the mature neighbourhood area in accordance with the Town's Official Plan policies;
- f) the proposed development does not provide for high-quality urban design elements with appropriate transition and does not meet the Town's Official Plan policies regarding urban design and relevant design guidelines;
- g) the proposed development results in overshadowing of the public realm and of solar panels on an existing building, potentially negatively impacting the building; and,

EXECUTIVE SUMMARY

- h) the proposed development has not addressed heritage conservation of listed heritage dwellings on the subject lands.
2. The reports and studies submitted to support the proposed development do not adequately address technical concerns related to water and wastewater servicing, stormwater management, groundwater, transportation and site contamination.
3. The proposed development is not good planning as the height, massing and scale results in an overdevelopment of the subject lands, does not positively contribute to the surrounding neighbourhoods, ignores the Town's planned urban structure and does not transition to or integrate with the adjacent mature neighbourhood.

REPORT

Background

Owner: Slessor Square LP Inc., 1442 Centre Road, Hamilton, ON.

Agent: Arcadis Professional Services (Canada) Inc., 360 James Street North, Hamilton, ON.

Location/Description: The subject lands comprise an entire block and are bounded by Main Street East, Bruce Street, Pearl Street and Prince Street. The subject lands include a total of seven properties and are legally described as Part of Lot 6 and all of Lots 7, 8 and 9, South of Main Street and all of Lots 4, 5, 6 and 7 North of Pearl Street Block 14 Registered Plan (Teetzels Survey), Town of Milton. The subject lands are municipally known as 388 Main Street East and 389, 395, 399, 405 and 409 Pearl Street and 17 Prince Street.

The subject lands are square in shape and include frontage on Main Street East (81.68 metres), Prince Street (81.01 metres), Pearl Street (81.66 metres) and Bruce Street (79.66 metres). Figure 1 to this Report identifies the subject lands on a map.

The subject lands comprise a total area of approximately 0.57 hectares (1.41 acres). The property located at 388 Main Street East currently contains an automobile dealership and repair garage, a restaurant and a midwifery clinic. The remaining properties are currently occupied by single detached dwellings along Pearl Street and Prince Street. The properties located at 389, 395, 399, 405 and 409 Pearl Street are listed on the Town's Heritage Register.

The subject lands are situated at the crest of a hill along Main Street East within Milton's Downtown area and are surrounded by a range of land uses. On the north side of Main Street East are a number of existing commercial uses as well as a six-storey condominium building

Background

situated behind the commercial plazas. The CP Railway line abuts the six-storey condominium building and provides service to the Milton GO Transit Station. A nine-storey apartment building is situated on the north side of the CP Railway line.

East of the subject lands is an existing two-storey building with commercial uses on the ground floor and office uses on the second floor. A restaurant is also located on the same property to the east of the building fronting Ontario Street. On the east side of Ontario Street is the Milton Mall and other commercial uses. The Milton GO Transit Station is located approximately 1.6 kilometers to the east of the subject lands.

On the south side of Pearl Street is the Milton Christian School (on leased property owned by the Town) with associated parking and an existing low-rise residential neighbourhood. The existing residential neighbourhood is a mature neighbourhood as delineated in the Town's Official Plan. To the west of the subject lands is an existing commercial plaza containing restaurants, office uses, a medical centre, a parking lot and existing low-rise residential dwellings.

There are 59 properties within 200 metres of the subject lands that are within the delineated mature neighbourhood area. Figure 2 to this Report includes examples of dwellings that contribute to defining local character in the mature neighbourhood area. Of the 59 properties, there are 36 properties listed on the Town's Heritage Register.

Proposal:

Applications have been submitted for an Official Plan Amendment and Zoning By-law Amendment to facilitate the proposed development on the subject lands. The proposed development is to redevelop the subject lands with a high-density mixed-use development that includes two towers (16-storeys and 18-storeys) on a six-storey podium and ground floor units along a portion of Pearl Street. The proposed development includes 570 residential units, ranging in unit types, and includes a floor space index (FSI) of 9.37. The proposal also includes 815 square metres (8,772.59 square feet) of commercial space at-grade along the Main Street East frontage and a portion of the Bruce Street frontage.

Figure 3 to this Report includes the proposed site plan. Figure 4 to this Report includes the architectural renderings of the proposed built form.

Phase 1 generally applies to the east portion of the subject lands and Phase 2 applies to the remaining area. Phase 1 is proposed to commence along Bruce Street and Phase 2 continues along Prince Street. Figure 5 to this Report includes the proposed phasing plan.

Below is table that summarizes the proposed unit types for the proposed development.



The Corporation of the Town of Milton

Background

| Unit Types | Number of Units by Phase | | Total Units by Type | Percentage |
|-----------------|--------------------------|-----------------------|---------------------|------------|
| | Phase 1 | Phase 2 | | |
| 1-bedroom | 231 | 82 | 313 | 54.91% |
| 1-bedroom + den | 29 | 167 | 196 | 34.39% |
| 2-bedroom | 18 | 29 | 47 | 8.24% |
| 2-bedroom + den | 0 | 14 | 14 | 2.46% |
| Totals | Phase 1: 278 units | Phase 2: 292 units | 570 units | 100% |
| | Full buildout: 570 units | | | |

Vehicular access to the subject lands is proposed from Bruce Street and Pearl Street. The proposed access from Bruce Street is for the purpose of drop-offs, pick-ups and loading spaces. There are no proposed parking spaces at-grade. The proposed access from Pearl Street provides access to three levels of underground parking where there are 417 vehicular parking spaces proposed (including visitor parking spaces). The proposed parking ratio is 0.58 parking spaces per unit and 0.15 parking spaces per unit for visitors. With respect to bicycle parking, the proposed concept includes 311 long-term bicycle parking spaces, 32 short-term bicycle parking spaces and 232 bicycle lockers.

The main pedestrian entrance to the proposed development is along Main Street East, which provides access to a centralized lobby area on the ground floor. The proposed ground floor commercial units are also accessible from the street along the Main Street East and Bruce Street frontages. Along Prince Street, there are seven proposed residential units that are accessible at-grade and another two units with at-grade access along Pearl Street. There are also two units internal to the site that are accessible at-grade. In addition to the above, there are a number of other ground floor entrances to multiple garbage rooms, moving rooms, bulk storage rooms and the large locker/bicycle room.

The proposed development includes balconies for each unit. Two amenity rooms are proposed on the ground floor with access from the centralized lobby area. Outdoor communal amenity area is proposed in the form of a rooftop patio on top of the six-storey podium and comprises an area of 859 square metres (9,246.2 square feet) or 1.5 square metres (16.1 square feet) per dwelling unit of outdoor communal amenity area.

Background

The servicing strategy for the proposed development includes connections to existing municipal water and wastewater infrastructure on Main Street East.

The applicant has submitted applications for an Official Plan Amendment and Zoning By-law Amendment to facilitate the proposed development. The purpose of the Official Plan Amendment is to redesignate the subject lands to the Urban Growth Centre Mixed Use Sub-Area designation and apply a site-specific policy area to facilitate the proposed development.

The purpose of the proposed Zoning By-law Amendment is to establish site-specific zoning permissions and provisions to facilitate the proposed development. The proposed Zoning By-law Amendment seeks to apply a site-specific Urban Growth Centre Mixed Use (UGC-MU*XX) zone to permit the high-density mixed-use building. A number of site-specific provisions are proposed to address parking, amenity space, floor space index, building height, setbacks, stepbacks, tower height, tower separation and floor plates.

Submission Materials:

The following materials have been submitted in support of the applications:

- Cover letter, prepared by Arcadis Professional Services (Canada) Inc. ('Arcadis'), dated March 25, 2025;
- Application Forms, prepared by Arcadis, dated March 18, 2025;
- Draft Official Plan Amendment, prepared by Arcadis, dated March 25, 2025;
- Draft Zoning By-law Amendment, prepared by Arcadis, dated March 25, 2025;
- Site Plan, prepared by Arcadis, dated March 21, 2025;
- Architectural Drawing Set, prepared by KNYMH Inc., dated February 25, 2025;
- Existing Conditions Plan, prepared by MTE, dated February 25, 2025;
- Functional Grading and Servicing Plan, prepared by MTE, dated February 25, 2025;
- Landscape Plans, dated January 23, 2025;
- Survey, prepared by J.D. Barnes Limited, dated October 28, 2024;
- Tree Protection Plan, prepared by Adesso Design Inc., dated December 2, 2024;
- Design Impact Analysis, prepared by KNYMH Inc., dated December 2, 2024;
- Functional Site Servicing and Stormwater Management Report, prepared by MTE, dated February 25, 2025;
- Geotechnical Investigation Report, prepared by Soil-Mat Engineers and Consultants Ltd., dated February 4, 2025;
- Heritage Impact Assessment, prepared by MHBC, dated March 7, 2024;
- Noise and Vibration Study, prepared by dBA Acoustical Consultants Inc., dated November 2024;

Background

- Preliminary Hydrogeological Considerations, prepared by Soil-Mat Engineers and Consultants Ltd., dated April 23, 2025;
- Phase 1: Environmental Site Assessment, prepared by Soil-Mat Engineers and Consultants Ltd., dated May 26, 2023;
- Phase 2: Environmental Site Assessment, prepared by Soil-Mat Engineers and Consultants Ltd., dated August 12, 2025;
- Planning Justification Report, prepared by Arcadis, dated March 25, 2025;
- Traffic Impact and Parking Study, prepared by Paradigm Transportation Solutions Limited; and,
- Urban Design Brief, prepared by MHBC, dated March 2025.

Planning Policy

Town staff has prepared a comprehensive policy analysis of the applicable Provincial Regional and Local planning policies that apply to the proposed development applications. Appendix 1 to this Report includes a policy analysis of the Planning Act, Provincial Planning Statement and the Region of Halton Official Plan. A policy analysis of the Town of Milton Official Plan is provided in the next section of this Report.

The Town has undertaken a number of comprehensive planning processes in the past ten years to inform the planned vision for growth for the historic Downtown area, surrounding mature neighbourhood character area and the Urban Growth Centre/Major Transit Station Area. These studies recognize the importance of balancing growth objectives to prioritize intensification while preserving the historic Downtown area and being sensitive to the existing mature neighbourhood character areas through appropriate development.

Later in this Report is an overview of the Downtown Study (completed in 2016), Mature Neighbourhoods Character Study (completed in 2020) and the Major Transit Station Area/Mobility Hub Study (completed in 2022). The studies and recommendations have been informed by substantial public input and have been approved by Town Council and Halton Region. The recommendations and implementation through planning policy and zoning provisions establish the planned vision for growth and ensures that development will occur in a coordinated, sustainable and transparent way that reflects community values. The Town's New Official Plan (Part 1 adopted by Council, Part 2 underway) will carry forward the planned vision for growth in these areas.

The subject lands are uniquely situated at the intersection of several planning areas, each with different development objectives. Its location presents both opportunities and challenges, requiring careful consideration of the objectives that apply including, but not limited to,

Background

promoting and enhancing the Downtown area, being sensitive to the existing mature neighbourhood character area and achieving appropriate intensification and built form.

The applicant has submitted an application for an Official Plan Amendment to redesignate the subject lands to the Urban Growth Centre Mixed Use Sub-Area designation and apply a site-specific policy area to permit a building height of 18-storeys and a density of 9.37 floor space index. Appendix 2 to this Report includes the proposed Official Plan Amendment.

It is Town staff's opinion that the proposed development has not carefully considered the planning framework and objectives that apply to development on the subject lands. It is Town staff's opinion that the development proposal solely relies upon its location within the Urban Growth Centre/Major Transit Station Area boundary as justification for the substantial increase in height and density without having regard for all of the other policies that apply, such as the established planned vision for growth in the area and ensuring proper integration with the historic Downtown area and surrounding mature neighbourhood.

Town staff are of the opinion that the proposed Official Plan Amendment is not consistent with the Provincial Planning Statement, does not conform to the Region of Halton Official Plan or Town of Milton Official Plan and does not represent good planning.

Town of Milton Official Plan

On November 18, 2019, Council held a Special Meeting to formally initiate the 'We Make Milton' Official Plan Review in accordance with Section 26 of the Planning Act. The new Official Plan will implement the Provincial Planning Statement (2024) and will absorb the relevant policies from the Region of Halton Official Plan. The workplan for the comprehensive new Official Plan includes five stages that are being implemented in two parts.

Part 1 of New Official Plan provided direction to guide growth to the year 2051, introduced initial policies to implement new growth management directions and incorporated Regional Official Plan policy directions to facilitate coordination with Halton Region. On March 17, 2025, Town Council adopted Official Plan Amendment 92 - Part 1 of the New Official Plan (Report DS-019-25) and at the time of writing this Report it is being reviewed by the Province who is responsible for issuing final approval.

Part 2 of the New Official Plan is advanced and will incorporate detailed implementation policies and include all final mapping updates. It is anticipated that Part 2 of the New Official Plan will be brought forward for Town Council adoption in 2026.

Background

At the time of writing this Report, the August 26, 1996, Town of Milton Official Plan is the in-effect version. The latest consolidated Official Plan is from December 2024 and has been used to prepare the policy analysis below.

The Town of Milton Official Plan ('Town's OP') applies policies to different parts of the subject lands. For the purpose of this section of the Report, when policies apply only to 388 Main Street East, the property will be referred to as the 'Main Street East property'. For policies that apply to the properties at 389, 395, 399, 405 and 409 Pearl Street and 17 Prince Street, the properties will collectively be referred to as the 'Pearl and Prince Street properties'.

Schedule 1 - Town Structure Plan in the Town's OP identifies the subject lands as being within the Town's Urban Area and, more specifically, within the Central Business District. Schedule B - Urban Area Land Use Plan in the Town's OP identifies the subject lands as being within the Urban Area and Central Business District and also within the Milton GO Major Transit Station Area ('MTSA')/Downtown Milton Urban Growth Centre ('UGC').

Section 2.1.3 of the Town's OP establishes the municipal structure and community context. Section 2.1.3.2 of the Town's OP includes an overview of the vision for the Urban Area and the relevant subsections are reproduced below.

2.1.3.2 Urban Area

The *Town's urban area* consists of the original historic *Town* site as defined through regionalization in 1974 and subsequently expanded by the Halton Urban Structure Plan (ROPA 8) in 1995 and the Sustainable Halton Plan (ROPA 38) in 2009. The *urban area* encompasses a full range of residential, commercial, industrial/employment, *institutional* and open space land uses. IT is intended to be the focus of urban *development* over the life of this Plan.

The Central Business District, containing the historic downtown and the Urban Growth Centre is the nucleus of the *urban area* and functions as the civic and commercial core of the *Town*. The historic downtown plays an important role in defining the community identity and is intended to be preserved, protected and enhanced over the life of this Plan.

Higher density mixed use *development* is generally directed to the Urban Growth Centre. The Urban Growth Centre for the *Town* is generally centred along Main Street, in the easterly area of the Central Business District and is a focal area for investment in *institutional* and Region-wide public services, as well as commercial, recreational, *cultural* and *entertainment* uses. It is to be planned as a vibrant high density, mixed use regional centre supported by a full range of

Background

public and complementary services and major transit *infrastructure*. It will accommodate and support a significant share of population and employment growth as well as major transit *infrastructure* to be achieved over the life of this Plan. The majority of the *Town's intensification* will be directed to the Urban Growth Centre, particularly to the Major Transit Station Area, located around the existing GO Station. The Urban Growth Centre/*Major Transit Station Area* is identified as a Protected *Major Transit Station Area* in the Regional Official Plan pursuant to Section 16 (16) of the *Planning Act*.

The *Mature Neighbourhood Areas*, located around the Central Business District, will remain relatively stable, and able to adapt to changing social, economic and physical considerations, over the life of this Plan. In these areas, infill and *development* that is *compatible* with and respectful of the existing neighbourhood *character* is expected to occur.

The subject lands are located within the Town's Central Business District that functions as the civic and commercial core of the Town. As noted above, the historic Downtown plays an important role in defining community identity and is intended to be preserved, protected and enhanced.

The subject lands are also located within the UGC and MTSA where development of higher-densities and mixed-uses are generally directed. A significant portion of population and employment growth is intended to be accommodated within the UGC and MTSA. The subject lands are also a the mature neighbourhood that is envisioned to remain relatively stable, however infill and development that is compatible and respective of the existing neighbourhood character is expected to occur.

Section 2.1.4 of the Town's OP includes policies that address growth management. The subject lands are within the Town's Urban Area, built boundary and the UGC/MTSA. Below are the relevant growth management policies for the subject lands.

2.1.4.3 Between the years of 2015 and 2031, a minimum of 5,300 new housing units are to be added within the *built boundary* shown on Schedule "K" to this Plan.

2.1.4.5 Within the HUSP Urban Area, minimum overall *development density* shall be in accordance with the approved Secondary Plans.

2.1.4.7 Within the Urban Growth Centre/Major Transit Station Area, a minimum *development density* of 200 persons and jobs combined per gross hectare, consistent with the general target proportion identified through the Regional

Background

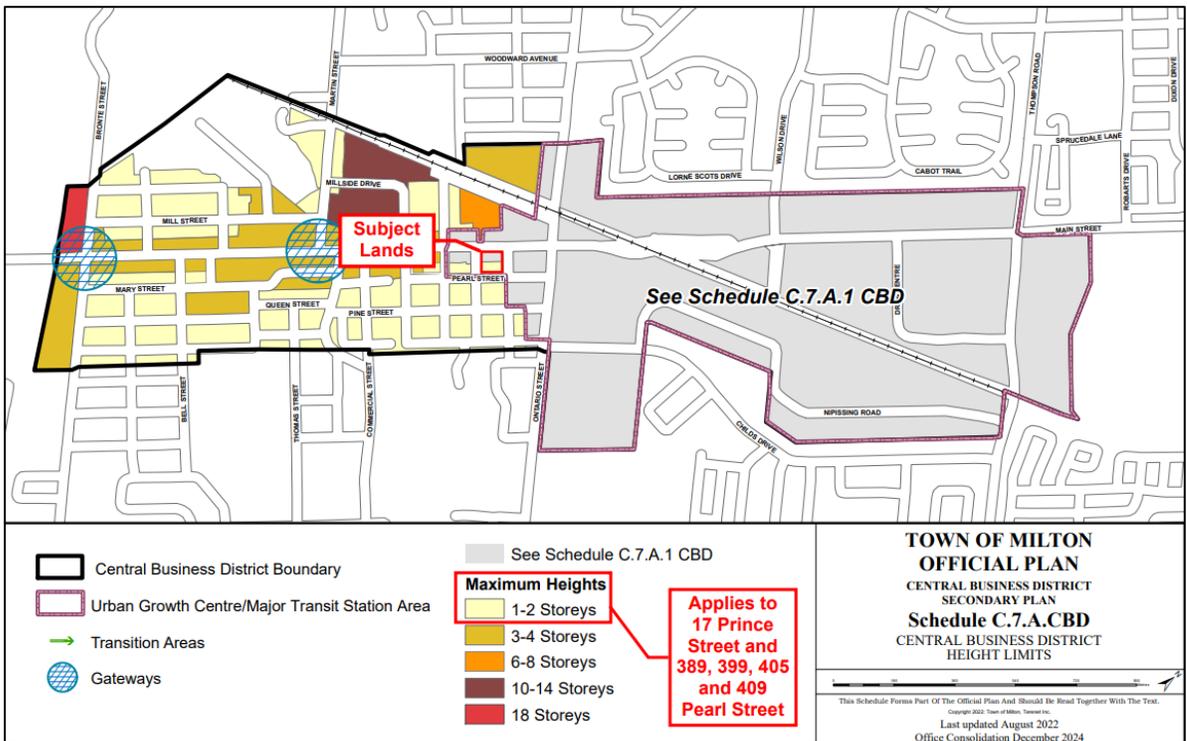
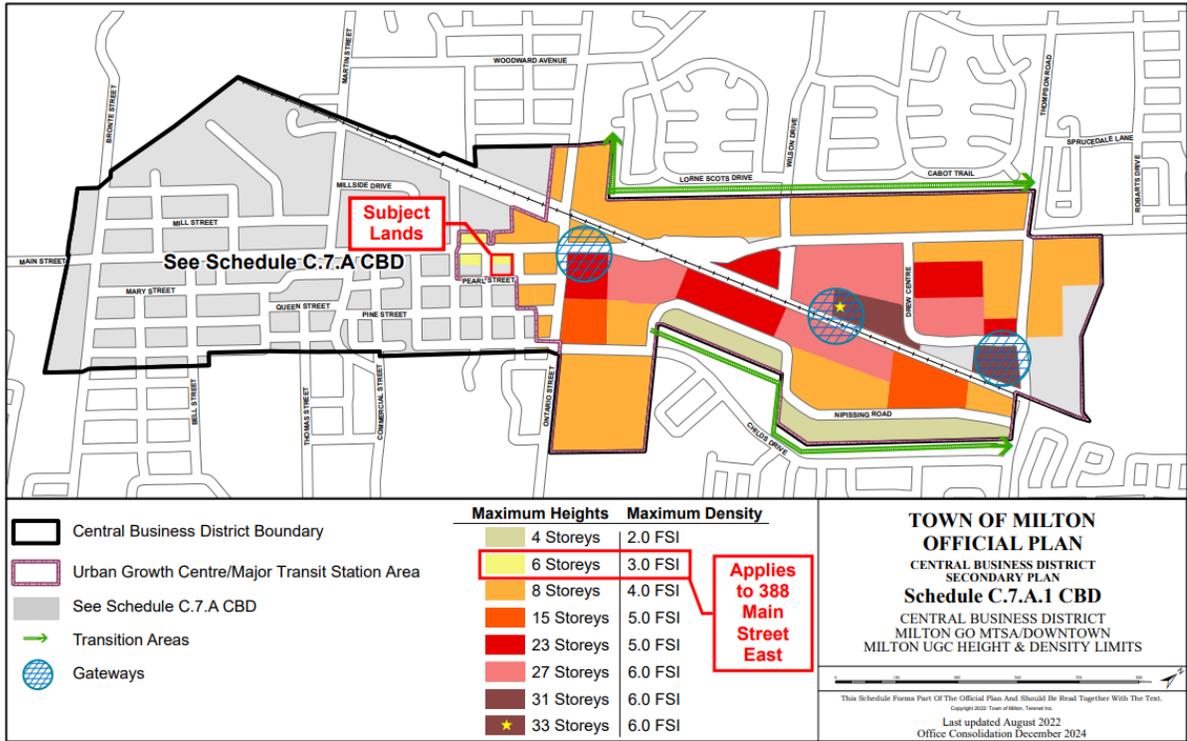
Official Plan, is to be achieved by 2031, or earlier subject to the availability of appropriate *infrastructure*. Over the long-term, the Town shall plan to achieve the general target for an overall proportion of 80% residents and 20% jobs in the Urban Growth Centre/Major Transit Station Area.

2.1.4.8 The minimum block level densities required to achieve the gross development density target within the Urban Growth Centre/Major Transit Station Area are shown on Schedule “C.7.C.CBD”. Additional density beyond the minimum requirement is encouraged subject to the maximum building heights and densities shown on Schedule “C.7.A.CBD”.

Currently, the Town’s OP aims to achieve a minimum of 5,300 new housing units between 2015 and 2031 within the built boundary. The development density within the UGC/MTSA is 200 person and jobs combined per gross hectare. According to the Planning Justification Report submitted to support the development applications, the proposed development would accommodate 1,670 people and 90 jobs per gross hectare (based on 1.7 people per unit), which exceeds the development density target of a minimum of 200 persons and jobs per hectare.

Schedule C.7.A.1.CBD - Central Business District Milton GO MTSA/Downtown Milton UGC Height & Density Limits in the Town’s OP identifies a maximum height of 6 storeys and a maximum density of 3.0 FSI for the Main Street East property. Schedule C.7.C.CBD - Central Business District Minimum Block Level Densities identifies a minimum density of 2.0 FSI for the Main Street property.

A separate maximum height/FSI schedule applies to the Prince and Pearl Street properties. In this regard, Schedule C.7.A.CBD - Central Business District Height Limits identifies a maximum height of 1-2 storeys for the Prince and Pearl Street properties. While the Prince and Pearl Street properties are within the UGC/MTSA boundary on a map, the framework for height and density treats them differently. For ease of reference, the following graphics clearly show the above-noted distinction.



Background

The proposed development includes a maximum height of 18 storeys and an FSI of 9.37, which exceeds the maximum height and density established in the UGC/MTSA for the Main Street property. The form of development is a substantial increase from planned vision for growth for the subject lands.

Schedule K - Strategic Growth Areas in the Town's OP identifies the Main Street East property as being within a strategic growth area. Section 2.1.6 of the Town's OP includes policies that apply to strategic growth areas. Below are the relevant policies from Section 2.1.6 and definitions for 'Intensification', 'Major Transit Station Area' and 'Strategic Growth Area' in the Town's OP.

2.1.6 Intensification

2.1.6.1 The *Town* shall promote *intensification* in order to support the *development* of compact, efficient, vibrant, complete and healthy communities that:

- a) Support a strong and competitive economy;
- b) Protect, conserve, enhance and wisely use land, air and water;
- c) Optimize the use of existing and new *infrastructure*;
- d) Manage growth in a manner that reflects Milton's vision, goals, and strategic objectives; and,
- e) Support achievement of the *intensification* and density targets of this Plan.

2.1.6.2 Strategic Growth Areas are located within the *Urban Area* and consist of the Urban Growth Centre, *Major Transit Station Areas*, *Intensification Corridors* and Secondary Mixed Use Nodes along with specific sites. These areas along with the *Built Boundary* as delineated by the Province, have been identified on Schedule K. The specific sites shown on Schedule "K" that are within an Employment Area designation are identified for the purposes of employment *intensification*.

2.1.6.3 *Intensification* and the development of *Strategic Growth Areas* shall be promoted to achieve the following objectives:

- a) To provide an urban form that is complementary to existing developed areas, uses space more economically, promotes live-work relationships, fosters social interaction, enhances public safety and security, reduces travel by private automobile, promotes active *transportation*, and is environmentally more sustainable;

Background

- b) To provide opportunities for more cost-efficient and innovative urban design;
- d) To provide a diverse and *compatible* mix of land uses, including residential and employment uses, to support neighbourhoods;
- e) To create a vibrant, diverse and pedestrian-oriented urban *environment*;
- f) To cumulatively attract a significant portion of population and employment growth;
- g) To provide high quality public open spaces with site design and urban design standards that create attractive and vibrant places;
- h) To support transit and *active transportation* for everyday activities;
- i) To generally achieve higher densities than the surrounding areas;
- j) To achieve an appropriate transition of *built form* to adjacent areas;
- k) For *Major Transit Station Areas, Intensification Corridors* and *Secondary Mixed Use Nodes*:
 - i) to achieve increased residential and employment densities in order to ensure the viability of existing and planned transit *infrastructure* and service; and,
 - ii) to achieve a mix of residential, *office*, institutional and commercial development, where appropriate;

For *Major Transit Station Areas*:

- i) to provide access from various transportation modes to the transit facility, including consideration of, but not limited to, pedestrians, bicycle routes and bicycle parking, commuter pickup/ drop-off areas, carpool parking, car share vehicles, and parking/recharging stations for electric vehicles;

Strategic Growth Areas

2.1.6.5 It is the policy of the Town to:

- c) Encourage alternative and innovative forms of housing, including those that support *Affordable Housing* and, in particular, high density housing types that can accommodate a range of household types;
- d) Direct *development* with higher densities, including mixed uses and *transit-supportive* land uses to *Strategic Growth Areas*;
- f) Ensure the proper integration of Strategic Growth Areas with surrounding neighbourhoods through pedestrian walkways, cycling paths and transit

Background

routes, and the protection of the physical character of these neighbourhoods through urban design;

- h) Promote *development densities* that will support existing and planned transit services;
- i) Consider *intensification* and *development of Strategic Growth Areas* as the highest priority of urban *development* within the *Town* and consider programs and incentives, including Community Improvement Plans, Community Planning Permit System, and Inclusionary Zoning policies informed by an assessment report completed to the Region's satisfaction, in the Protected *Major Transit Station Area* under the Planning Act, to promote and support intensification and further the development of *Affordable Housing*;
- s) promote the use of rehabilitated *brownfield* and *greyfield sites* for residential intensification.

Intensification means the *development* of a property, site or area at a higher density than currently exists through:

- a) Redevelopment, including the reuse of *brownfield sites*;
- b) The *development* of vacant and/or under-utilized lots within previously developed areas;
- c) Infill *development*, or
- d) The expansion or conversion of existing buildings.

Major Transit Station Area means the area including and around any existing or planned *higher order transit* station within the *Urban Area*; or the area including and around a major bus depot in an urban core. Station areas generally are defined as the area within an approximate 500m to 800 m radius of a transit station, representing about a 10-minute walk.

Strategic Growth Area means lands identified within the *Urban Area* that are to be the focus for accommodating population and employment *intensification* and higher-density mixed uses in a more compact built form. *Strategic Growth Areas* include Urban Growth Centres, *Major Transit Station Areas*, *Intensification Corridors* and Secondary Mixed Use Nodes.

The Town's OP promotes intensification in order to support compact and complete communities in a form that, among other matters, manages growth in a manner that reflects Milton's vision, goals and strategic objectives. Intensification is directed to the Town's strategic growth areas that are intended to be the focus of accommodating substantial population and

Background

employment growth that is of a higher-density, with mixed uses and in a compact built form. The Town's OP establishes a range of objectives to be achieved through intensification and development of strategic growth area. Some examples include: providing for an urban form that is complementary to existing developed areas, providing a diverse and compatible mix of land uses to support neighbourhoods, creating a diverse and pedestrian-oriented urban environment, providing high-quality public open spaces and urban design standards that create attractive and vibrant places. Strategic growth areas are to generally achieve higher densities than surrounding areas (also specifically applicable to the MTSA) as well as achieve an appropriate transition of built form to adjacent areas.

The Town's OP indicates that intensification and development within strategic growth areas is considered as the highest priority of urban development. In these areas, alternative and innovative housing that accommodates a range of household types is encouraged and development with higher densities, including mixed uses and transit-supportive land uses, is directed to strategic growth areas. Integration of strategic growth areas with surrounding neighbourhoods and the protection of the physical character through urban design is required.

The Main Street property is identified as being within a strategic growth area on Schedule K - Strategic Growth Areas in the Town's OP where intensification is directed. The proposed development includes a density that is higher than what currently exists on the property, includes mixed-uses, is considered a compact built form and includes a range of unit types. However, the proposed development also includes lands, being the Prince and Pearl Street properties, that are not identified as being within a strategic growth area.

Town staff are of the opinion that the proposed density far exceeds what is appropriate for the Main Street property and the subject lands as a whole. It is Town staff's opinion that the development proposal solely relies upon the subject lands being within the UGC/MTSA boundary as justification for the substantial increase to height and density without having regard for all of the other policies that apply.

Section 2.6 of the Town's OP includes policies that address functional community services related to the transportation network, water and wastewater systems, stormwater management, utilities and telecommunications and waste management. Below are the relevant policies that apply to development on the subject lands.

Objectives

2.6.2.1 To provide a safe, convenient, affordable, efficient and energy-conserving transportation system, while minimizing the impact on the environment.

2.6.2.3 To recognize and encourage the Region of Halton's role in the provision of municipal wastewater and water supply systems in order to ensure efficient, environmentally sustainable planning, development and management of wastewater and water services for existing and future development within the Town.

2.6.2.5 To ensure that all development is controlled using environmentally sustainable stormwater management approaches to support the protection of ground and surface water quantity and quality.

Transportation Facilities: Classification, Function and Design Requirements

2.6.3.4 The location of transportation facilities shall generally conform with the designations on Schedule "E", Town of Milton Transportation Plan, and Schedule "F", Urban Area Transportation Plan, of this Plan. Where necessary, significant transportation facilities in any Planning District will be shown in Secondary Plans in Part C of this Plan. The remainder of the transportation facilities for a Planning District will be planned as part of the subdivision design process noting that all municipal road projects and transit facilities are subject to Municipal Environmental Approvals requirements. However, regardless of where the transportation facilities are designated, where a new transportation corridor crosses a watercourse, the facility shall not impact on flood conveyance and/or flood storage of the affected watercourse.

Roads

2.6.3.8 The *Town* may require as a condition of approval of any new development, creation of new lots, or redevelopment that sufficient lands are conveyed to the Town, the Region of Halton or the Province of Ontario as applicable, to provide the road right-of-way width established in Table 2 and Table 2A. In the acquisition of these rights-of-way, lands will generally be acquired on either side of the centre line of the original road allowance. All new and reconstructed transportation facilities within the Niagara Escarpment Plan Area shall be designed and located to minimize the impact on the Escarpment environment consistent with the policies of the Niagara Escarpment Plan. Exceptions to this could occur where it is not possible to acquire right-of-ways

Background

due to constraints beyond the Town's control or where an Environmental Assessment or functional design study recommends an asymmetric alignment." after the sentence ending with the phrase "original road allowance.

2.6.3.9 The *Town* shall require the conveyance of lands at intersections to provide for exclusive turning lanes, daylighting and other special treatments including the construction of roundabouts, bridges, overpasses and depressed sections of roads. Such additional right-of-way requirements shall be determined at the time of the design of the road facilities and will become part of the total required right-of-way. Such requirements shall be based on the following:

- a) 5 metre radius: Laneway to Local Road;
- b) 5 metre radius: Local Road to Local Road;
- c) 7.5 metre triangle: Local Road to Collector Road;
- d) 15 metre triangle: Local Road to Arterial Road;
- e) 10 metre triangle: Collector Road to Collector Road;
- f) 15 metre triangle: Collector Road to Arterial Road; and,
- g) 15 metre triangle: Arterial Road to Arterial Road.

2.6.3.14 New development and/or redevelopment shall not be permitted unless such lands are accessible by means of an improved public road, which is of a standard of construction acceptable to the Town and which accommodates the traffic generated by the development and/or redevelopment.

Public and Private Parking

2.6.3.18 The Town shall require as a condition of development or redevelopment that adequate off-street parking and loading facilities be provided. In addition, ingress/egress points to such parking areas shall be limited in number and the sharing of access points with adjacent similar uses shall be encouraged.

The Town's OP establishes road classifications and right-of-way requirements for all public roads. Schedule E - Transportation Plan in the Town's OP classifies Main Street East as a multi-purpose arterial (35 metre right-of-way) and Prince Street, Pearl Street and Bruce Street as local roads (16-20 metre right-of-way). Schedule F - Downtown Character Area Right-of-Way Widening Requirements in the Town's OP identifies Main Street East as requiring more than 10 metres for a widening and up to 5 metres for Prince Street, Pearl Street and Bruce Street.

Background

Despite Town Planning staff not being supportive of the proposed development, the development applications were circulated to internal Town departments and external agencies for technical review. The Town's Transportation Planning staff provided substantial comments on the first submission review with respect to access, traffic, circulation and parking and these are detailed in the 'Agency Circulation and Comments' section of this Report. Through the Town's Transportation Planning staff comments, it was confirmed that any lands within 17.5 metres of the Main Street East centreline are to be dedicated to the Town. For Prince Street, Pearl Street and Bruce Street, any lands within 16 metres of the road centreline are to be dedicated to the Town.

Section 2.6.3.34 of the Town's OP includes direction on water and wastewater capacity and reads as follows:

Wastewater and Water System Capacity

2.6.3.34 All development and redevelopment in the *Urban Area* shall be connected to the municipal wastewater and water systems, provided that adequate capacity at the water and wastewater treatment plants is available.

The Town's OP requires all development and redevelopment within the Town's Urban Area to connect to municipal infrastructure.

Servicing for the proposed development is proposed to connect to municipal water and wastewater systems. The Functional Site Servicing and Stormwater Management Report submitted to support the proposed development applications indicates that there is capacity in the existing municipal infrastructure system to service the proposed development. However, Halton Region and Town Development Engineering staff has issued substantial comments on the first submission review requesting additional information and modelling and these are detailed in the 'Agency Circulation and Comments' section of the Report.

Section 2.6.3.38 and 2.6.3.39 include policies that address best management practices and stormwater management plans and these sections read as follows:

Best Management Practice

2.6.3.38 Where a Subwatershed Plan, except in the Niagara Escarpment Plan Area, where such uses are prohibited is not required in accordance with the policies of subsection 2.6.3.37, the Town shall ensure that development is in accordance with Best Management Practices. The Town shall assess Best Management Practice alternatives for stormwater quantity and quality enhancement with regard to the following:

Background

- a) location of stormwater management facilities with a preference for source controls rather than "end-of-pipe" controls;
- b) impact of maintenance and jurisdictional costs for wet or dry ponds and other stormwater management facilities to the Town; and,
- c) *no negative impacts* to the Natural Heritage System.

Stormwater Management Plans

2.6.3.39 The Town shall, prior to the approval of a development application, require the approval of a stormwater management plan which implements a management concept endorsed by a subwatershed plan, if applicable, or which is in accordance with Best Management Practice where a subwatershed plan is not applicable.

The Functional Site Servicing and Stormwater Management Report submitted to support the development applications includes a stormwater management plan that proposes to manage stormwater by discharging to existing sewers and by overland flow. However, Town Development Engineering staff has issued substantial comments on the first submission review requesting additional information and updates to the report and these are detailed in the 'Agency Circulation and Comments' section of the Report.

Section 2.7 of the Town's OP includes housing policies. Section 2.7.3.1 includes direction on housing targets in the Town's Urban Area and reads as follows:

2.7.3.1 Housing targets for the *Urban Area* shall be in accordance with the following:

- a) that at least 50 per cent of new housing units produced annually be in the form of townhouses or multi-storey buildings; and
- b) that at least 30 per cent of new housing units produced annually be *Affordable Housing*. ...

The Town's OP requires at least 50% of new housing units to be provided in the form of townhouses or multi-storey buildings in the urban area. The proposed mixed-use, multi-storey building includes a range of unit types and would contribute to the housing target described above. The Planning Justification Report submitted to support the development applications did not include any information on ownership tenure or if affordable or assisted housing is being contemplated.

Background

Sections 2.7.3.13 and 2.7.3.14 of the Town's OP include policies that speak to intensification, which applies to the proposed development in accordance with the definition in the Town's OP.

2.7.3.13 The present and future demand for housing in Milton will be accommodated, in part, through forms of intensification, which include the efficient use of vacant residential lands, underutilized lots and existing housing stock in all neighbourhoods, while recognizing the flood susceptibility in the urban core. Intensification may include the following subject to the provisions of Section 3.5:

- d) Outside *Employment Areas*, the redevelopment of employment lands with compatible residential or mixed use developments with a residential component, which may also include conversion of nonresidential buildings (e.g., schools, commercial facilities) to residential use, provided that:
 - i) a similar account of commercial and/or employment floor area is provided in the new development that was previously on the site; or
 - ii) through a Site Plan application and prior to the lifting of a holding by-law a technical study is completed demonstrating to the satisfaction of the Town and the Region that space to accommodate a similar number of jobs as existing shall be provided as part of the proposed development or made available prior to the commencement of, or concurrent with, the proposed development.

Where redevelopment is proposed on employment lands outside of Employment Areas, the Town's OP requires replacement jobs to be provided. The proposed development includes at-grade commercial uses (815 square metres) along Main Street East and a portion of the Bruce Street frontages. According to the Planning Justification Report, a total of 90 jobs are anticipated, however the Planning Justification Report does not explain how the number of jobs was calculated and no information was provided on the number of jobs that currently exist at the operating businesses on the subject lands.

Section 2.7.3.14 of the Town's OP includes policies that address infill development through intensification setting out criteria that must be satisfied and it reads as follows:

2.7.3.14 Infill development and redevelopment of sites and buildings through intensification, will be considered based on conformity with all of the following criteria:

Background

- a) the proposed development meets locational criteria in the Official Plan;
- b) the existing hard infrastructure, including wastewater and water services, can support additional development;
- c) the required parking can be accommodated;
- d) the local road network can accommodate any additional traffic;
- e) compliance with the zoning by-law;
- f) compatibility with the existing development standards and physical character of the adjacent properties and the surrounding neighbourhood; and
- g) recognition of the flood susceptibility in the urban core.

2.7.3.16 Residential Intensification in accordance with the policies of subsections 2.7.3.13 through to 2.7.3.16 of this Plan shall only apply in the Urban and Hamlet Area designations.

The Town's OP requires infill development to meet all the above-noted criteria such as servicing, parking and accommodation of site traffic in the local transportation network. It also requires compatibility with the standards and physical character of the adjacent properties and surrounding neighbourhood.

As noted earlier, it is Town Planning staff's opinion that the proposed development has not considered policies that speak to locational criteria for intensification and that it is not compatible with the physical character of adjacent properties and the surrounding mature neighbourhood area. There are also many technical concerns from Town departments and external agencies as described in the 'Agency Circulation and Comments' section of this Report.

Section 2.8 of the Town's OP includes policies that address urban design and the relevant subsections are identified below.

Objectives

2.8.2.2 To achieve a consistently high standard of design in the *built environment* that is complementary to and compatible with existing *development* and the *Town's* natural and cultural heritage in all areas including site, building and landscape design.

2.8.2.3 To develop an active and attractive network of urban spaces by ensuring mutually supportive relationships between those open spaces and the built forms which enclose them.

Background

2.8.2.9 To consistently apply human scale design principles in urban design, such that buildings, spaces, and facilities accommodate various human dimensions, mobility and strength.

2.8.2.10 To create a physical environment which permits humans to perceive and comprehend the relative size and location of buildings and their parts, and the spaces between buildings, in order to enhance opportunities to appreciate the built environment.

2.8.2.12 To achieve a complementary relationship between new buildings and existing buildings, while accommodating a gradual evolution of architectural styles, as well as accommodating innovative built forms.

2.8.2.14 To maximize the richness and visual delight of the existing building architecture, specifically within the Central Business District, through attention to massing, proportion, facade articulation, architectural detail, materials, and their successful integration.

Design Guidelines

2.8.3.2 An Urban Design Brief of a proposed development shall be undertaken by the proponent of a development project when that development is proposed within the Central Business District or is defined as medium or high density development such as those envisioned for the Secondary Mixed Use Node areas. The Urban Design Concept shall establish the contextual relationship of the proposed development to adjacent buildings, streets and areas.

2.8.3.3 The following urban design factors shall be used to determine the acceptability of development proposals:

- a) The extent to which the proposal attains the pertinent Urban Design objectives and policies of this Plan; and,
- b) The extent to which the proposal fits within any Council-approved Urban Design guidelines which are applicable to a development site, its local area, and/or its neighbourhood or district.

2.8.3.6 The development of urban design guidelines by the proponent shall ensure that proposed high density residential, mixed use or commercial centres:

- a) is compatible in architectural form with abutting neighbourhoods;
- b) forms a cohesive and unified cluster of buildings which are architecturally compatible with each other;

Background

- c) provides links with the pedestrian, cycle, transit and vehicular routes on their perimeter by such means as the extension of existing pathways and local streets into or through the site; and,
- d) maintains and enhances remaining elements of valued historic development patterns in the layout of new development.

2.8.3.8 New development located within an established district or *Mature Neighbourhood Area* will be designed as an integral part of the area's existing larger pattern of built form and open spaces, reinforcing and complementing viable existing patterns by complementing the existing range of building mass, height, proportion, enclosed volume and position relative to street and site.

2.8.3.9 A transition between high and low profile buildings will be encouraged through the application of such urban design measures as incremental changes in height, substantial space separation of a planting buffer, or through the use of an existing topographical break or waterway.

2.8.3.10 The preservation of the existing pattern of setbacks in the Established *Urban Area* shall be supported so that new buildings, additions and alterations to existing buildings do not substantially alter the existing character of the neighbourhood or district.

2.8.3.11 New developments within the Central Business District will be required to support the creation of continuous building facades along streets frequented by pedestrians. These building facades may be interrupted at strategic locations with pocket parks, plazas or other open spaces which provide a supportive function to the street activity.

2.8.3.19 *Tall Building* tower design and siting should maximize sunlight penetration and views between buildings, including views of the sky, and minimize shadows cast on private rear yards, the public realm, school yards and parks. Tower separation and orientation, as well as floorplate size control, should have regard to the Town's *Tall Building Design Guidelines*.

The Town's OP includes many design objectives that emphasize the relationship of built form with the public realm. The design objectives aim to obtain a high standard of design in the built environment that is both complementary to and compatible with existing development that contributes to defining a sense of place and identity and providing for public safety and security.

Background

To support the proposed development, the applicant submitted an Urban Design Brief as well as an Architectural Drawings set. The Town's Policy and Urban Design staff are of the opinion that the proposed development, as designed, fails to achieve the urban design directions established for this transition area, as identified through the Mobility Hub Study, area and its surrounding context. Further detail on the Town's Policy and Urban Design staff comments is provided in the 'Agency Circulation and Comments' section of this Report.

Sections 2.8.3.31 and 2.8.3.32 of the Town's OP includes policies that address wind conditions and read as follows:

Microclimate

2.8.3.31 The avoidance of undesirable wind conditions which may be associated with medium and high-density development shall be promoted through the use of building design and subdivision design which reduces or mitigates undesirable wind impacts on streets, open spaces and other pedestrian activity areas.

2.8.3.32 Wind testing of medium and high-density development proposals, specifically within the CBD area, to evaluate the wind impact of these proposals, and to determine the appropriate design measures to reduce or mitigate any undesirable wind conditions, will be required.

Through the development review process, the Town's OP requires potential wind impacts to be assessed and for building design to incorporate mitigation measures, if required. A Pedestrian Impacts Wind Study was not submitted in support of the development applications, however it is noted that all lands within the Town's MTSA that are zoned Urban Growth Centre - Mixed Use (UGC-MU) are subject to a Holding provision (H71) that requires the completion of a Pedestrian Impacts Wind Study, to the satisfaction of the Town, as part of an application for Site Plan Approval. The Site Plan Approval process is not carried out until lands are designated and zoned appropriately for development.

Section 2.8.3.39 and 2.8.3.40 includes policies that apply to views and they read as follows:

Views

2.8.3.39 The preservation of important views from strategically located viewpoints, and the preservation of significant sequences of views of particularly important landmarks and features shall be encouraged to the extent possible.

2.8.3.40 "Landmark" views of unique features, particularly the Central Business District streetscape and the Niagara Escarpment, shall be enhanced to the extent possible.

The Town's OP requires the preservation of landmark views, particularly in the Central Business District, and the Niagara Escarpment. While landmark is not a defined term in the Town's OP, there is reference to Main Street East being a landmark street in Section 3.5.3.39 of the Town's OP, which reads as follows:

3.5.3.39 Main Street East connects the community and cultural arts district in the east to the historic downtown in the west. It is envisioned as a landmark street and a central focus of the *UGC/MTSA*. The design of Main Street East should include active pedestrian boulevards, wide sidewalks, consistent paving treatment, street tree planting and *active frontages*. Buildings along Main Street East should include a generous setback along the south side for an additional row of trees and plantings within the private setback.

To facilitate the proposed development, a Zoning By-law Amendment is proposed that seeks to reduce the minimum setback of the proposed building from the street along Main Street East. As described in further detail through the Mobility Hub Study, the minimum setback of 6.0 metres along the south side of Main Street East was intentional to facilitate wider sidewalks, bicycle lanes, landscaping and furnishings, patio space, other public realm improvements and were intended to protect views to the Downtown area and the Escarpment. It is Town staff's opinion that the proposed building has also not been sited with a sufficient setback to achieve the objectives above.

Section 2.10 of the Town's OP include policies that address cultural heritage and the relevant subsections are identified below.

Heritage List

2.10.3.3 The Town of Milton shall, in consultation with Heritage Milton and other interested groups or individuals and public agencies, maintain and update, as necessary, a list of properties that contain one or more buildings structures, monuments, installations or remains associated with architectural, cultural,

social, political, economic or military history. This is to be known as the Heritage List.

2.10.3.4 If a resource is not on the *Town's* Heritage List, it does not necessarily mean that the property and/or resource is not of cultural heritage interest.

2.10.3.5 During the processing of *development* applications, resources of potential cultural heritage interest will be identified, evaluated and following approval by Council, will be added to the *Town's* Heritage List as appropriate.

Designation of Character Areas

2.10.3.35 The *Town* may designate as *Character Areas*, *mature neighbourhood areas*, core areas of villages, cultural landscapes or other areas in both the urban and rural areas, where designation under the *Ontario Heritage Act* may or may not be appropriate.

2.10.3.36 The *Town* shall require that *Character Area* Plans be developed for *Character Areas* as identified on Schedule D, in accordance with the policies of subsections 5.4.3.11 and 5.4.3.12 of this Plan.

2.10.3.39 Proposed *development* in the form of new housing, replacement housing, additions and alterations within *Character Areas* shall be subject to the policies of subsections 3.2.1.8 to 3.2.1.12 inclusive, where applicable, and subsection 5.6.3 of this Plan.

Character Area: means an existing developed or planned area within the *Town*, which has distinct land use functions and a unique, identifiable *character* that is different from the surrounding areas.

The *Town's* OP includes direction for the review of buildings listed on the *Town's* Heritage Register. Several properties that comprise the subject lands are listed properties on the *Town's* Heritage Register and these include: 389, 395, 399, 405 and 409 Pearl Street. In support of the development applications, the applicant prepared a Heritage Impact Assessment that concluded that the above-noted properties do not warrant conservation. The *Town's* Heritage staff do not agree with the assessment that none of the properties warrant conservation and have indicated that further evaluation of the properties located at 395 and 399 Pearl Street is required. A complete summary of the *Town's* Heritage staff comments is detailed under the 'Agency Circulation and Comments' section of this Report.

The above-noted policies also address character areas. The Prince and Pearl Street properties are identified within a mature neighbourhood character area in the *Town's* Zoning By-law.

Background

Section 3 of the Town's OP establishes land use policies for lands in the Urban Area shown on Schedule 1 - Town Structure Plan in the Town's OP. General land use designations and policies for the Urban Area are shown on Schedule B - Urban Area and Schedule C - Central Business District Land Use Plan in the Town's OP. As noted previously, the subject lands are within the Town's Urban Area and Central Business District Secondary Plan. This secondary plan was conducted to provide detailed direction with respect to the allocation of land uses, heritage protection, street layout and urban design in the Downtown area. The Town's OP indicates that the policy recommendations from the secondary plan process were integrated into the existing Section 3.5 of the Town's OP, and the relevant sections have been reproduced below.

Section 3.5.2 of the Town's OP includes permitted uses for the Central Business District designations and the relevant subsections read as follows:

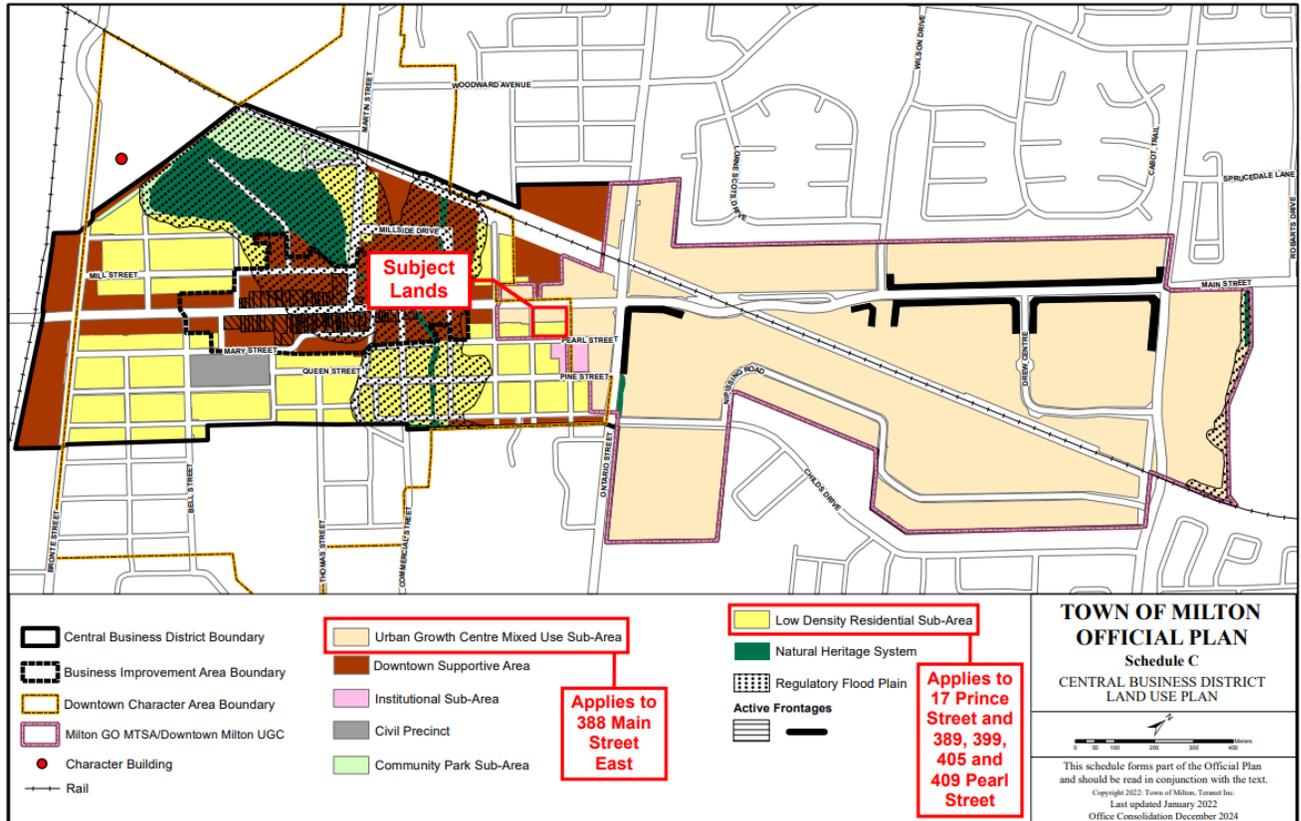
3.5.2 Permitted Uses

3.5.2.1 The Central Business District designations on Schedule "C" shall permit a variety of commercial, *institutional* and *office uses*, and *community facilities*, including a diversified mixture of basic shopping facilities, specialty retail, food stores, business and professional offices, personal service uses, *assisted, affordable* and *shared housing*, existing uses, and religious, recreational, *entertainment* and *cultural facilities*, unless otherwise specified in the Sub-Area classifications as set out in Section 3.5.3.

3.5.2.2 Residential uses shall be permitted in accordance with the policies of the various sub-areas as outlined in Section 3.5.3.

On the basis of the above, a range of uses are permitted within the Central Business District and residential uses in particular are permitted in accordance with various sub-areas. The subject lands are within two sub-areas. The Main Street East property is within the Urban Growth Centre Mixed-Use Sub-Area and the Pearl and Prince Street properties are within the Low Density Residential Sub-Area. For ease of reference, the graphic at the top of the next page shows the sub-areas that apply to the subject lands. The above-noted sub-areas both permit residential uses and these sub-areas are addressed in further detail later in this section of the Report.

Background



Section 3.5.3 of the Town’s OP includes policies that apply to the planned function and development in the Central Business District. Below are the relevant policies from Section 3.5.3 as well as the definition of ‘character’ and ‘transit supportive’ in the Town’s OP.

3.5.3 Central Business District Policies

3.5.3.1 The intent of the Central Business District land use designation is to preserve, promote and enhance the function of the core area of the *Town* as the primary centre for commerce, tourism and civic activity at a pedestrian-scale.

3.5.3.4 All *development* within the CBD shall be evaluated on its ability to be serviced by the regional water and wastewater sewer systems. The timing of *development* shall be co-ordinated with the financing and delivery of the *infrastructure* required to support it.

3.5.3.5 The *development* of a wide range of complementary uses to contribute to the vitality of the Central Business District and foster a live-work relationship,

Background

including the *development* of residential units above commercial establishments or offices, shall be encouraged.

3.5.3.7 *Transit-supportive* densities and pedestrian oriented, active streetscapes active frontages and improvements to the *public realm* that revitalize and enhance the *character* of the Central Business District are required.

3.5.3.8 New *development* shall exhibit high quality architectural and urban design and shall be integrated with adjacent land uses, especially *Mature Neighbourhood Areas* through the incorporation of appropriate transitions to minimize impacts.

3.5.3.9 The scale and location of new development within the historic downtown area shall be sensitive to and *compatible* with the existing character and appearance.

3.5.3.15 The maximum permitted *building heights* and densities shall be in accordance with the ranges provided on Schedule C.7.A.CBD and Schedule C.7.A.1.CBD.

Character means the aggregate of features that combined indicate the quality and nature of a particular area. The distinct features include built and natural attributes of an area such as: scale and massing, vegetation, topography, lotting pattern, colour, texture, material and the relation between buildings, spaces, and landforms.

Transit-supportive means development that makes transit viable and improves the quality of the experience of using transit. It often refers to compact, mixed-use development that has a high level of employment and residential densities. Transit-supportive development will be consistent with Ontario's Transit-Supportive Guidelines.

The Central Business District is intended to preserve, promote and enhance the function of Milton's Downtown core area. A range of complementary uses are permitted and residential units above commercial office or uses is also encouraged in the Central Business District. Development is required to be serviced by municipal water and wastewater in a coordinated manner. Transit-supportive densities and pedestrian-oriented, active frontages that enhance the character of the area are also required.

Background

With respect to new development in the Central Business District, the Town's OP requires a high quality of architectural and urban design and emphasis is given to integration with adjacent land uses, particularly with mature neighbourhood areas, through the incorporation of appropriate transitions. Further, the policies require the scale and location of new development within the historic downtown area to be sensitive to and compatible with the existing character and appearance. In the Central Business District, the maximum permitted building heights and densities are established on Schedules C.7.A.CBD: Central Business District Height Limits and C.7.A.1.CBD: Central Business District Milton GO MTSA/Downtown Milton UGC Height & Density Limits.

The proposed development is for a high-density mixed-use building that includes ground floor commercial uses and residential units above. Municipal services are proposed to service the development. The proposed density exceeds what currently exists on the subject lands and meets the definition of transit-supportive in the Town's OP. The proposed building design includes some step backs that aim to provide some transition to the surrounding area.

Despite the above, Town Planning staff is of the opinion that there are several objectives for the Central Business District that are not achieved by the proposed development. It is the opinion of Town Planning staff that the proposed development does not enhance the character of the Central Business District, does not exhibit a high quality of architectural design and is not adequately integrated with adjacent land uses. Town Planning staff is also of the opinion that the scale of development is an example of overdevelopment and is of an inappropriate scale (height and density) for its location that will ultimately detract from the Downtown area.

Section 3.5.3.20 of the Town's OP identifies the permitted uses in the Low Density Residential Sub-Area as follows:

Low Density Residential Sub-Area

3.5.3.20 The permitted uses within the Central Business District Low Density Residential Sub-Area shall be single detached, semi-detached and duplex dwellings. *Development* shall be subject to the policies of subsections 2.10.3.35 to 2.10.3.41 inclusive, subsections 5.4.3.11 and 5.4.3.12, and Section 3.2 of this Plan.

The Pearl and Prince Street properties are located within the Low Density Residential Sub-Area. Low-density residential development is envisioned within this sub-area and the permitted built form includes single-detached, semi-detached and duplex dwellings. The proposed development includes some residential units along Pearl Street but does not provide for adequate transition to the surrounding low-density built form.

Background

The Main Street property is within the Urban Growth Centre Mixed Use Sub-Area and the applicable policies are listed below.

Urban Growth Centre Mixed Use Sub-Area

3.5.3.21 The Urban Growth Centre Mixed Use Sub-Area designation makes up the majority of the UGC/*MTSA*. It is to be planned as a concentrated, vibrant urban centre that accommodates a significant share of the Town's population and employment growth supported by Regional scale public services and major transit *infrastructure*.

3.5.3.22 In addition to the uses permitted within the Central Business District land use designation, within the Urban Growth Centre Mixed Use Sub-Area designation, higher density residential and employment uses, *major office*, retail, hotels and convention centres and appropriate major institutional uses, may be permitted.

All permitted uses within the Urban Growth Centre Mixed Use Sub-Area shall contribute to achieving the overall minimum *development density* target for the UGC of 200 residents and jobs combined per hectare, subject to the availability of appropriate infrastructure.

3.5.3.23 *New development* and redevelopment in this area may take the form of purpose designed or mixed use buildings and shall be guided by the following policies:

- a) Opportunities for lot consolidation and co-ordinated redevelopment of adjacent lots shall be encouraged to facilitate efficiencies including shared access, parking, amenity space and the *Open Space Linkages* shown on Schedule C.7.B.CBD;
- b) Pedestrian oriented activities, particularly retail commercial uses and restaurants, at grade, with upper floor residential and *office uses* shall be encouraged, especially in the *Active Frontage* areas in accordance with 3.5.3.20 and at the Gateways and Focal Points shown on Schedule C7.B.CBD;
- c) Parking shall be provided in accordance with the policies of subsection 3.5.3.48, with the majority of the required parking being provided in a structured parking garage or underground;

Background

- d) Rear or side yards abutting residential *development* shall be designed to include fencing and landscaping and other design features to mitigate noise, light and visual impacts;
- e) Buildings abutting established residential neighbourhoods shall be stepped back, terraced or setback to maintain an appropriate transition and relationship between the different *built* forms. Where applicable, *development* proposals shall be subject to Section 2.10, Subsections 3.2.1.8 to 3.2.1.12 inclusive, and subsection 5.6.3 of this Plan;
- f) Generally, buildings shall be oriented towards the street and positioned to create a sense of enclosure along the street. All new buildings surrounding the Milton GO Station and along internal local streets within the *Active Frontage Areas*, shall be located close to or at the street line to encourage retail activity. Along the south side of Main Street East, buildings will be setback sufficiently to maintain an enhanced public view corridor of the Escarpment and to accommodate a double row of street trees, landscape elements and furnishing/ marketing zones. Along Ontario Street and Thompson Road, landscape setbacks will be required for additional tree planning and greening to the frontages of new *developments*. Generally, setbacks should be unencumbered with no below grade structures so that trees and other planning can grow to a mature size;
- h) *Development* shall be transit-supportive to facilitate access to public transit, including commuter pick-up/drop-off areas and bicycle parking, and encourage active transportation.
- i) The installation of on-street and off-street electric vehicle charging stations shall be encouraged.

3.5.3.25 A network of Major and Minor Linkages as described in Section 3.5.3.38 to 3.5.3.39 and shown on Schedule C7.B.CBD shall be created. This network will provide *active transportation* connections from the Milton GO Station to the wider community and to improve linkages through the *MTSA*.

3.5.3.26 The comprehensive redevelopment of existing industrial and automotive related establishments within the Urban Growth Centre/*Major Transit Station Area* and replacement with intensive, high density residential, *office* and *institutional uses* shall be promoted, subject to 2.7.3.13e.

Background

The Urban Growth Centre Mixed-Use Sub-Area is intended to be a concentrated urban centre that accommodates a significant share of the Town's population and employment growth as well as a minimum density target of 200 residents and jobs combined per hectare, subject to appropriate infrastructure.

New mixed-use development is subject to a number of policies that address shared access, parking, amenity space, pedestrian-oriented activities and active frontages, parking, landscaping and noise and light mitigation and parking and active transportation. Buildings abutting established residential neighbourhoods are required to be stepped back, terraced or setback with an appropriate transition and relationship between built forms and are subject to various urban design policies of the Town's OP.

The policy framework also includes requirements for building orientation in relation to Main Street East, as an example, buildings are to be sufficiently setback to maintain an enhanced public view corridor of the Downtown area and the Escarpment as well as to accommodate a double row of street trees, landscape elements and furnishing/marketing zones.

The proposed development includes a mixed-use building, which is a permitted use that is encouraged within the Urban Growth Centre Mixed Use Sub-Area. Mixed-use buildings with at-grade commercial uses are encouraged particularly in active frontage areas, which applies to the Main Street East property. The subject lands include the consolidation of seven properties for the redevelopment of an entire block that creates a unique opportunity for efficient redevelopment that addresses all applicable policies.

Town Planning staff is of the opinion that the form, scale and location of the proposed building does not conform to the policies of the Urban Growth Centre Mixed Use Sub-Area. It is Town Planning staff's opinion that the proposed building design lacks appropriate transition with the surrounding established residential neighbourhood. The proposed building has also not been setback sufficiently to maintain an enhanced public view corridor of the Downtown area and the Escarpment or to accommodate a double row of street trees and landscape elements as required in the policy framework.

In addition to the above, while the proposed development meets the definition of transit-supportive, the Town's Transportation Planning staff has highlighted substantial concerns with the proposed site accesses and internal site-circulation that are detailed in the 'Agency Circulation and Comments' section of this Report.

Section 3.5.3.45 of the Town's OP includes policy direction on urban design within the Central Business District and it reads as follows:

Background

Urban Design

3.5.3.45 All *development* within the Central Business District shall have regard for the general design objectives contained in Section 2.8 of this Plan and the CBD Urban Design Guidelines. In addition, all *development* within the *Major Transit Station Area* shall have regard to the Milton Mobility Hub Urban Design Guidelines.

As noted above, all development within the Central Business District is required to implement the design policies in the Town's OP as well as the Central Business District Guidelines and the Milton Mobility Hub Urban Design Guidelines. Further discussion on the urban design policies from Section 2.8 of the Town's OP is provided later in this section of the Report.

Section 3.5.3.47 of the Town's OP includes policies that address parking in the Central Business District and the relevant subsections read as follows:

Parking

3.5.3.47 The *Town* supports the development of common parking areas in the CBD and shall apply a strategic and holistic approach to parking provision as follows:

- c) where a major *development* or redevelopment project is proposed in any area, a detailed study by a qualified traffic engineer of the implications of the redevelopment for parking in the CBD will be submitted by the proponent. The study will identify parking problems created by the redevelopment, and outline alternative solutions to the problems;
- d) sufficient to provide an appropriate supply of parking that meets the needs of users while promoting the use of *active transportation* and transit;
- f) all proposed developments should illustrate through their site plans how parking areas will be developed having regard for the *Town's* Urban Design Guidelines;
- g) *travel* demand management, reduced parking and opportunities for shared parking shall be encouraged in accordance with 2.6.3.14;

The above-noted policy establishes requirements for parking in the Central Business District. The proposed development includes 417 parking spaces provided in an underground parking structure with three levels. It is noted that Bill 185 *Cutting Red Tape to Build More Homes Act, 2024*, limits the Town's ability to require a minimum number of parking spaces in an Official

Background

Plan or Zoning By-law for any lands within an MTSA. Instead, parking necessary to service a development is to be determined by the market.

The Town's Transportation Planning staff has indicated that the Transportation Impact and Parking Study has not used adequate proxy sites in their analysis and has not sufficiently demonstrated that the proposed parking will meet market demand for the residential units as well as for the commercial units and that all parking would be able to be accommodated on-site. While there may be limited options for on-street parking in the vicinity of the subject lands, Pearl Street, Bruce Street and Prince Street are currently narrow, local roads and substantial on-street parking would pose safety concerns.

Section 3.2.1.8 of the Town's OP includes policies that apply to mature neighbourhood areas. Below are the relevant policies that apply to mature neighbourhood areas as well as the definition of 'mature neighbourhood area' in the Town's OP.

Mature Neighbourhood Areas

3.2.1.8 Proposed *development* in the form of new housing, replacement housing, and additions and alterations within *Mature Neighbourhood Areas* may be permitted provided they are *compatible* and respectful of the *character* of the neighbourhood by incorporating scale, massing, building height, and other characteristics that are prevalent in the *Mature Neighbourhood Area*.

3.2.1.9 Proposed *development* should be generally consistent with the setbacks, orientation and building separation distances within the *Mature Neighbourhood Area*. Landscaping and fencing is encouraged to maintain established aesthetics and privacy.

3.2.1.10 *Mature Neighbourhood Areas* shall be identified in the Town's Zoning By-law. The implementing Zoning By-law shall further detail appropriate standards for new *development* within *Mature Neighbourhood Areas*, including lot coverage, lot frontage, and building height and setbacks, among other standards.

Mature Neighbourhood Area means an older residential area within the Residential Area designation, as identified in the implementing Zoning By-law, characterized by predominantly single-detached dwellings generally on large lots, and other built and natural qualities that collectively provide a distinct and recognizable *character*.

Background

The Pearl and Prince Street properties are not within the Residential Area designation, however they are within the delineated mature neighbourhood area on Schedule F: Mature Neighbourhood Overlay Area in the Town's Urban Zoning By-law 016-2014, as amended. Development within these areas may be permitted provided the development is compatible and respectful of the character of the neighbourhood by incorporating scale, massing, building height and other characteristics that are present. For the reasons noted previously in this Report, Town Planning staff are of the opinion that the proposed development has not considered the neighbourhood characteristics noted above in the proposed design.

For the reasons provided throughout this section of the Report, Town Planning staff is of the opinion that the proposed development does not conform to the Town of Milton Official Plan.

Downtown Study

On November 9, 2015, Town Council adopted a new Strategic Plan, referred to as Destiny Milton 3, that identified several actions to be achieved between 2015-2018 (Report COMS-025-15). One of the actions identified was to develop a comprehensive policy and operation framework to support revitalization and sustainability in the Town's Downtown, recognizing its function as a focal point for the community. To achieve this action, Town Council approved a terms of reference for the Downtown Study.

The purpose of the Downtown Study was to examine the state of the Downtown area at the time and optimize opportunities for redevelopment and revitalization. The study area comprised of a primary area that included the Downtown historic area and civic precinct and the secondary area included areas within the Downtown that coincided with the Downtown character area boundary. The subject lands referred to in this Report were contained within the secondary area.

On January 11, 2016, Town Planning staff presented the Downtown Study Interim Report (PD-020-16) to Council. This report included an overview of the goals and objectives of the Downtown Study, provided an overview of various public engagement sessions that had been held with the community and established a vision for the downtown area. The vision recognized the civic presence as an anchor in the Downtown area, opportunities to build on existing character, a desire to create a vibrant public realm that is pedestrian friendly and achieve place making for the entire community. The report also included an analysis of opportunities for intensification in the Downtown area, while recognizing constraints to development such as heritage and the floodplain boundary. Through the above-noted report, Town Planning staff were directed to obtain consulting services to prepare a market analysis for Downtown Milton that intended to determine what level of growth can be accommodated

Background

in the Downtown area. The Town retained Watson and Associates to complete this analysis that focused on the primary area as delineated in the Downtown Study and these findings were presented to Council on June 27, 2016 (Report PD-029-16).

On December 12, 2016, Town Planning staff presented the Downtown Study Final Report (PD-054-16). The Downtown Study Final Report included recommendations to prepare an Official Plan Amendment and urban design guidelines to guide development in Milton's downtown area, among other action items such as additional studies on office-mixed use buildings, parking in the downtown area and cultural heritage protection. The Downtown Study Final Report also recognized the growing pressures within this area for redevelopment. The report indicated that further analysis was required of the character areas within the secondary area to identify the forms of development that are appropriate and not appropriate. Further, the report suggested that the findings of a future study of the secondary area would then be used to develop Official Plan policies, zoning provisions and design guidelines that tailored to the areas in question.

Mature Neighbourhoods Character Study

In May of 2018, Town Planning staff initiated the Mature Neighbourhoods Character Study in response to a Council Notice of Motion requesting that a review be completed of the Town's Official Plan policies and zoning by-law provisions relating to development in the Town's mature neighbourhood areas. The purpose of the study was to gain a better understanding of the elements and qualities that contribute to neighbourhood character and to assess whether the policies of the Town's Official Plan and zoning by-law were effective at managing appropriate development and maintaining character in the areas.

The work plan was carried out in several phases. The area under review for Phase 1 included the Downtown area, which also comprised the Pearl and Prince Street properties. Town Planning staff engaged in substantial consultation with the community including six walking tours with 54 attendees, an online survey with 94 participants, two open houses to present key findings of the technical review and another three open houses to present and review the proposed official plan and zoning by-law amendments. A statutory public meeting was held on August 24, 2020, to present the amendments to Council and the public (Report DS-025-20).

Town Planning staff prepared an Official Plan Amendment to introduce new policies for the Town's Official Plan that described the role of character areas and clarify the Town's goals and objectives to achieve infill and development that is compatible and respectful of existing character in mature neighbourhood areas. The Official Plan Amendment also introduced new

Background

definitions for character, character area and mature neighbourhood area, established urban design policies and introduced policies related to the transportation system (right-of-ways and daylighting requirements). Character areas were also identified on Schedule C: Central Business District Land Use Plan, Schedule D2: Urban Districts and Neighbourhoods and Schedule F: Downtown Character Area and Right-of-Way Widening Requirements in the Town's Official Plan.

In addition to the above, Town Planning staff prepared a Zoning By-law Amendment introduced zoning standards to maintain the character of mature neighbourhood areas and detail the appropriate standards for new development within such areas including regulations for lot frontage, lot depth, lot area, lot coverage, rear yard setback, landscaped open space, interior side yard setback, front yard setback, building height and garages. Character areas and building heights were identified on a schedule in the Town's Urban Zoning By-law 016-2014, as amended.

On October 19, 2020, Town Council adopted Official Plan Amendment 60 and Zoning By-law 081-2020 (Report DS-043-20) to implement the policies and provisions for the Town's mature neighbourhood character areas.

As it relates to the subject lands, recommendations from the Mature Neighbourhoods Character Study were used to inform the building heights on the Pearl and Prince Street properties as recommended in the Mobility Hub Study and implemented through the associated Official Plan Amendment and Zoning By-law Amendment.

Town of Milton - Major Transit Station Area/Mobility Hub Study

On February 8, 2017, Halton Regional Council endorsed the Mobility Management Strategy for Halton Region (PW-03-17/LP13-17). The purpose of the Mobility Management Strategy was to analyze region-wide issues facing Halton Region at the time and to the year 2041 as well as to develop goals and strategies to guide the evolution of the Region's immediate and longer-term transportation system. The Mobility Management Strategy aligned with the Regional Official Plan policies and Transportation Master Plan (2031), the Ministry of Transportation (MTO) plans, including Metrolinx's 'The Big Move' Regional Transportation Plan, and the Regional Express Rail plan.

Part of the Region's Mobility Management Strategy included a review of Major Transit Station Areas (MTSAs) within the Region to identify and prioritize projects required to unlock the economic potential of MTSAs and the region-wide network to facilitate connections throughout the Region. Through this work, Regional Council agreed to fund studies of the area around the Town of Milton GO Station.

Background

On the basis of the above, on April 9, 2018, Town Council awarded a contract to R.E. Millward & Associates Ltd./DTAH (Report PD-017-18), who led a team of subconsultants, to undertake a Major Transit Station Area/Mobility Hub Study ('Mobility Hub Study') that comprised of the following elements:

- Future vision and planning principles;
- Land use planning and design framework to guide the preparation of a Secondary Plan (including a 3D model);
- Conceptual transportation plans, including active transportation;
- Market feasibility assessments (focused on potential for redevelopment);
- Functional design for proposed infrastructure, having regard to the station access plan prepared by Metrolinx; and,
- Implementation plans, including an Official Plan Amendment and Zoning By-law Amendment.

The Mobility Hub Study involved comprehensive community engagement that was carried out over three phases. Town staff engaged with the public, Council, external stakeholders (including Regional services and the school boards) between May 2018 and June 2021, through a visioning workshop, three public information centre meetings and four focus group meetings on different stages of the study process. A technical advisory committee was also consulted at various stages throughout the study process.

The feedback received during early engagement opportunities was incorporated into the Mobility Hub Study Final Report. This report included an overview of background and study purpose, described the basis for the plan, established the vision for transforming the MTSA, included an overview of the comprehensive consultation undertaken, described the key directions and recommendations and provided direction on phasing and implementation.

Seven key directions for the MTSA were developed to support the creation of a complete community as follows and three of the key directions apply to the subject lands, as follows:

1. Mixed-Use Mid-Rise Green Corridor (Main Street East)

Main Street East should serve as a green corridor prioritizing cyclists and pedestrians. Wider boulevards with trees, street furniture, wide sidewalks, space for patios, consistent paving treatment and ground floor activation will encourage pedestrian movement and activity. Mid-rise buildings along Main Street East should step back to promote a pedestrian scale and support sensitive transitions to residential neighbourhoods to the north.

2. Frame View to the Escarpment and Throughout the Study Area

Important public views to the Niagara Escarpment should be framed through the appropriate siting of buildings. A network of streets, mid-block connections, open spaces and active transportation connections should provide strong visual and physical connectivity across the Study Area.

4. Mixed-Use Intensification at an Appropriate Scale and Form

Mixed-Use Intensification at an Appropriate Scale and Form Intensification should be focused along the rail corridor, Main Street East and the existing Real Canadian Superstore and Milton Mall. Buildings along Main Street East should include active frontages.

The above-noted directions were incorporated into the planning and development framework developed in the Mobility Hub Study. The framework included a Primary and Secondary Zone. The Primary Zone is to accommodate the tallest building and highest densities and the Secondary Zone is to accommodate a mix of mid- and low-rise buildings in order to provide for transition to the Downtown area and established residential neighbourhoods. A demonstration plan was prepared to illustrate the planning and development framework and the projected growth for the MTSA. In this regard, the Primary and Secondary Zones were planned to accommodate a projected density of 221 people and jobs per hectare, resulting in a total of 25,114 residents and 4,137 jobs at full buildout (between the years 2055-2062).

On August 24, 2020, Town staff presented the Mobility Hub Study Final Report to Town Council (Report DS-028-20) and Town Council directed Town Planning staff to prepare a Policy Directions Report outlining implementation measures of the Mobility Hub Study. On April 12, 2021, Council directed Town Planning staff to advance short-term implementation measures in the form of a Town-initiated Official Plan Amendment and Zoning By-law Amendment (Report DS-026-21).

The proposed Official Plan and Zoning By-law Amendments were circulated to external agencies and the public ahead of the statutory public meeting. On October 21, 2021, a statutory public meeting was held and Town Planning staff presented a public meeting information report (DS-076-21) and the proposed amendments. The proposed Official Plan Amendment, among other changes, identified and delineated the MTSA and UGC boundary, prescribed minimum block-level densities, maximum building heights and development densities and introduced many design-related policies for development.

The proposed Zoning By-law Amendment pre-zoned lands in the MTSA and UGC to an Urban Growth Centre - Mixed Use (UGC-MU) zone and established permitted uses and zoning provisions in a manner that implemented the proposed Official Plan Amendment. A range of

Background

Holding provisions were also established for all lands within the UGC-MU zone that apply to technical matters related to new development.

No members of the public came forward to address Town Council at the statutory public meeting for the Mobility Hub Study, however Town Planning staff did receive six written submissions requesting site-specific changes to individual properties that were considered by Town Planning staff before returning to Town Council with a technical recommendation report. On February 28, 2022, Town Planning staff presented the proposed Official Plan Amendment and Zoning By-law Amendment for the Mobility Hub Study and recommended adoption of the amendments (Report DS-010-22). In the aforementioned report, Town Planning staff noted that the written submissions were carefully considered, however Town were not supportive of the requested changes for the reasons described below.

The Planning Act clearly contemplates that Local Municipalities will set maximum permitted building heights and maximum permitted development densities within a Protected Major Transit Station Area.

The proposed maximum height and density provisions are consistent with the findings of the Milton Mobility Hub Study. The Study was a major comprehensive planning exercise. It involved extensive community and stakeholder involvement. Through built form modelling the Study demonstrated that the height and density provisions would meet the required population target for the Downtown Milton Urban Growth Centre.

The Study identified a Primary and a Secondary Zone. The Primary Zone is the area closest to the station. It has the greatest potential for intensification. Taller buildings and greater densities are proposed in this area around the station and closest to the rail corridor. The Secondary Zone includes the properties on the north side of Main Street East and on the west side of Ontario Street and north of Pearl Street. The Secondary Zone provides opportunities for mid-rise intensification. Building heights in the Secondary Zone are planned to establish a predominantly mid-rise built form and provide a transition in scale towards the historic downtown core and mature neighbourhood areas.

Based on the Study recommendations, Staff do not support any changes to the maximum permitted heights in the Secondary Zone. ...

On the basis of the above, Town Council adopted Official Plan Amendment No. 70 (OPA 70) and it was submitted to Halton Region for approval. On August 2, 2022, Halton Region

Background

approved OPA 70 and the implementing Zoning By-law Amendment was subsequently passed.

Town of Milton - Mobility Hub Study Urban Design Guidelines

Through the Mobility Hub Study, a separate set of Urban Design Guidelines was prepared to implement the recommendations from the Mobility Hub Study. The Mobility Hub Study Urban Design Guidelines are divided into two parts. Part 1 includes urban design guidelines that provide an overarching vision and design framework to guide and direct development in a manner that achieves the MTSA framework with respect to built form, privately-owned spaces and public spaces. Part 2 includes streetscape guidelines that provide guidance for the design of both public and private streets.

The Mobility Hub Study Urban Design Guidelines include guiding principles; some of which include providing for balanced, safe and efficient mobility, creating strong visual and physical connectivity, creating a walkable and inviting public realm, permitting a mix of uses in the Primary and Secondary Zones and supporting intensification at an appropriate scale and form. On the latter principle, this includes focusing intensification and critical mass in the Primary Zone, while providing for appropriate transitions in the Secondary Zones to minimize impacts on stable residential neighbourhoods.

In addition to the above, other components of urban design are addressed including streets and blocks, built form, views and vistas, parking and access as well as servicing.

Town of Milton - Mid-Rise and Tall Building Guidelines

On May 7, 2018, Town Council endorsed the Milton Mid-Rise and Tall Building Guidelines (Report PD-022-18) following consultation with the community and the Halton Chapter of the Building Industry and Land Development Association ('BILD'). The Town proactively developed these design guidelines to aid in the integration of these forms of development into the community. They are a recognition of the Province's emphasis on urban intensification and increasing developer interest in pursuing mid-rise and tall buildings in the Town.

By clarifying the Town's expectations for the design of mid-rise and tall buildings, it is intended that the guidelines will assist with the interpretation of Official Plan policies and objectives and provide clear design direction related to building height, massing, transition, sun/shadow impacts and building articulation to promote quality proposals. The guidelines also provide urban design solutions to ensure that mid- and high-density projects will be integrated within the existing neighbourhood context. Developers are encouraged to have regard for the

Background

guidelines when preparing their proposals and Planning staff use the guidelines in evaluating development proposals.

Town of Milton - Sun/Shadow Analysis Terms of Reference

The Town's Planning, Policy and Urban Design staff rely upon a sun/shadow analysis terms of reference when reviewing potential shadow impacts from proposed development. Prior to 2020, Town Planning staff relied upon Town of Oakville's Shadow Impact Analysis Guideline, however in Town Planning 2020 staff prepared a Sun/Shadow Analysis Terms of Reference, as amended, that has been provided to all development proponents contemplating mid- and high-rise development proposals to implement in their designs.

The Sun/Shadow Analysis Terms of Reference is used to evaluate whether a proposed development causes any undue shadow impacts on the subject lands and the surrounding context including, but not limited to, building facades, private and public outdoor amenity and open space area, public parkland, sidewalks and other components of the public realm. In addition, private realm considerations including front yards, rear yards, windows and rooftop patios are also to be evaluated as well as buildings and/or structures where solar panels have been installed. The Sun/Shadow Analysis Terms of Reference includes criteria with respect to the number of hours of sunlight required for certain aspects of the public realm.

The Sun/Shadow Analysis Terms of Reference requires that shadow impacts be evaluated at the April 21, June 21 and September 21 equinoxes. For development that contains solar panels, the December 21 equinox is also to be evaluated to ensure that solar panels receive sunlight for an extended period of the day (minimum 8 hours and may not be consecutive) with shadow impacts not to exceed two consecutive hourly test times on December 21.

Town of Milton Urban Zoning By-law 016-2014, as amended.

The subject lands are currently split zoned in the Town's Urban Zoning By-law 016-2014, as amended. The property located at 388 Main Street East is zoned Urban Growth Centre Mixed Use Sub Area with Holding provisions (UGC-MU-H). The UGC-MU zone permits a range of residential, commercial and institutional uses. A mixed-use building is permitted in the UGC-MU zone.

Schedule D1 - Building Heights in the Town's Urban Zoning By-law 016-2014, as amended, applies a maximum height of 6 storeys and 20 metres and a maximum density of 3.0 FSI for the property located at 388 Main Street East.

In addition to the above, various Holdings (H1-H2-H4-H71-H74) apply to the property located at 388 Main Street East that require technical reports/studies to be satisfied prior to the lifting

Background

of the Holdings and enabling development to proceed. The applicable Holding provisions relate to the confirmation of servicing (water and wastewater) capacity, the submission of technical reports such as a Noise Study, Functional Servicing Report, Stormwater Management Report and Traffic Impact Study, the submission of an Employment Study demonstrating that a similar number of replacement jobs are being provided and the submission of an application for Site Plan Approval including a Sun-Shadow Analysis, a Pedestrian Wind Study and an Urban Design Brief prepared to the satisfaction of the Town.

The properties located at 389, 395, 399, 405 and 409 Pearl Street and 17 Prince Street are identified on Schedule F - Mature Neighbourhood Area Overlay in the Town's Urban Zoning By-law 016-20, as amended. The properties are zoned Low Density Residential I (RLD1) to implement the recommendations from the Mature Neighbourhoods Character Study completed by the Town in 2020. The RLD1 zone permits detached, duplex and semi-detached dwellings, shared housing and short-term rental uses. The RLD1 zone does not permit a mixed-use building.

Schedule D1 - Building Heights in the Town's Urban Zoning By-law 016-2014, as amended, applies a maximum height of 2 storeys and 8.0 metres (flat roof) or 9.5 metres (gable, hip, gambrel or mansard roof) for the properties located at 389, 395, 399, 405 and 409 Pearl Street and 17 Prince Street.

The applicant is seeking to rezone the subject lands to a site-specific Urban Growth Centre Mixed Use Sub Area (UGC-MU*XX) zone to permit the proposed high-density mixed-use building as well as apply a number of site-specific provisions. The proposed site-specific provisions address parking, amenity space, floor space index, building height, setbacks, step backs, tower height, tower separation and flood plates. Appendix 3 to this Report includes the proposed Zoning By-law Amendment.

Town Planning staff is of the opinion that proposed Zoning By-law Amendment does not comply with the implementing zoning for the MTSA, does not comply with the implementing zoning for the mature neighbourhood area and does not conform to the planned vision or general intent of the Town of Milton Official Plan. As noted above, Town staff is not supportive of the proposed Official Plan Amendment and is therefore not in support of the proposed Zoning By-law Amendment.

Site Plan Control

All mid-rise and high-rise development proposals are subject to Site Plan Control which is required prior to the issuance of building permits. Detailed site plan drawings addressing matters such as building elevations, lot grading and drainage, site design, lighting, waste

Background

management, snow storage and landscaping must be evaluated through the Site Plan Approval process. For development applications on properties where Holding provisions apply, the lifting of the Holding is required prior to Site Plan Approval being granted. The Town also requires development proponents to enter into a site plan agreement with the Town and provide securities to guarantee the completion of works in accordance with the approved drawings.

Discussion

Public Consultation

The development applications were deemed complete on September 10, 2025. In accordance with the Planning Act requirements, Town Planning Staff mailed Notice of Complete Applications to assessed property owners within 200 metres of the subject lands. All materials, technical studies and reports prepared by the applicant to support the development applications were made available the Town's website. Notice signs were subsequently posted on each of the assessed properties that comprise the subject lands.

The Town received written comments highlighting concerns with the proposed development prior to the statutory public meeting and these included: impact on the existing heritage and character of the area, the size and scale of development within the existing mature neighbourhood, increased traffic and congestion, loss of privacy and disruption from prolonged construction activity.

Notice of the statutory public meeting was provided in accordance with the Planning Act requirements and the Town's enhanced notification requirements, which included notice to all assessed property owners within 200 metres of the subject lands. A statutory public meeting information report (Report DS-061-25) was made available to the public prior to the statutory public meeting being held.

The statutory public meeting was held on November 3, 2025. Following a presentation by the Agent for the applications, Town Council asked several questions and provided comments about the proposal. Questions and comments were provided by Town Council and these included: questions about the developer, whether a market analysis was prepared for the development applications, comments about constraints of the current road network, whether consideration had been given to mitigation measures for local businesses and residents, concerns raised about site circulation and emergency services, questions asked about snow storage and waste management and a request for further consideration of the Town-owned



Background

property currently being leased by the Milton Christian School. Councillor Best also shared a development tracking document to demonstrate the approved and pipeline supply of condominium projects to date.

In addition to the above, Council asked the Agent if there was a willingness to reduce the development proposal to align with the Town's Official Plan vision for growth. The Agent responded that the applicant is willing to work with the Town to discuss the proposed building height through the development process and noted that their team was digesting first submission comments and would reach out to Town Planning staff to set up a meeting. Since the statutory public meeting, and at the time of writing this report, Town Planning staff has not received any correspondence from the applicant.

There were 26 delegates that provided oral submissions to Council at the statutory public meeting. All delegates voiced objections to the proposal and identified concerns with the applications. Their concerns relate to: inadequate and inconsistent technical reports; lack of public engagement; height and density; lack of transition and compatibility with the surrounding mature neighbourhood area and Downtown area; shadow impacts; economic impacts to the building operations at 383 Main Street East as a result of the proposed building shadow; lack of urban design elements that contribute to the public realm and livability; impact on servicing infrastructure; hydrogeological concerns and impacts to existing basement foundations; increased traffic and lack of parking, safety concerns with respect to fire and emergency services, wind and traffic and pedestrian circulation, lack of snow storage and noise associated with snow removal and nuisances caused by construction. Council and Town Planning staff were also aware of a community petition signed by more than 2,000 individuals objecting to the development applications at the time of the statutory public meeting.

Staff has also received a total of 42 written submissions in response to the development applications whereby 41 submissions highlighted concerns with the proposal and objections to the development applications and one submission in support of the development applications. Appendix 4 to this Report includes all written submissions received by Town Planning staff at the time of writing this Report. All concerns raised at the statutory public meeting and through written submissions are addressed in the 'Issues of Concern' section of this report.

Agency Circulation and Comments

Over the past couple of years, a number of development concepts for the subject lands have been provided to Town Planning staff for consideration and comments. Town Planning staff provided feedback on each of the development concepts and noted concerns each time that

Background

the concepts did not align with the vision for the area and are not suitable in the context of the policy framework designed to achieve the planned vision for the area. Town Planning staff formally communicated with the applicant through the Town's comprehensive Mobility Hub Study process (between September 2020 to March 2022), through Pre-Consultation Meetings held on April 19, 2022, and May 16, 2023 and the latest email correspondence on a concept on June 25, 2024. The proposed development concept in the current development applications contemplates a higher density and height than any previous concept reviewed by Town Planning staff.

The applicant decided to proceed with the submission of development applications, associated fees and submission materials, forming a complete application in accordance with the Planning Act. The applications were deemed complete in accordance with the Planning Act requirements on September 10, 2025 and were subsequently circulated to Town departments and external agencies to undertake a technical review. Town departments and external agencies completed a technical review of the submission materials and a comprehensive consolidated comment package was provided to the applicant on October 28, 2025. In the comment package, Town Planning staff indicated that the proposed development concept was not supported, but that staff is willing to work with the applicant towards a revised development concept that more closely aligns with the planned vision for growth for the area. At the time of writing this Report, Town Planning staff has not received any feedback, comments or correspondence from the applicant.

Town Planning staff is not supportive of the proposed development from a policy and urban design perspective and there are also substantial technical issues of concern that have been raised by Town departments and external agencies. Below is a summary of the comments provided on the first submission materials.

Halton Region - Public Works

As of July 1, 2024, Halton Region's role in land use planning and development matters has changed. The Region has a continued interest in supporting local municipal partners and has undertaken a review of the submission materials and provided comments on their scope of interests for the development applications, which include: water and wastewater infrastructure, regional transportation systems (including stormwater management infrastructure and acoustic mitigation of Regional right-of-ways), waste collection and finance.

Regional staff has completed a review of the submission materials and has indicated that they are not in a position to support the applications at this time. Below is a summary of Regional comments issued to date.

Background

Regional Servicing staff reviewed the Functional Site Servicing and Stormwater Management Report submitted to support the development applications and indicated that a revised report is required to provide a more thorough analysis of water and wastewater, including the use of hydraulic modeling to support the findings. Regional staff noted errors in the population and employment growth assumptions and requires the applicant to calculate the growth forecasts based on the Halton Region Development Charges Background Study.

With respect to water consumption and wastewater generation, Regional Servicing staff require peaking factors for maximum day and peak hour water consumption to be calculated and applied. These factors are to be incorporated into the water distribution system hydraulic model. Peaking factors for peak dry weather wastewater generation also need to be calculated and infiltration and inflow catchment parameters need to be determined for wet weather flows. Regional Servicing staff also provided design criteria that is to be utilized in the assessment.

With respect to water servicing analysis, Regional Servicing staff require an in-depth analysis of the existing baseline capacities within the water distribution network and this analysis is to review watermains, booster pumping stations and storage facilities. An analysis of the most recent water hydraulic model, including scenarios that reflect development phasing, is also required. Existing limitations to be included within the analysis include storage capacity, supply availability, pressure levels and fire flow capacity. Water hydraulic modelling conditions to be modelled and discussed in an updated report include: average day demand, maximum day demand, peak hour demand and maximum day demand plus fire flow. Regional Servicing staff also highlighted in their comments that the results may identify areas that require upgrades to accommodate development and direction has been provided on the preparation of a comprehensive water servicing strategy that considers both local and Regional development charge infrastructure within the study area and beyond.

With respect to wastewater servicing analysis, Regional Servicing staff require an analysis of existing baseline capacities within the wastewater collection system including sewers, wastewater pumping stations, forcemains and maintenance holes/chambers. An analysis is also required using the Region's most recent wastewater hydraulic model to reflect developing phasing and is to evaluate limitations in terms of capacity utilization, surcharging, self cleansing velocity and basement flooding risk. As noted in the water servicing comments, Regional staff also highlighted in their comments that the results may identify areas that require upgrades to accommodate development and direction has been provided on the preparation of a comprehensive wastewater servicing strategy that considers both the study area and the extended larger catchment area and broader wastewater collection system.

Background

With respect to waste management, Regional Waste staff indicated that the residential development may be eligible for regional waste collection provided it meets the requirements set out in the Region's Development Design Guidelines for Source Separation of Solid Waste. Waste associated with the commercial units would be serviced by a cart program on the Business Improvement Area (BIA) collection schedule.

Regional Waste staff requested the submission of a waste plan, detailing the waste collection for each building including design elements, vehicle turning drawing, elevations, waste capacity and receptacles, internal and external waste storage area(s), movement of waste from storage area to collection point and the waste collection points (loading areas). Regional Waste staff also provided the capacity requirements, height clearance requirements, turning radii, head-on approach and back-up distance and minimum dimensions for waste loading areas to be implemented in the building design.

Regional Transportation staff reviewed the Traffic and Impact Parking Study submitted to support the development applications. Regional Transportation staff has no concerns with the proposed development from a transportation perspective given the distance of the subject lands from the Regional road network.

Regional Finance staff also provided information on applicable Regional Development Charges.

Town of Milton Development Services - Policy and Urban Design

Town Policy and Urban Design staff has completed a review of the submission materials and has indicated that they cannot support the applications at this time. Policy and Urban Design staff is of the opinion that the proposed development, as designed, fails to achieve the urban design directions established for this transition area, as identified through the Mobility Hub Study, area and its surrounding context and does not meet the intent of the Town's Official Plan and relevant design guidelines. Below is a summary of the extensive comments provided by Policy and Urban Design staff on intensification objectives, building massing and height, public realm and Main Street East frontage, other at-grade enhancements, other site plan considerations, built form materials and comments on other technical studies.

Policy and Urban Design staff referenced the extensive studies that have been completed by the Town to inform development within the area and for the subject lands, the latest of which include the Mobility Hub Study (completed in 2022) and the Mature Neighbourhoods Character Study (completed in 2020). On this basis, Policy and Urban Design staff reaffirmed Council's direction for intensification within the MTSA where the Primary Zone is to accommodate the highest form of intensification and the Secondary Zone (applies to part of

Background

the subject lands) is intended to accommodate some intensification in an appropriate built form and provide for adequate transition to minimize impacts on the Downtown and mature neighbourhoods.

Policy and Urban Design staff reviewed the Architectural Drawing set and the Urban Design Brief submitted to support the proposed development applications to inform their comments. Policy and Urban Design staff is of the opinion that a mid-rise typology is more appropriate for the subject lands than the high-rise built form that is proposed and notes that a mid-rise typology will ensure that the directions introduced through extensive research, consultation and planning for the MTSA, the Downtown and mature neighbourhood are met. While not supportive of the proposed built form, Policy and Urban Design staff reviewed the proposal against the Town's Tall Building Guidelines and noted that several elements of the design are not in accordance with the guidelines such as adequate tower separation, tower step backs, podium size and variation in height between the towers. Policy and Urban Design staff is of the opinion that the built form deficiencies, in accordance with the Tall Building Guidelines, may have significant negative impacts such as inadequate airflow, limited access to sunlight, reduced privacy, substantial visual bulk and an uncomfortable and unappealing visual environment at the street level.

Policy and Urban Design staff has highlighted the road widening requirements for Main Street East that are to be implemented in the design and location of the proposed building and has noted that the plans need to be updated to depict the road widening requirements consistently (e.g. site plan, landscape plan, elevations) in order for staff to provide design comments on the public-private interface. Policy and Urban Design staff is supportive of commercial uses and outdoor patios facing Main Street East that will activate the street and has noted that outdoor patios should be designed to maintain a clear path of travel with the use of other features to better demarcate the location within the property. Additional recommendations were provided on the commercial patio space being integrated with the interior commercial function, consideration of a breezeway mid-block to break up the massing, add visual interest and transparency of the commercial units, increase the step backs above the podium and consider privately-owned public spaces (POPS) in a redesigned mid-rise built form.

Policy and Urban Design staff is not supportive of the current direction of the underground parking garage ramp and its location directly adjacent to the driveway on Pearl Street. Recommendations have been made to reorient the ramp to the interior of the site to increase safety for pedestrians and improve the transition of development towards the existing neighbourhood. Policy and Urban Design staff also provided several other design

Background

recommendations that aim to contribute to local identity and enhance the character of the public realm and provide for design that is respectful of the pedestrian-level experience.

Policy and Urban Design staff also reviewed the Design Impact Analysis submitted to support the development applications, which provides an evaluation of shadow impact, and noted that the proposed design does not meet the Town's Sun/Shadow Analysis Terms of Reference for the opposing sidewalks on Main Street East. Recommendations have been provided to increase the tower separation distance, reduce the floor plate area, increase the tower step backs and reduce height to positively contribute to increasing sunlight on the impacted public realm.

Lastly, Policy and Urban Design staff recommend that a Wind Study be submitted to support the development applications.

Town of Milton Development Services - Development Engineering

Town of Milton Development Engineering staff (includes Development Engineering, Transportation and Parks Planning) has completed a review of the submission materials and has indicated that they are not in a position to support the applications at this time. Below is a summary of Development Engineering comments issued to date.

Development Engineering

Development Engineering staff reviewed the Geotechnical Investigation submitted to support the development applications and noted that limited ground water level measurements were taken in November and December of 2024 and requested clarification on additional measurement dates to assess groundwater table. Additional clarifications were requested on whether the grading and servicing plans were provided to the Geotechnical Engineer at the time of authoring the report.

Development Engineering staff also reviewed the Hydrogeological Considerations Letter submitted to support the development applications. Development Engineering staff indicated that a complete Hydrogeological Report is required to evaluate the hydrogeological conditions on the subject land and to develop a plan to manage risk, to assess water balance and assessment of infiltration rates for existing (pre-development) and post-development conditions. Development Engineering staff noted that the Town does not have data/information of local groundwater in the area and its movement and it is unclear if the development will have a negative impact on the creek and/or whether approvals are required from the Province. It is further highlighted that the proposed development intends to excavate to depths of approximately 10-12 metres below grade, however the geotechnical investigation indicated groundwater depths at approximately 3-5 metres. Development Engineering staff

Background

has indicated that a third-party external peer review of the Hydrogeological Report may be required.

Development Engineering staff reviewed the Phase One Environmental Site Assessment submitted to support the development applications and noted that the property located 389 Pearl Street was missing from the report and that the properties at 389, 399 and 405 Pearl Street were missing from the MECP FOI Record. The Phase Two Environmental Site Assessment submitted to support the development applications was also reviewed and a number of discrepancies were highlighted including: missing the property at 389 Pearl Street, missing borehole for one of the areas of potential environmental control, only one drilled well (of the seven wells) is being used for groundwater monitoring, incomplete summary of groundwater levels and sediment sampling was not completed. Additional intrusive soil sampling is recommended before the filing of a Record of Site Condition.

Development Engineering staff reviewed the Noise and Vibration Impact Study submitted to support the development applications and requested clarification of street names and references to Oshawa.

Development Engineering staff also reviewed the Functional Site Servicing and Stormwater Management Report submitted to support the development applications and provided extensive comments to be addressed in a revised report:

- Incorrect assumption of existing storm drainage flow;
- Water quality treatment does not meet enhanced level of protection;
- Further analysis required of the existing and proposed peak discharges to the receiving sewer to ensure sufficient capacity;
- Non-compliance with the water balance criteria;
- Infiltration infrastructure not provided;
- Missing topographic information and drainage delineation;
- Major overland flow routes and ponding extents are not shown on the pre-development drainage plan, post-development drainage plan and grading plan;
- Uncontrolled catchment area has not been justified;
- Orifice design does not comply to standards;
- Receiving sewer classification requires clarification;
- Insufficient cover and unclear area drain connections;
- Grading does not comply with Town standards; and,
- Hydrogeological (groundwater and water balance) requirements not addressed.

Background

In addition to the above, Development Engineering also reviewed the Functional Site Servicing and Stormwater Management Report in accordance with the Milton Major Transit Station Area and Mobility Hub Study (MTSA) Servicing Report (February 1, 2020). Staff confirmed that the MTSA Servicing Report provides a watershed-level hydrological analysis and establishes a site-specific quantity control criteria for the Sixteen Mickle Creek sub-watershed and that this study takes precedence over the default Town standards. Comments have been provided on the proposed catchment boundary, modelling assumptions and infiltration that must be addressed in a revised report. Development Engineering staff stressed the importance of addressing key stormwater management requirements at the Official Plan Amendment and Zoning By-law Amendment stage to ensure the feasibility and appropriateness of the proposed design. The key stormwater management requirements include demonstrating compliance with water quantity, quality, water balance criteria and confirming major overland flow routes, ponding limits and infrastructure sizing are conceptually feasible.

Transportation Planning

Town Transportation Planning staff reviewed the Traffic Impact and Parking Study submitted to support the development applications. Transportation Planning staff confirmed that road widenings are required along all frontages in accordance with the Town's Official Plan and highlighted drawing updates to identify the accurate right-of-way requirements, proper classification of roadways, curb radii, daylighting triangles, fire route and road cross sections.

With respect to access, Transportation Planning staff noted that the new driveways would result in vehicle headlights shining into nearby homes and the appropriate mitigation requirements that would be required to reduce light intrusion. Additional concerns were documented about the proposed configuration of the underground parking area ramp and the driveway access from Pearl Street, driveway spacing, site circulation (including access to loading spaces for larger delivery trucks) and waste collection.

Substantial comments were also provided on the trip generation, distribution and capacity analysis and, in particular, the request for Transportation Tomorrow Survey ('TTS') data to review and validate the trip distribution assumptions in the report. Concerns were also raised over the proxy site locations selected to justify the proposed parking supply and Transportation Planning staff has requested new proxy sites to provide a comprehensive review and confirm a suitable parking rate for the development. Town Transportation Planning staff has also indicated that a third-party external peer review of the updated Traffic Impact and Parking Study may be required.

Parks Planning

Town Parks Planning staff reviewed the Landscape (Concept) Plan submitted to support the development applications and indicated that staff is supportive of tree plantings along the private frontages of the subject lands in lieu of municipal (street trees). Parks Planning staff has indicated that the proposed sidewalks should be situated closer to curbs in accordance with the Town's standard road cross section in order to provide for appropriate drainage and snow storage areas. Town Parks Planning also highlighted that the property located at 45 Bruce Street is Town-owned and future reports are to acknowledge and consider impacts to pedestrian and vehicular circulation and servicing of that property.

Town of Milton Development Services - Heritage

Town of Milton Heritage staff has completed a review of the submission materials and has indicated that they are not in a position to support the applications at this time. Town Heritage staff reviewed the Heritage Impact Assessment submitted to support the development applications and confirmed that the properties located at 389, 405 and 409 are not worth of designation under the Ontario Heritage Act. Town Heritage staff indicated that further evaluation is required of the properties located at 395 and 399 Pearl Street. Further evaluation is to confirm whether there are significant, original historical or architectural features within the interior of the house and confirm whether the homes are structurally or environmentally compromised in any way. Town Heritage staff has noted that if the properties are found to be unworthy of designation and proposed to be demolished, that the properties should be documented, commemorated and a list of materials that could be salvaged be provided to the Town. Town Heritage staff has also indicated that a third-party external peer review of the updated Heritage Impact Assessment may be required.

Town of Milton - Fire Department

Town of Milton Fire Department staff has completed a review of the proposed site plan as it relates to access to the site. Town Fire Department staff has indicated that a fire route application will be required for the interior driveway, the height of the overhead is to be adjusted for fire truck access, a fire safety plan is required prior to occupancy and a lock box for access is recommended.

CP Railway / Metrolinx

In a letter dated September 18, 2025, Metrolinx confirmed it had completed a review of the submission materials and included detailed comments to be addressed in the next submission. Metrolinx reviewed the Noise & Vibration Impact Study submitted to support the development applications and requires updates to the information presented as it relates to

Background

the CP Railway. Metrolinx also provided warning clauses to be included in a future development agreement.

Milton Hydro Distribution Inc.

In a letter dated September 15, 2025, Milton Hydro Distribution Inc. confirmed it had completed a review of the submission materials and offered no objections to the proposal. Milton Hydro Distribution Inc. included directions to the applicant regarding new or upgraded electrical servicing requirements. Milton Hydro Distribution Inc. also provided siting guidelines for transformers/switchgears, driveways, hydro poles and clearances.

Halton District School Board

In a letter dated October 1, 2025, the Halton District School Board ('HDSB') confirmed it had completed a review of the submission materials and offered no objections to the proposal. In its letter, the HDSB expects that the proposed development would yield between 45 to 85 students between grades K-12 and identified capacity at JM Denyes Public School (remaining stable at 75%-85% capacity), W.I. Public School (near capacity by 2033) and Martin Street Public School (declining below 75% by 2027). The HDSB also supplied standard warning clauses to be included in a future development agreement.

Halton Catholic District School Board

In a letter dated October 21, 2025, the Halton Catholic District School Board ('HCDSB') confirmed it had completed a review of the submission materials and offered no objections to the proposal. In its letter, the HCDSB indicated that elementary students would be accommodated at Holy Rosary Catholic Elementary School and secondary students would be accommodated at Bishop P.F. Reding Catholic Secondary School. The HCDSB also supplied standard warning clauses to be included in a future agreement.

Issues of Concern

Conformity with Provincial, Regional and Local Planning Policies

As explained in greater detail in the 'Planning Policy and Town of Milton Official Plan' sections and Appendix 1 of this Report, Town Planning staff is of the opinion that the proposed development is not consistent with the Provincial Planning Statement, does not conform to the Region of Halton Official Plan and does not conform to the Town of Milton Official Plan.

Public Engagement

A number of individuals at the statutory public meeting indicated that there was a lack of awareness of the development proposal and engagement with the community on the proposed development applications.

The Planning Act establishes, among other things, the requirements for the processing of development applications, notice and public consultation. Further direction with respect to notice requirements is provided through Ontario Regulation 543/06: Official Plans and Official Plan Amendments and Ontario Regulation 545/06: Zoning By-laws, Holding By-laws and Interim Control By-laws. There are no mandatory requirements in the Planning Act for a development proponent to consult with the public before submitting a complete application in accordance with the Planning Act.

As noted earlier in this Report, the applicant submitted development applications for an Official Plan Amendment and Zoning By-law Amendment, associated fees and submission materials for the subject lands. In accordance with the Planning Act, these meet the requirements of a complete application and notice of the complete applications was provided in accordance with the Planning Act and the Town's enhanced notification policies contained within the Town's Official Plan. The materials were circulated for technical review and a statutory public meeting was scheduled. Notice of the statutory public meeting was provided in accordance with the Planning Act and the Town's enhanced notification policies contained within the Town's Official Plan as well.

Urban Design, Massing and Compatibility

Many concerns were raised about the proposed height and density by delegates at the statutory public meeting as well as in the written submissions received by Town Planning staff. Comments indicated that the proposed height and density fails to respect the policies in the Town's Official Plan that address the appropriate scale of development for the site and the character of the Downtown area and mature neighbourhood area. Many acknowledged that the site is in need of redevelopment and that there are permissions within the Town's Official Plan for intensification of a mid-rise form, including appropriate transition to the Downtown area and mature neighbourhood area. The proposed development was described as overdevelopment that is not compatible with the mature neighbourhood area or historic Downtown area and would create unsafe pedestrian wind conditions and cause shadow impacts (discussed further in the following sections).

A Planning Justification Report was submitted in support of the development applications. It includes a review of the policies that apply to the subject lands and provides rationale supporting the proposed development. An Urban Design Brief was also prepared to describe

Background

how the proposed design achieves the applicable Town Official Plan policies and implements the applicable Urban Design Guidelines.

As noted throughout this Report, Town Planning staff is of the opinion that the proposed development is not appropriate as it does not implement the planned vision for growth in the area and does not provide for adequate transitions to both the Downtown area and mature neighbourhood area. The Town's Policy and Urban Design staff is also of the opinion that the proposed design fails to achieve the urban design directions established for the subject lands in a transition area as identified in the Mobility Hub Study and its surrounding context. A more detailed summary of these comments was provided earlier in this Report under the 'Agency Circulation and Comments' section.

Heritage and Neighbourhood Character

The Town has undertaken comprehensive studies including the Downtown Study (completed in 2016) and the Mature Neighbourhoods Character Study (completed in 2020) to gain a better understanding of the elements and qualities that contribute to neighbourhood character. As noted earlier in this Report, 36 of the 59 properties within 200 metres of the subject lands that are listed on Town's Heritage Register. These all contribute towards defining the character of the neighbourhood.

Five properties that comprise the subject lands are also listed on the Town's Heritage Register. In support of the development applications, the applicant submitted a Heritage Impact Assessment that concluded that none of the properties warrant conservation, however Town Heritage staff disagree with that conclusion based on the Heritage Impact Assessment that was submitted. Town Heritage staff has indicated that further evaluation is required for the properties located at 395 and 399 Pearl Street. Further detailed comments from Town Heritage staff are included in the 'Agency Circulation and Comments' section in this Report.

Shadow Impact

The shadow impact from the proposed development was also identified as a concern at the statutory public meeting and in written submissions received by Town Planning staff. Concerns about shadow impacts include impacts to the public realm, to the physical well-being of people and to the building operations at the Greenlife Condominium Building located at 383 Main Street East. Residents of the Greenlife Condominium Building highlighted their concerns about shadow impacts and provided an overview of the significant financial impacts that would be caused from the loss of solar production. The Greenlife Condominium Building relies on innovative technology for their building operations including geothermal energy and solar energy collected through solar panels that cover the entire rooftop area as well as the

property line along the railway tracks. A representative from the Greenlife Condominium Building indicated that the proposed shadows would create a loss in revenue generated from the solar production and would increase the cost to building operations, which would directly impact housing affordability for the existing residents. Requests have been made for the Town to require an external third-party peer review of the Design Impact Analysis (includes the shadow impact analysis) for the proposed development.

A Design Impact Analysis was submitted to support the proposed development. The Design Impact Analysis included an analysis of shadow impacts on the public realm (including public sidewalks), surrounding residential properties, the Milton Christian Public School (which is operating on land owned by the Town of Milton) and the solar panels at the Greenlife Condominium Building. The conclusions from this analysis were that the proposed design is compatible with the area and does not have a significant negative effect on the existing neighbourhood in general.

Through the first submission review, Town Planning staff highlighted concerns with the Design Impact Analysis that assessed the shadow impacts from the proposed development. Town staff is of the opinion that the Design Impact Analysis does not meet the criteria in the Town of Milton's Sun/Shadow Analysis Terms of Reference document as it relates to shadows cast on the public realm (on opposing sidewalks on Main Street East) and on existing solar panels in the private realm.

Traffic, Parking and Pedestrian Circulation/Safety

Many concerns were identified at the statutory public meeting and in written submissions received by Town Planning staff with respect to impacts to pedestrian circulation/safety in the area and traffic generated from and accessing the proposed development. Comments received referred to the existing conditions surrounding the subject lands including the local narrow streets, short sightlines and narrow sidewalks that already can pose a challenge to navigate, particularly in winter months. Safety concerns were also raised about emergency services accessing the proposed development and pedestrian-related concerns including crossing Main Street East as well as school-aged children attending the Milton Christian School and those travelling to bus stops travelling to other local schools.

In addition to the above, comments were provided about the proposed accesses along Bruce Street and Pearl Street, concerns were raised about all site traffic utilizing local roads to access the site and underground parking structure and questions were posed about potential conflicts with the Town-owned property that is currently leased by the Milton Christian School. Concerns were also raised about the parking supply proposed for the development as well as

Background

traffic associated with deliveries. Requests were made by the public to require an external third-party peer review of the Traffic Impact and Parking Study for the proposed development.

A Traffic Impact and Parking Study was submitted to support the proposed development. The study reviewed the existing traffic conditions along the roads surrounding the subject lands and identified existing delays (operating at a level of service D) at the Ontario Street intersection. It is further noted that the background traffic conditions for the 2034 horizon indicates that the westbound left-turn lane on Main Street East to Ontario Street is projected to provide a level of service F during the weekday peak hours. It is concluded that the background traffic conditions and the inclusion of the site-generated traffic will result in a slight increase in delays and queue lengths along Main Street East.

The Traffic Impact and Parking Study also calculated the proposed trip generation from the site to be approximately 170 weekday trips in the morning peak hours and 242 weekday trips in the afternoon peak hours. The conclusions indicate that the site driveway approaches to Bruce Street and Pearl Street are all forecasted to operate at acceptable levels of service.

In addition to the above, the study suggests that the Town consider optimizing signal timings to provide for additional time for left-turning vehicles from Main Street East onto Ontario Street and that the Town promote alternative modes of transportation to reduce the number of vehicle trips in the area.

With respect to vehicle trips generated from associated site traffic, Town Transportation Planning provided substantial comments on the trip generation, distribution and capacity analysis from the Traffic Impact and Parking Study. Town Transportation Planning staff also requested Transportation Tomorrow Survey ('TTS') data to review and validate the trip distribution assumptions in the report.

With respect to parking supply, the Traffic Impact and Parking Study notes that in accordance with Bill 185, no parking is required for lands within a protected major transit station area and the parking requirement for motor vehicles is zero. However, the study recognizes that it is crucial to accommodate parking demand for the proposed development to ensure its marketability and functionality. The proposed parking rate is 0.58 spaces per unit for residents and 0.15 spaces per unit for visitors, providing for a total number of 417 parking spaces to be accommodated entirely in three levels of underground parking. For comparison purposes, Town Planning staff note that outside of the MTSA for the same form of development the minimum parking requirement for residents and visitors is 570 parking spaces (0.8 spaces per unit for residents and 0.2 spaces per unit for visitors).



Background

The Town's Transportation Planning staff has provided substantial comments on the Traffic Impact and Parking Study submitted to support the proposed development including road widening requirements, site accesses, light intrusion on existing properties opposite the parking garage ramp, site circulation (both internal and external) and parking supply. Town Transportation Planning staff also indicated that a third-party external peer review of the updated Traffic Impact and Parking Study may be required. A more detailed summary of these comments was provided earlier in this Report under the 'Agency Circulation and Comments' section.

Groundwater Impacts

Concerns were raised both at the statutory public meeting and in written submissions received by Town Planning staff about hydrogeological impacts from the proposed development that have not been adequately addressed. Town Council heard from many residents in the mature neighbourhood area about the high groundwater table and issues with basement foundation leaks and flooding. Further concerns were provided about the materials submitted to support the proposed development not providing an adequate characterization of groundwater in the area, risks of subsidence, foundation damage and stormwater overload due to dewatering associated with the construction of the underground parking garage.

A Preliminary Hydrogeological Considerations Letter was submitted to support the proposed development. This letter indicates that a Geotechnical Investigation was completed and as part of this work the water levels measured from the monitoring wells indicated groundwater at depths of 3 to 5 metres. Based on the proposed construction depths (three levels of underground parking), excavation would extend below the groundwater table.

Town Development Engineering staff has confirmed that the Town of Milton does not have data/information of the local groundwater in the area of the site and that a complete Hydrogeological Assessment is required to evaluate hydrogeological conditions and potential impacts. This is required to develop a plan to manage risk of potential impacts associated with the proposed development including a water balance and assessment of infiltration rates for existing (pre-development) and post development conditions. With respect to the potential for environmentally contaminating activities, Town Development Engineering staff has also highlighted that a complete understanding of groundwater and its movement is required to fully inform the approvals and permitting requirements for the site. A more detailed summary of these comments was provided earlier in this Report under the 'Agency Circulation and Comments' section.

Servicing and Stormwater Management

Concerns were raised both at the statutory public meeting and in written submissions received by Town Planning staff about the proposed servicing and stormwater management strategies. Questions were raised about servicing capacity for the proposed development as well as concerns about missing analysis in the servicing study as it relates to the evaluation of the impact of the development on the existing infrastructure in the Downtown area.

A Functional Site Servicing and Stormwater Management Report was submitted to support the proposed development applications. The proposed servicing plans are to utilize existing infrastructure in proximity to the subject lands. The study concludes that there is adequate capacity in the existing municipal infrastructure system to service the proposed development. Water and wastewater connections are proposed to the existing watermain and sanitary sewers on Main Street East.

With respect to stormwater management and water quantity control, the proposed plan is to collect runoff by a series of roof drains and area drains and outlet the flows to an existing 375 mm diameter combined sewer located on Main Street East. The exterior perimeter landscaped areas and walkways are proposed to drain uncontrolled to the abutting right-of-ways via overland sheet flow. With respect to water quality control, the proposed scheme includes a stormceptor at the end of the system prior to connecting to the existing 375 mm combined sewer to remove pollutants before entering the broader system.

Halton Region staff and Town Development Engineering staff has reviewed the first submission of the above-noted study and have provided extensive comments. A more detailed summary of these comments was provided earlier in this Report under the 'Agency Circulation and Comments' section.

Environmental Site Assessment

The subject lands currently contain commercial uses and require the completion of an environmental site assessment to support a proposed land use change to a sensitive use. The proposed mixed-use development is considered to be a sensitive land use. The Region of Halton Official Plan directs the Town to require an evaluation of potential contamination and remedial measures to be carried out on a site prior to consideration of a development proposal.

In support of the development applications, a Phase One and Phase Two Environmental Site Assessments (ESA) were prepared to document contamination on the site. The Phase One ESA revealed four potentially contaminating activities (PCAs) (e.g. land uses including a commercial automotive repair facility and an underground storage tank) on the subject lands that are likely to have caused ten areas of potential concern (APECs) that may have contaminated both soil and groundwater on the subject lands. The Phase One ESA also noted

Background

that due to the age of the buildings it is also possible with at designated substances, such as asbestos containing materials and ozone depleting substances, may also be present. Based on the findings in the Phase One ESA, the potential site contamination was classified as 'medium' and additional site investigations were deemed to be required.

A Phase Two ESA was undertaken that included the advancement of thirteen boreholes to assess any impact to the soil as well as seven boreholes for groundwater monitoring. It is noted that one of the seven groundwater monitoring wells was installed for geotechnical purposes only and was not used to sample for Phase Two ESA activities. The soil samples identified multiple elevated levels of contaminants. The groundwater samples indicated that all levels were below the standards for residential/parkland/institutional land use site conditions. It was also noted that due to site restrictions and access limitations, advanced sampling for one of the APECs was not possible but is required should development proceed.

Town Development Engineering staff reviewed the Phase One and Phase Two ESAs and noted concerns with missing properties in the assessment as well as the incomplete summary of groundwater levels and sediment sampling not completed. A more detailed summary of Development Engineering staff comments was provided earlier in this Report under the 'Agency Circulation and Comments' section.

Pedestrian Wind Impacts

Concerns were raised both at the statutory public meeting and in written submissions received by Town Planning staff about potential wind impacts associated with the proposed built form. Comments received have cited the location of the proposed development at the crest of a hill, the size of the podium and its massing as having the potential to create unsafe wind tunneling conditions for pedestrians and the public realm as well as potential for damage to existing surrounding buildings. Requests have been made for the Town to require an external third-party peer review of a Pedestrian Impacts Wind Study.

A Pedestrian Impacts Wind Study was not submitted in support of the development applications. The Town's Official Plan requires potential wind impacts to be assessed and for building design to incorporate mitigation measures, if required. The Town's Official Plan also indicates that the avoidance of undesirable wind conditions shall be promoted through tower step-backs and weather protection for pedestrians such as canopies, colonnades, or recessed ground floor facades along the pedestrian routes.

It is noted that all lands within the Town's MTSA that are zoned Urban Growth Centre - Mixed Use (UGC-MU) are subject to a Holding provision (H71) that requires the completion of a Pedestrian Impacts Wind Study, to the satisfaction of the Town, as part of an application for

Background

Site Plan Approval. The Site Plan Approval process is not carried out until lands are designated and zoned appropriately for development. Site Plan Approval cannot be issued until Holding provisions have been lifted.

Lack of Amenity Space

The Town's Urban Zoning By-law 016-2014, as amended, requires a minimum of 4 square metres per unit of outdoor communal amenity space that is to be provided at-grade or as rooftop area on the podium and must be maintained and operated by a common entity (such as condominium corporation). The outdoor communal amenity space is to be aggregated into areas of not less than 50 square metres and have a minimum width of 6.0 metres. For the proposed building, this means that a minimum of 2,280 square metres of outdoor community amenity space is required.

The proposed development includes a total of 859 square metres of outdoor amenity area in the form of a rooftop amenity area on top of the six-storey podium. This equates to a ratio of 1.5 square metres of amenity area per dwelling unit. In justifying the reduction, the Planning Justification Report indicates that the proposed reduction is mitigated by proximity of the subject lands having proximity to Livingston Park, Milton Fairgrounds, Holy Rosary Field and Timberlea Trail. For reference, the aforementioned locations are all at least 650 metres (or an approximately 9-minute walk) from the subject lands.

Amenity areas are a vital component of condominium development. Communal amenity space contributes to residents' quality of life, helps create a sense of place, supports healthier living by encouraging active lifestyles and promotes socialization. For families, amenity space offer options for children to play. Town Planning staff are of the opinion that the proposed reduced outdoor communal amenity space is not supportable, particularly when the locations provided to justify the reduction are not close or convenient.

Waste Management

Through the first submission review, it was identified by Halton Waste staff that insufficient information was provided on waste management. The Architectural Set identifies a large ground floor garbage room for the building as well as a second smaller garbage room for the commercial units. There is also a temporary waste pick up area identified, but it is unclear how garbage trucks would access and maneuver through the site. Town Transportation Planning identified that the Traffic Impact and Parking Study did not include proper turning movement diagrams to illustrate how garbage trucks would service the site and these comments were

echoed by Halton Waste staff, who also requested a Waste Management Plan and provided building criteria to be satisfied should municipal waste collection be provided.

Snow Storage and Removal

Concerns were raised at the statutory public meeting about the lack of details for snow storage and snow removal for the proposed development. Town Council heard from residents about the current challenges for snow storage on the narrow local roads in the mature neighbourhood area. Concerns were also raised about private snow removal and noise and light nuisances associated with heavy duty vehicles, snow on balconies and the water ponding impacts observed during the spring thaw.

The materials submitted to support the proposed development did not address snow storage or removal. Adequate snow storage and mitigation is required for all proposed developments and is a technical design item that is reviewed through the Site Plan Approval process. The Site Plan Approval process is not carried out until lands are designated and zoned appropriately for development.

Construction Impacts

Construction impacts were also raised as a concern at the statutory public meeting and in written submissions received by Town Planning staff. The concerns included: parking, traffic, noise, pedestrian safety, dust and mud associated with construction. Several delegates at the statutory public meeting highlighted the narrow local roads surrounding the subject lands and the lack of parking in the downtown area. Additional concerns were raised by residents of the Greenlife Condominium Building about the potential for illegal construction-related parking in their parking lot and associated enforcement costs on the condominium corporation.

A Construction Management Plan was not submitted in support of the development applications. Through the Site Plan Approval process and building permit process, construction management plans are required to ensure that disruptions to the community associated with construction are minimized. The Town of Milton has numerous by-laws in place to regulate and assist with mitigation impacts of construction activity (e.g. hours of operation, dust control, mud tracking, noise, etc.) and ensure that appropriate safety mitigation measures are implemented on site.

Conclusion

Town staff has carefully considered the planning framework and objectives for growth that apply to development on the subject lands. In accordance with the applicable policies, development on the subject lands should aim to promote and enhance the Downtown area,

Background

be sensitive to the existing mature neighbourhood character area and contribute to achieving intensification objectives by proposing appropriate intensification and built form.

As identified throughout this Report, Town Planning staff is of the opinion that the proposed amendments are not consistent with the Provincial Planning Statement, do not conform to the Region of Halton Official Plan, do not conform to the Town of Milton Official Plan and do not represent good planning.

On the basis of the above, Planning staff recommends that the proposed Official Plan Amendment and proposed Zoning By-law Amendment, as attached in Appendix 2 and 3 to this Report, **BE DENIED**.

Financial Impact

The Town of Milton is the approval authority for Official Plan Amendments and Zoning By-law Amendment. For development applications under the Planning Act, the applicant, Ministry of Municipal Affairs and Housing, certain public bodies and 'specified persons' (as defined by the Planning Act) can appeal to the Ontario Land Tribunal either a decision or failure to make a decision. Once an application is appealed to the Ontario Land Tribunal, a number of processes can occur from mediation, motion, pre-hearing and hearing. Once a matter is before the Ontario Land Tribunal is finalized, a decision and order is issued.

The Town's User Fee By-law 071-2025, as amended, requires an appellant to pay an administrative fee to prepare the appeal package required by the Ontario Land Tribunal. The required fee is in accordance with the User Fee By-law in-effect at the time the appeal is submitted to the Ontario Land Tribunal

The cost to a municipality to participate in an appeal process can be significant depending on what form the appeal process takes. If an appeal proceeds to a hearing, the municipality will incur costs that include, but are not limited to, staff time for planners, legal counsel and expert witnesses to prepare reports, review materials and present evidence at a hearing as well as administrative time and staff time for planners/senior management to report to Council for direction, if necessary.



Respectfully submitted,

Jill Hogan

Commissioner, Development Services

For questions, please contact: Jessica Tijanic MSc., MCIP, RPP Phone: Ext. 2221
Senior Planner, Development
Review

Attachments

Figure 1 - Location Map

Figure 2 - Examples of Built Form that Contribute to Character

Figure 3 - Proposed Site Plan

Figure 4 - Proposed Architectural Drawings

Figure 5 - Proposed Phasing Plan

Appendix 1 - Provincial and Regional Policy Analysis

Appendix 2 - Proposed Official Plan Amendment

Appendix 3 - Proposed Zoning By-law Amendment

Appendix 4 - Public Comments

Approved by CAO

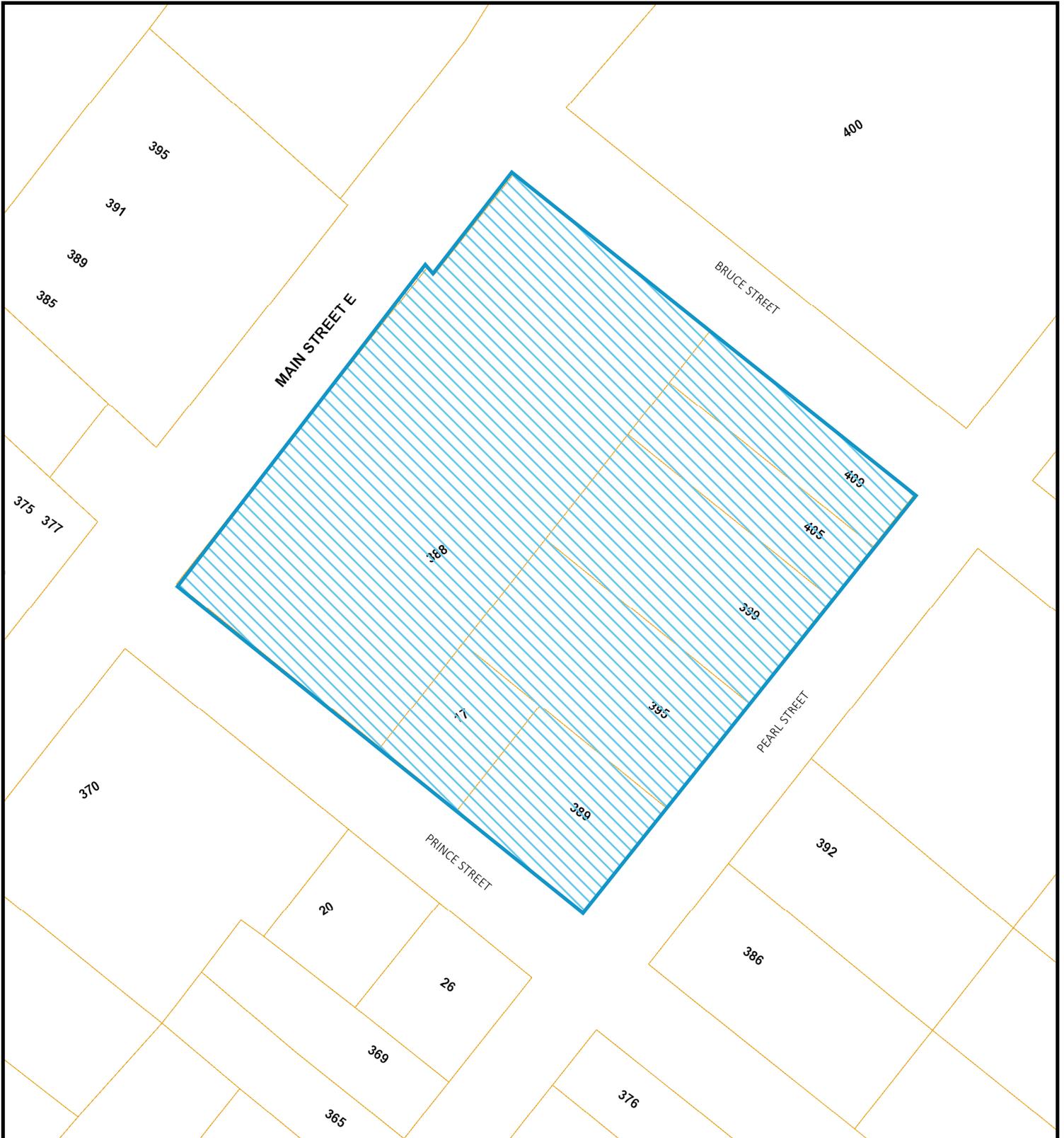
Andrew M. Siltala

Chief Administrative Officer

Recognition of Traditional Lands

The Town of Milton resides on the Treaty Lands and Territory of the Mississaugas of the Credit First Nation. We also recognize the traditional territory of the Huron-Wendat and Haudenosaunee people. The Town of Milton shares this land and the responsibility for the water, food and resources. We stand as allies with the First Nations as stewards of these lands.

FIGURE 1 LOCATION MAP



Council Meeting Date:
December 8, 2025

Scale: 1:1,128.5

File Numbers: LOPA-07/25 & Z-18/25

Development Services



Subject Lands

Figure 2: Examples of Built Form that Contribute to Character



372 Pearl Street



376 Pearl Street



386 Pearl Street



379 Pine Street



22 Court Street South



55 Court Street South

LEGEND

| | |
|-----|---------------------------|
| GL | GLAZING PANEL |
| SP | SPANDREL PANEL |
| MF | METAL FLASHING |
| LV | LOUVRED PANEL |
| AW | AWNING WINDOW |
| S1 | STUCCO COLOUR 1 |
| S2 | STUCCO COLOUR 2 |
| AR | ALUMINUM RAILING W/ GLASS |
| AB | ALUMINUM BALCONY COLOUR |
| BR | BRICK |
| STN | STONE |
| MR | PREFINISHED METAL ROOFING |

NOTE: BALCONIES, COLUMNS TO BE STUCCO COLOUR 1

CONTRACTOR MUST CHECK AND VERIFY ALL DIMENSIONS AND JOB CONDITIONS BEFORE PROCEEDING WITH WORK.
ALL DRAWINGS MAY BE SUBJECT TO CHANGE DUE TO COMMENTS FROM MUNICIPAL DEPARTMENTS AND OTHER AGENCIES WITH AUTHORITY.
ALL DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY OF THE ARCHITECTS AND MUST BE RETURNED AT THE COMPLETION OF THE WORK.
THE CONTRACTOR WORKING FROM DRAWINGS NOT SPECIFICALLY MARKED FOR CONSTRUCTION MUST ASSUME FULL RESPONSIBILITY AND BEAR COSTS FOR ANY CORRECTIONS OR DAMAGES RESULTING FROM HIS OR HER WORK.

KEY TO DETAIL LOCATION

| | |
|-----|----------------------|
| No. | DETAIL NUMBER |
| No. | DRAWING SHEET NUMBER |

| DRAWING SETS ISSUED | No. | DATE (DD.MM.YY) | BY |
|-----------------------------|-----|-----------------|-------|
| REVISIONS PER CITY COMMENTS | 1 | 11 - 09 - 23 | KNYMH |
| PHASED CONCEPT | 2 | 20 - 09 - 23 | KNYMH |
| FORMAL CONSULTATION | 3 | 12 - 06 - 24 | KNYMH |
| SPA SUBMISSION | 4 | 25 - 02 - 25 | KNYMH |

| REVISIONS TO DRAWING | No. | DATE (DD.MM.YY) | BY |
|----------------------|-----|-----------------|----|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

NOT FOR CONSTRUCTION

BUILDING PERMIT NUMBER:
NOT FOR CONSTRUCTION WITHOUT PERMIT

KNYMH
ARCHITECTURE • SOLUTIONS

KNYMH INC.
1006 SKYVIEW DRIVE • SUITE 101
BURLINGTON, ONTARIO • L7P 0V1
T 905.639.6595
F 905.639.0394
www.knymh.com info@knymh.com

THIS DOCUMENT IS INCOMPLETE AND MAY BE USED FOR REGULATORY APPROVAL, PERMIT APPLICATION, OR CONSTRUCTION. IT IS NOT TO BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF THE ARCHITECTS. SUBCONTRACTORS, OWNER AND CONTRACTORS TO PROVIDE THEIR INPUT TO THE DETERMINATION OF THIS DOCUMENT.

MIKAMADA HOMES Victoria Park Village Inc.
c/o Adam Nesbitt
(905) 336-7335 x 222
anesbitt@mikmadahomes.com

388 MAIN ST. E.
388 MAIN STREET EAST
MILTON, ONTARIO

DRAWING SHEET TITLE:
ELEVATIONS (PRINCE STREET)

DRAWING SCALE: As indicated
PROJECT NUMBER: **22063**

DRAWN BY: Author
CHECKED BY: Checker
DRAWING SHEET NUMBER: **A401**
DRAWING VERSION:
PLOT DATE: 2024-10-16



1 SOUTH ELEVATION (PRINCE STREET)
A401 1:200

LEGEND

| | |
|-----|---------------------------|
| GL | GLAZING PANEL |
| SP | SPANDREL PANEL |
| MF | METAL FLASHING |
| LV | LOUVRED PANEL |
| AW | AWNING WINDOW |
| S1 | STUCCO COLOUR 1 |
| S2 | STUCCO COLOUR 2 |
| AR | ALUMINUM RAILING W/ GLASS |
| AB | ALUMINUM BALCONY COLOUR |
| BR | BRICK |
| STN | STONE |
| MR | PREFINISHED METAL ROOFING |

NOTE: BALCONIES, COLUMNS TO BE STUCCO COLOUR 1

CONTRACTOR MUST CHECK AND VERIFY ALL DIMENSIONS AND JOB CONDITIONS BEFORE PROCEEDING WITH WORK.
 ALL DRAWINGS MAY BE SUBJECT TO CHANGE DUE TO COMMENTS FROM MUNICIPAL DEPARTMENTS AND OTHER AGENCIES WITH AUTHORITY.
 ALL DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY OF THE ARCHITECTS AND MUST BE RETURNED AT THE COMPLETION OF THE WORK.
 THE CONTRACTOR WORKING FROM DRAWINGS NOT SPECIFICALLY MARKED FOR CONSTRUCTION MUST ASSUME FULL RESPONSIBILITY AND BEAR COSTS FOR ANY CORRECTIONS OR DAMAGES RESULTING FROM HIS OR HER WORK.

KEY TO DETAIL LOCATION

| | |
|-----|----------------------|
| No. | DETAIL NUMBER |
| No. | DRAWING SHEET NUMBER |

| DRAWING SETS ISSUED | No. | DATE (DD.MM.YY) | BY |
|-----------------------------|-----|-----------------|-------|
| REVISIONS PER CITY COMMENTS | 1 | 11 - 09 - 23 | KNYMH |
| PHASED CONCEPT | 2 | 20 - 09 - 23 | KNYMH |
| FORMAL CONSULTATION | 3 | 12 - 06 - 24 | KNYMH |
| SPA SUBMISSION | 4 | 25 - 02 - 25 | KNYMH |

ALL PREVIOUS ISSUES OF THIS DRAWING ARE SUPERSEDED

| REVISIONS TO DRAWING | No. | DATE (DD.MM.YY) | BY |
|----------------------|-----|-----------------|----|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

NOT FOR CONSTRUCTION

BUILDING PERMIT NUMBER:
 NOT FOR CONSTRUCTION WITHOUT PERMIT

KNYMH
 ARCHITECTURE • SOLUTIONS

KNYMH INC.
 1006 SKYVIEW DRIVE • SUITE 101
 BURLINGTON, ONTARIO • L7P 0V1
 T 905.639.6595
 F 905.639.0394
 www.knymh.com info@knymh.com

PROJECT NORTH

TRUE NORTH

THIS DOCUMENT IS INCOMPLETE AND MAY BE USED FOR REGULATORY APPROVAL, PERMITS, CONSTRUCTION, OR FOR USE BY CONTRACTORS, SUBCONTRACTORS, OWNER AND CONTRACTORS TO PROVIDE INPUT TO THE DETERMINATION OF THIS DOCUMENT.

MIK MADA HOMES

Victoria Park Village Inc.
 c/o Adam Nesbitt
 (905) 336-7335 x 222
 anesbitt@mikmadahomes.com

388 MAIN ST. E.
 388 MAIN STREET EAST
 MILTON, ONTARIO

DRAWING SHEET TITLE:
ELEVATIONS (INSIDE SOUTH)

DRAWING SCALE:
 As indicated

PROJECT NUMBER:
22063

DRAWN BY: Author
 CHECKED BY: Checker

DRAWING SHEET NUMBER:
A405

PLOT DATE:
 2024-10-16



1 INSIDE SOUTH ELEVATION
 A405 1:200

TIMESTAMP: 2024-10-29 9:27:25 AM FILEPATH: C:\root\London22063_MikMada-Homes_388Main_St_knymh\032024.ctb



4 3D VIEW
A450



3 3D VIEW
A450



2 3D VIEW
A450



1 3D VIEW
A450

CONTRACTOR MUST CHECK AND VERIFY ALL DIMENSIONS AND JOB CONDITIONS BEFORE PROCEEDING WITH WORK.
ALL DRAWINGS MAY BE SUBJECT TO CHANGE DUE TO COMMENTS FROM MUNICIPAL DEPARTMENTS AND OTHER AGENCIES WITH AUTHORITY.
ALL DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY OF THE ARCHITECTS AND MUST BE RETURNED AT THE COMPLETION OF THE WORK.
THE CONTRACTOR WORKING FROM DRAWINGS NOT SPECIFICALLY MARKED FOR CONSTRUCTION MUST ASSUME FULL RESPONSIBILITY AND BEAR COSTS FOR ANY CORRECTIONS OR DAMAGES RESULTING FROM HIS OR HER WORK.

KEY TO DETAIL LOCATION

| | |
|-----|----------------------|
| No. | DETAIL NUMBER |
| No. | DRAWING SHEET NUMBER |

| DRAWING SETS ISSUED | No. | DATE (DD.MM.YY) | BY |
|-----------------------------|-----|-----------------|-------|
| REVISIONS PER CITY COMMENTS | 1 | 11 - 09 - 23 | KNYMH |
| PHASED CONCEPT | 2 | 20 - 09 - 23 | KNYMH |
| FORMAL CONSULTATION | 3 | 12 - 06 - 24 | KNYMH |
| SPA SUBMISSION | 4 | 25 - 02 - 25 | KNYMH |

ALL PREVIOUS ISSUES OF THIS DRAWING ARE SUPERSEDED

| REVISIONS TO DRAWING | No. | DATE (DD.MM.YY) | BY |
|-----------------------------|-----|-----------------|----|
| NOT FOR CONSTRUCTION | | | |

BUILDING PERMIT NUMBER:
NOT FOR CONSTRUCTION WITHOUT PERMIT



KNYMH INC.
1006 SKYVIEW DRIVE • SUITE 101
BURLINGTON, ONTARIO • L7P 0V1
T 905.639.6595
F 905.639.0394
www.knymh.com info@knymh.com

THIS DOCUMENT IS INCOMPLETE AND MAY BE USED FOR REGULATION APPROVAL, PERMIT OR CONSTRUCTION PURPOSES FOR USE BY CONTRACTORS, SUBCONTRACTORS, OWNER AND CONTRACTORS TO PROVIDE INPUT TO THE DETERMINATION OF THIS DOCUMENT.



388 MAIN ST. E.
388 MAIN STREET EAST
MILTON, ONTARIO

DRAWING SHEET TITLE:
3D VIEW

DRAWING SCALE:
PROJECT NUMBER:
22063

DRAWN BY: CHECKED BY:
Author Checker
DRAWING SHEET NUMBER:
A450

DRAWING VERSION:
PLOT DATE:
2024-10-16

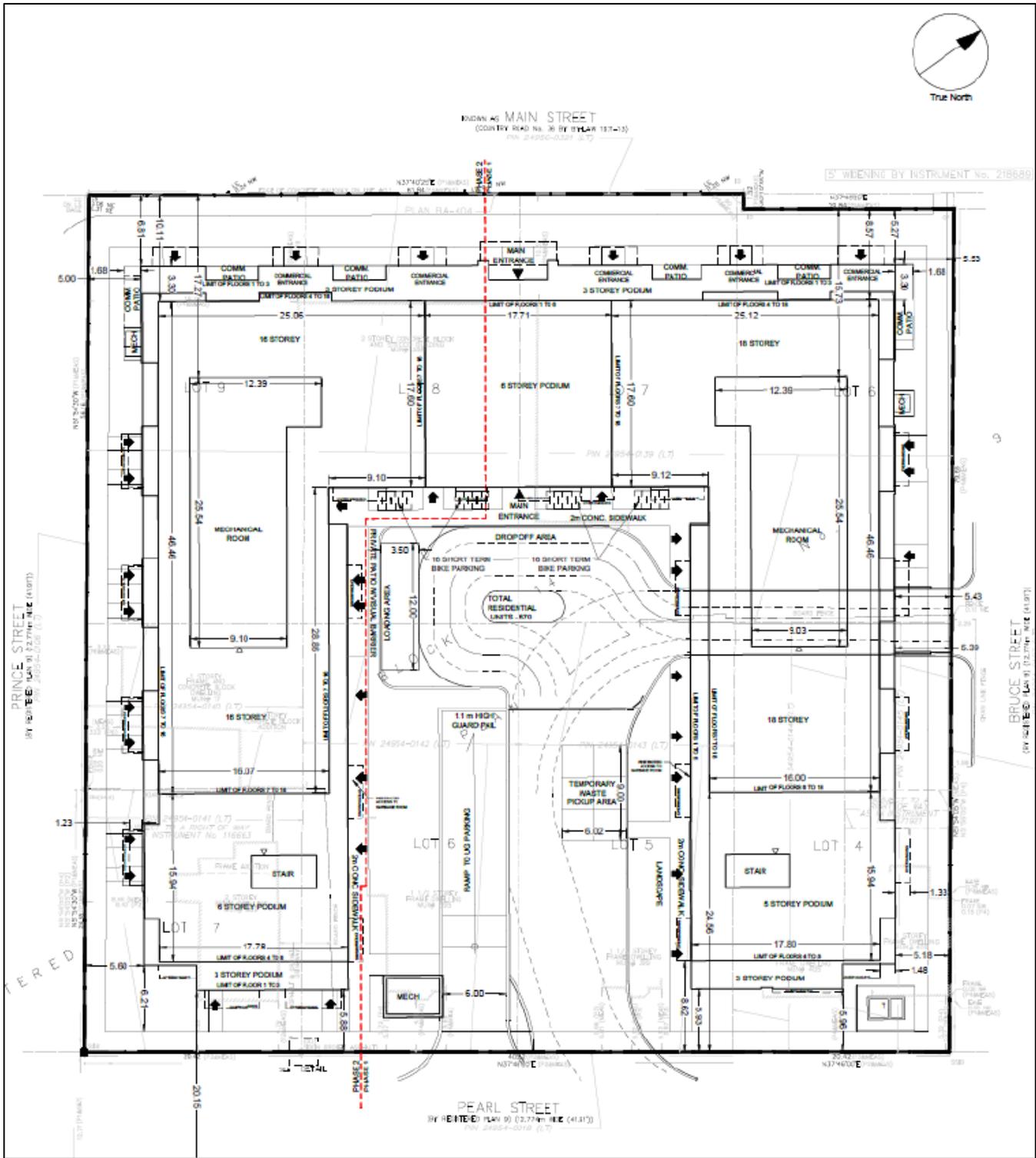


Figure 4 - Proposed Phasing Plan (red dotted line illustrates the anticipated phase limits between Phase 1 and Phase 2) (Arcadis Planning Justification Report, page 17)

Provincial and Regional Policy Analysis

This appendix includes a complete policy analysis of the Planning Act, Provincial Planning Statement (2024) and the Region of Halton Official Plan.

Planning Act

The Planning Act is the Provincial legislation that governs land use planning in Ontario by identifying matters of provincial interest, establishing land use controls and setting out responsibilities for local municipalities.

Section 2 of the Planning Act establishes matters of provincial interest that decision-makers are to have regard for when making decisions on applications under the Planning Act and the relevant subsections read as follows:

2. The Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,

- (d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;
- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;
- (h) the orderly development of safe and healthy communities;
- (j) the adequate provision of a full range of housing, including affordable housing;
- (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;

2.1 (1) When an approval authority or the Tribunal makes a decision under this Act that relates to a planning matter, it shall have regard to,

- (a) any decision that is made under this Act by a municipal council or by an approval authority and relates to the same planning matter; and

Appendix 1: Provincial and Regional Policy Analysis

Report DS-067-25

- (b) any information and material that the municipal council or approval authority considered in making the decision described in clause (a). 2015, c. 26, s. 13; 2017, c. 23, Sched. 3, s. 2 (1); 2019, c. 9, Sched. 12, s. 1 (1).
- (3) For greater certainty, references to information and material in subsections (1) and (2) include, without limitation, written and oral submissions from the public relating to the planning matter. 2015, c. 26, s. 13.

The matters of provincial interest include a broad range of themes that reflect provincial priorities and these are to be considered with any application submitted under the Planning Act.

In this regard, Town Council as a decision-maker is to consider the conservation of features of significant historical interest, adequate provision of a full range of housing, appropriate locations for growth and development, promotion of sustainable and pedestrian-oriented development and the promotion of built form that is well-designed, encourages a sense of place and provides for high-quality, safe, accessible and vibrant public spaces.

In addition to the above, Town Council is required to consider all written and oral submissions from the public relating to the planning matter being considered.

Section 3.1 of the Planning Act enables the Minister to issue policy statements on matters related to municipal planning that are of a provincial interest and it reads as follows:

3. (1) The Minister, or the Minister together with any other minister of the Crown, may from time to time issue policy statements that have been approved by the Lieutenant Governor in Council on matters relating to municipal planning that in the opinion of the Minister are of provincial interest. R.S.O. 1990, c. P.13, s. 3 (1).

On the basis of the above, the Provincial Planning Statement (2024) is a policy statement that provides direction to decision-makers on matters of provincial interest in the Province of Ontario.

Section 3.5 provides direction to decision-makers on the provincial policy tests for all planning matters under the Planning Act and it reads as follows:

3. (5) A decision of the council of a municipality, a local board, a planning board, a minister of the Crown and a ministry, board, commission or agency of the government, including the Tribunal, in respect of the exercise of any authority that affects a planning matter,

- (a) subject to a regulation made under subsection (6.1), shall be consistent with the policy statements issued under subsection (1) that are in effect on the date of the decision; and
- (b) shall conform with the provincial plans that are in effect on that date, or shall not conflict with them, as the case may be. 2006, c. 23, s. 5; 2017, c. 23, Sched. 5, s. 80; 2023, c. 10, Sched. 6, s. 2 (1).

On the basis of the above, the Planning Act requires all Council decisions to be consistent with the Provincial Planning Statement (2024).

Section 16(15) of the Planning Act provides municipalities with the authority to establish Major Transit Station Areas in their respective Official Plan. While the Planning Act does not include a definition of protected Major Transit Station Area ('MTSA'), the Provincial Planning Statement (2024) defines MTSA as follows:

Major Transit Station Area: means the area including and around any existing or planned higher order transit station or stop within a settlement area; or the area including and around a major bus depot in an urban core. Major transit station areas generally defined as the area within an approximate 500 to 800-metre radius of a transit station.

When planning for MTSA, Section 16(15) of the Planning Act requires municipalities to delineate the MTSA boundary and include, at a minimum, certain policies that apply to growth, land uses and densities. In this regard, Section 16(15) of the Planning Act reads as follows:

16(15) The official plan of a single-tier municipality or a lower-tier municipality that, for municipal purposes, forms part of an upper-tier municipality without planning responsibilities may include policies that identify the area surrounding and including an existing or planned higher order transit station or stop as a protected major transit station area and that delineate the area's boundaries, and if the official plan includes such policies it must also contain policies that,

- a) identify the minimum number of residents and jobs, collectively, per hectare that are planned to be accommodated within the area;
- b) identify the authorized uses of land in the major transit station area and of buildings or structures on lands in the area; and
- c) identify the minimum densities that are authorized with respect to buildings and structures on lands in the area. 2017, c. 23, Sched. 3, s. 5 (2); 2022, c. 21, Sched. 9, s. 4 (2).

Appendix 1: Provincial and Regional Policy Analysis

Report DS-067-25

Once an Official Plan is updated to identify and include the planning framework for a MTSA, municipalities are required to update their zoning by-law to implement the framework. In this regard, Section 16(20) of the Planning Act reads as follows:

16(20) No later than one year after the official plan policies described in paragraph 1 or 2 of subsection (21) come into effect, the council of the local municipality shall amend all zoning by-laws that are in effect in the municipality to ensure that they conform with the policies. 2022, c.21, Sched. 9, s.4(4).

Section 17(36.1.4) of the Planning Act prohibits appeals to the following protected MTSA policies and it reads as follows:

17(36.1.4) Despite subsection (36), there is no appeal in respect of the following:

1. Policies that identify a protected major transit station area in accordance with subsection 16 (15) or (16), including any changes to those policies.
2. Policies described in clauses 16 (15) (a), (b) or (c) or (16) (a) or (b) with respect to a protected major transit station area that is identified in accordance with subsection 16 (15) or (16).
3. Policies in a lower-tier municipality's official plan that are described in subclause 16 (16) (b) (i) or (ii).
4. Policies that identify the maximum densities that are authorized with respect to buildings and structures on lands in a protected major transit station area that is identified in accordance with subsection 16 (15).
5. Policies that identify the maximum densities that are authorized with respect to buildings and structures on lands in a protected major transit station area that is identified in accordance with subsection 16 (16).
6. Policies that identify the minimum or maximum heights that are authorized with respect to buildings and structures on lands in a protected major transit station area that is identified in accordance with subsection 16 (15).
7. Policies that identify the minimum or maximum heights that are authorized with respect to buildings and structures on lands in a protected major transit station area that is identified in accordance with subsection 16 (16). 2017, c. 23, Sched. 3, s. 6 (8).

On the basis of the above, in 2022 the Town of Milton completed the Mobility Hub Study that had the effect of delineating a protected MTSA and established the vision for growth and the planning framework in the Town of Milton Official Plan ('Town's OP'). All of the provisions identified above, as well as others intended to guide growth and development in the protected MTSA, were established in the planning framework for the protected

Appendix 1: Provincial and Regional Policy Analysis

Report DS-067-25

MTSA. A complete overview of the study process and implementation tools is included in the 'Town of Milton - Major Transit Station Area/Mobility Hub Study' section of this Report.

Provincial Planning Statement

The purpose of this section of the report is to provide an overview of the Provincial Planning Statement (2024) ('PPS') as it relates to the comprehensive planning that has been undertaken to inform appropriate development on the subject lands.

The PPS was issued under Section 3 of the Planning Act and came into effect on October 20, 2024. The PPS provides direction on matters of provincial interest related to land use planning and development in Ontario. It sets the foundation for regulating development with the goal of achieving and meeting the needs of a fast-growing province while enhancing the quality of life for all residents.

Chapter 1 of the PPS includes an introduction to the policy document and establishes the vision for growth in Ontario, the role of the PPS, legislative authority and provides direction on how to read the PPS. The PPS confirms that municipal official plans are the most important vehicle for implementation of the PPS to achieve comprehensive, integrated and long-term planning. Zoning by-laws are also identified as important tools that should be forward looking and facilitate opportunities for an appropriate range and mix of housing options.

The PPS is more than a set of individual policies. It is to be read in its entirety and the relevant policies are to be applied to each situation. When one or more policy is relevant, a decision-maker is to consider all of the relevant policies to understand how they work together. All decisions of Council in respect of the exercise of any authority that affects a planning matter shall be consistent with the PPS. Comments, submission or advice affecting a planning matter that are provided by Council shall also be consistent with the PPS.

The PPS also clarifies that the policies represent minimum standards and that while the framework is designed to provide for a provincial policy-led planning system, planning authorities and decision-makers may go beyond these minimum standards to address matters of importance to a specific community, unless doing so would conflict with any policies of the PPS.

Chapter 2 of the PPS includes policies that address building homes, sustaining strong and competitive communities and Section 2.1 includes policies that address planning for people and homes.

2.1.4 To provide for an appropriate range and mix of *housing options* and densities required to meet projected requirements of current and future residents of the *regional market area*, planning authorities shall:

- a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are *designated and available* for residential development; and

- b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.

2.1.6. Planning authorities should support the achievement of *complete communities* by:

- a) accommodating an appropriate range and mix of land uses, *housing options*, transportation options with *multimodal* access, employment, *public service facilities* and other institutional uses (including schools and associated child care facilities, longterm care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;

The PPS requires planning authorities to maintain designated land to accommodate residential growth for a minimum of 15 years and encourages them to support the achievement of complete communities by accommodating an appropriate range and mix of land uses. The Town's OP has designated lands for residential development, including a range and mix of housing options that will provide for development opportunities for the planned horizon. The Town's OP indicates that development within strategic growth areas, which includes the Town's parts of the Urban Growth Centre and the MTSA, is the highest priority.

Section 2.2 of the PPS includes policies that address housing, requiring planning authorities to provide for an appropriate range and mix of housing options and densities to meet the project needs of current and future residents. Section 2.2.1.1 of the PPS reads as follows:

2.2.1. Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a) establishing and implementing minimum targets for the provision of housing that is *affordable to low and moderate income households*, and coordinating land use planning and planning for housing with Service Managers to address the full range of *housing options* including *affordable* housing needs;
- b) permitting and facilitating:
 1. *all housing options* required to meet the social, health, economic and wellbeing requirements of current and future residents, including *additional needs housing* and needs arising from demographic changes and employment opportunities; and

2. all types of residential *intensification*, including the *development* and *redevelopment* of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new *housing options* within previously developed areas, and *redevelopment*, which results in a net increase in residential units in accordance with policy 2.3.1.3;
- c) promoting densities for new housing which efficiently use land, resources, *infrastructure* and *public service facilities*, and support the use of active *transportation*; and
- d) requiring *transit-supportive* development and prioritizing *intensification*, including potential air rights development, in proximity to transit, including corridors and stations.

The PPS defines intensification and redevelopment as follows:

Intensification: means the development of a property, site or area at a higher density than currently exists through:

- a) *redevelopment*, including the reuse of *brownfield sites* and underutilized shopping malls and plazas;
- b) the development of vacant and/or underutilized lots within previously developed areas;
- c) infill development; and
- d) the expansion or conversion of existing buildings.

Redevelopment: means the creation of new units, uses or lots on previously developed land in existing communities, including *brownfield sites*.

The Town's current Official Plan aims to achieve a minimum of 5,300 new housing units between 2015 and 2031. It is noted that the Town's new Official Plan (adopted by Town Council and awaiting Provincial approval) forecasts 27,000 units in the built up area between 2022 and 2051, of which 10,400 units as low and medium density units and 16,600 units as high density units. The current Town's OP requires a minimum development density in the UGC/MTSA of 200 persons and jobs per gross hectare and this is carried forward in the Town's new Official Plan (adopted by Town Council and awaiting Provincial approval) as well.

The portion of the subject lands along Main Street East is within the Town's Urban Growth Centre and MTSA where the majority of intensification is directed. The Mobility Hub Study (completed in 2022) for the MTSA is predicated on density of 221 people and jobs per hectare, resulting in 25,114 residents and 4,137 jobs at full buildout (between the years 2055 and 2062). Limited intensification is anticipated for the Pearl and Prince Street properties.

Redevelopment of the subject lands would be considered intensification and would contribute towards achieving the targets in the Town's OP. According to the Planning Justification Report submitted to support the development applications, the proposed development would accommodate 1,670 people and 90 jobs per gross hectare and a density of 9.37 floor space index (FSI). However, the proposed density exceeds the maximum density of 6.0 FSI at the core of the MTSA where the tallest and densest buildings are envisioned and permitted.

Section 2.3 of the PPS includes policies that address land use and development within settlement areas.

2.3.1 General Policies for Settlement Areas

1. *Settlement areas* shall be the focus of growth and development. Within *settlement areas*, growth should be focused in, where applicable, *strategic growth areas*, including *major transit station areas*.
2. Land use patterns within *settlement areas* should be based on densities and a mix of land uses which:
 - a) efficiently use land and resources;
 - b) optimize existing and planned *infrastructure* and *public service facilities*;
 - c) support *active transportation*;
 - d) are *transit-supportive*, as appropriate; and
 - e) are *freight-supportive*.
3. Planning authorities shall support general *intensification* and *redevelopment* to support the achievement of *complete communities*, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary *infrastructure* and *public service facilities*.
4. Planning authorities shall establish and implement minimum targets for *intensification* and *redevelopment* within built-up areas, based on local conditions.

The PPS directs growth and development to settlement areas and specifically in strategic growth areas. The PPS further indicates that land use patterns within settlement areas should be based on densities and a mix of land uses to achieve a number of objectives. The PPS also requires municipalities to establish and implement minimum targets for intensification in built-up areas, taking into consideration local conditions. The Town has undertaken a number of studies in the built-up area (which includes the subject lands) to guide development and intensification. These studies include: Downtown Study (completed in 2016), Mature Neighbourhoods Character Study (completed in 2020) and

the Major Transit Station Area/Mobility Hub Study (completed in 2022). While these are discussed in more detail later in this Report, the level of appropriate intensification for the subject lands has been determined through those processes and has been implemented in the Town's OP.

Section 2.4 of the PPS includes policies for Strategic Growth Areas, which are defined as follows:

Strategic Growth Areas: means within *settlement areas*, nodes, corridors, and other areas that have been identified by municipalities to be the focus for accommodating *intensification* and higher density mixed uses in a more compact *built form*.

Strategic growth areas include *major transit station areas*, existing and emerging downtowns, lands in close proximity to publicly-assisted postsecondary institutions and other areas where growth or development will be focused, that may include infill, *redevelopment* (e.g., underutilized shopping malls and plazas), *brownfield sites*, the expansion or conversion of existing buildings, or greyfields. Lands along major roads, arterials, or other areas with existing or planned *frequent transit service* or higher order transit corridors may also be identified as *strategic growth areas*.

The Town's urban structure establishes strategic growth areas within the Town's Urban Area (settlement area), which includes the Town's Urban Growth Centre and MTSA. The Town's OP identifies land use designations and maximum building heights and maximum and minimum densities that apply to the subject lands. The Town's OP supports intensification and has identified the appropriate areas to achieve the objectives in the policy above.

The subject lands are located within the Town of Milton Urban Area (settlement area) and a portion of the subject lands along Main Street East are within a strategic growth area, while the Pearl and Prince Street properties that comprise the subject lands are abutting the strategic growth area. Town Planning staff are of the opinion that the proposed development does not achieve the planned vision for growth and that the scale of the proposed intensification is not appropriate.

Section 2.4.1 of the PPS includes general policies that apply to planning for growth in strategic growth areas and it reads as follows:

2.4.1 General Policies for Strategic Growth Areas

1. Planning authorities are encouraged to identify and focus growth and development in *strategic growth areas*.

2. To support the achievement of *complete communities*, a range and mix of *housing options*, *intensification* and more mixed-use development, *strategic growth areas* should be planned:
 - a) to accommodate significant population and employment growth;
 - b) as focal areas for education, commercial, recreational, and cultural uses;
 - c) to accommodate and support the transit network and provide connection points for inter- and intra-regional transit; and
 - d) to support *affordable*, accessible, and equitable housing.
3. Planning authorities should:
 - a) prioritize planning and investment for *infrastructure* and *public service facilities* in *strategic growth areas*;
 - b) identify the appropriate type and scale of development in *strategic growth areas* and the transition of built form to adjacent areas;
 - c) permit *development* and *intensification* in *strategic growth areas* to support the achievement of *complete communities* and a *compact built form*;
 - d) consider a student housing strategy when planning for *strategic growth areas*; and
 - e) support *redevelopment* of commercially-designated retail lands (e.g., underutilized shopping malls and plazas), to support mixed-use residential.

Compact Built Form: means a land use pattern that encourages the efficient use of land, walkable neighbourhoods, mixed land uses (residential, retail, workplace, and institutional) all within one neighbourhood, proximity to transit and reduced need for *infrastructure*. *Compact built form* can include detached and semi-detached houses on small lots as well as townhouses, duplexes, triplexes and walk-up apartments, multi-storey commercial developments, and apartments or offices above retail. Walkable neighbourhoods can be characterized by roads laid out in a well connected network, destinations that are easily accessible by transit and *active transportation*, sidewalks with minimal interruptions for vehicle access, and a pedestrian-friendly environment along roads.

The Town's OP identifies strategic growth areas and encourages the development of these areas in a manner that supports the achievement of complete communities. As directed by the policy above, the Town's OP has established a planned framework for strategic growth areas that was informed by various comprehensive planning exercises

over the past 10-years. The Town's OP policies also identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas.

Town Planning staff are of the opinion that the proposed development does not achieve the planned vision for growth, does not represent an appropriate scale of development for the subject lands and is lacking adequate transition of built form to adjacent areas.

Strategic growth areas refer generally to areas intended to accommodate intensification and higher density mixed uses in a more compact built form. Strategic growth areas also include major transit station areas, which are further defined as follows:

Major Transit Station Area: means the area including and around any existing or planned *higher order transit station* or stop within a *settlement area*; or the area including and around a major bus depot in an urban core. *Major transit station areas* generally are defined as the area within an approximate 500 to 800-metre radius of a transit station.

Section 2.4.2 of the PPS includes policies that address development in major transit station areas.

2.4.2 Major Transit Station Areas

1. Planning authorities shall delineate the boundaries of *major transit station areas* on *higher order transit corridors* through a new official plan or official plan amendment adopted under section 26 of the *Planning Act*. The delineation shall define an area within an approximately 500 to 800-metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.
2. Within *major transit station areas* on *higher order transit corridors*, planning authorities shall plan for a minimum density target of:
 - a) 200 residents and jobs combined per hectare for those that are served by subways;
 - b) 160 residents and jobs combined per hectare for those that are served by light rail or bus rapid transit; or
 - c) 150 residents and jobs combined per hectare for those that are served by commuter or regional rail.
3. Planning authorities are encouraged to promote *development* and *intensification* within *major transit station areas*, where appropriate, by:

- a) planning for land uses and built form that supports the achievement of minimum density targets; and
 - b) supporting the redevelopment of surface parking lots within *major transit station areas*, including commuter parking lots, to be *transit-supportive* and promote *complete communities*.
4. For any *particular major transit station area*, planning authorities may request the Minister to approve an official plan or official plan amendment with a target that is lower than the applicable target established in policy 2.4.2.2, where it has been demonstrated that this target cannot be achieved because:
- a) *development* is prohibited by provincial policy or severely restricted on a significant portion of the lands within the delineated area; or
 - b) there are a limited number of residents and jobs associated with the built form, but a *major trip generator* or feeder service will sustain high ridership at the station or stop.
6. All *major transit station areas* should be planned and designed to be *transit-supportive* and to achieve *multimodal* access to stations and connections to nearby *major trip generators* by providing, where feasible:
- a. connections to local and regional transit services to support *transit service integration*;
 - b. *infrastructure* that accommodates a range of mobility needs and supports active *transportation*, including sidewalks, bicycle lanes, and secure bicycle parking; and
 - c. commuter pick-up/drop-off areas.

Following the completion of a Mobility Hub Study in 2022, the Town's OP was updated to delineate the boundaries of the protected major transit station area to include lands within 500-800 metres of the transit station as well as some additional lands in transitional areas. The subject lands are located beyond 800 metres from the transit station and are considered to be located in a transition area due to their proximity to the Downtown area and being partially within a mature neighbourhood character area.

The Town's OP establishes a minimum density target of 200 jobs and persons per hectare. Based on the Demonstration Plan developed through the Mobility Hub Study that was used to inform policies in the Town's OP, the MTSA is planned to achieve 221 people

and jobs per hectare. The Town's OP policies also identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas.

The subject lands are within the Town's protected MTSA (beyond 800 metres) from the transit station and are located along local bus transit lines. The Town's OP identifies a maximum building height of 6 storeys and a maximum floor space index ('FSI') of 3.0 along Main Street East and the remaining portion of the subject lands are permitted to have a maximum building height of 1-2 storeys.

The proposed development includes a maximum building height of 18 storeys and an FSI of 9.37, which far exceeds the scale and height envisioned in the Town's OP. Town Planning staff are of the opinion that the proposed development does not achieve the planned vision for growth, does not represent an appropriate scale of development for the subject lands and is lacking adequate transition of built form to adjacent areas.

The PPS also includes policies for intensification along frequent transit corridors where public transit service runs at least every 15 minutes in both directions throughout the day and into the evening every day of the week. The current transit service along Main Street East abutting the subject lands does not meet this definition and therefore Town staff are of the opinion that the policy is not applicable.

Section 2.8 of the PPS includes policies that address employment and require planning authorities to promote economic development and competitiveness. Section 2.8.1 of the PPS reads as follows:

2.8.1 Supporting a Modern Economy

1. 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;
 - d) encouraging *intensification* of employment uses and compatible, compact, mixed-use development to support the achievement of *complete communities*; and

The Town's OP includes policies that provide for an appropriate mix of uses in the Central Business District Secondary Plan area and Urban Growth Centre/MTSA. The Town's OP also encourages employment uses in mixed-use development as a means of achieving complete communities.

The proposed development includes at-grade commercial units (815 square metres) along the Main Street East and a portion of the Bruce Street frontages. According to the Planning Justification Report submitted to support the development applications, the

proposed commercial uses will generate a total of 90 jobs, however it is unclear how the number of jobs was determined.

Section 2.9 of the PPS includes policies that address energy conservation, air quality and climate change.

2.9.1. Energy Conservation, Air Quality and Climate Change

1. Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the *impacts of a changing climate* through approaches that:
 - a) support the achievement of compact, *transit-supportive*, and *complete communities*;
 - b) incorporate climate change considerations in planning for and the development of *infrastructure*, including stormwater management systems, and *public service facilities*;
 - c) support energy conservation and efficiency;
 - d) promote *green infrastructure*, low impact *development*, and *active transportation*, protect the environment and improve air quality; and
 - e) take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the *impacts of a changing climate*.

The PPS requires planning authorities to prepare for the impacts of a changing climate by supporting the achievement of compact, transit-supportive complete communities and, among others, promoting the development of infrastructure and other alternatives to achieve climate change objectives.

The proposed high-density mixed-use development is considered to be a compact form of development and transit-supportive. The proposed development also intends to connect to municipal water and wastewater services. However, it is noted that technical concerns have been raised by both Halton Region staff and Town Development Engineering staff as it relates to the proposed servicing and stormwater strategies. These comments are detailed in the 'Agency Circulation and Comments' section of this Report.

Chapter 3 of the PPS includes policies that speak to infrastructure and facilities. Section 3.1 of the PPS includes general policies for infrastructure and public service facilities and section 3.1.1 reads as follows:

3.1.1 *Infrastructure and public service facilities shall be provided in an efficient manner while accommodating projected needs.*

Planning for infrastructure and public service facilities shall be coordinated and integrated with land use planning and growth management so that they:

- a) are financially viable over their life cycle, which may be demonstrated through asset management planning;
- b) leverage the capacity of development proponents, where appropriate; and
- c) are available to meet current and projected needs.

The PPS requires infrastructure and public facilities to be provided in an efficient manner while accommodating project needs. Further, the PPS requires municipalities to coordinate and integrate land use planning and growth management to ensure that the system is financially viable, leverages capacity of development proponents and makes the service available to meet current and projected needs.

The servicing strategy for the proposed development is to connect to municipal water and wastewater services. The Functional Site Servicing and Stormwater Management Report indicates that there is capacity within the current system to accommodate the proposed development. However, it is noted that technical concerns have been raised by both Halton Region staff and Town Development Engineering staff as it relates to the proposed servicing and stormwater strategies. These comments are detailed in the 'Agency Circulation and Comments' section of this Report.

Sections 3.2 and 3.3 include policies that address transportation systems and infrastructure and the relevant subsections read as follows:

3.2.1 *Transportation systems* should be provided which are safe, energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support the use of zero- and low- emission vehicles.

3.2.2 Efficient use should be made of existing and planned *infrastructure*, including through the use of *transportation demand management strategies*, where feasible.

3.3.1 Planning authorities shall plan for and protect corridors and rights-of-way for *infrastructure*, including transportation, transit, and electricity generation facilities and transmission systems to meet current and projected needs.

Infrastructure: means physical structures (facilities and corridors) that form the foundation for development. *Infrastructure* includes: sewage and water systems, septage treatment systems, stormwater management systems, *waste management systems*, electricity generation facilities, electricity transmission and distribution systems, communications/telecommunications including broadband, transit and

transportation corridors and facilities, *active transportation systems*, oil and gas pipelines and associated facilities.

Transportation System: means a system consisting of facilities, corridors and rights-of-way for the movement of people and goods, and associated transportation facilities including transit stops and stations, sidewalks, cycle lanes, bus lanes, high occupancy vehicle lanes, *rail facilities*, parking facilities, park'n'ride lots, service centres, rest stops, vehicle inspection stations, inter-modal facilities, harbours, *airports*, *marine facilities*, ferries, canals and associated facilities such as storage and maintenance.

The PPS recommends that transportation systems, as defined above, to be safe, facilitate the movement of people and goods and appropriate to address projected needs. Transportation demand measures are also promoted. Planning authorities are further required to plan for and protect rights-of-way for infrastructure.

The proposed development is located on a multi-purpose arterial road (Main Street East) and local roads (Prince Street, The Traffic Impact and Parking Study indicates that the local road network can accommodate the site-related traffic and also includes recommendations for transportation demand measures.

The Town's OP includes right-of-way widening requirements for all of the roads that bound the subject lands, which are required to be accounted for in the proposed design. Town Transportation Planning staff have identified substantial concerns with the above-noted study and these comments are detailed in the 'Agency Circulation and Comments' section of this Report.

Section 3.6 of the PPS includes policies that address sewage, water and stormwater and the relevant subsections read as follows:

1. Planning for *sewage and water services* shall:
 - a) accommodate forecasted growth in a timely manner that promotes the efficient use and optimization of existing *municipal sewage services* and *municipal water services* and existing *private communal sewage services* and *private communal water services*;
 - b) ensure that these services are provided in a manner that:
 1. can be sustained by the water resources upon which such services rely;
 2. is feasible and financially viable over their life cycle;
 3. protects human health and safety, and the natural environment, including the *quality and quantity of water*, and

4. aligns with comprehensive municipal planning for these services, where applicable.
 - c) promote water and energy conservation and efficiency;
 - d) integrate servicing and land use considerations at all stages of the planning process;
 - f) be in accordance with the servicing options outlined through policies 3.6.2, 3.6.3, 3.6.4 and 3.6.5.
8. Planning for stormwater management shall:
- a) be integrated with *planning for sewage and water services* and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;
 - b) minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;
 - c) minimize erosion and changes in water balance including through the use of *green infrastructure*;
 - d) mitigate risks to human health, safety, property and the environment;
 - e) maximize the extent and function of vegetative and pervious surfaces;
 - f) promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and *low impact development*; and
 - g) align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a *watershed scale*.

The PPS requires municipalities to plan for sewage and water services to accommodate forecasted growth in an efficient manner, ensure that services are provided in a sustainable way including being financially viable over their life cycle and aligning with comprehensive municipal planning. Services are also to be provided in a manner that protects human health and safety as well as the quality and quantity of water.

The PPS also requires municipalities to plan for stormwater management in an integrated and sustainable manner, addressing aspects such as minimizing stormwater loads and contaminant loads, erosion and changes in water balance and mitigating risks to human health, safety, property and the environment. The PPS promotes best practices for stormwater management and requires alignment with comprehensive municipal plans for stormwater that also consider cumulative impacts of stormwater from development on a watershed scale.

Halton Region and Town Development Engineering staff have issued many technical comments on the proposed servicing and stormwater strategies for the proposed development. These comments are detailed in the 'Agency Circulation and Comments' section of this Report.

Section 3.9 of the PPS includes policies that address public spaces, recreation, parks, trails and open space and it reads as follows:

3.9.1 Healthy, active, and inclusive communities should be promoted by:

- a) planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate *active transportation* and community connectivity;

The PPS recommends the development of healthy, active and inclusive communities by planning for the public realm in a manner considers pedestrians, social interaction, active transportation and community connectivity. The proposed development is bound by four local roads and by the nature of redevelopment the public realm of each of these streets will be impacted. The Town's Policy and Urban Design staff have identified a number of concerns with respect to the proposed design and considerations that aim to contribute to local identity, enhance the character of the public realm and provide for design that is respectful of the pedestrian-level experience. These comments are detailed in the 'Agency Circulation and Comments' section of this Report.

Section 4.6 of the PPS includes policies that apply to cultural heritage and archaeology and the relevant subsection reads as follows:

4.6.1 *Protected heritage property, which may contain built heritage resources or cultural heritage landscapes, shall be conserved.*

Built Heritage Resources: means a building, structure, monument, installation or any manufactured or constructed part or remnant that contributes to a property's cultural heritage value or interest as identified by a community, including an indigenous community.

The PPS requires that built heritage resources be conserved. A number of properties that comprise the subject lands are listed properties on the Town's Heritage Register and these include: 389, 395, 399, 405 and 409 Pearl Street. In support of the development applications, the applicant prepared a Heritage Impact Assessment that concluded that the properties do not warrant conservation. The Town's Heritage staff do not agree with the assessment that none of the properties warrant conservation and have indicated that further evaluation of the properties located at 395 and 399 Pearl Street is required. A complete summary of the Town's Heritage staff comments is detailed under the 'Agency Circulation and Comments' section of this Report.

Lastly, Chapter 6 of the PPS includes direction for implementation and interpretation. Section 6.1 includes general policies for implementation and interpretation and Section 6.2 includes direction on coordination and the relevant subsections read as follows:

6.1 General Policies for Implementation and Interpretation

1. The Provincial Planning Statement shall be read in its entirety and all relevant policies are to be applied to each situation.

5. Official plans shall identify provincial interests and set out appropriate land use designations and policies. Official plans shall provide clear, reasonable and attainable policies to protect provincial interests and facilitate development in suitable areas.

In order to protect provincial interests, planning authorities shall keep their official plans up-to-date with the Provincial Planning Statement. The policies of the Provincial Planning Statement continue to apply after adoption and approval of an official plan.

6. Planning authorities shall keep their zoning and development permit by-laws up-to-date with their official plans and the Provincial Planning Statement by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development.

11. *Strategic growth areas* and *designated growth areas* are not land use designations and their delineation does not confer any new land use designations, nor alter existing land use designations. Any development on lands within the boundary of these identified areas is still subject to the relevant provincial and municipal land use planning policies and approval processes.

12. Density targets represent minimum standards and planning authorities are encouraged to go beyond these minimum targets, where appropriate, except where doing so would conflict with any policy of the Provincial Planning Statement or any other provincial plan.

As noted above, the PPS is to be read in its entirety and all relevant policies are to be applied to each situation. The PPS reiterates that Official Plans are required to identify provincial interests, set out appropriate land use designations and policies, and ultimately facilitate development in suitable areas.

The PPS requires Official Plans to remain up-to-date with the Provincial Planning Statement and the same applies to Zoning By-laws, which are to implement Official Plans by establishing permitted uses, minimum densities, heights and other development standards to accommodate growth and development.

Appendix 1: Provincial and Regional Policy Analysis

Report DS-067-25

The PPS indicates that strategic growth areas are not land use designations and confirms that any development within such areas is subject to provincial and municipal land use planning. Further, density targets are minimum standards and the PPS encourages municipalities to go beyond these, where appropriate.

The proposed development includes building heights between three to eight times the maximum permitted heights in in the Town's OP a significantly higher density than is permitted at the core of the MTSA where the highest heights and densities are permitted. It is Town Planning staff's opinion that the proposed development does not include an appropriate level of intensification or built form for the subject lands in accordance with the planned vision for growth in the Urban Growth Centre and Major Transit Station Area as established in the Town of Milton Official Plan policy framework for the area, which was developed in conformity to the Region of Halton Official Plan and consistent with the Provincial Planning Statement;

On the basis of the above, Town Planning staff is of the opinion that the proposed development is not consistent with the Provincial Planning Act (2024).

Region of Halton Official Plan

Starting in 2014, Halton Region began a municipal comprehensive review of the Region of Halton Official Plan ('ROP') under Section 26 of the Planning Act. The purpose of the review was to update the ROP to conform to Provincial plans and policies, ensure it continues to meet the needs of the Region and develop a strategy to accommodate growth in Halton Region to the year 2051. Regional Council adopted two Regional Official Plan Amendments ('ROPA') related to accommodating growth and these are described below.

On July 7, 2021, Regional Council adopted ROPA 48 that had the effect of defining the Regional Urban Structure and a hierarchy in which to direct population and employment growth. ROPA 48 was approved by the Province, with modifications, on November 10, 2021.

On June 15, 2022, Regional Council adopted ROPA 49 which updated the Region's strategy for accommodating growth. ROPA 49 was approved with modifications on November 4, 2022.

In October 2022, the Province tabled Bill 23, *More Homes Built Faster Act, 2022*. This legislation identified Halton Region as an 'upper-tier municipality without planning responsibilities'. In April 2024, through Bill 185, *Cutting Red Tape to Build More Homes Act, 2024*, the effective date of this change to Halton Region's role in land use planning was identified as July 1, 2024. At the time of writing this Report, the ROP remains in-effect and the local municipalities are responsible for administering the plan until such time that it is revoked or amended by the respective municipality.

On the basis of the above, the following policy analysis of the ROP is based on the operative Office Consolidation of the Region of Halton Official Plan, dated May 16, 2024.

The subject lands are within the Town of Milton's 'Built Boundary', are designated 'Urban Area' and within the 'Major Transit Station Area' on Map 1h: Regional Urban Structure of the ROP. Table 2 - Intensification and Density Targets in the ROP identifies the minimum target for new housing units to be accommodated in each lower-tier municipality.

The goal of the Urban Area and the Regional Urban Structure is to manage growth in a manner that fosters complete communities while enhancing mobility, addressing climate change and improving housing affordability. Section 72.1 of the ROP establishes policy objectives for the Urban Area designation and the relevant policies are listed below.

Urban Area and the Regional Urban Structure

72.1 The *objectives* of the Urban Area are:

- (1) To accommodate growth in accordance with the *Region's* desire to improve and maintain regional unity, retain local community identity, create

healthy communities, promote economic prosperity, maintain a high quality, sustainable *natural environment*, and preserve certain landscapes permanently.

(2) To support a form of growth that is compact and supportive of transit usage and non-motorized modes of travel, reduces the dependence on the automobile, makes efficient use of space and services, promotes live-work relationships and fosters a strong and competitive economy.

(3) To provide a range of identifiable, inter-connected and complete communities of various sizes, types and characters, which afford maximum choices for residence, work and leisure.

(4) To ensure that growth takes place commensurately both within and outside the *Built Boundary*.

(6) To identify a Regional Urban Structure that directs growth to *Strategic Growth Areas* and protects Regional *Employment Areas*.

(8) To promote the adaptive re-use of *brownfield* and *greyfield sites*.

(9) To facilitate and promote *intensification* and increased densities.

Section 75 of the ROP addresses growth targets for intensification and strategic growth areas as follows:

75. The Urban Area is planned to accommodate the distribution of population and employment for the *Region* and the four Local Municipalities as shown in Table 1, the *intensification* and density targets as shown in Table 2, the Regional phasing as shown in Table 2a, and the targets for *Strategic Growth Areas* as shown in Table 2b.

The ROP definitions for intensification and strategic growth area are as follows:

253.1 Intensification means the development of a property, site or area at a higher density than currently exists through: (1) redevelopment, including the reuse of brownfield sites, (2) the development of vacant and/or under-utilized lots within previously developed areas, (3) infill development; or (4) the expansion or conversion of existing buildings.

280.2 Strategic Growth Areas means lands identified by the *Region* or its Local Municipalities within the Urban Area that are to be the focus for accommodating population and employment *intensification* and higher-density mixed uses in a more compact built form. *Strategic Growth Areas* include *Urban Growth Centres*, *Major Transit Station Areas*, *Regional Nodes*, *Regional Corridors*, and *Local Nodes* as identified in Local Official Plans.

The ROP supports growth in a form that is compact and transit-supportive and that reduces the dependence on the automobile. The ROP directs growth to strategic growth areas and promotes the redevelopment of underutilized sites, intensification and increased densities. In the Town of Milton, Table 2 of the ROP establishes a minimum intensification target of 9,800 units in the built-up area between 2022 and 2041, representing 45% of all new units during this time period.

The proposed development is considered intensification and the subject lands are partially within a strategic growth area where higher-density mixed uses in a compact built form are directed. The proposed development includes 570 residential units that would contribute towards the growth targets established in Table 2 of the ROP.

Section 76 of the ROP indicates that the range of permitted uses and lot creation requirements are established in local Official Plans and Zoning By-laws, however all development is subject to the policies of the ROP. Section 76 of the ROP reads as follows:

76. The range of permitted uses and the creation of new lots in the Urban Area will be in accordance with Local Official plans and Zoning By-laws. All development, however, shall be subject to the policies of this Plan.

Section 77 of the ROP establishes requirements for Local Municipalities to achieve planned growth targets, to undertake monitoring associated with growth and to prepare area-specific plans or policies for major growth areas, among other matters. Such plans or policies are required to demonstrate how the goals and objectives of the ROP are being attained and require the inclusion of specific policies that establish a general statement of the intended character of the area, identify the boundaries of the area, identify population and growth forecasts, establish the location, types and density of land uses that contribute to healthy communities (including an appropriate mix and density of housing) and others.

Regional Urban Structure

Section 78 of the ROP establishes the Regional Urban Structure which includes, among other areas, strategic growth areas and built-up areas. The policy objectives include directing a significant proportion of population and certain types of employment to strategic growth areas through mixed-use intensification that supports the local role and function of its place. Increased opportunities for the development of affordable housing, particularly in strategic growth areas, is also encouraged as well as supporting climate change through the establishment of complete communities and reducing dependence on automobiles and supporting existing and planned transit and active transportation.

Below are the relevant policies that apply to strategic growth areas.

Strategic Growth Areas

79. The objectives of the Strategic Growth Areas are:

(1) To provide an urban form that is complementary to existing developed areas, uses space more economically, promotes live-work relationships, fosters social interaction, enhances public safety and security, reduces travel by private automobile, promotes active transportation, and is environmentally more sustainable in order to promote the development of *complete communities*.

(2) To provide opportunities for more cost-efficient and innovative urban design.

(3) To provide a range of employment opportunities, facilities and services in centralized locations that are readily accessible by public transit.

(4) To provide a diverse and compatible mix of land uses, including residential and employment uses, to support neighbourhoods.

(5) To create a vibrant, diverse and pedestrian-oriented urban environment.

(6) To cumulatively attract a significant portion of population and employment growth.

(7) To provide high quality public parks and open spaces with site design and urban design standards that create attractive and vibrant places to promote the development of *complete communities*.

(8) To support transit and active transportation for everyday activities.

(9) To generally achieve higher densities than the surrounding areas.

(10) To achieve an appropriate transition of built form to adjacent areas.

(10.1) To conserve cultural heritage resources in order to foster a sense of place and benefit communities in *Strategic Growth Areas*.

79.1 *Strategic Growth Areas* are integral to the Regional Urban Structure within the Urban Area and consist of:

(1) *Urban Growth Centres*, as delineated as an overlay on top of the Urban Area on Map 1H and Map 6, subject to specific policies in Section 80.1, in addition to those for *Strategic Growth Areas*,

(2) *Major Transit Station Areas* as delineated on Map 1H and Map 6 and identified by symbol on Map 3, which generally consist of areas within 500 m to 800 m of the Major Transit Station, subject to specific policies in Section 81, in addition to those for *Strategic Growth Areas*,

79.2 The Regional Urban Structure contains a hierarchy of *Strategic Growth Areas* as delineated or identified by symbol on Map 1H:

- (1) *Urban Growth Centres / Major Transit Station Areas on a Priority Transit Corridor;*
- (2) *Urban Growth Centres / Major Transit Station Areas on a Commuter Rail Corridor;*
- (3) *Major Transit Station Areas on a Priority Transit Corridor;*
- (4) *Major Transit Station Areas on a Commuter Rail Corridor;*
- (5) *Primary Regional Nodes;*
- (6) *Secondary Regional Nodes;* and,
- (7) *Regional Intensification Corridors.*

The Regional Urban Structure is supported by the *Local Urban Structures* identified in Local Official Plans which reflect this hierarchy of *Strategic Growth Areas* and may include additional *Local Nodes and Local Intensification Corridors*.

The *Strategic Growth Areas* are not land use designations and their delineation or identification does not confer any new land use designations nor alter any existing land use designations. Development on lands within *Strategic Growth Areas* is subject to the applicable *policies* of this Plan and is to occur in accordance with Local Official Plans and Zoning By-laws.

79.3 It is the policy of the *Region* to:

- (1) Direct *development* with higher densities and mixed uses to *Strategic Growth Areas* in accordance with the hierarchy identified in Section 79.2 of this Plan.
- (6) Require the Local Municipalities to ensure the proper integration of *Strategic Growth Areas* with surrounding neighbourhoods through pedestrian walkways, cycling paths and transit routes, and the protection of the physical character of these neighbourhoods through urban design.
- (7.2) Consider *intensification and development of Strategic Growth Areas* as the highest priority of urban development within the Region and implement programs and incentives, including Community Improvement Plans, Community Planning Permit System, and Inclusionary Zoning in Protected *Major Transit Station Areas* under the Planning Act, to promote and support *intensification* and further the development of *Affordable Housing*.

The ROP includes a number of objectives for strategic growth areas that are to be implemented through more detailed Local Official Plan policies. The ROP clearly indicates

that strategic growth areas are not land use designations, however development with higher densities and mixed uses are directed to these areas. The ROP also considers intensification and development of strategic growth areas as the highest priority of urban development in the Region, but reiterates that development on lands within strategic growth areas is to also occur in accordance with Local Official Plans and Zoning By-laws.

The subject lands are located within a strategic growth area in the ROP. The proposed development includes a compact form of development that provides for both residential units and ground floor commercial uses. The proposed density represents an increase from what currently exists on the site and would be considered as a transit supportive as well.

However, it is Town Planning staff's opinion that the proposed development does not meet several of the strategic growth area objectives and these include: providing for an urban form that is complementary to the existing developed area, creating a pedestrian-oriented urban environment, achieving an appropriate transition of built form to adjacent areas and conserving cultural heritage resources.

In addition to the above, the ROP requires Local Municipalities to ensure the proper integration of strategic growth areas with surrounding neighbourhoods through pedestrian, vehicular and active transportation routes as well as the protection of physical character of these neighbourhoods through urban design. Town Planning staff are of the opinion that the proposed development does not integrate with the surrounding mature neighbourhood.

Section 80 of the ROP includes policies that apply to Urban Growth Centres and the relevant policies are provided below.

Urban Growth Centres

80. The objectives of the *Urban Growth Centres*, as delineated on Map 1H, are:

- (1) To serve as focal areas for investment in institutional and region-wide public services, as well as commercial, recreational, cultural and entertainment uses;
- (2) To accommodate and support the transit network at the regional scale and provide connection points for inter- and intra-regional transit;
- (3) To serve as high density major employment centres that will attract provincially, nationally or internationally significant employment uses; and
- (4) To function as the primary *Strategic Growth Areas* of the Regional Urban Structure hierarchy where a significant share of population and employment growth will be accommodated.

80.1 The *Urban Growth Centres* are *Strategic Growth Areas*, which in turn are parts of the Urban Area and therefore are subject to the *objectives* and *policies* for both *Strategic Growth Areas* and the Urban Area. The boundaries of the Urban Growth Centres as delineated on Map 1H are to be interpreted in accordance with Section 52 of this Plan.

80.2 It is the *policy* of the Region to:

(1) Require *Urban Growth Centres* to be planned to achieve a minimum *development* density target of 200 residents and jobs combined per gross hectare by 2031 or earlier, as identified in Table 2b.

Urban Growth Centres function as the primary strategic growth area and are intended to accommodate a significant share of population and employment growth. According to the Planning Justification Report submitted with the development applications, the proposed development would accommodate 1,670 people and 90 jobs per gross hectare (based on 1.7 people per unit), which exceeds the development density target in Table 2b of the ROP. However, it is unclear how the population and jobs were determined.

Section 81 of the ROP includes policies that apply to major transit station areas and has been reproduced below.

Major Transit Station Areas

81. The *objectives* of the *Major Transit Station Areas*, as delineated on Map 1H and Map 6, are:

(1) To leverage *infrastructure* investments and the development of *public service facilities* to support a significant share of growth, and achieve transit support densities through existing or planned *frequent transit* service.

(2) To provide a range and mix of transit-supportive uses, such as residential, retail, office and public uses, as well as *public service facilities* and parks and open spaces that support the area in a pedestrian-oriented urban environment.

(3) To function as an important *Strategic Growth Area* component of the Regional Urban Structure and leverage *infrastructure* investment and *frequent transit* service to accommodate increased densities and transit-supportive growth.

(4) To achieve *multimodal* access to stations and support *complete communities*.

(5) To plan for a diverse mix of uses, including additional residential units and *Affordable Housing*, where appropriate.

(6) To protect existing employment uses within and adjacent to *Major Transit Station Areas* by ensuring land use compatibility with adjacent new development is achieved. New developments are required to meet the Provincial Policy Statement, 2020 requirements for land use compatibility.

(7) To maximize the number of potential transit users within walking distance of a station, while considering contextually appropriate *intensification* opportunities within stable residential neighbourhoods to ensure the protection of neighbourhood character, to be determined through the preparation of *Area-Specific Plans*.

The ROP includes a number of objectives to achieve the vision of MTSAs. MTSAs are to be planned with transit supportive densities through a mix of land uses that support a pedestrian-oriented urban environment. MTSAs are to maximize the number of transit users within walking distance while considering contextually appropriate intensification opportunities within stable residential neighbourhoods to ensure the protection of neighbourhood character.

The proposed development includes mixed of land uses, proposing both residential units and ground floor commercial uses along the Main Street East and a portion of the Bruce Street frontages. However, Town Planning staff are of the opinion that the proposed development does not meet the objective of considering contextually appropriate intensification as established in the Town's OP.

Section 81.2 of the ROP includes policies that apply to protected major transit station areas and the relevant sections are identified below.

Protected Major Transit Station Areas

81.2 It is the policy of the Region to:

(1) Direct development with higher densities and mixed uses to *Major Transit Station Areas* in accordance with the hierarchy of *Strategic Growth Areas* identified in Section 79.2 of this Plan.

(4) Require the Local Municipalities to prepare detailed official plan *policies* or an *Area-Specific Plan* for a *Major Transit Station Area*, in accordance with Sections 48 and 77(5) of this Plan that also:

k) may identify stable residential neighbourhoods where only contextually appropriate intensification opportunities in keeping with the neighbourhood character are contemplated.

The ROP directs development with higher densities and mixed uses to protected MTSAs. The proposed development includes a mix of uses as well as higher densities than what currently exists on the subject lands.

In addition to the above, the ROP requires Local Municipalities to prepare detailed Official Plan policies for a MTSA and enables municipalities to also identify stable residential neighbourhoods where only contextually appropriate intensification opportunities are contemplated. The Town completed has completed a number of comprehensive studies including the Downtown Study (completed in 2016), Mature Neighbourhoods Character Study (completed in 2020) and the Major Transit Station Area/Mobility Hub Study (completed in 2022). While these are discussed in more detail later in this Report, the level of appropriate intensification for the subject lands has been determined through those processes and has been implemented in the Town's OP.

The ROP also provides direction on housing and the relevant policies are included below.

Housing

84. The *goal* for housing is to supply the people of *Halton* with an adequate mix and variety of housing to satisfy differing physical, social and economic needs.

86. It is the policy of the Region to:

(6) Adopt the following housing targets:

a) that the per cent of new housing units produced annually in *Halton* in the form of townhouses or multi-storey buildings be at least 65 per cent to 2031 and at least 75 per cent each year thereafter;

b) that at least 30 per cent of new housing units produced annually in *Halton* be *Affordable* or *Assisted Housing*.

The proposed mixed-use, multi-storey building includes a range of unit types and would contribute to the housing target described above. The Planning Justification Report did not include any information on ownership tenure or if affordable or assisted housing is being contemplated.

Section 89 of the ROP requires all new development to connect to municipal water and wastewater services and reads as follows:

Urban (Water Supply and Wastewater Treatment) Services

89. It is the policy of the Region to:

(3) Require that approvals for all new *development* within the Regional Urban Boundary as delineated on Map 1 of this Plan, be on the basis of connection to *Halton's* municipal water and wastewater systems, unless otherwise exempt by other *policies* of this Plan.

In support of the development applications, the applicant prepared a Functional Site Servicing and Stormwater Management Report to outline the servicing and stormwater

management strategy for the subject lands. Connections to the municipal water and wastewater system are proposed. Stormwater is proposed to connect to an existing combined sewer located on Main Street East. Both Halton Region and Town Development Engineering staff have substantial comments on the proposed servicing strategy that are detailed later in this Report. Further detail on the comments provided by Halton Region staff and Town Development Engineering staff is included in the 'Agency Circulation and Comments' section of this Report.

Section 146 and 147 of the ROP include policies that require development sites to be in a condition suitable for its intended use and these sections read as follows:

Land

146. The *objectives* of the *Region* are:

(11) To ensure that *development* takes place on sites that are safe from soil contamination.

147. It is the *policy* of the *Region* to:

(17) Require that, prior to the Region or Local Municipality considering any *development* proposals, the proponent undertake a process in accordance with the *Region's* Guidelines (Protocol) for Reviewing Development Applications with Respect to Contaminated or Potentially Contaminated Sites and any applicable Provincial legislation, regulations and guidelines to determine whether there is any potential contamination on the site and the steps necessary to bring the site to a condition suitable for its intended use.

(18) Consider approval for *development* proposals only when the *development* site complies with Provincial guidelines, Regional standards and other requirements regarding soil and groundwater quality.

Prior to considering development proposals, the ROP requires the completion of proper assessments of a development site to ensure it is safe from soil contamination. The applicant submitted a Phase 1 and Phase 2 Environmental Site Assessments in support of the development applications, however the assessments did not capture all of the subject lands and requires further borehole testing and evaluation. A record of site condition would be required, certifying that the lands are safe for redevelopment to a sensitive residential land use. Town Development Engineering has identified other issues with the reports and these are summarized in the 'Agency Circulation and Comments' section of this Report.

Section 165 of the ROP includes policies that apply to cultural heritage resources. The relevant sections and definitions are provided below.

Cultural Heritage Resources

165. The *goal* for *Cultural Heritage Resources* is to protect the material, cultural and built heritage of *Halton* for present and future generations.

167. It is the *policy* of the *Region* to:

(3) Require that *development* proposals on adjacent lands to protected Cultural Heritage Resources:

a) study and consider the preservation, relocation and/or adaptive re-use of historic buildings and structures based on both social and economic costs and benefits;

b) incorporate in any reconstruction or alterations, design features that are in harmony with the area's character and existing buildings in mass, height, setback and architectural details; and

c) express the *Cultural Heritage Resources* in some way, including: display of building fragments, marking the traces of former locations, exhibiting descriptions of former uses, and reflecting the former architecture and uses.

224. Cultural Heritage Resources means elements of the Regional landscape which, by themselves, or together with the associated environment, are unique or representative of past human activities or events. Such elements may include built heritage resources, cultural heritage landscapes, and archaeological resources.

220.3 Built Heritage Resources means one or more significant buildings, structures, monuments, installations or remains associated with architectural, cultural, social, political, economic or military history and identified as being important to a community. These resources may be identified through designation or heritage conservation easement under the Ontario Heritage Act, or listed by local, provincial or federal jurisdictions.

A number of properties that comprise the subject lands are listed properties on the Town's Heritage Register and these include: 389, 395, 399, 405 and 409 Pearl Street. As part of the submission materials, the applicant prepared a Heritage Impact Assessment that concluded that the properties do not warrant conservation. Town Heritage staff do not agree with the assessment that none of the properties warrant conservation and have indicated that further evaluation of the properties located at 395 and 399 Pearl Street is required. Further detail on the comments provided by Halton Region staff and Town Heritage staff is included in the 'Agency Circulation and Comments' section of this Report.

Section 172 of the ROP includes policies that address the transportation system and the relevant sections are provided below.

Transportation

172. The *objectives* of the *Region* are:

(2) To develop a balanced transportation system that:

- a) reduces dependency on automobile use;
- b) includes a safe, convenient, accessible, affordable and efficient public transit system that is competitive with the private automobile; and
- c) promotes *active transportation*.

(9.2) To ensure *development* is designed to support *active transportation* and public transit.

(9.3) To integrate transportation planning, land use planning and investment in *infrastructure*.

(10) To promote land use patterns and densities that foster strong live-work relationships and can be easily and effectively served by public transit and *active transportation*.

The subject lands have frontage on a multi-purpose arterial road (Main Street East) and three local roads (Bruce Street, Pearl Street and Prince Street). Milton transit operates two bus routes along Main Street East providing 30-minute peak weekday service to and from the Milton GO station. The subject lands are also within proximity to the Ontario Street/Regional Road 25 high-order transit corridor where future inter-regional services are anticipated. The proposed development is of a compact built-form that has the potential to support transit service and promote active transportation.

The ROP includes many policies applicable to the proposed development and these have been identified and addressed above. The subject lands are located within a strategic growth area, which includes Urban Growth Centres and MTSAs. Intensification and development of strategic growth areas is considered the highest priority of urban development, but all development is subject to all applicable policies of the ROP.

The subject lands are located within a strategic growth area as described in the ROP. At the local level, the properties located along Pearl Street and Prince Street are also within a delineated mature neighbourhood character area. The proposed development represents intensification within the Town's Urban Growth Centre and MTSAs and includes a high-density, mixed-use and compact built form that is generally encouraged in strategic growth areas. However, the proposed development does not meet other objectives for strategic growth areas that speak to providing an urban form that is complementary to existing developed areas, considering contextually appropriate intensification within stable residential neighbourhoods to ensure the protection of neighbourhood character, creating a pedestrian-oriented urban environment, achieving appropriate transition of built

Appendix 1: Provincial and Regional Policy Analysis

Report DS-067-25

form to adjacent areas or conserving heritage resources. In this regard, Town Planning staff are of the opinion that the proposal does not conform to the Region of Halton Official Plan.

THE CORPORATION OF THE TOWN OF MILTON

BY-LAW XXX-2025

BEING A BY-LAW TO ADOPT AN AMENDMENT TO THE TOWN OF MILTON OFFICIAL PLAN PURSUANT TO SECTIONS 17 AND 21 OF THE *PLANNING ACT* IN RESPECT OF THE LANDS KNOWN MUNICIPALLY AS 388 MAIN STREET EAST, 389, 395, 399, 405, 409 PEARL STREET, AND 17 PRINCE STREET AND LEGALLY DESCRIBED AS PART OF LOT 6 AND ALL OF LOTS 7, 8 AND 9, SOUTH OF MAIN STREET AND ALL OF LOTS 4, 5, 6 AND 7 NORTH OF PEARL STREET BLOCK 14 REGISTERED PLAN 9 (TEETZEL'S SURVEY), TOWN OF MILTON, REGIONAL MUNICIPALITY OF HALTON (SLESSOR SQUARE LP INC.) - FILE: LOPA-XX/25

The Council of the Corporation of the Town of Milton, in accordance with the provisions of Sections 17 and 21 of the *Planning Act* R. S. O. 1990, c. P.13, as amended, hereby enacts as follows:

1. Amendment No. XX to the Official Plan of the Town of Milton, to amend Schedule C, Schedule C.7.A.CBD, and Schedule C.7.A.1 CBD of the Town of Milton Official Plan to permit the development of a 16-storey tower and 18-storey tower on a shared six (6) storey podium, at lands known municipally as 388 Main Street East, 389, 395, 399, 405, 409 Pearl Street, and 17 Prince Street and legally described as Part of Lot 6 and all of Lots 7, 8 and 9, South of Main Street and all of Lots 4, 5, 6 and 7 North of Pearl Street Block 14 Registered Plan 9 (Teetzel's Survey), Town of Milton, Regional Municipality of Halton, consisting of the attached maps and explanatory text, is hereby adopted.
2. Pursuant to Subsection 17(27) of the *Planning Act*, R.S.O. 1990, c. P. 13, as amended, this Official Plan Amendment comes into effect the day after the last day for filing a notice of appeal, if no appeal is filed pursuant to Subsections 17 (24) and (25). Where one or more appeals have been filed under Subsection 17 (24) or (25) of the said Act, as amended, this Official Plan Amendment comes into effect when all such appeals have been withdrawn or finally disposed of in accordance with the direction of the Ontario Land Tribunal.
3. In the event that the Regional Municipality of Halton, being the Approval Authority, has declared this Official Plan Amendment to not be exempt, the Clerk is hereby authorized and directed to make application to the Approval Authority for approval of the aforementioned Amendment Number No. XX to the Official Plan of the Town of Milton.

PASSED IN OPEN COUNCIL ON [DATE]

Gordon A. Krantz Mayor

_____ Town Clerk
Meaghen Reid

AMENDMENT NUMBER XX

TO THE OFFICIAL PLAN OF THE TOWN OF MILTON

PART OF LOT 6 AND ALL OF LOTS 7, 8 AND 9, SOUTH OF MAIN STREET AND ALL OF LOTS 4, 5, 6 AND 7 NORTH OF PEARL STREET BLOCK 14 REGISTERED PLAN 9 (TEETZEL'S SURVEY), TOWN OF MILTON, REGIONAL MUNICIPALITY OF HALTON (SLESSOR SQUARE LP INC.)

388 MAIN STREET EAST, 389, 395, 399, 405, 409 PEARL STREET, AND 17 PRINCE STREET

FILE: LOPA-XX/25

AMENDMENT NUMBER XX

TO THE OFFICIAL PLAN OF THE TOWN OF MILTON

PART 1 THE PREAMBLE, does not constitute part of this Amendment

**PART 2 THE AMENDMENT, consisting of the following text constitutes
Amendment No. XX to the Official Plan of the Town of Milton**

PART 1: THE PREAMBLE

THE TITLE

This amendment, being an amendment to the Official Plan of the Town of Milton shall be known as:

Amendment No. XX
To the Official Plan of the Town of Milton

388 Main Street East, 389, 395, 399, 405, 409 Pearl Street, and 17 Prince Street
Part of Lot 6 and all of Lots 7,8 and 9, South of Main Street and all of Lots 4, 5, 6
and 7 North of Pearl Street Block 14 Registered Plan 9 (Teetzel’s Survey)
(Town of Milton)
(File: LOPA XX/25)

PURPOSE OF THE AMENDMENT

The purpose of this amendment is to add a Specific Policy Area XX to the lands at 388 Main Street East, 389, 395, 399, 405, 409 Pearl Street, and 17 Prince Street. It will redesignate 389, 395, 399, 405, 409 Pearl Street and 17 Prince Street from ‘Low Density Residential Sub-Area’ to ‘Urban Growth Centre Mixed Use Sub-Area’ (Schedule C - Central Business District Land Use Plan).

In addition, it will redesignate 389, 395, 399, 405, 409 Pearl Street and 17 Prince Street from ‘Maximum Heights of 1-2 Storeys’ to ‘Maximum Heights of 18 Storeys’ (Schedule C.7.A.CBD - Central Business District Height Limits), and redesignate 388 Main Street East from ‘Maximum Heights of 6 Storeys’ to ‘Maximum Heights of 18 Storeys’. It will redesignate the whole property from ‘Maximum Density of 3.0 FSI’ to ‘Maximum Density of 9.37 FSI’ (Schedule C.7.A.1 CBD - Central Business District Milton GO MTSA/Downtown Milton UGC Height & Density Limits).

LOCATION OF THE AMENDMENT

The subject lands are located on the south corner of Main Street East between Prince Street and Bruce Street. The lands are municipally identified as 388 Main Street East, 389, 395, 399, 405, 409 Pearl Street, and 17 Prince Street. The lands are legally described as Part of Lot 6 and all of Lots 7, 8 and 9, South of Main Street and all of Lots 4, 5, 6 and 7 North of Pearl Street Block 14 Registered Plan 9 (Teetzel’s Survey), Town of Milton.

BASIS OF THE AMENDMENT

The proposed amendment would permit the development of a high-rise mixed-use building, containing a 16-storey and an 18-storey building. It would contain 570 residential units with a density of 9.37 FSI on the subject lands.

- a) The subject application proposes intensification that is consistent with the Provincial Planning Statement, 2024. The provincial policies contained within

the PPS 2024 actively promote and encourage compact urban form, intensification, and development which will take better advantage of existing and future public transit within the Milton GO MTSA .

- b) The proposed development contributes in building a complete community that is compact and creates a mixed-use, transit supportive and pedestrian friendly area where residents could live, work and shop
- c) The proposal represent intensification within the Milton Urban Growth Centre. Central Business District and Milton GO MTSA, which would assist in accommodating the Town's population and employment forecasts
- d) The proposed development would bring a vibrant new residential use to the Urban Growth Centre, providing a range of housing opportunities for present and future residents of all ages and incomes
- e) The subject application promotes urban design excellence within Milton's Urban Growth Centre/ Milton GO MTSA and will help maintain and enhance a well-designed built form that contributes to community image and identity
- f) The proposed high-rise mixed-use building is compatible with surrounding land uses, development pattern, built form and landscapes.

PART 2: THE AMENDMENT

All of this document, entitled Part 2: THE AMENDMENT consisting of the following text constitutes Amendment No. XX to the Town of Milton Official Plan.

DETAILS OF THE AMENDMENT

The Town of Milton Official Plan is hereby amended by Official Plan Amendment No. XX, pursuant to Sections 17 and 21 of the Planning Act, as amended, as follows:

1.0 Mapping Change

- 1.1 Amending Schedule I1 - “Urban Area Specific Policy Areas” by adding Special Policy Area No. XX to the lands at 388 Main Street East, 389, 395, 399, 405, 409 Pearl Street, and 17 Prince Street
- 1.2 Amending Schedule C - Central Business District Land Use Plan by redesignating 389, 395, 399, 405, 409 Pearl Street and 17 Prince Street from ‘Low Density Residential Sub-Area’ to ‘Urban Growth Centre Mixed Use Sub-Area’; as per Schedule B attached
- 1.3 Amending Schedule C.7.A.CBD - Central Business District Height Limits by redesignating 389, 395, 399, 405, 409 Pearl Street, and 17 Prince Street from “Maximum Heights of 1-2 Storeys” to ‘Maximum Heights of 18 Storeys’; and,
- 1.4 Amending Schedule C.7.A.1 CBD - Central Business District Milton GO MTSA/Downtown Milton UGC Height & Density Limits be amended by redesignating 388 Main Street East from ‘Maximum Heights of 6 Storeys and Maximum Density of 3.0 FSI’ to ‘Maximum Heights of 18 Storeys and Maximum Density of 9.37 FSI’.

2.0 Text Change

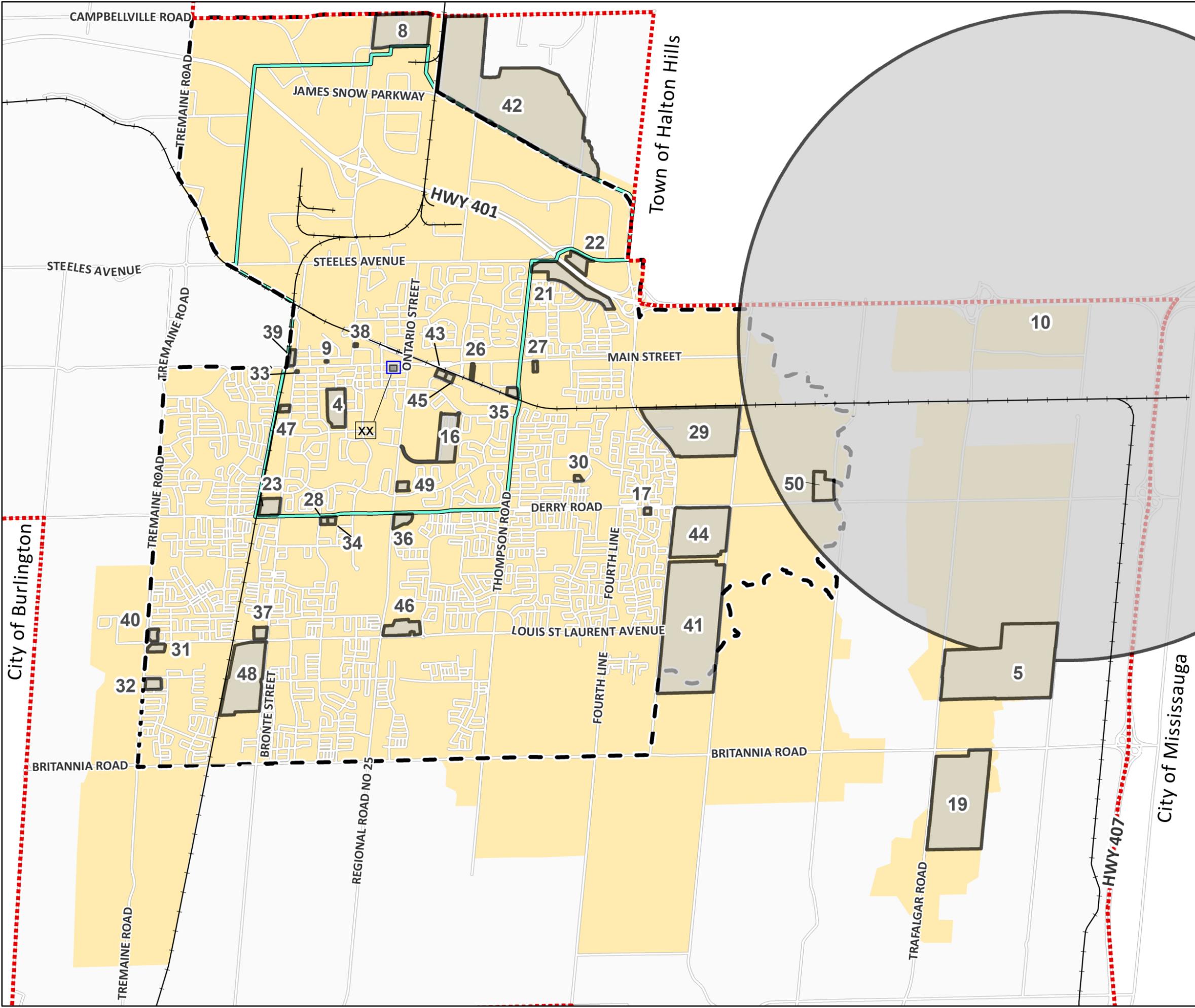
- 2.1 Adding the following text to Section 4.11 Specific Policy Area

4.11.XX The lands identified as Specific Policy Area XX on Schedule I1 of this Plan, being the lands at 388 Main Street East, 389, 395, 399, 405, 409 Pearl Street, and 17 Prince Street may be developed to provide a high-density building, consisting of two towers of up to 18 storeys in height and a maximum density of 9.37 FSI.

TOWN OF MILTON OFFICIAL PLAN

Schedule I1

URBAN AREA SPECIFIC POLICY AREAS (Refer to Section 4.11)



- Rail
- Urban Area Specific Policy Area
- Area Milton Boundary
- Urban Area
- Established Urban Area
- HUSP Area



This schedule forms part of the Official Plan and should be read in conjunction with the text.

Copyright 2024: Town of Milton, Teranet Inc.

Last updated May 2024
Office Consolidation December 2024

Legend
 LANDS TO REMAIN "URBAN GROWTH CENTRE MIXED USE SUB-AREA".

 "LOW DENSITY RESIDENTIAL SUB-AREA" LANDS TO BE DESIGNATED "URBAN GROWTH CENTRE MIXED USE SUB-AREA"

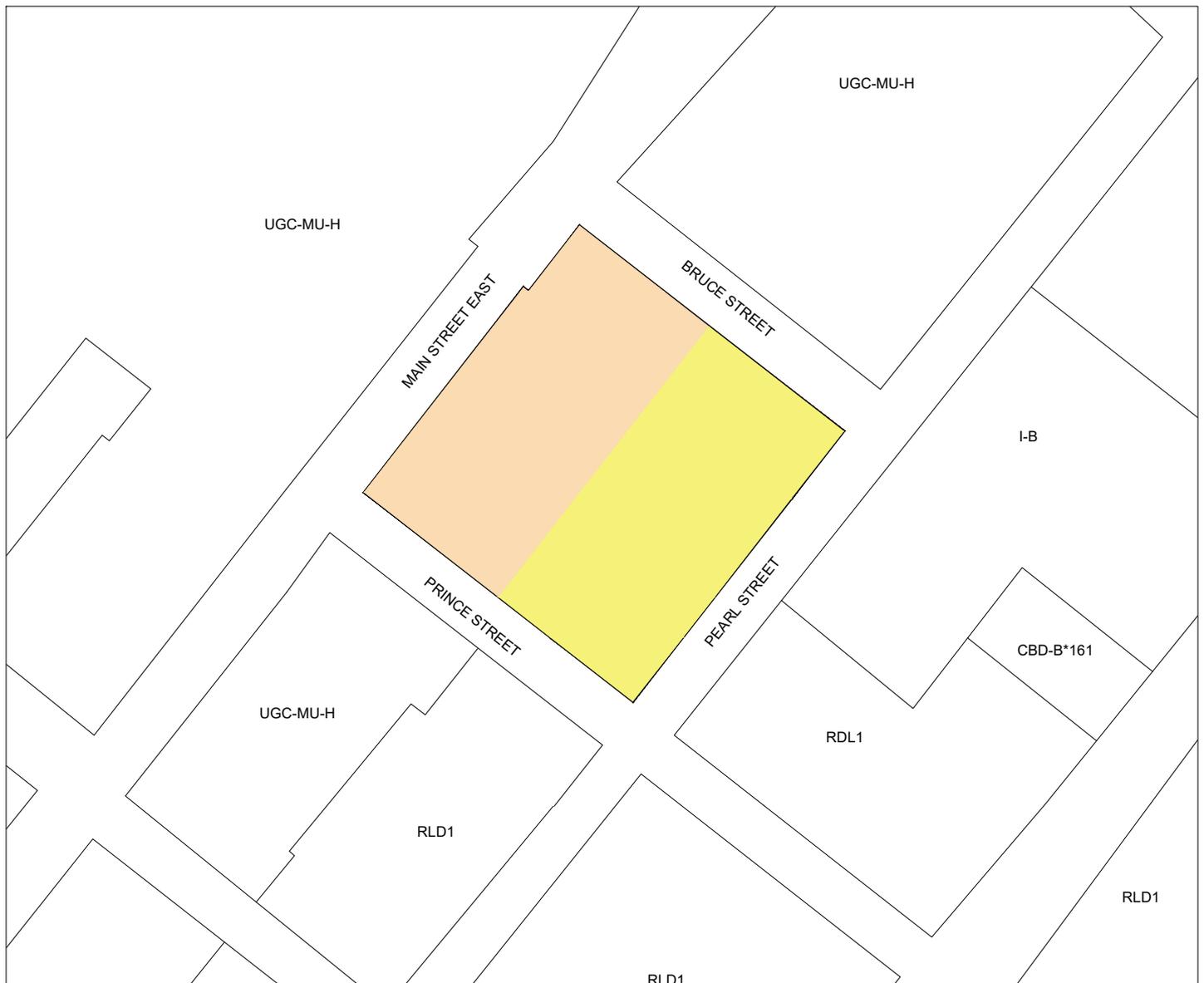

Scale: N.T.S.

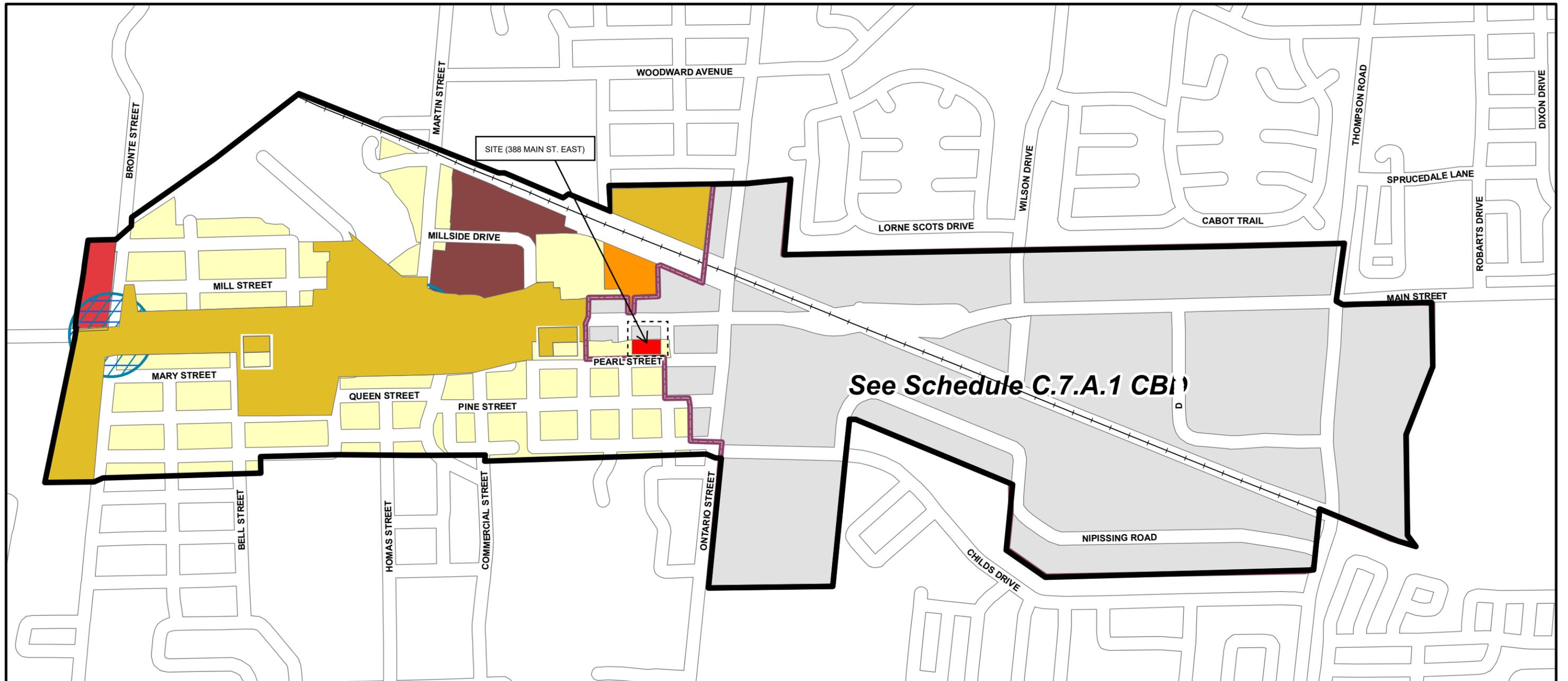
File Number:

This is Schedule 'B' to amend the Town of Milton Official Plan, Schedule C - Central Business District Land Use.

Passed the ____ day of _____, 2025.

 MAYOR

 CLERK




See Schedule C.7.A.1 CBD

Central Business District Boundary

Urban Growth Centre/Major Transit Station Area

Transition Areas

Gateways

See Schedule C.7.A.1 CBD

Maximum Heights

1-2 Storeys

3-4 Storeys

6-8 Storeys

10-14 Storeys

18 Storeys

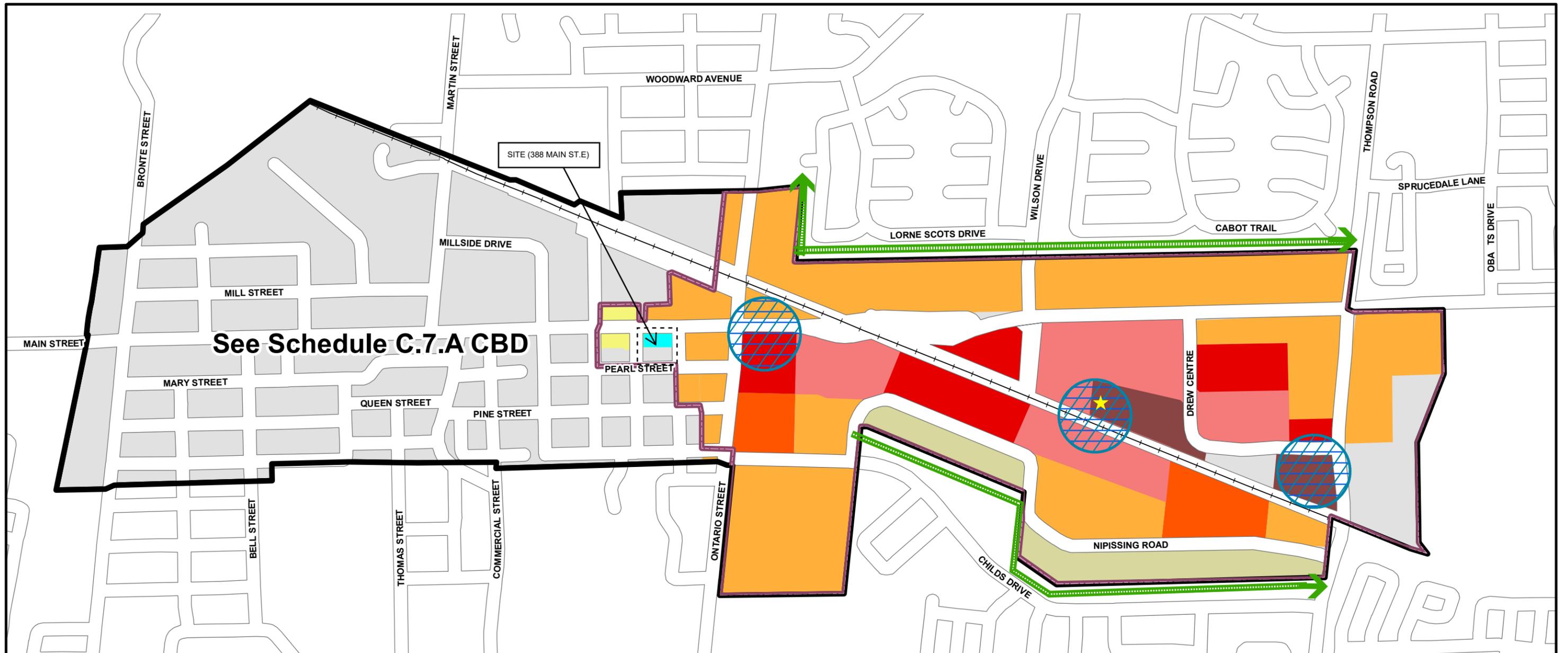
**TOWN OF MILTON
OFFICIAL PLAN
CENTRAL BUSINESS DISTRICT
SECONDARY PLAN
Schedule C.7.A.CBD
CENTRAL BUSINESS DISTRICT
HEIGHT LIMITS**



This Schedule Forms Part Of The Official Plan And Should Be Read Together With The Text.

Copyright 2022: Town of Milton, Terenet Inc.

Last updated August 2022
Office Consolidation December 2024



See Schedule C.7.A CBD

SITE (388 MAIN ST.E)

Maximum Heights Maximum Density

-  Central Business District Boundary
-  Urban Growth Centre/Major Transit Station Area
-  See Schedule C.7.A CBD
-  Transition Areas
-  Gateways

| | | |
|---|------------|----------|
|  | 4 Storey | 2.0 FSI |
|  | 6 Storey | 3.0 FSI |
|  | 8 Storey | 4.0 FSI |
|  | 15 Storey | 5.0 FSI |
|  | 18 Storeys | 9.37 FSI |
|  | 23 Storeys | 5.0 FSI |
|  | 27 Storeys | 6.0 FSI |
|  | 31 Storeys | 6.0 FSI |
|  | 33 Storeys | 6.0 FSI |

**TOWN OF MILTON
OFFICIAL PLAN
CENTRAL BUSINESS DISTRICT
SECONDARY PLAN
Schedule C.7.A.1 CBD
CENTRAL BUSINESS DISTRICT
MILTON GO MTA/MTSA/DOWNTOWN
MILTON UGC HEIGHT & DENSITY LIMITS**



This Schedule Forms Part Of The Official Plan And Should Be Read Together With The Text.
Copyright 2022: Town of Milton, Terenet Inc.
Last updated August 2022
Office Consolidation December 2024

THE CORPORATION OF THE TOWN OF MILTON

BY-LAW XX-2025

BEING A BY-LAW TO AMEND THE TOWN OF MILTON COMPREHENSIVE ZONING BY-LAW 016-2014, AS AMENDED, PURSUANT TO SECTION 34 OF THE PLANNING ACT IN RESPECT OF THE LANDS DESCRIBED AS 388 MAIN STREET EAST, 389, 395, 399, 405, 409 PEARL STREET, AND 17 PRINCE STREET, TOWN OF MILTON, REGIONAL MUNICIPALITY OF HALTON

WHEREAS the Council of the Corporation of the Town of Milton deems it appropriate to amend Comprehensive Zoning By-law 016-2014, as amended;

AND WHEREAS the Town of Milton Official Plan provides for the lands affected by this by-law to be zoned as set forth in this by-law;

NOW THEREFORE the Council of the Corporation of the Town of Milton hereby enacts as follows:

1. **THAT** Schedule A to Comprehensive Zoning By-law 016-2014, as amended, is hereby further amended by changing the existing Urban Growth Centre Mixed-Use Zone with a Holding Provision symbols (UGC-MU-H) to a new site-specific Urban Growth Centre Mixed-Use (UGC-MU-XX) Zone symbols on the lands shown on Schedule A attached hereto and changing the Low Density Residential (RLD1) to a new site specific Urban Growth Centre Mixed Use Zone (UGC-MU-XX) zone on lands shown on Schedule A attached hereto
2. **THAT** Schedule D1 to Comprehensive Zoning By-law 016-2014, as amended, is hereby further amended by changing the existing Maximum Building Height and Maximum Density to 18 storeys and 63 metres and 9.37 FSI on the lands shown on Schedule D1 attached hereto
3. **THAT** Section 13.1.1 of Comprehensive Zoning By-law 016-2014, as amended, is hereby further amended by adding Section 13.1.1.XX to read as follows:

Urban Growth Centre Mixed-Use – Special Section (UGC-MU-XX) Zone

- a. Notwithstanding any provisions of the By-law to the contrary, for lands zoned the following standards and provisions shall apply
 - i. Notwithstanding the provisions of Section 4.19.5 Encroachments, balconies for mixed-use buildings may encroach 1.7 metres into a required yard;

- ii. Notwithstanding Section 5.10 Bicycle Parking Space Requirements, a minimum of 311 Long-Term Bicycle Parking Spaces and 32 Short-Term Bicycle Parking Spaces shall be provided;
- iii. Notwithstanding Section 5.5.2 vii) 0 visitor parking spaces and 0 EV Parking Spaces will be provided.
- iv. Notwithstanding Section 5.19, 0 EV Parking Spaces will be provided.

b. Zone Standards:

Notwithstanding any provisions of Section 7.2, Table 7A, the following shall apply:

- i. A minimum of 1.5 square metres per dwelling unit of outdoor communal amenity area shall be provided as a rooftop amenity area. This outdoor communal amenity space shall be aggregated into areas of not less than 50 square metres.
- ii. Where residential and/or non-residential uses are located on the first-storey of a Mixed-Use Building, a minimum of one principal building entrance to each dwelling unit shall be directly accessible from a public street or internal roadway
- iii. Footnote 13 (Where a Mixed-Use Building(s) will replace an existing non_residential building on the same lot? the replacement building or buildings must contain one or more permitted non_residential use(s) with the same or greater gross floor area as the existing non_residential use or? where a lesser non_residential gross floor area is proposed? the gross floor area of the permitted non_residential use(s) must be sufficient to accommodate a similar number of jobs as the existing non_residential use(s) on the lot) does not apply

Notwithstanding any provisions of Section 7.2, Table 7A, the following shall apply:

- i. Maximum Floor Space Index: 9.37
- ii. Minimum front yard setback on the south side of Main Street East: 5.0 metres
- iii. A minimum stepback of 3.0 metres is required above a height of 19.5 metres or 6 storeys

- iv. Maximum Exterior Side Yard Setback on all other streets: 5.6 metres
 - v. Minimum Stepback along Exterior Side Yard does not apply
 - vi. Minimum Rear Yard Setback abutting a Residential Zone is as follows:
 - a. Floor 1 to 3: 5.5 metres
 - b. Floor 4 to 5: 8.5 metres
 - c. Floor 6 to 18: 24.5 metres
 - vii. Maximum building height: 18 storeys
 - viii. Multiple towers on the same lot shall have a height difference of at least 2 storeys and 6.0 metres between the height of the tallest tower and shortest tower on the lot
 - ix. Minimum Landscaped Buffer abutting a Residential Zone: 0.0 m
 - x. Each tower must be separated by a minimum of 17.5 metres from any other tower located on the same lot, measured horizontally from the main wall of one tower to the other, projecting balconies excepted
 - xi. Any Tower Portion of a building above a height of 9 storeys shall have a maximum floor plate area of 900 square metres
4. If no appeal is filed pursuant to Section 34(19) of the Planning Act, R.S.O. 1990, c. P.13, as amended, or if an appeal is filed and the Ontario Land Tribunal dismisses the appeal, this by-law shall come into force on the day of its passing. If the Ontario Land Tribunal amends the by-law pursuant to Section 34 (26) of the Planning Act, as amended, the part or parts so amended come into force upon the day the Tribunal's Order is issued directing the amendment or amendments.

PASSED IN OPEN COUNCIL ON _____

_____ Mayor

Gordon A. Krantz

_____ Town Clerk

Meaghen Reid

Legend

Areas to be zoned:

 LANDS TO BE REZONED FROM URBAN GROWTH CENTRE MIXED USE ZONE WITH HOLDING PROVISION [UGC-MU-H] ZONE TO URBAN GROWTH CENTRE MIXED USE ZONE [UGC-MU]

 LANDS TO BE REZONED FROM LOW DENSITY RESIDENTIAL ZONE [RLD1] TO A SITE-SPECIFIC URBAN GROWTH CENTRE MIXED USE ZONE [UGC-MU]



Scale: N.T.S.

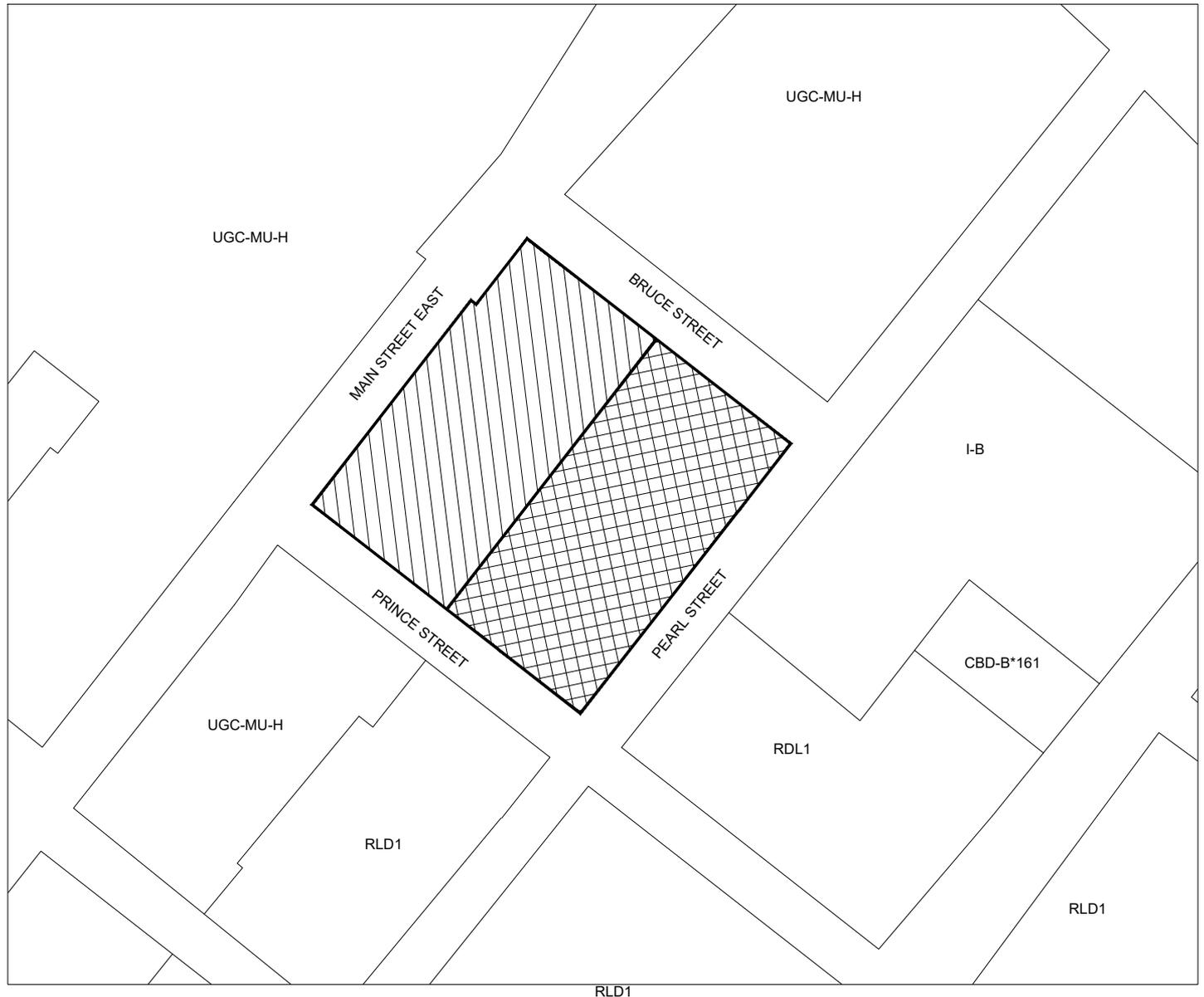
File Number:

This is Schedule 'A' to By-law No. ____ - 2025 to amend the Town of Milton Zoning By-Law No.016-2014.

Passed the ____ day of _____, 2025.

MAYOR

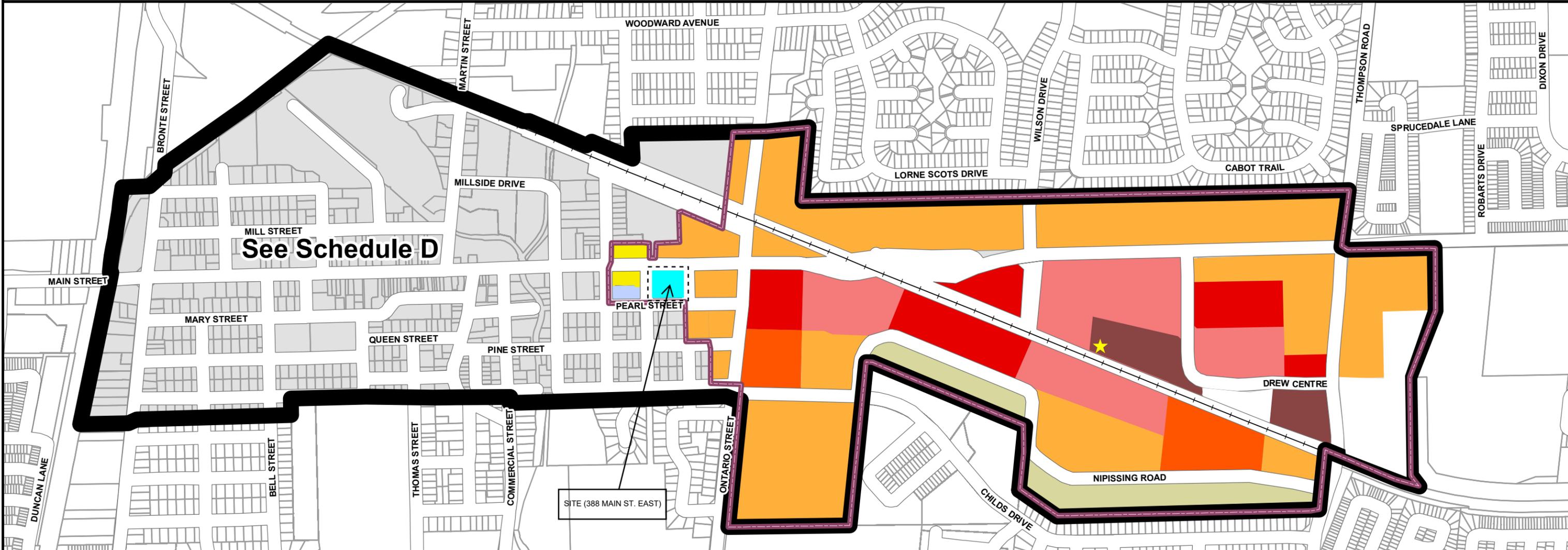
CLERK



RLD1

SCHEDULE D1

Central Business District - Building Heights



Town of Milton Zoning By-law 016-2014 (HUSP Urban Area)

Date: 2022-08-30
Copyright 2022: Town of Milton, Terenet Inc.

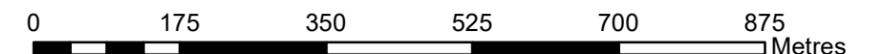
| Maximum Heights | | Maximum Density |
|---|---------------------|-----------------|
|  | 4 Storeys and 14m | 2.0 FSI |
|  | 6 Storeys and 20m | 3.0 FSI |
|  | 8 Storey and 26m | 4.0 FSI |
|  | 15 Storeys and 47m | 5.0 FSI |
|  | 18 Storeys and 63m | 9.37 FSI |
|  | 23 storey and 72m | 5.0 FSI |
|  | 27 Storey and 84m | 6.0 FSI |
|  | 31 Storeys and 95m | 6.0 FSI |
|  | 33 Storeys and 101m | 6.0 FSI |

 RLD1, Max 2 Storeys; height in accordance with the provisions of Table 6B

 Central Business District

 Milton GO MTSA/Downtown Milton UGC

 See Schedule D



Jessica Tijanic

To: MB-Planning@milton.ca
Subject: RE: 388 Main St. Developing in Milton - Katherine Waszkiewicz Ref #: 2025-09-27-039

From: noreply@esolutionsgroup.ca <noreply@esolutionsgroup.ca>

Sent: Saturday, September 27, 2025 4:32 PM

To: MB-Planning@milton.ca <Incoming-Planning-Email@milton.ca>

Subject: Website feedback - Developing in Milton - Katherine Waszkiewicz Ref #: 2025-09-27-039

Hello Development Services,

Please note the following response to Planning and Development has been submitted at Saturday September 27th 2025 4:28 PM with reference number 2025-09-27-039.

- **First Name:**
Katherine
- **Last Name**
Waszkiewicz
- **Street Address:**
[REDACTED]
- **Town**
Milton
- **Postal Code:**
[REDACTED]
- **Email Address:**
[REDACTED]
- **Phone number:**
[REDACTED]
- **Category**
Developing in Milton
- **Comments**
To: Town of Milton Planning Department

Subject: Objection to Proposed Development at 388 Main Street East

Dear Members of the Planning Department,

I am writing to formally express my strong opposition to the proposed development at 388 Main Street East, as outlined in the Urban Design Brief submitted by Slessor Square LP Inc. and MHBC Planning. While I appreciate the Town's efforts to encourage growth and revitalization, this particular proposal raises serious concerns that I believe warrant reconsideration.

1. Incompatibility with Heritage Character

The proposed 18-storey mixed-use tower is entirely out of scale and character with the surrounding Old Milton neighbourhood. This area is defined by its low-rise, heritage-style homes and small-scale commercial buildings. Introducing a high-density, contemporary structure into this context would erode the architectural integrity and historic charm that make Old Milton unique.

2. Exacerbation of Traffic Congestion

Main Street East is already a minor arterial road experiencing significant traffic volumes. The addition of 570 residential units and multiple commercial spaces will dramatically increase vehicular and pedestrian traffic, further straining an already congested corridor. The surrounding streets—Bruce, Pearl, and Prince—are narrow and ill-equipped to handle such intensified circulation.

3. Loss of Privacy for Existing Residents

The proposed tower, with its height ranging from 4 to 18 storeys, will overlook adjacent low-rise residential properties, severely compromising the privacy of current residents. The setbacks and transitions described in the design brief are insufficient to mitigate the visual and spatial intrusion this development would impose.

4. Construction Disruption

The scale of this project guarantees prolonged construction activity, which will bring noise, dust, and disruption to the neighbourhood. Residents will be subjected to months—if not years—of construction-related disturbances that will negatively impact their quality of life.

5. Negative Impact on Property Values

The introduction of a high-rise development in a predominantly low-density residential area risks devaluing nearby properties. The loss of heritage character, increased traffic, and diminished privacy are all factors that could make the area less desirable to prospective buyers.

In light of these concerns and as a resident who will be directly impacted by this development, I urge the Town of Milton to reject the proposed Official Plan and Zoning By-law Amendments associated with this development. Growth must be pursued thoughtfully and in a manner that respects the character, needs, and well-being of existing communities.

Thank you for your attention to this matter.
Sincerely,

Katherine Waszkiewicz



[This is an automated email notification -- please do not respond]



esolutionsNoReply -External Contact

, ON,

www.milton.ca

Jessica Tijanic

Subject: RE: [REDACTED] - Developing in Milton - T. Earl Goodeve Ref #: 2025-10-15-067

From: noreply@esolutionsgroup.ca <noreply@esolutionsgroup.ca>

Sent: Wednesday, October 15, 2025 3:18 PM

To: MB-Planning@milton.ca <Incoming-Planning-Email@milton.ca>

Subject: Website feedback - Developing in Milton - T. Earl Goodeve Ref #: 2025-10-15-067

Hello Development Services,

Please note the following response to Planning and Development has been submitted at Wednesday October 15th 2025 3:16 PM with reference number 2025-10-15-067.

- **First Name:**
T. Earl
- **Last Name**
Goodeve
- **Street Address:**
[REDACTED]
- **Town**
Milton
- **Postal Code:**
[REDACTED]
- **Email Address:**
[REDACTED]
- **Phone number:**
[REDACTED]
- **Category**
Developing in Milton
- **Comments**
Copy of email sent to Councillor Minakakis (Ward 1)

Dear Councillor Minakakis,

My wife and I reside at [REDACTED] and we would like

to advise you that we strenuously object to the subject proposed development that will be across the street from us.

Most objectionable is the arrogance exhibited by the developer that they can propose buildings tall enough cast shade on our buildings' rooftop solar panels. That directly will affect our ability to produce power in the quantity that we are used to and thus will impact the maintenance fees of each and every unit owner in this condo. It matters not that the shading will be in the cooler months and supposedly only for an unspecified, not quantitatively evaluated time. ANY SHADE impacts our power production and unlike nature, the developments shade would be a constant.

Traffic will also be an issue with us. Our access to Main Street already is problematic for a good portion of the day. There are times when, should one insist on turning left (eastward) out of our driveway, the wait can be as long as five plus minutes. We have often given up on turning left and turned right to then scoot over to turn left onto Court Street, and then along Pine or Oak streets to get to Ontario Street. The proposed development will greatly increase traffic wanting to turn left off Main onto Prince (offset to the right of our driveway) and in doing so will completely prevent our ability to go east on Main from our driveway.

In addition to the above blocking, there is very little storage ability between Ontario and Bruce streets and it is very easy to see that left turning traffic from Main to Bruce will cause backups into the Ontario/Main intersection. That already occurs on occasion at Go Train arrival times!

The fact that insufficient parking will be provided guarantees that our visitor parking spots, located toward the street, will be abused. It is not reality to assume that a great number of residents of the proposed development would be "carless". This town's subdivisions with single car garages and short driveways are testimony to the problems that this creates. We appreciate that making parking difficult might encourage some people to abandon cars but, until governments get together and create interwoven public transit networks that offer realistic travel times between points, it isn't going to happen.

And a final observation about the size of the proposed development in the proposed location; it is too close to downtown. The beauty of Milton lies in the fact that it does have a nicely preserved "downtown". Complaints about traffic, should the development proceed, will put pressure on elected officials to perhaps consider opening up Main Street to more lanes of traffic. Should that unfortunate situation occur, street parking downtown would likely be removed and the core would die a slow death. In our opinion, the closest that such high density developments should be permitted to encroach on the "downtown" area along Main, should be the east side of Ontario Street and the west side of Bronte.

We would appreciate it if you take our concerns under advisement and make them known at council meetings discussing the advancement of the subject proposal.

Sincerely,

T. Earl Goodeve, P. Eng
Michaele K Goodeve



Sent from my iPad

[This is an automated email notification -- please do not respond]



esolutionsNoReply -External Contact

, ON,

www.milton.ca

Jessica Tijanic

From: Rob Montanaro [REDACTED]
Sent: Sunday, October 19, 2025 2:18 PM
To: Colin Best; george@electgeorge.ca; Sameera Ali; historymilton@gmail.com; Jessica Tijanic; John Challinor II; Rick Malboeuf; Adil Khalqi; Sammy Ijaz; Sarah Marshall; MB-townclerk@milton.ca; MB-ExecutiveServices@milton.ca
Subject: Request: Oppose Main & Prince rezoning (Nov 3) + share petition & MTSA review

Dear Mayor Krantz, Councillors, Jessica, Executive Services, Town Clerk, and the Milton Historical Society,

Thank you for the time, professionalism, and care you've shown in reviewing the Main & Prince development application. As nearby residents, we share your goal of ensuring that growth in Old Milton proceeds responsibly, and in keeping with our community's established planning framework.

We, the undersigned residents, respectfully request that Milton Town Council refuse or defer the current applications for the Main & Prince development until the following steps have been completed:

1. Independent technical reviews of traffic, parking, and infrastructure impacts.
2. Comprehensive community consultation, ensuring meaningful resident engagement and public transparency.
3. Significant design reductions to bring height, scale, and massing into alignment with the *Downtown Secondary Plan* and surrounding heritage character.

In addition, we ask Council to:

- Refrain from approving the requested site-specific Zoning By-law Amendments that would enable 16–18 storeys and a six-storey podium on this parcel.
- Share our neighbourhood petitions, consisting of the online submission (<https://c.org/kBKcTvx6jZ>) and the accompanying door-to-door signature campaign — both to be provided prior to Nov 3 — with Council colleagues and constituents so that residents' input is formally recorded.
- Direct staff to work with Halton Region to review and rationalize the Milton GO MTSA boundary, particularly the “bump-out” west of Main Street that captures this site contrary to local context.

Why this matters

- The proposal depends on sweeping amendments (height, density, setbacks, parking) that would effectively pre-approve the current massing.
- The *Downtown Secondary Plan* calls for transition in height and scale and compatibility with the surrounding heritage neighbourhood.
- Correcting the MTSA boundary anomaly would restore planning consistency without blocking appropriate, mid-rise redevelopment.

We deeply appreciate the leadership Council, staff, and local partners continue to show in maintaining a balanced vision for Milton’s downtown core.

Sincerely,

Rob Montanaro



Jessica Tijanic

From: Janet Openshaw on behalf of MB-Planning@milton.ca
Sent: Monday, October 27, 2025 9:02 AM
To: Jessica Tijanic; [REDACTED]
Cc: Christian Lupis; Jill Hogan
Subject: FW: Neighbourhood Technical Submission – Main & Prince (LOPA-07/25 & Z-18/25)
Attachments: Neighbourhood_Technical_Submission_Report.pdf

Good morning Rob,

Thankyou for contacting the Town of Milton and providing the attached report.

By copy of this email I have included our Planning Department Management team for their notification.

Regards, Development Services



Janet Openshaw

Planning Services Representative
150 Mary Street, Milton ON, L9T 6Z5
905-878-7252 ext. 2398
www.milton.ca

From: Rob Montanaro [REDACTED]
Sent: Sunday, October 26, 2025 9:39 PM
To: MB-Planning@milton.ca <Incoming-Planning-Email@milton.ca>; MB-townclerk@milton.ca <Townclerk@milton.ca>; Colin Best <Colin.Best@milton.ca>; Rick Malboeuf <Rick.Malboeuf@milton.ca>; Sammy Ijaz <Sammy.Ijaz@milton.ca>; Sameera Ali <Sameera.Ali@milton.ca>; John Challinor II <John.Challinor@milton.ca>; Adil Khalqi <Adil.Khalqi@milton.ca>; Sarah Marshall <Sarah.Marshall@milton.ca>; George Minakakis <George.Minakakis@milton.ca>
Subject: Neighbourhood Technical Submission – Main & Prince (LOPA-07/25 & Z-18/25)

Dear Jessica, Councillors, and the Town Clerk's Office,
Please find attached my Neighbourhood Technical Submission – Main & Prince regarding applications LOPA-07/25 & Z-18/25 (Slessor Square LP Inc.).

This report summarizes key technical, planning, and community concerns shared by residents of Old Milton and proposes a balanced, policy-consistent alternative focused on responsible low- to mid-rise redevelopment, incorporating mixed commercial uses or two-storey residential forms that better reflect the area's character and scale.

I would also like to put into the record that our neighbourhood petition has received a strong and growing response, with hundreds of signatures gathered both in person and online.

The digital petition can be viewed here:

 <https://www.change.org/p/petition-summary-opposition-to-main-prince-development>

The petition and accompanying submissions convey a consistent message from residents: we support responsible, well-scaled development that aligns with Milton's Official Plan, protects the heritage character of Old Milton, and ensures safe, sustainable growth.

We appreciate the continued professionalism and accessibility of Town staff and Council throughout this process and respectfully request that this submission and petition link be included in the public record for the November 3rd Council meeting.

Thank you for your time, attention, and engagement on this important matter.

Warm regards,

Rob Montanaro

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sent from my iPad

Neighbourhood Technical Submission – Main & Prince Development

Applicant: Slessor Square LP Inc.

Applications: LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389–409 Pearl / 17 Prince

Submitted by: Rob Montanaro, [REDACTED], Milton, [REDACTED]

Date: October 26, 2025

Submission Type: Written Statement to Town Clerk for Council Record

1. Executive Summary

This submission requests that Council refuse the Official Plan and Zoning By-law amendments sought for the Main & Prince proposal (two residential towers of 16 and 18 storeys atop a six-storey podium, with near full-lot coverage), on the grounds that the application:

- Conflicts with the Town's Official Plan and Downtown planning framework that require compatible scale and a defensible transition to established low-rise areas;
- Overburdens local streets and municipal servicing (stormwater, water, sanitary), lacks a viable winter operations plan, and risks unacceptable construction and safety impacts;
- Creates adverse built-form, shadow, wind, livability, and heritage-setting impacts that cannot be mitigated at the proposed scale; and
- Relies on an irregular MTSA “bump-out” mapping to justify tower-scale density at a site lacking direct transit integration.

Residents support responsible, context-sensitive mid-rise redevelopment (4–6 storeys) with Main Street-oriented retail, step-backs, and angular planes that respect adjacent homes.

Requested Council Actions (Summary):

- REFUSE the proposed amendments as filed;
- DIRECT staff to work with Halton Region to review and rationalize the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent, publicly released peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, and construction logistics), followed by genuine public consultation.

2. Site & Proposal Overview

Site: The subject property occupies a prominent corner in Old Milton, with frontages on Main Street East, Pearl Street, and Prince Street. The site directly borders established 1- and 2-storey residential homes and sits within a heritage streetscape characterized by small-lot houses, mature trees, and human-scale façades. The property forms a transition zone between the Main Street commercial corridor and adjacent residential blocks to the south.

Proposal: The applicant proposes to redevelop the site with two high-rise residential towers of 16 and 18 storeys atop a six-storey podium, containing approximately 570 condominium units and 815 m² of

ground-floor commercial space. The development would cover nearly the full lot area from Main to Pearl and Prince, with minimal setbacks and no significant open-space buffers to neighbouring homes.

3. Policy & Guideline Framework

This assessment references (non-exhaustive): Town of Milton Official Plan (compatibility, character, transition), Downtown planning directions, Urban Design Manual and tall-building/angular-plane guidance, Heritage policies/Master Plan, and applicable transportation/servicing standards.

4. Detailed Findings

4.1 Height and Scale

- The proposed 16- and 18-storey towers vastly exceed the existing 1–2 storey context.
- Fails to respect the “transition in height and density” policies of Milton’s Official Plan.
- Establishes a precedent for over-intensification in Old Milton, contrary to its small-town, heritage character.
- Creates an overbearing visual presence incompatible with the pedestrian scale of Main, Pearl, and Prince Streets.

4.2 Built Form and Transition

- No meaningful step-backs or angular planes to protect adjacent low-rise residential properties.
- Podium height (6 storeys) is too tall for the surrounding context — should be reduced to a maximum of 4 storeys.
- Shadow and overlook impacts on homes and yards along Pearl and Prince are excessive.
- The mass and floorplate size do not comply with recommended tall-building guidelines.

4.3 Traffic, Parking, and Access

- Pearl and Prince are narrow residential streets not designed for large traffic volumes.
- Additional vehicle movements and deliveries would worsen congestion and reduce safety.
- Increased risk for pedestrians and children — especially near schools and crossings.
- Construction staging and trucks would cause noise, dust, and road obstruction.
- Access points must be restricted to Main or Bruce Street only — no Pearl or Prince access.

4.4 Infrastructure and Servicing

- Local stormwater, water, and sanitary systems are already near capacity.
- Increased density will strain municipal services without demonstrated capacity.
- The Town must require peer-reviewed servicing studies confirming system adequacy.
- Without upgrades, there’s risk of flooding, runoff, and pressure drops in nearby homes.
- Snow accumulation and removal from a large-scale development will further burden local infrastructure and narrow residential streets.

- Added population will increase strain on nearby schools and educational resources already operating near capacity.

4.5 Shadow, Wind, and Environmental Impacts

- Tall towers will create prolonged shadows on neighbouring properties and streets.
- Reduced natural light and livability for existing homes.
- Potential wind-tunnel effects around the podium and public realm, requiring detailed testing.
- Independent shadow and wind studies should be peer-reviewed before approval.

4.6 Heritage and Character

- The site borders Old Milton's heritage core, where existing buildings reflect a human-scaled, small-town fabric.
- The project disrupts the visual harmony of the area and erodes Milton's historical identity.
- Violates Official Plan policies emphasizing preservation of community character and cultural heritage.
- A more context-sensitive design would align with Milton's Civic Precinct and Reimagining Main Street goals.

4.7 Public Realm and Livability

- The development prioritizes density over public realm improvements.
- Insufficient setbacks and landscaping for pedestrian comfort and greenery.
- Commercial frontages should face Main Street, not residential side streets.
- Lacks community amenities or meaningful contributions to local infrastructure.

4.8 Process and Community Consultation

- The community has not been adequately consulted — the scale of opposition indicates a disconnect.
- Residents request deferral until proper consultation and peer review occur.
- Approval without these steps would undermine public trust and transparency.

4.9 Precedent and Cumulative Impact

- Approval would signal to other developers that extreme height and density are acceptable in Old Milton.
- Would accelerate uncoordinated intensification, threatening the character and infrastructure capacity of nearby blocks.
- Sets a dangerous precedent for future development applications.

4.10 Reasonable Alternative

- Support mid-rise redevelopment (4–6 storeys max) that aligns with Milton's urban design guidelines.
- Encourage mixed-use density along Main Street while maintaining transitions to Pearl and Prince.
- Residents are not anti-development — they're seeking responsible, contextual growth.

4.11 Snow Management and Winter Safety

- The proposed development provides no realistic on-site solution for snow storage or removal.
- Full-lot coverage and underground parking ramps eliminate safe areas for accumulation or containment.
- Frequent truck haulage would add winter noise, emissions, and congestion on local streets.
- Meltwater runoff risks refreezing on sidewalks, driveways, and roadways, creating hazardous conditions.
- Tower shadows will delay snowmelt, prolonging icy surfaces throughout the winter months.
- Narrow residential streets like Pearl and Prince cannot accommodate additional plowing, piling, or haulage operations.
- Tower residents removing snow from balconies could drop snow and ice onto surrounding sidewalks and properties, creating serious public safety hazards.
- No winter operations plan has been provided to address snow management or pedestrian safety impacts.

4.12 Zoning Amendments and MTSA Boundary Misalignment

- The proposal depends entirely on major zoning by-law amendments to permit height, density, setbacks, and parking far beyond existing zoning.
- Current designations (DC-FU and RO) permit low- to mid-rise mixed-use, not 16–18 storey towers on a six-storey podium.
- These amendments would override both the Downtown Secondary Plan and Milton's Official Plan, which require compatible scale and gradual height transition.
- Approving the requested rezoning would pre-approve the developer's current massing, eliminating Council's ability to negotiate reductions later.
- The developer's justification relies on the site's inclusion in an arbitrary MTSA "bump-out" west of Main Street that captures this parcel while excluding others closer to the station.
- This mapping irregularity creates a false basis for "transit-oriented" tower density on a site lacking direct GO access or pedestrian integration.
- Council can refuse the zoning amendments and request a boundary review by Halton Region to correct the MTSA map and exclude this parcel, restoring conformity with local planning intent.
- A refusal maintains Council's planning authority, prevents a dangerous precedent for high-rise approvals west of Main Street, and reinforces the policy intent of balanced, context-sensitive growth.

4.13 Quality of Life & Community Impact

- Noise, light, and privacy intrusions into neighbouring backyards and windows.
- Loss of small-town character and walkable setting residents value.
- Congestion and daily disruption from vehicles, deliveries, and extended construction.
- Diminished livability from shadowing, wind effects, and loss of open sky.

- Social fabric strain as tower-scale density disconnects from the existing street network.
- Human health and well-being effects should be considered in planning decisions.

4.14 Safety

- Pearl, Prince, and Main were not designed for tower-scale traffic, density, and service vehicles.
- Minimal setbacks and no internal loading/turnaround space obstruct emergency access.
- Heavy construction and daily vehicle movements threaten safety near schools, parks, and community facilities.
- People before buildings: growth must enhance, not endanger, Milton's walkability and livability.

4.15 Constructibility and Feasibility

- The site is too small, irregular, and bounded by heritage streets to safely accommodate deep excavation and heavy staging for two towers.
- Multi-year excavation and crane operations would cause lane closures, noise, vibration, and dust for 5–7 years.
- No safe route or on-site space for construction vehicles without blocking public roads.
- Deep shoring, dewatering, and vibration could compromise nearby heritage foundations and utilities.
- A mid-rise (5–6 storey) design could be safely built within the site's limits, adding housing without years of disruption.

4.16 Responsible Alternative

- Replace the 16–18 storey towers with low-rise, human-scale options — e.g., townhomes, semis, singles — or a modest 5–6-storey mixed-use / small commercial building.
- This approach aligns with Milton's Official Plan and Reimagining Main Street vision for balanced, pedestrian-friendly growth that respects adjacent heritage homes and neighbourhood character.
- Delivers new housing, jobs, and tax revenue without overloading traffic, infrastructure, or shadowing neighbours.
- Constructive path: Council can direct the applicant to redesign within these parameters — saying “yes, but responsibly.”

5. Conclusions & Requested Council Directions

- REFUSE the proposed Official Plan and Zoning By-law amendments for the Main & Prince application as inconsistent with policy intent for compatibility, transition, safety, and livability;
- DIRECT Town staff to collaborate with Halton Region on a review and rationalization of the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, construction logistics), all publicly released, followed by meaningful public consultation;
- SUPPORT a redesigned, low- to mid-rise (4–6 storey) alternative — such as townhomes, semis, or a modest mixed-use / small commercial building — featuring Main Street-oriented retail, step-backs, and

angular planes that respect surrounding homes.

6. Declarations

I, Rob Montanaro, certify that the statements herein are true and made in good faith as a resident directly affected by the proposed development.

Address: [REDACTED], Milton, [REDACTED]

NEIGHBOURHOOD TECHNICAL SUBMISSION

Re: Proposed “Main & Prince” Development

Applicant: Slessor Square LP Inc. Applications: LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389-409 Pearl / 17 Prince

Submitted by: Rob Montanaro, [REDACTED], Milton, [REDACTED]

Date: October 26, 2025

Submission Type: Written Statement to Town Clerk for Council Record

1. Executive Summary

This submission requests that Council refuse the Official Plan and Zoning By-law amendments sought for the Main & Prince proposal (two residential towers of 16 and 18 storeys atop a six-storey podium, with near full-lot coverage), on the grounds that the application:

- Conflicts with the Town’s Official Plan and Downtown planning framework that require compatible scale and a defensible transition to established low-rise areas;
- Overburdens local streets and municipal servicing (stormwater, water, sanitary), lacks a viable winter operations plan, and risks unacceptable construction and safety impacts;
- Creates adverse built-form, shadow, wind, livability, and heritage-setting impacts that cannot be mitigated at the proposed scale; and
- Relies on an irregular MTSA “bump-out” mapping to justify tower-scale density at a site lacking direct transit integration.

Residents support responsible, context-sensitive mid-rise redevelopment (4–6 storeys) with Main Street-oriented retail, step-backs, and angular planes that respect adjacent homes.

Requested Council Actions (Summary):

- REFUSE the proposed amendments as filed;
- DIRECT staff to work with Halton Region to review and rationalize the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent, publicly released peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, and construction logistics), followed by genuine public consultation.

2. Site & Proposal Overview

• **Site:** The subject property occupies a prominent corner in Old Milton, with frontages on Main Street East, Pearl Street, and Prince Street. The site directly borders established 1- and 2-storey residential homes and sits within a heritage streetscape characterized by small-lot houses, mature trees, and human-scale façades. The property forms a transition zone between the Main Street commercial corridor and adjacent residential blocks to the south.

• **Proposal:** The applicant proposes to redevelop the site with two high-rise residential towers of 16 and 18 storeys atop a six-storey podium, containing approximately 570 condominium units and 815 m² of ground-floor commercial space. The development would cover nearly the full lot area from Main to Pearl and Prince, with minimal setbacks and no significant open-space buffers to neighbouring homes.

3. Policy & Guideline Framework

This assessment references (non-exhaustive): Town of Milton Official Plan (compatibility, character, transition), Downtown planning directions, Urban Design Manual and tall-building/angular-plane guidance, Heritage policies/Master Plan, and applicable transportation/servicing standards.

4. Detailed Findings

The following findings summarize technical, design, and community considerations relevant to the Main & Prince proposal. They address height, built form, infrastructure, shadowing, heritage compatibility, and public safety impacts.

5. Conclusions & Requested Council Directions

- REFUSE the proposed Official Plan and Zoning By-law amendments for the Main & Prince application as inconsistent with policy intent for compatibility, transition, safety, and livability;
- DIRECT Town staff to collaborate with Halton Region on a review and rationalization of the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, construction logistics), all publicly released, followed by meaningful public consultation;
- SUPPORT a redesigned, low- to mid-rise (4–6 storey) alternative — such as townhomes, semis, or a modest mixed-use / small commercial building — featuring Main Street-oriented retail, step-backs, and angular planes that respect surrounding homes.

6. Declarations

I, Rob Montanaro, certify that the statements herein are true and made in good faith as a resident directly affected by the proposed development.

Address: [REDACTED] Milton, [REDACTED]

388 Main St East Development Proposal Review

Town of Milton File Reference: Main & Prince (LOPA-07/25 & Z-18/25)

October 27, 2025

Author:

Nik Krpan, [REDACTED], Milton

1 Summary

The residents of Old Milton Residents are **not anti-development** — they support **responsible, contextual growth** that fits Milton’s character. The proposed development for the 388 Main Street site has a number of deficiencies in its current form that need to be addressed before council gives approval to any by law amendments or variances, and there are additional by law amendments that should be included to control activities at the site.

The development as currently proposed will directly contribute to a significant decline in the quality of life for current residents, and afford a quality of life for future residents of this development that is not commensurate for the type of community Milton is and hopes to be.

The construction of this development has potentially ruinous impacts to neighbouring businesses, both during construction and after completion.

Overall, the evaluation and impact assessments conducted by the developer fail to adequately consider impacts to the environment, infrastructure and the surrounding community. Specific issues that are not adequately addressed include:

- 1) Overly narrow traffic assessment that does not realistically assess baseline conditions.
 - a) Intersections of Oak + Ontario, Pine + Ontario, Pearl + Ontario should be evaluated
 - b) Overall impact to neighbourhood speeds not considered
 - c) Impact of delivery vehicle traffic not considered
- 2) No evaluation of dewatering impact to direct environment (groundwater, soil subsidence) nor to downstream infrastructure or environment (16 mile creek)
- 3) No constructability plan
 - a) No evaluation of dust generation during construction to neighbouring properties including the foreseeable impairment of solar panels due to dust accumulation
 - b) Impact to Prince St, a secondary emergency route
 - c) Impact to the neighbouring school
- 4) No evaluation or consideration of the fact that the water supply will be on the old Milton well water supply which has limited capacity
 - a) The evaluation also considers a low number of occupants compared to what is happening in these types of buildings
- 5) The Solar impact analysis conclusions are questionable and limit hours of evaluation in September and December when the conclusions would be rendered invalid if the full daylight hours were considered.
 - a) No evaluation of the impact of reflected light to traffic safety, and to the neighbouring properties.

- 6) No evaluation of wind impacts was presented
- 7) No evaluation of whether already over capacity schools would have ability to accommodate increased student numbers

In addition there are specific concerns and recommended changes to the design summarized below.

1. Building Height, Scale & Form

Concern: Proposed 16–18 storey towers are drastically out of scale with the surrounding 1–2 storey heritage neighbourhood, violating Milton’s Official Plan and urban design principles.

Recommendation: Limit building height to ≤ 6 storeys, reduce podium height to ≤ 3 storeys, and introduce meaningful setbacks and step-backs to mitigate visual dominance and shadowing.

2. Environmental & Solar Impacts

Concern: Inadequate shadow analysis threatens solar panel performance on neighbouring properties; reflected light from glass surfaces may impair traffic safety and neighbour comfort.

Recommendation: Conduct full-day solar impact studies, assess reflected light impacts on traffic and adjacent buildings, and revise façade materials to reduce glare.

3. Ice, Snow & Wind Hazards

Concern: Risks of falling ice and snow from balconies due to height and design; potential wind tunnel effects due to building mass and hilltop location.

Recommendation: Redesign balconies, add podium roofing features, conduct wind modeling, and increase setbacks to mitigate pedestrian and property risks.

4. Privacy & Livability

Concern: Tower height compromises privacy of neighbouring backyards and homes.

Recommendation: Reduce height and reorient balconies to minimize direct views into private spaces.

5. Snow Removal & Pedestrian Safety

Concern: Insufficient space for snow storage and removal; raised beds and narrow sidewalks will impede pedestrian movement and damage landscaping.

Recommendation: Increase setbacks, widen Main Street, add a bus stop, and allocate above-ground parking for seasonal snow storage.

6. Planning Principles & Precedent

Concern: Proposal fails tests of replicability, equity, and community capacity; risks monopolizing development potential and undermining neighbourhood diversity. Design fails to follow guidelines and zoning requirements.

Recommendation: Adopt urban planning frameworks that prioritize scalable, equitable, and context-sensitive growth. Incorporate design guideline principles.

7. Traffic & Parking

Concern: Traffic study underestimates growth, omits key intersections, and ignores local congestion and pedestrian safety. Parking supply is insufficient.

Recommendation: Require independent peer review, updated traffic data, and binding transportation demand management plans.

8. Infrastructure & Servicing

Concern: Water and sewer capacity assessments are flawed; occupancy assumptions are unrealistically low; groundwater supply is limited.

Recommendation: Conduct broader utility impact studies, include realistic occupancy projections, and regulate over-occupancy.

9. Hydrogeological Impacts

Concern: Inadequate groundwater characterization; risks of subsidence, foundation damage, and stormwater overload due to dewatering.

Recommendation: Reduce building depth, install permanent dewatering systems, and complete full hydrogeological assessments before approval.

10. Constructability & Construction Impacts

Concern: No constructability plan; risks from excavation, truck traffic, noise, vibration, and dust; impacts to schools, daycare, and businesses.

Recommendation: Submit and review a full constructability plan before granting zoning variances.

11. Environmental Design Deficiencies

Concern: Lack of green features such as solar panels, EV charging, recycling infrastructure, and green space.

Recommendation: Integrate environmentally friendly design elements and mitigate impacts to neighbouring green buildings.

12. Pet-Related Impacts

Concern: Insufficient dog facilities will lead to increased pet waste in the neighbourhood.

Recommendation: Limit unit count to ≤ 200 or consider bylaw amendments restricting outdoor pets.

13. Landscape Design

Concern: Unrealistic landscaping on Main Street due to limited sunlight and wind stress; planters may obstruct sightlines and be damaged by snow removal.

Recommendation: Increase setbacks and reposition planters to ensure visibility and durability.

Table of Contents

| | | |
|-------|---|----|
| 1 | Summary..... | 2 |
| 2 | Description of Neighbourhood | 8 |
| 3 | Need for Redevelopment of the Site | 12 |
| 4 | Concerns with Proposed Design..... | 13 |
| 4.1 | Building Height and Scale | 13 |
| 4.1.1 | Visual and Complementarity..... | 13 |
| 4.1.2 | Impact to Neighbouring Properties Solar Collection..... | 13 |
| 4.1.3 | Reflected Light..... | 14 |
| 4.1.4 | Ice Shedding and Balcony Snow Accumulation | 14 |
| 4.1.5 | Privacy of Neighbouring Properties | 15 |
| 4.1.6 | Wind | 15 |
| 4.1.7 | Snow Removal | 15 |
| 4.1.8 | Planning Principles Violation | 16 |
| 4.1.9 | RECOMMENDATIONS:..... | 19 |
| 4.2 | Traffic Impact..... | 20 |
| 4.2.1 | Methodology and Data Integrity..... | 20 |
| 4.2.2 | Operational Findings | 21 |
| 4.2.3 | Access Design and Local Street Compatibility | 21 |
| 4.2.4 | Parking Supply and Overflow Impacts | 21 |
| 4.2.5 | Study Does not Consider the Neighbourhood | 21 |
| 4.2.6 | Policy Context and Compliance..... | 22 |
| 4.2.7 | RECOMMENDATIONS..... | 23 |
| 4.2.8 | Closing Summary | 23 |
| 4.3 | Infrastructure and Servicing..... | 24 |
| 4.3.1 | Sewer and Water | 24 |
| 4.3.2 | Stormwater..... | 24 |
| 4.3.3 | Schools | 25 |
| 4.3.4 | Policing | 25 |

4.3.5 RECOMMENDATIONS..... 25

4.4 Building Depth – Water Table Disruption 26

4.4.1 RECOMMENDATIONS:..... 27

4.5 Constructability 28

4.5.1 RECOMMENDATIONS..... 29

4.6 Lack of Environmentally Friendly Features 29

4.7 Impact of Pets on Neighbouring Properties..... 30

4.7.1 RECOMMENDATIONS..... 30

4.8 Unrealistic Landscape Design for Main St 30

4.8.1 RECOMMENDATIONS..... 31

4.9 Fire Department Accessibility 31

5 Alternative Design Approaches 31

2 Description of Neighbourhood

Old Milton homes in Ontario are unique due to their rich history and architectural diversity. The town was first settled by Jasper and Sarah Martin in 1821, and the Martin's established a grist mill along 16 Mile Creek. The name "Milton" was derived from mill town when the local post office opened in 1836. Over the years, Old Milton has evolved from a rural community to a residential neighborhood, attracting families from all over. The town features well-preserved homes from the mid 1800s and early 1900s, showcasing a variety of architectural styles including Victorian, Edwardian, Italianate, Georgian, Craftsman, and Ontario Cottage. These homes often feature front porches, detached garages, and mature trees, contributing to the charm and character of the neighborhood. The dedication of Centennial Park and the presence of the Martin family's mill have also played a significant role in the town's development and identity.

Typical photos of the immediate neighbourhood are below:





(note in the above picture of Pine St looking east, the 5 level Senior apartment building on Ontario street, and how neatly it blends into the neighbourhood, complimenting other buildings)



(note in the above picture of Prince St looking north the green building on the north side of Main street. At 6 storeys is blends in and compliments the neighbourhood well. Also note it's light coloured accents reducing heat adsorption)



3 Need for Redevelopment of the Site

The need for redevelopment for the site is not only acknowledged but encouraged. The site is ideal for and in need of redevelopment. The current state of the site is not reflective of and not in keeping with the character of the rest of the neighbourhood and the downtown Milton area.

Local residents will welcome the redevelopment of this site in a responsible way that will maintain quality of life.

It is desirable to develop the site such that it compliments the neighbourhood, and not dominate the neighbourhood as the current proposal does.

There are numerous heritage buildings in the neighbourhood and the nature and style of these buildings should be a consideration in the execution of this development.

There is an opportunity for the community to be enhanced and quality of life improved. This opportunity is one time, and once this site is developed it is permanent for a couple of lifetimes. Let's not squander it.

4 Concerns with Proposed Design

4.1 Building Height and Scale

4.1.1 Visual and Complementarity

The height of the building exceeds the next highest building by 12 storeys. Objectively, this is not complimentary to the rest of the neighbourhood, and will rather become a dominating feature.

The almost vertical face on Main street will be brutalist in appearance and dominate the streetscape from Main Street. As people come into downtown Milton from the east by foot, by transit or by car they will be faced with an immense dark coloured monolithic building and need to travel through it's imposing shadow. This is not complimentary to the quaint and unassuming character of downtown Milton.

Milton is not Toronto and does not want to be Toronto.

The finishes proposed for the building do not match nor compliment the neighbourhood. For an excellent example of complimentary buildings one need look no further than Milton Town Hall:



Not the use of a limestone finish on the new building that complements the existing building

4.1.2 Impact to Neighbouring Properties Solar Collection

The Design Impact Analysis document references Milton design guides:

“SHADOW IMPACT ANALYSIS (Solar Panels) - Town of Milton (Section 5.3):

December 21

Solar panels should receive sunlight for an extended period of the day (minimum 8 hours may not be consecutive). Shadow impacts from development should not exceed two consecutive hourly test times on December 21.”

The impact analysis images only evaluate the impact between 9AM-3PM. Sunrise and sunset on Dec 21 are at 7:45 AM and 4:45PM. The impact analysis should cover sunrise to sunset, and if considered appropriately conclusions will likely be different.

Existing solar panels installed at 383 are likely to have more than 2 hour impact.

In addition the properties at 400 and 420 main street will be impacted beyond this limit and impact the future ability to economically install solar panels on those rooftops.

4.1.3 Reflected Light

A structure this size with the highly reflective windows and balcony railings will reflect a great deal of sunlight. In the shadow analysis in the Design Impact Analysis it is clear that on Main street there will be reflection of sunlight onto the roadway. The impact of this reflected light on traffic safety is not assessed, but has the potential to be significant.

In addition with the size of the building and considering the reduced setbacks, the amount of reflected light into other neighbouring properties could be quite significant.

4.1.3.1 Impact to Drivers on Main St

There is no evaluation of reflected light impact to driver safety. This should be considered in the impact analysis.

4.1.3.2 Impact to Neighbouring Buildings

There is not evaluation of reflected light into neighbouring properties. This should also be considered.

4.1.4 Ice Shedding and Balcony Snow Accumulation

Tall buildings in Toronto have been infamous for dangers posed in winters from falling ice after storm events, see: [The Sky is Falling: The Dangers of Falling Ice | McLeish Orlando LLP](#).

The reduced setbacks proposed for this development, its height and the nature of the balcony design all exacerbate these risks:

- Balconies are open to the elements and in winter will accumulate snow. It is reasonable to assume residents will remove snow from their balconies by shovelling it over the edge, and onto the heads of pedestrians below.
- The balconies in the rendered images and design brief appear to be equipped with glass faced railing, on which ice can accumulate and shed

- The reduced setback will also pose a danger to vehicular traffic on the Main, Prince and Bruce Streets, but especially on Main where there is more and higher speed traffic

4.1.5 Privacy of Neighbouring Properties

Given the height of the building the level of privacy of neighbouring properties will be negatively impacted. Backyards will be on full display for observation from balconies of the building, especially the southern and western faces of the building.

4.1.6 Wind

The building footprint will be approximately 68m x 63m. Such a large building dominating the skyline will have significant wind effects. None of the design documentation contemplates the wind effects of the building. Given that there are no neighbouring buildings of similar size one of the potential effects will be significant down drafts. This has the potential to exacerbate issues with respect to falling ice discussed above.

In addition the reports claim to prioritize the pedestrian experience, however these wind effects, especially on the north and west faces of the building will be profound in winter, seriously discouraging pedestrian traffic. A local example of the wind effect of large buildings is the velodrome, whose height is nowhere near the proposed height of this building.

The specific location of this building will be at the crest of a hill. This combined with the height of the building means there is no wind break and wind effects are likely exacerbated.

These kinds of wind effects could result in damage to neighbouring properties. These risks are not evaluated in the developer submission. Literature on research conducted on buildings smaller than the one proposed indicates “creating a severe risk of associated unexpected exterior material damage” (see reference 1)

4.1.6.1 References:

1. Wind, 2023, (<https://www.mdpi.com/2674-032X/3/1/7>), “Wind Tunnel Experiments on Interference Effects of a High-Rise Building on the Surrounding Low-Rise Buildings in an Urban Block” by Yasuyuki Ishida, Akihito Yoshida, Shuhei Kamata , Yuta Yamane and Akashi Mochida

4.1.7 Snow Removal

The winter of 2025 should be fresh in our memories, and the quantities of snow that it brought. The reduced setbacks and proximity of walkways to the road will ensure that pedestrians will lack adequate space to walk when the streets are plowed and snow is

heaped onto the proposed raised beds. The raised beds are also likely to be damaged by snow removal equipment and these features are likely to become eyesores unless appropriately set back from the roadway.

Given the limited parking availability in the development and the stated aim to reduce vehicular traffic, it is imperative that pedestrian ways snow removal be excellent. In fact consideration should be made to widening the roadway and creating a new bus stop at this location to accommodate all the additional transit passengers this development is sure to create.

There is also a total lack of space on the site for storage of snow removal from the courtyard / driveway. It would be completely inappropriate for the snow to be plowed onto neighbouring properties and with the current layout this would be the only option as there is no space available on site, and there is no reference to in ground heating for snow melting on the courtyard. This courtyard will likely be quite prone to concentrated snow accumulation as it will be a sheltered area where the snow will settle. This is a major deficiency in site planning.

4.1.8 Planning Principles Violation

Urban planning increasingly emphasizes equitable, scalable, and sustainable development. The following evaluative questions reflect recognized principles in urban design and planning:

1. Can the proposal be replicated in the next block?
2. Can it be replicated across the street in that block?
3. How many repetitions of this proposal can the community support?
4. What would be the effects of 2 to 4 of the proposal?
5. Does the proposal saturate the community's capacity, thereby limiting equitable development opportunities for others?

These questions align with established frameworks and principles in urban planning, particularly those emphasizing replicability, community capacity, and equity.

The proponent for this building has failed to even answer any of these questions in their proposal. Our evaluation of the proposed design indicates that it would fail this test.

In addition, the developers own Urban design brief claims to demonstrate adequate access to green space / park space. Their own figure shows that this access is barely within the 800 m radius, and only the tip of Victoria Park and Rotary park with the bulk of those parks well outside the 800 m radius.

4.1.8.1 Milton Planning Guidance Violations – CBD Secondary Plan

A cursory review of some of Milton’s planning and design guidelines reveal a number of violations of planning principles:

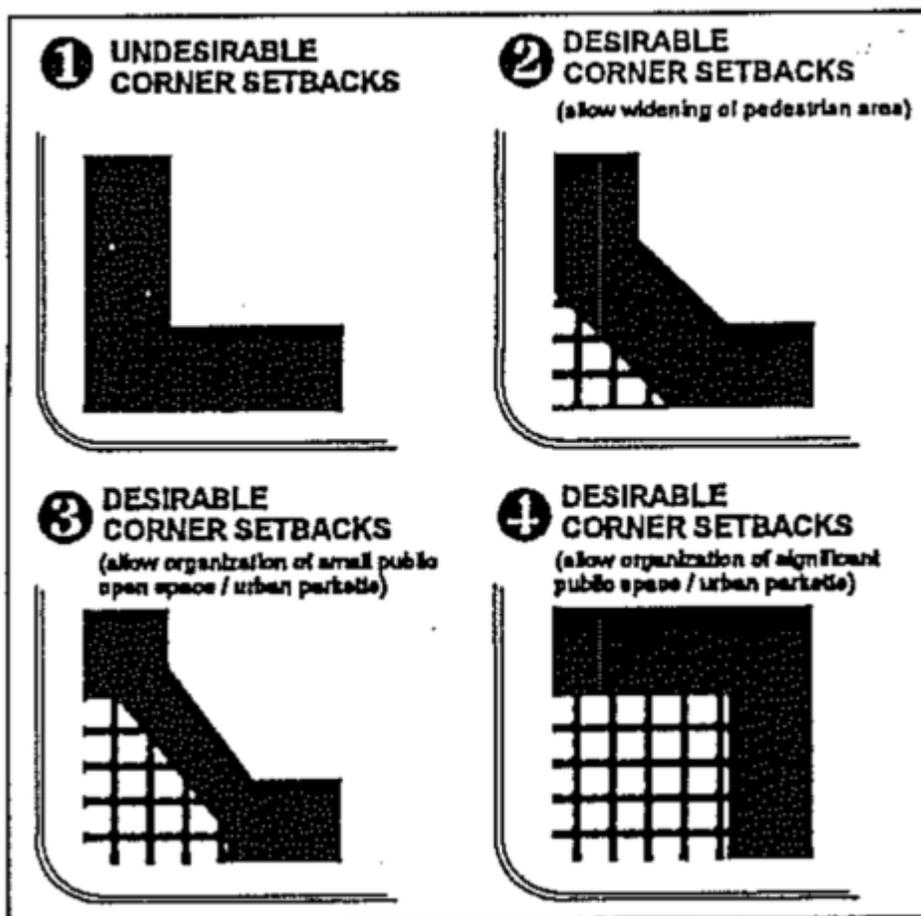
The area at Ontario and Main is defined as a gateway to the CBD, and the guidance was essentially ignored regarding the design of gateway buildings, in particular the requirement for building setback is not only not increased, but the developer is seeking to decrease the set backs:

- **Building developments within gateway designations must incorporate streetscape improvements that will serve to provide shelter to pedestrians at these major intersections. For example, this can be accomplished by:**
 - **positioning the building directly adjacent to the intersection, respecting the principle of enclosure and incorporating into its design a colonnade, awnings or interior public spaces;**
 - **setting the building back from the street and developing a public space in front that incorporates landscaping, public art, lighting and/or shelters.**

The building orientation is inverted vs the recommendation in section 7.3. The main feature is facing Pearl st and not Main St. Main St features a brutalist vertical wall of structure.

Building corner design:

The Town of Milton Central Business District Secondary Plan – Urban Design Guidelines recommends building corner design as follows per the figure below. Not a single corner of the building follows this recommendation.



The guide recommends that when buildings are placed close to the street as proposed by the developer, that the building corners be accentuated per the above figure.

There has been no consideration by the developer of the requirements around architectural detailing to reflect the historic nature of the buildings, neither in selection of materials, nor in orientation of windows.

The guide requirements around Building height, massing and scale have essentially been ignored, and the developer has not made any attempt to adhere to these important requirements in making a streetscape that will suit the character of the CBD.

4.1.8.2 Milton Planning Guidance Violations – Tall Buildings Guidelines

This section looks at the Town of Milton Tall Buildings

The podium design does not follow the guidelines on page 11 in almost any way. The height of the proposed podium is well in excess of the guidance recommendation. With a street width of approximately 15m, the recommended podium height would be 5 m, not the proposed 11m. Even if the width is extended to the far side of the opposite sidewalk and a

more reasonable setback matching the current WOMB building, that measurement is 25m, indicating a reasonable podium height of 8.3m, IF a more reasonable setback were selected.

There is virtually no meaningful publicly accessible private open outdoor space in the design.

4.1.8.3 Recognized Planning Principles:

1. Replicability and Urban Form: Urban design principles encourage scalable and context-sensitive development that maintains neighborhood character and connectivity.

- Sources: Los Angeles Urban Design Principles, NYC Principles of Good Urban Design.

2. Saturation and Community Capacity: The LEED v4 Neighborhood Development Guide introduces the concept of ecological carrying capacity, warning against developments that exceed community or environmental limits.

- Source: LEED v4 Neighborhood Development Guide.

3. Equity and Fair Access: The Urban Institute's Equitable Development Framework and the EPA's Smart Growth Principles stress that development should be inclusive and equitable.

- Sources: Urban Institute, EPA Smart Growth Principles.

4. Historical and Ethical Context: Jane Jacobs championed mixed-use, human-scale development and warned against large-scale projects that disrupt community fabric.

- Source: Jane Jacobs, The Death and Life of Great American Cities.

Conclusion: The proposed evaluative framework is well-supported by urban planning literature and policy. It promotes scalable, equitable, and sustainable development by ensuring that no single proposal monopolizes community capacity or undermines neighborhood diversity. Planners and policymakers should adopt these questions as part of impact assessments and design review processes to uphold urban equity and resilience.

4.1.9 RECOMMENDATIONS:

1. Reduce building height to <6 storeys to mitigate risk.

AND

2. Modify balcony design to mitigate amount of snow accumulation and need for removal

AND

3. 3m setback of the tower from the podium, and podium roofing features to mitigate effects of falling ice, and wind

AND

4. Reduce height of the podium to 3 storeys.

5. Evaluate the impact to motorists and neighbours of reflected light from the building.
6. Wind modelling of the building should be done, including the assessment of:
 - a. Impact to pedestrian experience
 - b. Impact to risk of ice fall
 - c. Impact to neighbouring buildings
 - d. Impact to proposed landscape architecture and ability for trees to grow
7. Pending the results of the wind investigation increase building setbacks o mitigate wind effects
8. Increase setbacks to enable adequate snow removal without damaging architectural features and allow for excellent pedestrian traffic.
9. Widen Main Street at this location to accommodate the addition of a new bus stop that will not impact Main St traffic.
10. Enough excess above ground visitor parking should be allocated on the site so that in winter months this space can be used for storage of snow removed from the site driveway.
11. Provide additional green space on the site with full sun exposure for residents to use, including a play structure for children.

4.2 Traffic Impact

This section examines the Traffic Impact and Parking Study (Paradigm Transportation Solutions, March 2025) submitted in support of the proposed development at 388 Main Street East. The study claims that projected traffic and parking impacts will be minor and manageable. However, independent review of the data, assumptions, and methodologies demonstrates that the study's conclusions are not supported by evidence, are inconsistent with existing conditions, and contradict key municipal and provincial planning policies. This section situates these findings within the broader neighbourhood context, emphasizing the relationship between traffic performance, livability, and compatibility of built form.

4.2.1 Methodology and Data Integrity

The Paradigm study relies on traffic counts collected prior to 2024 and applies a 2% annual compounded growth rate to forecast 2034 and 2039 horizons. This rate underrepresents growth in the Main and Nipissing corridors, where multiple projects totaling more than 1,500 units are either approved or under construction. Only six intersections were modeled, omitting others that directly serve the site. These methodological limitations weaken the report's claim that network performance will remain acceptable under future conditions.

4.2.2 Operational Findings

Paradigm's Synchro 11 modeling shows that the Ontario Street East and Main Street intersection already operates at Level of Service (LOS) D. By 2034, westbound left turns degrade to LOS F, with queue lengths exceeding 100 metres, and further deteriorate to LOS F by 2039. Despite these results, the study concludes that the project adds 'less than 10 seconds of delay.' This interpretation is inconsistent with both technical standards and observed conditions.

4.2.3 Access Design and Local Street Compatibility

The site's only vehicular access points are proposed on Pearl and Bruce Streets—narrow local residential streets characterized by short blocks, on-street parking, and high pedestrian activity. These streets are not designed to accommodate the estimated 500+ daily vehicle trips the project would generate. The study's reliance on TAC geometric compliance ignores local context and fails to assess safety implications for pedestrians, cyclists, and school-related traffic.

4.2.4 Parking Supply and Overflow Impacts

The proposed development provides 417 parking spaces for 570 units, representing a 27% deficit relative to the Town's Zoning By-law 89-2022 requirements. The consultant invokes Bill 185 to claim that no parking is required within a Protected Major Transit Station Area (PMTSA). However, no rapid transit currently exists, and no mitigation strategy is proposed to address on-street parking displacement on Court, Prince, Pearl, and Pine Streets.

In addition there is no street level parking provided for the 8000 sqft of commercial space that is provided.

4.2.5 Study Does not Consider the Neighbourhood

The existing neighbourhood already has negative impact due to traffic cutting through to avoid the near gridlock conditions at Main and Ontario. There are unconventional misaligned intersections at Pine and Oak streets with Ontario St that do not permit good traffic flow. Due to this a west or north bound traffic from the neighbourhood tends to exit onto Main St. In addition, the cut through traffic, especially on Pine St and Oak St is substantial during the AM and PM peaks.

The traffic study failed to examine the impact to the local neighbourhood of the proposed development, and the exacerbation of existing traffic concerns in the neighbourhood.

The traffic study does not consider the current conditions of residents at 383 Main St and the already unacceptable wait times they experience to exit their building onto Main St. IT

is entirely foreseeable that their quality of life will be negatively impacted and that similar conditions will be replicated on streets near the development.

An estimate of the existing number of vehicles in the neighbourhood south of Main St is provided below.

| Dwelling Type | Block | # units | # cars per | # cars in traffic |
|---------------------|-----------------------------------|---------|---------------|-------------------|
| Detached Homes | Main-Fulton-16 Mile Creek-Pine | 6 | 2 | 12 |
| Detached Homes | Main-Pearl-Fulton-Court | 2 | 2 | 4 |
| Detached Homes | Main-Pearl-Prince-Court | 6 | 2 | 12 |
| Detached Homes | Pearl-Pine-Fulton-Court | 10 | 2 | 20 |
| Detached Homes | Pearl-Pine-Court-Pine | 9 | 2 | 18 |
| Detached Homes | Pearl-Pine-Prince-Ontario | 5 | 2 | 10 |
| Law Firm | | 1 | 10 | 10 |
| School | | 1 | 52 | 52 |
| Senior Apt building | | 80 | 0.55 | 44 |
| Detached Homes | Pine-Oak-Fulton-Court | 11 | 2 | 22 |
| Detached Homes | Pine-Oak-Court-Prince | 10 | 2 | 20 |
| Detached Homes | Pine-Oak-Prince-Bruce | 10 | 2 | 20 |
| Detached Homes | Pine-Oak-Bruce-Ontario | 4 | 2 | 8 |
| Low Rise Apartment | | 18 | 1 | 18 |
| Detached Homes | Oak - Sewage Plant - Ashbrook | 13 | 2 | 26 |
| Detached Homes | Oak - Cemetary - Ashbrook | 16 | 2 | 32 |
| Dentist + Offices | Oak - Wakefield - Bruce - Ontario | 1 | 22 | 22 |
| Detached Homes | | 3 | 2 | 6 |
| | | | Totals | 356 |

Based on this estimated number of vehicles it is unlikely that the traffic issues we are presently seeing are a result of this density.

In addition a development of this size will induce a large number of food service deliveries and other on line order service deliveries. These kinds of delivery drivers will tend to be travelling rapidly from stop to stop and exacerbate neighbourhood concerns with traffic speed.

4.2.6 Policy Context and Compliance

The conclusions of the Traffic Impact and Parking Study conflict directly with the Town of Milton Official Plan, the Downtown Secondary Plan, and provincial planning policies. Key excerpts include:

Milton Official Plan (January 2024 Consolidation, Section 5.6.3):

“New development shall not adversely affect the safe and efficient operation of adjacent roads and intersections.”

Downtown Milton Secondary Plan (Section 6.2 – Complete Streets):

“Development within the Downtown shall prioritize pedestrian movement, safety, and the comfort of the public realm.”

Provincial Planning Statement (2024, Policy 2.2.1):

“Land use patterns shall be based on densities and a mix of uses that minimize the need for vehicle trips and support active transportation.”

Growth Plan for the Greater Golden Horseshoe (2020, Policy 2.2.4.9):

“Municipalities will ensure that the transportation system is sustainable, safe, and provides appropriate capacity for planned development.”

The proposed development does not satisfy these policy directions. Concentrating all access on narrow local roads undermines the objective of safe and efficient operation, and the use of theoretical transit proximity to justify reduced parking contravenes the intent of the PMTSA framework.

4.2.7 RECOMMENDATIONS

Given these deficiencies, the Traffic Impact and Parking Study cannot be relied upon as a sound basis for approval. The Town of Milton should require:

1. Independent peer review of the study’s data, methodologies, and assumptions;
2. A comprehensive neighbourhood traffic-calming and parking management plan;
3. Updated trip generation and parking utilization analyses using current 2025 baseline data;
4. Binding Transportation Demand Management commitments tied to occupancy permits;
5. Confirmation of actual rapid transit infrastructure before applying PMTSA exemptions.

4.2.8 Closing Summary

Traffic performance, access design, and parking adequacy are inseparable from issues of height, massing, and compatibility. The congestion, spillover, and safety impacts identified in this section demonstrate that the proposed scale and intensity of development exceed the functional capacity of Old Milton’s road network. These findings directly inform the subsequent chapter on Built Form and Scale.

4.3 Infrastructure and Servicing

4.3.1 Sewer and Water

The Functional Site Servicing and Stormwater Management Report prepared by MTE consultants fails to fully evaluate impacts to municipal infrastructure by the proposed development.

In addition the basis of evaluation for water and sewer is flawed. The report assumes 570 single bedroom apartments when about 20% of the units are 2 bedroom units. It is known that in many of these buildings occupancies, particularly in rental units, significantly exceed the designed or typical occupancy levels. The report assumes 1.7 people per unit which is a low figure, possibly by as much as 1 person per unit.

The report only evaluates whether there may be capacity based on typical main trunk / header sizes without taking into consideration what the overall existing load on those mains are. Considering the size of this development and the size of the take offs to the size of the mains, they look like they could take up to 30-50% of the main line capacity, it is reasonable to demand that a broader system evaluation be conducted to ensure that the demands placed on the water and sanitary sewer infrastructure will be adequately handled without impairing delivery of utilities to existing neighbours.

In addition the supply of drinking water to Old Milton is groundwater based and has serious capacity restrictions which are not evaluated in the impact assessment.

4.3.2 Stormwater

The stormwater evaluation is deficient. The Geotechnical report by Soil Mat states that “The scale of dewatering is likely to be greater than 50,000 litres per day, which would require an EASR notification, and possibly greater than 400,000 litres per day which would require a Permit to Take Water [PTTW]”.

There is no evaluation of this large scale discharge of water on the storm water system, its impact to the storm water system and the downstream environment.

Neither the geotechnical nor the storm water reports contemplate foundation dewatering and its related discharge. A building with below grade infrastructure up to 8 m below the groundwater level is sure to require foundation dewatering and will not solely rely on the foundation design being “watertight”.

This is a serious deficiency in the evaluation of the impact to storm water infrastructure.

4.3.3 Schools

Milton schools are already overcrowded. Bishop Redding possibly the worst being designed for approximately 1600 students and now taking in excess of 2,200 with over 50 portable structures on site.

Other schools in the old Milton area are similarly struggling with overcrowding.

The developer does not address this aspect of infrastructure strain imposed by such a large development.

4.3.4 Policing

The police station in old Milton is slated to close, at the exact same time as there are the proposal for this development and numerous others.

The impacts of reduced police presence at the same time as increasing the population and population density is not addressed in this development proposal nor in any other planning documents and should be addressed.

There are predictable outcomes that are possible: the Condo market is severely depressed and likely to be for some time. This may lead to many of the units being rental housing. This is another risk factor that should be considered in the planning of policing resources.

Later in this report the idea of at least part of the development being seniors focussed including with some hospice care is presented. Specialized development like this will attract a population that will not put further strain on policing resources.

In terms of addressing issues related to this development, there is evidence that extensive Air B N B presence increases crime ([Why Does Crime Increase in a Neighborhood When Airbnbs Increase?](#)). It is recommended that short term rentals in the development be forbidden, by the town via by law and in the condo board rules.

Overall, the present design of the building does not foster community cohesion. Community cohesion is a key factor to ensuring that high density development does not result in increased crime.

4.3.5 RECOMMENDATIONS

1. Retain a professional third party to do a broader review of the impact of the building development on the broader water and sewer utility systems to support the added load presented by the development.
 - a. The assessment must include evaluation of the groundwater supply capacity of Old Milton

2. Pass bylaws or some form of regulation that will disincentivize over-occupancy of the finished units.
3. Pas by laws prohibiting and with harsh penalties for short term rentals.
4. Evaluate impact to educational infrastructure that is already over capacity.
5. Further evaluation should consider more realistic occupancy levels in the building.
6. Further evaluation should evaluate both the in construction excavation dewater impact to storm sewer infrastructure and long term foundation dewatering impact.

4.4 Building Depth – Water Table Disruption

The hydrogeological investigation is inadequate and there was no characterization of the groundwater flows on the southern half of the site. Only one well was installed in the center of the site and that well only had its water level measured once, and not at the same time as the other wells on site.

The scant measurement of water levels was in November and December of 2024. Anyone in the neighbourhood with a basement can attest to the fact this this is a low groundwater time of year.

The depth of the groundwater at this low level time of year was approximately 3 m below surface. When the foundations are considered the planned building will penetrate to well below 10 m depth, 7 m into the water table and the hydrogeology report recommended that the building be constructed to be “water tight”.

There is no mention in the Soil Mat reports nor in any of the other reports about whether foundation dewatering will be incorporated into the design. This presents two possibilities:

1. There will be permanent foundation dewatering whose impact to stormwater and to neighbouring properties has not been evaluated
2. There will not be permanent dewatering and the impact to the water table of a massive obstruction in the flow of groundwater has not been evaluated.

In both cases the level of investigation to impact to neighbouring properties is inadequate.

In the case of #1 above it could mean storm water flows into the storm water system that are far larger than anticipated and overwhelming of the storm sewer system. Another potential impact is the lowering of the water table in the area surrounding the construction site and consequent subsidence of the surface soil level. This could lead to damage to building foundations and roadways. There has been no evaluation of this risk and any necessary mitigation.

In the case of #2 above, potential impacts could include displacement of groundwater on site and water normally flowing through that conduit onto neighbouring properties and roadways. This has the potential to negatively impact buried infrastructure on the streets, including Main St., and to put additional hydrostatic pressure on nearby building foundations. It is noteworthy that many of the nearby heritage buildings have stone foundations, and may not have the structural strength to withstand such increased loads.

Furthermore, in the Phase 2 assessment the water table gradient was incorrectly calculated using the elevation of the top of well instead of the actual water table elevation, underestimating the water table gradient by at least an order of magnitude.

Considering the size of the building and its potential hydrogeological impact, not sampling in spring and not examining the south end of the site is negligent to the impacts on neighbouring sites.

4.4.1 RECOMMENDATIONS:

1. Reduce the height of the building and therefore also the depth of the building to no deeper than 4 meters to mitigate the impacts of water table displacement.
AND
2. Install permanent fully redundant and battery backed up dewatering infrastructure to mitigate the effects of water table displacement.
AND
evaluate the impact of permanent dewatering systems to the storm water system and to the soil conditions of the neighbouring properties.
3. The town should withhold site plan approval until the site has been fully characterized hydrogeologically, including the south half of the site, and appropriate design features are included to mitigate hydrogeologic impacts to neighbouring properties.
AND
4. Correct the water gradient calculation so that it is not incorrectly used in further evaluation work.

4.4.1.1 References:

1. Attard, G., Winiarski, T., Rossier, Y., & Eisenlohr, L. (2016). Impact of underground structures on the flow of urban groundwater. *Hydrogeology Journal*, 24, 5–19.
2. Chang, N.-B. (2010). *Effects of Urbanization on Groundwater: An Engineering Case-Based Approach for Sustainable Development*. ASCE.

3. La Vigna, F. (2022). Urban groundwater issues and resource management. *Hydrogeology Journal*, 30, 1657–1683.

4.5 Constructability

From the geotechnical reports and considering the requested variances for setbacks it is quite clear that the entire perimeter of the site will require shoring to a depth exceeding 10 meters.

The submitted design package contains no evaluation of constructability nor construction plans.

It is estimated based on the dimensions and depth of the site that 4000-5000 tri-axle truck loads of soil will need to be removed from the site. A host of questions arise that need to be answered before any zoning bylaw amendments can be approved:

- How will this level of traffic be accommodated in the neighbourhood?
- What will be the traffic impact to Main St?
- How much wear and tear will this put on roadways not designed for this kind of heavy traffic? Will the developer pay for resurfacing of damaged roads?
- Are emergency roads impacted?
- What roads will the trucks be permitted to drive on?
- What will the impact be to neighbours?
- Will the developer be responsible for cleaning mud and stones from streets?
- What is the impact of dust generation during construction to the environment and neighbourhood? Given the large size of the excavation and its close proximity, lack of setbacks the impact could be considerable.

There are other construction related questions that are unanswered that should be considered:

- How long will the duration of this construction be?
- What will the permitted hours of construction be?
- How will shoring be installed? What type of shoring? What is the impact of installing the shoring to neighbouring foundations (vibration on stone or dug foundations.)
- How will construction vehicles enter and exit the site? Off what street? Will these trucks be forbidden from using other residential streets? Will there be enforcement?
- Where will construction workers park during construction?

- During excavation how many truckloads per day of soil will be removed? Impact to nearby roads? Traffic congestion?
- During concrete pouring, how many trucks per day?
- How much noise and vibration will this project generate during working hours?

It is noteworthy that similar developments that have been approved in Milton are not immediately adjacent to residential neighbourhoods, rather they are adjacent to rail lines and / or commercial / light industrial land uses.

It is also noteworthy that there is a day care center where children will have afternoon naps, and a dog kennel business nearby. Both of these businesses could be seriously negatively impacted by this project. How will these impacts be mitigated?

There is a school across the street with pick up and drop off of students. How will this school be impacted during construction?

4.5.1 RECOMMENDATIONS

1. Since the variances and zoning by law amendments proposed by the developer have a direct impact on the constructability of the site, a complete constructability plan including impact assessment of construction activities must be submitted and reviewed prior to granting variances or approval of zoning by law amendments.

4.6 Lack of Environmentally Friendly Features

The design of this building is profoundly environmentally unfriendly. There is zero consideration of the following design features that would indicate that the developer is serious about making this building environmentally friendly:

- Impact to the solar generating capacity of neighbouring buildings due to height
 - See section 4.1.2
- Embodied carbon due to the exclusive use of poured concrete construction
- Garbage chutes only will de-incentivize recycling in the building
- No solar generation on the building rooftops
- Zero provision for EV charging
- Black building colour
- Minimal setbacks and minimal green space on the developed lot
- Lack of real assessment of other environmental impacts

In addition this building as designed will impair solar collection at the neighbouring GREEN BUILDING preventing an original green building being green.

4.7 Impact of Pets on Neighbouring Properties

In a development with 570 units there are bound to be many with dogs. There is a tiny “dog run” in the proposed development that appears to be about 5m x 15m. This is unlikely to get extensive use, and most of the dog owners will end up using the rest of the neighbourhood as their toilet.

There are already enough issues in the neighbourhood with dog owners who do not clean up after their pets. This is a near daily occurrence for many property owners, so much that several property owners have installed security cameras specifically because of this issue.

This quantity of units is sure to be yet another deterioration to quality of life to the neighbourhood.

4.7.1 RECOMMENDATIONS

1. Reduce the number of units in the development to no more than 200.
2. If the number of units is over 200 consider a by law amendment prohibiting outdoor pets in the building.

4.8 Unrealistic Landscape Design for Main St

The landscape design on the north face of building on Main Street is unrealistic for two reasons. First there will be limited sunlight, primarily in the late afternoon. Plants, especially trees require sunlight to grow.

The landscape design in general is unrealistic due to the expected down draft from the building that will cause additional stress and damage to trees.

Lastly as shown in the image below and described in the Urban Design brief the trees are expected to be in planters.



These planters are shown to be immediately adjacent to the curb on Main Street. This presents several problems:

1. Snow removal. Snow plowing damage these planters as the snow is plowed from Main Street into and over these planters. Within 1 winter they will likely be destroyed.
2. These planters will impede lines of sight for drivers exiting onto Main St westbound from Prince and Bruce streets.

4.8.1 RECOMMENDATIONS

1. Increase the setbacks on Main St adequately so that safe lines of sight are provided for drivers on Prince and Bruce streets.
 - a. Move planters back far enough from Main street so they are not damaged during snow removal.

4.9 Fire Department Accessibility

The developer proposal does not address access to the buildings by fire truck and what type of fire suppression will be used.

In informal discussion with people familiar with fire response it is apparent that there are already problems in the area of the development with inadequate water supply pressure for fire trucks.

Prince St is a secondary emergency roadway. The impact to this roadway from an emergency services perspective has not been evaluated both during construction and after construction.

If the ladder / boom based fire trucks are to respond to a fire emergency at the building an initial review of site plans seems to indicate that there is not enough width for the truck outriggers to be able to set up to operate a safe distance from the building.

A complete review of the design and its impact to the safety of the community is needed.

5 Alternative Design Approaches

There are unmet needs in the community for senior friendly housing. This development is an opportunity to address such needs.

Imagine instead of one podium, that the site was composed of two buildings, one a senior's residence including space for hospice care. The other building would be similar to what the developer has proposed. Both buildings are more limited in height, with extensive terracing of the buildings, rising to an overall height of 6 levels.

The landscaping at the site would include some green space in a central courtyard, visible from Main St and Pearl St with this open courtyard as a possible through path for pedestrian to traverse from Main Street to Pearl St.

Limited above ground parking is provided for businesses and visitors in keeping with Milton urban design guidelines. Underground parking access is incorporated into the building rather than as a separate feature. Some of these above ground parking spaces could also be allocated for electric vehicle charging.

Alternative design features using greener construction materials like massed timber, and or locally cut structural stone could be incorporated. Solar rooftops, and green rooftops could also be incorporated. Rainwater harvesting for irrigation should be considered. Overall, a LEED approach should be utilized for the building design including the design of ventilation systems and window openings to take advantage of passive ventilation during shoulder seasons. Rather than being a blight on the environment as the current design will be this building has the potential to be an exemplar in sustainable urban design with respect to both embodied carbon and the long term energy consumption and environmental impact.

Density on its own is not an adequate environmental solution and density done improperly can have a seriously negative environmental impact. In the case of this development some of the environmental impacts that would be mitigated in the approach proposed here include:

- provision of more green space for storm water adsorptions, and to mitigate heat island effects
- shallower foundations mitigating the groundwater impacts
- reduced embodied carbon through use of sustainable materials enabled by medium height.
- use of lighter coloured facing materials and reduced mass will mitigate heat island effects
- reduced height will mitigate impact to the ability of neighbours to enjoy use of current and future solar installations

October 27, 2025

Town of Milton Council

150 Mary St Milton, ON L9T 6Z5

Town File LOPA-07/25 and Z18/25 (“Slessor Square”):

Dear Mayor and Members of Council,

I am sending this letter on behalf of several residents that live and own properties on Court St N which is adjacent to the proposed development. We have a number of concerns regarding the proposed application and Official Plan amendments:

Height, Massing and Community Context

The proposed development’s two towers of 16 and 18 storeys and 570 residential units is in direct contradiction to the Town’s Official Plan and guidance for urban growth centres which outlines a maximum height of 6 storeys for the parcel. Such a dramatic increase in density on a small parcel of land will overwhelm the site and surrounding area. The transition between the high towers and adjacent lower density neighbourhoods will be jarring and negatively impact the surrounding community character.

Further, the shadow study completed by the applicant also indicates the sun will be blocked in the surrounding areas for the majority of the morning hours. As a result, the proposed structure will further impact the surrounding livability of the neighbourhood.

Traffic, Parking and Vehicular Access

Despite proposed underground parking restrictions, 570 residential units and commercial units will generate significant traffic in the area. Main St East already experiences significant traffic volume and delays throughout the day. The applicant’s traffic study indicates increased degradation of traffic flow around the site, resulting in higher traffic volumes and reduced pedestrian and roadway safety around the site and on side streets adjacent to the property.

Travelling south on Court St N to the intersection of Court St and Main St, drivers are faced with a blind corner looking left to traffic coming from the east on Main St. due to the current building on the north-east corner violating bylaw rules by being built too close to the road. Just last year there was a serious T-bone accident at this exact intersection. Adding these towers will not only significantly increase traffic flowing into this dangerous intersection, but the development violates the same encroachment bylaw creating four more blind corners and four more dangerous intersections.

Floor Space Index (FSI), Density and Strain on Existing Infrastructure

The application indicates a very high FSI, contrary to the Official Plan’s maximum density of 3.0 FSI for the site. Further, increased density will result in significant impacts to surrounding infrastructure, including roadways and water/ wastewater infrastructure.

Misalignment to Town's Strategic Priorities and Official Plan

Lastly, the proposed development is starkly misaligned to the Town's strategic guiding documents for development. The Official Plan highlights the following:

- The Town's vision for its future is defined as "to be the best of town and country in Ontario".
- The vision also highlights community values that uses historical preservation and *neighbourhood scale planning*...
- Section 2.1.6.3 of the Official Plan highlights guidance around intensification, which includes *manage growth in a manner that reflect Milton's vision, goals and strategic objectives*.
- The Plan states that within intensification and strategic growth areas (in which the proposed Slessor project is located), shall be promoted to achieve objectives including providing urban form that *is complementary to existing developed areas*.
- Further section 2.1.6.5 f) states the Town is to *ensure the proper integration of Strategic Growth areas with surrounding neighbourhoods...and the protection of the physical character of these neighbourhoods through urban design*.

As demonstrated above, by building a structure of this density in a low-density, historic neighbourhood contradicts the Town's own planning guidance and its vision for the type of community it seeks to build. As Milton began to plan for growth in the 1990's and since, protecting the historic fabric of the Town was always identified as a value to the community. As we continue to grow and expand, it is even more important to retain those parts of the Town that remind us of our past.

Council has a unique opportunity to shape current and future communities through its planning decisions. For these reasons, we ask that Council not approve this development as it is in direct contradiction to the Town's own planning guidance and does not align to the character of the surrounding community. We ask Council to have the applicant engage the community on a revised vision for the site that balances the need for housing and intensification with the Town's vision for how growth should be managed.

Thank you for your consideration,

Melissa Bauman and Kyle Diniz, [REDACTED]
Peter Cieslak and Izabella Stadnik, [REDACTED]
Leslie Fitch, [REDACTED]
Carole Cameron, [REDACTED]
Linda Wiesner, [REDACTED]
Mark Symonds, [REDACTED]
Erika and Micheal Bryne. [REDACTED]

Jessica Tijanic

From: Michelle Statia [REDACTED]
Sent: Tuesday, October 28, 2025 2:37 PM
To: Jessica Tijanic
Subject: Town Council Meeting November 3, 2025 - Slessor Square LP Application

Good afternoon Jessica,

My name is Michelle Statia, I reside in the [REDACTED] E. here in Milton. I have been a resident of Milton for over 30+ years. The town brought me here for the uniqueness of Old Milton, the community, town events and beauty. I was distressed to see that the Slessor Square LP Application to change the Zoning By-law that has been brought to council. Please understand that I am not opposed to growth to our town, but it should be responsible and well planned. I believe that new investment and population growth should be thoughtfully designed, context-sensitive, and aligned with the Town of Milton's Official Plan, infrastructure capacity, and climate action priorities.

- - I am respectfully urging the Town Council and the Planning Department to:
 - Reject any Official Plan Amendment that would permit height or density beyond the limits set out in Schedule C.7.A.1 CBD..
 - Approve only a zoning by-law amendment that maintains the current official plan maximum of 6 storeys and 3.0 FSI, with full adherence to transition height guidelines and compatibility requirements.
 - Prioritize pedestrian safety by requiring a thorough assessment of existing conditions and projected impacts on crossings, sidewalks, and school zones, particularly at Pearl, Prince, Bruce, and Main Streets. Mitigation strategies must be developed to protect vulnerable road users, including seniors, children, and persons with disabilities.
 - Insist on a comprehensive, peer-reviewed construction management plan and robust mitigation for impacts on sunlight, parking, traffic, pedestrian safety, and local businesses and institutions. Greenlife 383 Main Street E. is a green building initiative, one of very few in Milton and should be allowed to retain that designation.

I am very concerned about this change in zoning to high density from current mid to low designation. I would like to be included in the Interested Partys List in case this submission is appealed in the future.

I unfortunately cannot attend the Monday November 3rd, 2025 Town Council Meeting regarding this issue, I would like to attend the [REDACTED] meeting virtually. Is there a special form I need to fill out? If you could let me know, I'd appreciate it.

Regards,

Michelle Stata



Jessica Tijanic

From: Jeanne Robinson [REDACTED]
Sent: Tuesday, October 28, 2025 2:10 PM
To: Jessica Tijanic
Cc: Anthony Davies
Subject: Slessor Square

Good afternoon Ms Tijanic,

Our names are Jeanne Robinson and Anthony Davies and we are residents at 383 Main Street in the Greenlife building. We are opposed to this type of development directly across the road from our home for numerous reasons. We would like to go on record as being opposed to this proposed development.

Thank you
Sincerely,

Jeanne Robinson and Anthony Davies

[REDACTED]

Sent from my iPhone

Jessica Tijanic

From: Sonjia Vascotto [REDACTED]
Sent: Tuesday, October 28, 2025 3:51 PM
To: Jessica Tijanic
Subject: Proposed Slessor Square Development

Hi Jessica,

I'm so glad to hear that our condo community will be represented at the town meeting. I'm so disgusted that the Town is willing to destroy every area of our town to facilitate more grotesque condos, which, in turn, means a higher-density population in our charming downtown core. There appears to be an agenda to turn Milton into another overpopulated Brampton or Mississauga.

At times, it is almost impossible to turn onto Main Street from our condo driveway. This should be addressed in the near future, perhaps with some stop lights.

Unfortunately, I am unable to attend the meeting due to a flare-up of my illness, which requires more medication, but I will be there in spirit, supporting you and the others all the way.

Take care and God bless you all,

Kind regards,
Sonjia Vascotto
[REDACTED]

Sent from [Outlook](#)

Jessica Tijanic

From: Deborah Crawford [REDACTED]
Sent: Tuesday, October 28, 2025 5:13 PM
To: Jessica Tijanic
Subject: Proposed Slessor Square Development in Old Milton

Good afternoon Jessica,

I strongly oppose the proposed Slessor Square development near the centre of Old Milton. The project is far too large for this area and inconsistent with the character of our historic downtown. It lacks sufficient parking for residents, employees and customers. The increased density will only worsen traffic congestion along Main Street. I live in the Greenlife condos across the street from this proposed development. It is already a major issue exiting and entering our building because of the heavy traffic.

Growth is inevitable but it must be managed responsibly. I do not approve a zoning change for this area. Higher density projects should be concentrated near existing transit and infrastructure such as the east side of Ontario street by the GO Station where they are already planned. Bringing such density into the historic downtown risks destroying the very character that defines our town.

I urge Town Council and the Planning Department to protect Milton's heritage and ensure future growth enhances rather than overwhelms our community.

Yours very truly,

Deborah Crawford
[REDACTED]

Jessica Tijanic

From: Nicole Philibert [REDACTED] >
Sent: Tuesday, October 28, 2025 8:02 PM
To: Jessica Tijanic
Subject: Proposal Slessor Square

Being a resident of downtown Milton for a while, I choose this city because of our beautiful downtown and quiet town. I know that people need residence somewhere but big tours like those just on Main street would be really difficult for everybody in downtown Milton. A 6 highrise should be the max as the plan recommend. Parking, safety of people who would walk, removal of snow, water, traffic, sunshine for our building with our solar panels and so many other aspects would not be good with the old downtown.

Nicole Philibert
[REDACTED]

Jessica Tijanic

From: Clare Bell [REDACTED]
Sent: Tuesday, October 28, 2025 9:57 PM
To: Jessica Tijanic
Subject: Slessor Square developer request to redevelop corner of MainStreet East , Pearl Street and Prince Street

I consider the above request to be totally unsuitable for the area in which I reside because the request is incompatible with the neighborhood structure and would cause undue pressure on traffic and infrastructure. There are already some very dangerous situations to be observed amongst some extremely angry , impatient drivers in the area.

I believe that the whole concept causes a major health and safety issue to the Milton community at large as Pearl and Prince streets are narrow streets that are certainly unable to contain even more traffic. Local storm water , water and sanitary systems are near capacity and added density could cause flooding and water pressure issues.

It is challenging for pedestrians crossing Main Street at the lights ,as many drivers make no attempt to stop to allow both adults and children to cross! Also making a left turn in a vehicle onto Main Street from Green Life building or any building in the vicinity is extremely challenging ,as traffic is moving so fast and drivers make no attempt to slow down in order to allow other vehicles onto the road ! There are numerous reasons for this email to you and I can provide many more if required but ultimately the whole idea seems utterly ridiculous to me as it will lead to more chaos and congestion in Milton.

Clare Ganson Bell
[REDACTED]

Sent from my iPad

Hi,

My name is [REDACTED], and I am a resident of [REDACTED] [REDACTED] and have been living there for over 11 years. I am submitting my objections to the Slessor Square Development across from my building.

I purchased the unit because the building was designated as Green, maintenance fees were low because of the solar income, and I wanted to enjoy the small town feel that Milton had to offer.

I am not against the growth or development of Milton but believe that growth must be balanced with the health, safety and wellbeing of all residents and businesses in the neighbourhood.

The current proposal for the 16 and 18 storey towers at 388 Main Street East exceeds the Official Plan's prescribed maximum height, scale and density.

Listed below are some of my concerns on the construction of the 2 towers.

1. Income generated from the Solar panels on the condo roof

The shadow of the 2 towers will impact the income generated from the solar panels, which will have a drastic effect on the maintenance fees. As a single owner and a retiree, it will be difficult for me to pay the additional costs.

Cleaning the construction dust that will be accumulated on the solar panels will also be an additional expense that the building will have to incur which will once again result in an increase in maintenance fees.

2. Traffic and Pedestrian Safety

Due to the increase in traffic on Main Street, it sometimes takes more than 5 minutes to turn left from the building. This new construction will increase the traffic waiting to turn left on Prince Street and in doing so, will prevent my ability to turn left on Main Street. Every morning there is a backup of traffic going eastward on Main Street with cars blocking the sidewalk which is between the 383 Main Street driveway, Wisla and Prince. This crossing is already hazardous as cars do not stop even though the lights are flashing and a pedestrian is already walking on the crosswalk.

I walk every morning with my 2 little dogs from Ontario Street to Pine, then up Oak and right up to Fulton Street and back to Main Street. With this new development coming up, it will be difficult for us to walk because of the increase in traffic.

As the building is only 3 meters away from the sidewalk, the chances of snow and ice falling on pedestrians are very high.

3. Parking

During events like the Christmas parade, farmers market, etc., a lot of outsiders park in the visitor parking despite signs that state “Private Property” and “No Trespassing”. This will surely increase with the new development coming up across from our building as they have not designated enough parking spots for the residents, visitors and businesses. The condo board will have to increase parking enforcement which will once again result in increase in maintenance fees.

4. Quality of Life

My unit faces Main Street and the sunlight that I am getting right now in the morning will be reduced due to the shadow from the new development Sunlight is essential not just for warmth but for mental health too.

Tall buildings with minimal setbacks can create dangerous wind conditions at street level.

Sound from the increased traffic on Main Street as well as from Pearl, Prince and Pine will disrupt the quiet that one enjoys in their units and will be particularly vulnerable to noise-related stress and disruption.

I respectfully urge Council and the Planning Department to:

1. Reject any Official Plan Amendment that would permit height or density beyond the limits set out by the official plan.
2. Approve only a zoning by-law amendment that is in line with the official plan of maximum 4 to 6 storeys and 3.0 FSI.
3. Prioritize pedestrian safety, traffic and parking by doing a thorough assessment of existing conditions.

Thank you.

Regards,



NEIGHBOURHOOD TECHNICAL SUBMISSION

Regarding: Proposed “Main & Prince” Development

Applicant: Slessor Square LP Inc.

Applications: LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389-409 Pearl / 17 Prince

Submitted by: Katherine Waszkiewicz, [REDACTED] Milton, [REDACTED]

Date: Tuesday, October 28th, 2025

Submission Type: Written Statement to Town Clerk for Council Record

1. Executive Summary

This submission urges Milton Council to reject the proposed Official Plan and Zoning By-law amendments for the Main & Prince development (388 Main St E / 389-409 Pearl / 17 Prince), which includes two residential towers of 16 and 18 storeys atop a six-storey podium with near full-lot coverage. The application raises significant concerns on the following grounds:

- 1) **Incompatibility with Planning Framework:** The proposal contravenes the Town’s Official Plan and Downtown planning policies, which emphasize maintaining a compatible scale and ensuring a clear, defensible transition to surrounding low-rise residential areas.
- 2) **Infrastructure and Safety Concerns:** The development would place undue strain on local roadways and municipal services—including stormwater, water, and sanitary systems—while lacking a feasible winter operations strategy. The scale and intensity of construction also pose unacceptable risks to public safety and neighbourhood livability.
- 3) **Negative Built-Form Impacts:** The proposed massing and height would result in significant shadowing, wind effects, and reduced livability, while compromising the integrity of the surrounding heritage context. These impacts cannot be adequately mitigated at the proposed scale.
- 4) **Questionable Transit Justification:** The application relies on an irregular MTSA “bump-out” mapping to support tower-scale density, despite the site’s lack of direct integration with major transit infrastructure.

Residents remain supportive of thoughtful, context-sensitive redevelopment that aligns with the character and scale of Old Milton—such as the commercial/residential townhomes along Main Street and at the corner of Derry Road and Thompson Road.

Requested Council Actions (Summary):

Deny the proposed Official Plan and Zoning By-law amendments in their current form.

Instruct Town staff to collaborate with Halton Region to review and clarify the GO MTSA boundary west of Main Street to ensure alignment with planning objectives.

If denial is not granted, postpone any decision until independent peer reviews—covering traffic and safety, wind and shadow impacts, servicing and hydrogeology, winter operations, and construction logistics—are completed and publicly released, followed by meaningful public consultation.

2. Site & Proposal Overview

The Site: The subject property is located at a prominent intersection in Old Milton, with frontages along Main Street East, Pearl Street, Bruce Street, and Prince Street. It directly abuts established low-rise residential dwellings—primarily one- and two-storey homes—and is situated within a heritage streetscape defined by small-lot housing, mature tree cover, and pedestrian-scale building façades. The site serves as a transitional area between the Main Street commercial corridor and the adjacent residential neighbourhoods to the south.

The Proposal: The applicant is seeking to redevelop the site with two high-rise residential towers of 16 and 18 storeys, positioned atop a six-storey podium. The proposed development includes approximately 570 condominium units and 815 square metres of ground-level commercial space. The design features near full-lot coverage extending from Main Street to Pearl and Prince Streets, with minimal setbacks and no substantial open-space buffers to adjacent residential properties.

3. Policy & Guideline Framework

This assessment draws upon a range of planning documents and standards, including (but not limited to) the Town of Milton Official Plan—particularly policies on compatibility, character, and transition—the Downtown planning directions, the Urban Design Manual with tall-building and angular plane guidelines, heritage policies and the Heritage Master Plan, as well as relevant transportation and servicing standards.

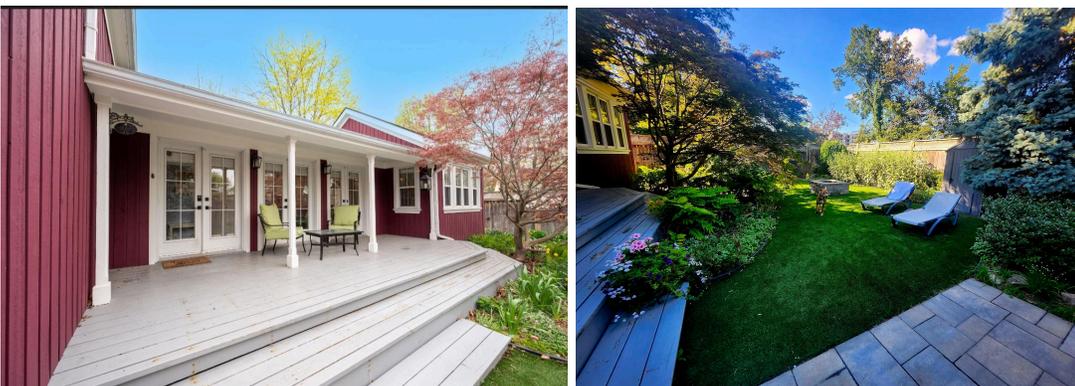
4. Detailed Findings

4.1 Height and Scale

The proposed development, featuring towers of 16 and 18 storeys, dramatically surpasses the surrounding built form, which is predominantly composed of one- and two-storey structures. This scale disregards the Town of Milton's Official Plan policies that emphasize a gradual and respectful transition in height and density between new developments and established neighbourhoods. Introducing such high-rise buildings in this context risks setting a precedent for over-intensification that undermines the historic, small-town character of Old Milton. Moreover, the sheer mass and height of the towers would impose a dominant visual presence that clashes with the pedestrian-friendly scale and charm of Main, Pearl, Bruce, and Prince Streets.

4.2 Built Form and Transition

The proposed development lacks appropriate architectural transitions, offering no meaningful step-backs or angular planes to safeguard the character and privacy of neighbouring low-rise residential properties. The podium, at six storeys, significantly exceeds the scale of the surrounding built form. Additionally, the height and massing of the towers would result in substantial shadowing and overlook impacts on adjacent homes and yards along Pearl and Prince Streets, diminishing livability and privacy. The overall building mass and floorplate dimensions also fall outside the parameters recommended in established tall-building design guidelines, raising concerns about compatibility and urban design integrity.



East side of 359 Pearl Street - The proposed development would look directly into the yard of the home and into east-facing windows and triple French doors, greatly reducing the privacy and security of the home's residents.

4.3 Traffic, Parking, and Access

Pearl and Prince Streets are quiet, narrow residential roads that were not built to accommodate high volumes of traffic. Introducing increased vehicle flow and frequent

deliveries associated with a large-scale development would intensify congestion and compromise safety for local residents. This is especially concerning for pedestrians and children, given the proximity to schools and designated crossing areas. Construction activities, including staging and the movement of heavy trucks, would further disrupt the neighbourhood by generating excessive noise, airborne dust, and physical obstructions along these streets. To minimize these impacts, all site access should be limited to Main Street or Bruce Street, with no entry or exit permitted via Pearl or Prince.

4.4 Environmental Impacts

The height and massing of the proposed towers are expected to cast extended shadows over nearby homes and streets, significantly diminishing access to natural light and negatively affecting the comfort and livability of surrounding residences. In addition, the scale and configuration of the podium may generate wind tunnel effects at street level and within public spaces, potentially impacting pedestrian safety and comfort. These environmental impacts warrant thorough investigation, and any shadow and wind studies conducted should undergo independent, peer-reviewed analysis prior to any development approvals being granted.

4.5 Infrastructure and Servicing

The existing stormwater, water, and sanitary infrastructure in the area is already operating close to its limits, and the proposed increase in residential density would place additional pressure on these municipal systems without clear evidence of sufficient capacity. It is essential that the Town require comprehensive, peer-reviewed servicing studies to confirm whether the infrastructure can support such growth. Without necessary upgrades, the community could face heightened risks of flooding, surface runoff, and reduced water pressure in nearby homes.

4.6 Heritage and Character

The proposed development is situated adjacent to Old Milton's heritage core, an area defined by its intimate scale, traditional architecture, and small-town charm. Introducing a project of this magnitude would significantly disrupt the visual cohesion of the neighbourhood and diminish the historical character that defines the community. Such a design conflicts with the Town's Official Plan, which prioritizes the protection of cultural heritage and the preservation of established community identity. A more thoughtful and context-sensitive approach—one that respects the surrounding built form and aligns with the goals of Milton's Civic Precinct and Reimagining Main Street initiatives—would better serve the long-term vision for this area.



Milton Historical Society plaque at 359 Pearl Street - the house is a Heritage Designated Home and is located approximately 50 metres from the proposed development.

4.7 Quality of Life & Community Impact

The proposed development raises serious concerns about its impact on the surrounding community. It would introduce disruptive levels of noise, artificial lighting, and privacy intrusions into neighbouring homes and backyards, eroding the quiet enjoyment residents currently experience. The scale and intensity of the project threaten the small-town character and pedestrian-friendly environment that locals deeply value. Daily congestion from increased traffic, deliveries, and prolonged construction activity would further strain the area, while shadowing, wind disturbances, and the loss of open sky would reduce overall livability. The disconnect between tower-scale density and the existing street network risks weakening the social cohesion of the neighbourhood. Importantly, the potential effects on human physical and mental health and well-being must be carefully weighed in any planning decision.

4.8 Community Consultation

The community has not been meaningfully engaged in the planning process for this proposal, as evidenced by the significant level of public opposition and concern. As of 8am on Tuesday, October 28th, 2025, an online petition hosted by Change.org had 1563 signatures, with another 200 signatures on paper. The level of community concern and opposition highlights the need for more thorough consultation and transparency. Residents are calling for a deferral of any decision until comprehensive peer reviews are completed and genuine public input is sought. Proceeding with approval in the absence of these steps would erode public confidence and compromise the integrity of the planning process in Milton.

4.9 Snow Management and Winter Safety

The proposed development fails to offer a practical on-site strategy for managing snow accumulation and removal. With full-lot coverage and underground parking ramps, there is no designated space for safe containment, forcing reliance on frequent truck

haulage that would increase winter noise, emissions, and traffic congestion on nearby streets. Meltwater runoff from the site poses a risk of refreezing on adjacent sidewalks, driveways, and roadways, creating hazardous conditions for pedestrians and drivers. The tall towers would also cast prolonged shadows, delaying snowmelt and contributing to persistent icy surfaces throughout the winter. Narrow residential streets such as Pearl and Prince are ill-equipped to handle the added burden of plowing, piling, or haulage operations. Additionally, snow and ice removal from tower balconies could result in dangerous debris falling onto public walkways and neighbouring properties. Despite these concerns, no winter operations plan has been submitted to address snow management or pedestrian safety.

4.10 MTSA Boundary Misalignment and Zoning Amendments

The proposed development is contingent on substantial zoning by-law amendments that would permit building height, density, setbacks, and parking provisions far beyond what is currently allowed. The site's existing designations—DC-FU and RO—support low- to mid-rise mixed-use development, not the construction of 16- and 18-storey towers atop a six-storey podium. Granting these amendments would override key policies in both the Downtown Secondary Plan and Milton's Official Plan, which emphasize compatible scale and a gradual transition in building height. Approval would effectively lock in the developer's current massing, removing Council's ability to negotiate meaningful reductions later in the process. The justification for this scale relies on the site's inclusion in a questionable MTSA "bump-out" west of Main Street, which captures this parcel while excluding others that are closer to the GO station. This irregular mapping creates a misleading rationale for transit-oriented density on a site that lacks direct access to transit infrastructure or pedestrian connectivity. Council has the authority to reject the proposed amendments and request that Halton Region review and revise the MTSA boundary to exclude this parcel, thereby restoring alignment with local planning objectives. Refusing the application would preserve Council's decision-making power, prevent a precedent for inappropriate high-rise development west of Main Street, and uphold the Town's commitment to balanced, context-sensitive growth.

4.11 Community Safety and Emergency Access

The streets surrounding the proposed development - Pearl, Prince, Bruce, and Main - were never intended to accommodate the volume of traffic, density, and service vehicle activity associated with high-rise towers. The design's minimal setbacks and lack of internal loading or turnaround space pose serious challenges for emergency access and response. Ongoing construction and increased daily vehicle movements would

compromise safety in areas frequented by children and families, including nearby schools, parks, and community facilities. Growth in Milton must prioritize people over buildings, ensuring that new development strengthens, rather than threatens, the town's walkability, safety, and overall quality of life.

4.12 Constructibility and Feasibility

The proposed site is constrained by its small, irregular shape and its location along heritage-designated streets, making it unsuitable for the deep excavation and heavy construction staging required for two high-rise towers. Multi-year construction activities—including excavation, crane operations, and material deliveries—would result in prolonged lane closures, elevated noise levels, ground vibration, and airborne dust, potentially lasting five to seven years. There is no safe or feasible route for construction vehicles that wouldn't obstruct public roads, and the deep shoring and dewatering processes pose risks to the structural integrity of nearby heritage buildings and underground utilities. A more appropriate solution would be to pursue low-rise residential or mixed-use development—such as townhomes, semi-detached homes, or small-scale commercial units—that fits within the site's physical limits and delivers new housing without subjecting the community to years of disruption.

4.13 Responsible Alternative

Rather than proceeding with the proposed 16–18 storey towers, the site should be redeveloped with low-rise, human-scaled alternatives such as residential or mixed-use townhomes, semi-detached houses, single-family dwellings, or a modest commercial building. This approach would better reflect the goals outlined in Milton's Official Plan and the Reimagining Main Street initiative, which emphasize balanced, walkable growth that complements the surrounding heritage homes and neighbourhood character. A thoughtfully scaled project could still provide new housing, employment opportunities, and municipal revenue without overwhelming local infrastructure, increasing traffic, or casting significant shadows on adjacent properties. Council has the opportunity to guide the applicant toward a more context-sensitive design—one that embraces growth while upholding community values and livability.

5. Conclusions & Requested Council Directions

Reject the proposed Official Plan and Zoning By-law amendments for the Main & Prince application, as they conflict with established policy objectives related to compatibility, transition, safety, and overall livability.

Instruct Town staff to work in partnership with Halton Region to review and rationalize the GO MTSA boundary west of Main Street to ensure alignment with planning principles and transit integration.

If rejection is not granted, postpone any decision until independent peer reviews—addressing traffic and safety, wind and shadow impacts, servicing and hydrogeology, winter operations, and construction logistics—are completed, publicly released, and followed by meaningful community consultation.

Endorse a revised, low-rise alternative—such as townhomes, semi-detached units, or a modest mixed-use/commercial building—that incorporates Main Street-facing retail, appropriate step-backs, and angular planes to ensure respectful integration with adjacent residential properties.

6. Declarations

I, Katherine Waszkiewicz, certify that the statements herein are true and made in good faith as a resident directly affected by the proposed development.

Signature:



Date: Tuesday, October 28th, 2025

Katherine Waszkiewicz



Jessica Tijanic

From: claire o'sullivan [REDACTED]
Sent: Wednesday, October 29, 2025 11:50 AM
To: Jessica Tijanic
Subject: RE: 388 Main Street East Slessor sq. proposed condo development

Attention: Jessica Tijanic
Senior Planner

I would just like to say first off that I do not object to the Slessor site being developed as it is an eye sore on Main Streets East Milton.

What I do object to is what is being proposed for that site. The building is too tall and the over all scale is massive, oppressive and does not fit in with the character of the old historic Town of Milton. If it is allowed to be built it will affect me personally and the other people in my building. We have solar panels that generate energy from the sun and the proposed building would block the sun sufficiently to have a negative outcome on the energy generated and the financial benefits we receive. This money keeps our condo fee low. The proposed building would block my unit of the morning sun, and it would eliminate my view of the beautiful trees I see out my window. I would loose my privacy as well. The increase of traffic that would come from the proposed building and its occupants would add to the congestion that already exists. I have a hard time getting out of my driveway as it is now. Main Street has only 2 lanes.

We respectfully urge council and the planning department to approve only a zoning by law amendment that maintains the current official plan maximum of 6 stories and 3.0FSI with full adherence to transition guidelines and compatibility requirements.

Thank you
Claire O'Sullivan

[REDACTED]

Sent from my iPhone

Jessica Tjanic

From: Linda Walker [REDACTED]
Sent: Wednesday, October 29, 2025 12:01 PM
To: Jessica Tjanic
Subject: SLESSOR APPLICATION FOR REZONING.

LINDA WALKER
[REDACTED]

The zoning is for 4 to 6 stories which even at this time and in the future would create a tremendous amount of congestion for traffic flow.

Linda Walker.

Get [Outlook for Android](#)

Applicant: Slessor Square LP Inc. **Applications:** LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389-409 Pearl / 17 Prince

Submitted by: Thomas Earl Goodeve, [REDACTED], Milton, [REDACTED]

Date: October 29, 2025

Good evening, Mr. Mayor, Councillors, Town staff, and fellow residents.

My name is **Earl Goodeve**, and I represent residents at 383 Main Street East, the GREENLIFE Condo. I have lived there since it was constructed some 13 years ago.

I'm here tonight to address one of the more critical issues from our viewpoint — proposed building height and its ensuing shadow. — and how this proposal fails to respect the fact that our condominium has an **existing** active solar energy array occupying the entire roof of our building.

I, and most other owners, purchased units in GREENLIFE 13 years ago because it was Green. It was one of the first buildings in Milton designed and built to minimize its carbon footprint. There was a premium to pay for the innovative construction, but this was to be offset with significantly lower maintenance fees over the life of the building. Ground source heating and cooling, colloquially referred to as Geothermal, was a desirable choice with lower operating costs, but the main feature that attracted attention, was the large solar array on the building roof. This array was a major reason the developer could promise that GREENLIFE would have lower unit maintenance fees, and building operating costs, than similar sized buildings. That solar array is a significant source of revenue for our residents. The average **annual** contribution to maintenance fees over the past 12 years that it has been operational is just over \$196,000. That is not a trivial amount!

For a solar array to work, it must be exposed to the sun. It works best of course on bright sunny days, but it still produces significant energy on cloudy days but at reduced levels that are directly related to cloud thickness.

Light rays, however, do not go through buildings. And since light rays travel in straight lines any solid, or opaque structure between the sun and a solar panel will result in the shaded cells and panels producing very little power. We need to minimize, or preferably eliminate, any blockage of sunlight for our panels to work and lower our maintenance fees and operational costs.

According to the developer's own study, and I quote,

"The shadow impact analysis of solar collection indicates the solar panel installation at #383 Main Street East will receive a minimum of eight (8) hours of sunlight during the April, June and September test periods plus not impacted more than two (2) continuous hours in December. The shadow impact analysis of solar collection shows that the proposed

development meets the criteria indicated in this assessment.” (per MHBC Urban Design Brief – Shadow Impact Study - File 22063 - dated December 2, 2024.)

That criteria is directed at quality of life, not an active solar generator.

This isn't just a technicality – ; deliberate shading is a **direct** financial loss for our residents and a setback for Milton's climate and sustainability goals. Unlike Mother Nature, a building shadow is deep and predictable. It is always there but, its extent, size and its duration would result from intentional decisions that could be prevented.

When they are properly designed and installed, solar panels are **intentionally** located in areas **totally free** of shadow so that they can do the job they were installed to do. A shadow on any portion of the array has an impact on energy production that is **greater** than a simple percentage of shade versus total area.

The DESIGN IMPACT ANALYSIS prepared for the developer admits that the proposed structure will be so tall as to cast building shadow on our solar array. It does not appear concerned that shadowing, of varying degrees and durations, will occur from some time prior to September 21 up to the study's December 21 evaluation. And, the study does not highlight that shadowing continues to the end of April. That is EIGHT months of the year that the proposed development would impact our solar energy production. In those eight months, solar energy revenues **average** over \$90,000 per year or almost half of our annual income. Any shadowing over those eight months would significantly affect that revenue.

It is apparent, even from the limited information in the analysis that, at the winter equinox, shadowing will impact close to 25% of our daily time to generate power.

Energy from the solar installation at 383 Main Street East has a direct and **positive** financial impact on all unit owners. Our buildings solar revenue helps offset costs for residents, many of whom are on fixed incomes. Under the planning Act, council must consider the economic well-being and health of existing residents. We urge you to require a full, independent, solar impact assessment before any approvals, and to ensure that existing investments in green energy are protected.

Not mentioned at all in the Impact Analysis is the effect of excessive dust accumulating on the solar panels during construction. Cleaning panels to restore output is an expensive undertaking as special hoisting equipment is required to clean the uppermost panels. Those costs are estimated to be in excess of \$5,000 for each occurrence.

We're not opposed to growth. We understand the need for housing and revitalization. But growth must be responsible. A lower building such as a 5 – to - 6 storey development could help deliver density, commercial vitality, and new housing — while still respecting the existing scale and allowing for open space, step-backs, and sunlight. In other words, a 5-

to 6- story building would fit right in, but anything higher would be detrimental to our building and to the neighbourhood.

Greenlife 383 Main St E Building Response

Applicant: Slessor Square LP Inc. **Applications:** LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389-409 Pearl / 17 Prince

Submitted by: Kathryn Boroski, [REDACTED] Milton, [REDACTED]

Date: October 29, 2025

Submission Type: Written Statement to Town Clerk for Council Record

The residents of Greenlife 383 Main St. E. are committed to supporting responsible, well-planned growth in Milton. We welcome new investment and population growth when developments are thoughtfully designed, context-sensitive, and aligned with the Town of Milton's Official Plan, infrastructure capacity, and climate action priorities.

We are not opposed to development or intensification; in fact, we recognize the importance of accommodating growth in a way that strengthens our community. However, we believe that growth must be balanced with the safety, health, and well-being of all residents, particularly in established neighbourhoods like Old Milton. Development should enhance the public realm, protect vulnerable populations, and respect the scale and character of its surroundings.

The current proposal for 16- and 18-storey towers at 388 Main St. E. is fundamentally incompatible with the surrounding neighbourhood. It significantly exceeds the Official Plan's prescribed maximum height and density for these parcels, lacks an appropriate transition to adjacent low-rise homes, and introduces substantial risks to the quality of life, safety, and sustainability of both current and future residents.

Our opposition is **not** rooted in resistance to growth, but in a firm belief that intensification must be strategic, equitable, and policy-compliant. The proposed development fails to meet these standards and does not adequately address the real-world impacts of its scale and density on infrastructure, mobility, and livability.

We respectfully urge Council and the Planning Department to:

- Reject any Official Plan Amendment that would permit height or density beyond the limits set out in Schedule C.7.A.1 CBD.
- Approve only a zoning by-law amendment that maintains the current official plan maximum of 6 storeys and 3.0 FSI, with full adherence to transition height guidelines, compatibility requirements, and appropriate setbacks and stepbacks to ensure a respectful relationship with adjacent low-rise properties and the public realm.
- Prioritize pedestrian safety by requiring a thorough assessment of existing conditions and projected impacts on crossings, sidewalks, and school zones, particularly at Pearl, Prince, Bruce, and Main Streets. Mitigation strategies must be developed to protect vulnerable road users, including seniors, children, and persons with disabilities.

- Insist on a comprehensive, peer-reviewed construction management plan and robust mitigation for impacts on sunlight, parking, traffic, pedestrian safety, and local businesses and institutions.

Our concerns are grounded in lived experience and supported by technical evidence and planning policy. The following sections detail six core areas of concern:

1. Shadow Impact on Solar Infrastructure and Energy Revenue
2. Traffic and Pedestrian Safety Risks
3. Parking Deficiencies and Spillover Effects
4. Construction Impacts and Lack of Mitigation Planning
5. Quality of Life and Public Realm Degradation
6. Inconsistencies, Risks, and Gaps in the Applicant's Submission

We ask Council and staff to uphold the Town's planning framework and climate commitments by ensuring that any development at 388 Main St. E. respects the scale, character, and capacity of Old Milton. Responsible growth must be rooted in policy, technical rigour, and community well-being.

1 - Shadow Impact on Solar Panels and Energy Revenue

- **Unassessed Solar Panel Impact:** The applicant's shadow study (Design Impact Analysis) admits that during September, 60% of the Main St. E. sidewalk fails to receive the required sunlight. However, it does not specifically analyze the impact on adjacent rooftop solar panels, such as those at 383 Main St. E. (our building)
- **Extended Shadowing Period Ignored:** Shadowing continues beyond December 22 through April, 8 months of the year. This prolonged impact is not acknowledged in the applicant's summary tables or graphics.
- **Economic Harm:** Our building relies on solar power for both energy and revenue. Our Solar array at 383 Main St. E. contributes over \$196,000 annually to building maintenance fees. The loss of solar access from September to April could result in substantial financial losses, which is a material planning consideration under the Planning Act (public health, safety, and economic well-being). Any reduction in solar access during these months will directly affect affordability for residents, many of whom are seniors on fixed incomes.
- **Technical Gaps in Shadow Analysis:** December 21 shadow plots show extensive shadowing between 9:00 AM and 11:00 AM. Analysis fails to account for early morning production starting at sunrise (7:49 AM), when elevated panels begin generating power.
- **Microclimate and Heat Island Effects:** Tall buildings can significantly alter local airflow and temperature, creating microclimates that affect solar panel efficiency. Dense urban development contributes to heat island effects, which can reduce the performance of temperature-sensitive solar technologies. These impacts are not addressed in the applicant's technical studies and represent a further risk to renewable energy generation and building sustainability.
- **Contradiction with Town's Climate and Sustainability Goals:** Proposal undermines existing solar infrastructure and limits future solar adoption on adjacent properties. Conflicts with Milton's green energy strategy and climate action commitments.
- **Policy Misalignment:** The Planning Act requires consideration of economic well-being, and solar revenue loss directly impacts residents. Official Plan (Section 7.7 CBD Secondary Plan Urban Guidelines) supports access to sunlight and sustainable development. Proposal's height and massing violate the Official Plan's 6-storey maximum for this area and transition height guidelines, resulting in prolonged and unmitigated shadowing.
- **Reflection Not Considered:** The applicant's reports do not consider the impact of reflected sunlight (glare) from the proposed glass towers, which could further reduce the efficiency of solar panels or create safety issues.

2 - Traffic and Pedestrian Safety

- **Pearl and Prince Intersection Safety:** The intersection of Pearl and Prince is already dangerous for pedestrians. The applicant's Traffic Impact Study (TIS) does not

adequately address pedestrian safety at this location, nor does it propose mitigation for increased traffic volumes from the development.

- **Pearl and Bruce Streets Not Sized for Large Vehicles:** The TIS proposes that large design vehicles (delivery trucks, waste collection, emergency vehicles) use Pearl and Bruce Streets. These are narrow, residential streets not designed for high-volume or large-vehicle traffic. This increases risks for pedestrians, cyclists, and children, especially those who attend the Christian school at Bruce and Pearl.
- **Pedestrian Crossing on Main Not Evaluated:** The TIS fails to assess the safety of the pedestrian crossing along Main Street, just east of Prince Street. This crossing is already hazardous and will experience increased foot traffic due to the proposed development.
- **Driveway Traffic Counts Incomplete:** The traffic study used the less-used 377 Main driveway (Wisla) for turn counts. It ignored the traffic flow at our more heavily used 383 Main driveway (our building), which serves 160 homes and functions like a dead-end street, and driveways for the other commercial lots of strip plazas to the east of the 383 Main driveway (such as those to reach the Subway Restaurant, floral shop, medical building, pharmacy, daycare). This omission underestimates actual traffic volumes and turning movements.
- **Convergence of Multiple Driveways Creates Unsafe Conditions:** The area includes three busy driveways: 383 Main, Subway, and Wisla, all converging near the pedestrian crossing. Drivers frequently fail to stop at the pedestrian crossing light. Numerous residents have reported near-misses or being struck by vehicles while crossing.
- **Increased Traffic on Secondary Streets:** The proposal will push overflow traffic onto side streets not designed for high volumes. We are already seeing dangerous levels with the construction on Ontario Street and people rerouting through this neighbourhood. No mitigation measures are proposed for traffic redistribution or calming.
- **Commercial Traffic Impacts Not Considered:** The TIS does not account for traffic generated by nearby businesses. These businesses already contribute to congestion and compete for limited parking, including:
 - Subway
 - Daycare
 - Sports store
 - Wisla Deli
 - Thrift store
 - Other commercial units
- **Intersection LOS Already Critical:** The Intersection Level of Service (LOS) for Main and Ontario is already at critical levels during PM peak hours (LOS D), as per Halton Region's TIS guidelines (see TIS, page 10) with current levels already projecting LOS F. The development will worsen these conditions, and the study's mitigation (signal timing) is not sufficient for long-term growth.
- **Policy and Planning Implications:** The Official Plan and Halton Region's TIS Guidelines require developments to demonstrate safe and efficient access, protect pedestrian safety, and mitigate traffic impacts. The proposal fails to meet these standards and does not reflect the real-world conditions or cumulative impacts of surrounding land uses.

3 - Parking Deficiencies and Spillover Effects

- **Parking Calculation Flaws:** The Traffic Impact Study (TIS) uses parking demand rates from large urban centers with robust transit, but Milton's transit is not comparable to more robust and established transit systems serving Toronto or Mississauga. Car ownership remains high most units at 383 Main St. E. have two vehicles per household, reflecting the car-dependent nature of our community. The TIS grossly underestimates the actual parking demand for both residents and visitors.
- **Visitor Parking for Commercial Units Ignored:** The site plan does not consider onsite visitor nor commercial parking. This oversight will force overflow parking onto neighbourhood streets, into 383 Main St. E.'s limited visitor parking lots, which are already strained during events like the farmers' market, parades, and other downtown activities.
- **Parking and Visitor Spillover Effects Ignored:** The study does not assess how increased traffic and commercial activity will affect visitor parking at 383 Main, commercial parking lots on Main Street, and the surrounding side streets. Side streets are not designed for overflow parking; many can only accommodate one lane of traffic when cars are parked, creating congestion and safety risks for vehicles and pedestrians
- **Real-World Example of Spillover:** When our building (383 Main St. E.) conducts routine cleaning of its parking garage, our residents temporarily park on surrounding streets. Even with just 160 units, this fills up Court, Pine, Prince, and other nearby roads. The proposed development includes significantly more units and will have a much greater impact during similar maintenance events. Without sufficient on-site parking, the strain on public streets will be severe and ongoing.
- **Economic Impact of Increased Parking Enforcement:** Due to existing visitor parking shortages, 383 Main St. E. will need to increase enforcement to prevent non-valid visitors from using our spaces. Enforcement costs are projected to rise by 70%. These costs represent a direct economic burden on residents and condo operations, including:
 - Signage updates to designate all-day parking for 383 Main residents only.
 - Legal fees to amend the condo declaration and extend posted visitor hours.
 - Potential hiring of a security guard for all-day surveillance.
 - Reduced availability for personal support workers, medical visitors for our residents, vendors and contractors we rely on (e.g., roof repairs requiring multiple spaces for bins and crew).
- **Winter Maintenance Oversight:** During winter months, snow plowing at our building (383 Main) requires the use of 4–6 visitor parking spots to store snow piles. The developer's proposal does not include a winter maintenance plan or account for similar operational realities. Without proper planning, snow storage will further reduce available parking and exacerbate spillover into surrounding streets.
- **Civic Precinct Parking Pressure:** With the proposed civic precinct near Town Hall, parking will become even more limited in the BIA, further straining neighbourhood parking and increasing spillover from the new development.
- **Policy and Planning Implications:** The Official Plan and Halton Region's TIS Guidelines require developments to provide adequate parking and protect

neighbourhood livability. The proposal fails to meet these standards and does not reflect the cumulative impact of surrounding land uses and civic infrastructure changes. It also ignores the operational realities of nearby buildings and the lived experience of residents.

4 - Construction Impacts and Lack of Construction Plan

- **No Construction Management Plan Submitted:** The application lacks an evaluation of constructability and a detailed construction management plan. This is a significant omission, especially given the immediate proximity to residential homes, a daycare, a school, and numerous businesses.
- **Dust and Solar Panel Impact:** Construction dust from a development of this scale will settle on our nearby solar panels (at 383 Main St. E.), reducing their efficiency and causing economic harm to residents and building owners. There is no plan for dust mitigation or regular cleaning. Reduced solar output directly affects building revenue and resident affordability. Based on estimated service rates, each cleaning of our solar array costs approximately \$5,000. Without a dust management strategy, multiple cleanings per season may be required, representing a significant and recurring financial burden.
- **Geothermal System Risk Not Assessed:** The proposal involves deep excavation into the water table. No analysis is provided on how water table changes could affect our building's geothermal system.
- **Parking for Construction Workers and Equipment:** No plan is provided for worker parking, concrete trucks, dirt-hauling vehicles, or crane accommodation. This will strain already limited neighbourhood parking and disrupt access for residents, businesses, and vendors.
- **Road Congestion and Safety:** The narrow residential roads (Pearl, Prince, Bruce) are not designed for heavy construction vehicles. Increased truck traffic will create congestion, damage road surfaces, and pose safety risks for pedestrians, cyclists, and especially children attending the nearby school and daycare.
- **Pedestrian Safety and Detours:** No plan for safe pedestrian detours or protected walkways. Impacts walkability and safety, especially for seniors, students, and families who rely on these sidewalks daily.
- **Traffic Flow and EMS Access:** No plan for managing traffic detours or maintaining emergency vehicle access. Construction will likely require street closures and rerouting onto smaller residential roads.
- **Dirt and Debris Removal:** The application does not address how dirt and debris will be removed from the site, nor does it specify routes or schedules to minimize disruption.
- **Crane Location and Overhead Safety:** The location of cranes and other large equipment is not specified. Without a plan, there is a risk of overhead hazards to pedestrians, vehicles, and adjacent properties.
- **Comparison to Other Developments:** It is noteworthy that similar high-rise developments in Milton have been approved where they are adjacent to rail lines or

commercial/light industrial areas, not immediately beside established residential neighbourhoods, schools, or daycares.

- **Policy and Planning Implications:** The proposal does not conform to the Official Plan's requirements for transition, compatibility, and public realm safety. The technical reports often "meet the minimum" but do not address the real-world context or cumulative impacts. The absence of a construction plan fails to meet these standards and does not address cumulative impacts. The proposed 9.37 Floor Space Index (FSI) is over three times the approved official plan (Schedule C.7.A.1 CBD) guideline of 3.0, reinforcing that the scale of development is inappropriate for this location.

5 - Quality of Life Affects

- **Loss of Sunlight and Livability:** The shadow studies show that the proposed towers will cast significant shadows on neighbouring homes, yards, and public spaces, especially from September to April. This will reduce natural light in living spaces, outdoor areas, and even impact the effectiveness of solar panels at 383 Main St. E.
- **Mental and Physical Health:** Reduced sunlight is linked to negative impacts on mental health (e.g., seasonal affective disorder) and physical well-being. Many residents at 383 Main are seniors—sunlight access is essential for their well-being. Limiting access to sunlight would eliminate a natural means of fighting depression for those with limited mobility or sufferers of physical disability. The Town's Official Plan and Urban Design Guidelines emphasize the importance of sunlight for livability and comfort.
- **Green Building Integrity Undermined:** Many owners purchased units at 383 Main because it is a green building. Shadowing and dust from the scale of proposed development will reduce solar output and compromise the building's sustainability. This contradicts the Town's climate action and green development goals.
- **Noise, Wind, and Environmental Stress:** The Noise & Vibration Impact Study acknowledges that noise levels from Main St. E., Ontario St., and the railway will exceed Ministry of Environment criteria for indoor spaces, requiring special construction and warning clauses for all units. This means future residents will experience higher noise levels, and existing neighbours may also be affected by increased traffic and activity from the 570 proposed residential units. Residents at 383 Main St. E. would be particularly vulnerable to noise-related stress and disruption.
- **Wind Tunnel Effects:** Tall buildings with minimal setbacks can create dangerous wind conditions at street level. The applicant's reports do not provide independent wind tunnel testing or mitigation strategies. This is especially concerning given that these subject properties are subject to multiple Holding provisions (H1, H2, H4, H71, H74) under the Town's planning framework. These provisions explicitly require the submission of a Pedestrian Wind Study before the Holding symbols can be lifted and development can proceed. The absence of this study is a significant gap in the application and raises concerns about pedestrian safety and comfort.
- **Public Realm and Livability:** The proposed minimum setback from the sidewalk to the podium creates a safety risk for pedestrians, especially in winter. Snow and ice falling

from upper balconies could endanger people walking below, a hazard not addressed in the applicant's design or risk assessments.

- **Pedestrian Comfort and Accessibility:** The narrow setback and increased shadowing will make the sidewalk less comfortable and accessible, contrary to the Town's urban design guidelines for a vibrant, safe, and accessible public realm.
- **Insufficient Public Space:** The plan prioritizes density over public space and pedestrian comfort. Setbacks, greenery, and community amenities are inadequate for the scale of development.
- **Overcrowding and Traffic:** Increased density will lead to more traffic and congestion. Pedestrian crossings will become more dangerous, especially for seniors and children.
- **Parking Spillover:** Insufficient on-site parking will push vehicles onto side streets and visitor parking at 383 Main. Side streets are not designed for overflow parking—many allow only one lane of traffic when cars are parked.
- **Economic Impact:** Reduced solar income affects affordability for seniors on fixed incomes. Increased enforcement and operational costs for parking and safety measures.
- **Loss of Community Character:** The scale and design of the proposal threaten the small-town feel and social cohesion of Old Milton. Risk of setting a precedent for further overdevelopment in the area and a lack of alignment with the development policy set by the Town and Council.

6 - Inconsistencies, Risks, and Gaps in the Applicant's Justification

- **Shadow Study Gaps:**
 - The applicant fails to provide a quantitative analysis of how shadowing will reduce solar energy production at 383 Main St. E., despite the building's reliance on solar revenue for operational costs. This omission ignores the economic implications under Section 2 of the Planning Act, which requires consideration of economic well-being.
 - The potential for reflected glare from glass façades of the proposed buildings is not addressed. Glare can reduce solar panel efficiency and create safety hazards for pedestrians and drivers.
 - The shadow study omits early morning and late afternoon production windows, particularly in winter months when solar access is most critical. December 21 plots show shadowing between 9:00–11:00 AM, but ignore sunrise generation, or building shadow affecting solar panels starting at 7:49 AM.
 - The Town of Milton's Official Plan (Section 7.7) and Climate Action Plan emphasize the protection and promotion of renewable energy infrastructure. The proposal undermines these goals.
- **Traffic Study Omissions:**
 - The Traffic Impact Study (TIS) does not evaluate pedestrian safety at key intersections (e.g., Pearl & Prince, Main Street crossing east of Prince), despite known hazards and proximity to a school and daycare.

- The TIS uses turn counts from the less-used 377 Main driveway (Wisla), ignoring the heavily trafficked 383 Main driveway, which serves 160 homes. This underrepresents actual traffic volumes and turning movements.
- The TIS fails to account for traffic generated by nearby businesses (e.g., Subway, daycare, sports store) and future Civic Precinct development. This violates Halton Region's TIS Guidelines, which require consideration of cumulative impacts.
- The Main & Ontario intersection operates at LOS D during PM peak hours. The proposed development will exacerbate congestion, and the mitigation measures (e.g., signal timing adjustments) are insufficient for long-term traffic growth.
- **Parking and Access:**
 - The applicant claims that Bill 185 eliminates parking minimums, implying that no visitor or commercial parking is required. However, this legislative change does not negate the practical need for adequate parking in areas with limited transit and high car ownership, such as Milton.
 - The proposal does not allocate visitor parking for commercial units, which will force overflow parking onto residential streets and into 383 Main's limited visitor spaces.
 - Economic Burden on Residents: Increased enforcement costs at 383 Main (e.g., signage, legal fees, security) are projected to rise by 70% to prevent unauthorized parking. This represents a direct financial impact on residents, many of whom are seniors on fixed incomes.
 - The Town of Milton's Official Plan and Halton Region's planning policies require developments to provide sufficient parking to protect neighbourhood livability and accessibility. The proposal fails to meet these standards.

Policy and Technical Support

- **Height and Density Non-Conformity:** The proposed 16- and 18-storey towers exceed the permitted maximum of 6 storeys and 3.0 FSI as outlined in Schedule C.7.A.1 CBD of the Town of Milton Official Plan. Section 7.7 of the CBD Secondary Plan Urban Guidelines emphasizes the importance of maintaining a human-scale built form and ensuring compatibility with adjacent low-rise residential areas. The proposed 9.37 FSI is more than triple the permitted density, and the height is up to nine times greater than adjacent parcels, violating both the intent and the letter of the Official Plan.
- **Transition and Compatibility:** The Official Plan requires developments to provide a 'transition in height and density' to adjacent low-rise areas. The proposed setbacks and podiums do not meet the intent of Policy 3.5.3.9 and 3.5.3.23.E, which call for meaningful transitions and compatibility with surrounding built form. The abrupt shift from 1–2 storey homes to 16–18 storey towers is inconsistent with these guidelines.
- **Holding Provisions and Technical Study Requirements:** The subject lands at 388 Main Street East are subject to multiple Holding provisions (H1, H2, H4, H71, H74) under the Town's Zoning By-law. These provisions require the submission and approval of several technical studies before development can proceed. The absence of a

completed wind study and other required reports undermines the application's readiness and fails to meet the Town's procedural and safety standards.

- **Mature Neighbourhood Area Compatibility:** Several adjacent properties—389, 395, 399, 405, and 409 Pearl Street and 17 Prince Street—are located within the Mature Neighbourhood Area, as delineated on Schedule F of the Town's Urban Zoning By-law 016-2014. Development within these areas must be compatible and respectful of the character of the neighbourhood, incorporating scale, massing, building height, and other characteristics that are prevalent in the area. The proposed towers do not reflect these requirements and risk destabilizing the established residential fabric.
- **Traffic and Safety:** The Halton Region TIS Guidelines require developments to demonstrate safe and efficient access and mitigate traffic impacts. The applicant's TIS fails to address critical intersections such as Pearl and Prince, and omits driveway data from 383 Main St. E., which serves 160 homes. This omission underrepresents actual traffic volumes and violates the Region's requirement for comprehensive traffic analysis.
- **Climate and Sustainability:** The Town of Milton's Official Plan (Section 2) and Climate Action Plan prioritize sustainable development and the protection of existing green infrastructure. The proposal's shadowing of solar panels at 383 Main St. E. undermines these goals, resulting in economic harm and reduced renewable energy generation. This contradicts the Town's stated objectives for climate resilience and energy efficiency.
- **Public Realm and Livability:** The Town's Community Design Guidelines emphasize pedestrian comfort, accessibility, and vibrant public spaces. The proposed minimal setbacks and shadowing effects compromise sidewalk usability, safety, and winter maintenance. These design choices are inconsistent with the Town's vision for a walkable, inclusive downtown.
- **Technical Reports:** Shadow, noise, and traffic studies all reveal impacts that will reduce the quality of life for both new and existing residents. The lack of a wind study and incomplete analysis of cumulative impacts further weaken the technical foundation of the application.

We urge Council and the Town to support responsible, contextual growth by only approving a zoning by-law amendment that is in line with the Official Plan: a 6-storey maximum for these parcels and adherence to transition height guidelines. This is the best way to protect Milton's character, quality of life, and long-term sustainability.

Policy Appendix: Planning and Technical Framework Supporting the 383 Main St. E. Response

| Policy Source | Policy Reference | Summary & Relevance to Proposal |
|---|---|---|
| Town of Milton Official Plan | Schedule C.7.A.1 CBD | Designates a maximum building height of 6 storeys and 3.0 FSI for parcels along Main St. E. The proposed 16–18 storey towers and 9.37 FSI exceed these limits, violating the Official Plan’s intent for compatible intensification. |
| Town of Milton Official Plan | Section 7.7 – CBD Secondary Plan Urban Guidelines | Emphasizes access to sunlight, transition in height, and compatibility with adjacent low-rise residential areas. The proposal’s massing and shadow impacts undermine these principles. |
| Town of Milton Official Plan | Section 2 – Community Goals | Prioritizes sustainable development, climate resilience, and protection of green infrastructure. The proposal’s shadowing of solar panels contradicts these goals. |
| Town of Milton Official Plan | Policy 3.5.3.9 | Requires developments to provide an appropriate transition in height and density to adjacent low-rise areas. The abrupt jump from 1–2 storeys to 16–18 storeys fails to meet this requirement. |
| Town of Milton CBD Urban Design Guidelines | Policy 3.5.3.23.E | Calls for setbacks and massing that respect the character of the surrounding neighbourhoods. The proposed 3m setback above the 6th floor is insufficient compared to the recommended 10m, resulting in an imposing street wall. |
| Town of Milton Urban Design Guidelines | Tall Building Guidelines – Section 4.0 | Recommends tower separation of 25m and floorplate limits to reduce visual bulk and shadowing. The proposed 17.5m separation and oversized floorplates intensify impacts on adjacent properties. |
| Town of Milton Zoning By-law 016-2014 | Schedule F – Mature Neighbourhood Area | Properties at 389–409 Pearl Street and 17 Prince Street are within the Mature Neighbourhood Area. Development must be compatible and respectful of |

Jessica Tijanic

From: Rick Houle [REDACTED]
Sent: Wednesday, October 29, 2025 5:39 PM
To: Jessica Tijanic
Subject: Submission to Town Council

We wish to include our names as concerned citizens regarding the proposed condo development on the Slessor property.

All of the issues outlined in our recent meeting are of concern to us.

- impact on our condo especially our solar panels and geothermal infrastructure
- traffic on Main St

Richard and Ruth Houle

[REDACTED]

Jessica Tijanic

From: Betty Warling [REDACTED] >
Sent: Thursday, October 30, 2025 12:38 PM
To: Jessica Tijanic
Subject: Re: Reminder - Town Council Meeting on Nov 3rd at 7 pm

Hi Jessica, thank you for your prompt reply. I live across the road from this proposed development and as a senior citizen I'm very concerned about the traffic as I have a difficult time trying to get out of our driveway now. Also the construction will be such a detriment to my well being using my balcony etc. Main st is already difficult for me to maneuver without this added congestion. And I'm concerned about the small town feel that enticed me to buy here in Milton with such a massive construction. I hope more thought and planning go into this project.

Thank you for the opportunity to voice my concerns. Take care

Betty Warling

On Thu., Oct. 30, 2025, 9:31 a.m. Jessica.Tijanic@milton.ca, <Jessica.Tijanic@milton.ca> wrote:

Good morning Betty,

Could you please provide me with a list of your concerns? Your comments/concerns will form part of the public record for these applications.

Thanks,

Jessica



Jessica Tijanic, M.Sc. MCIP RPP

Senior Planner, Development Review

[150 Mary Street., Milton ON, L9T 6Z5](https://www.milton.ca)

905-878-7252 ext. 2221

www.milton.ca

Confidentiality notice: This message and any attachments are intended only for the recipient named above. This message may contain confidential or personal information that may be subject to the Municipal Freedom of Information Act and must not be distributed or disclosed to unauthorized persons. If you received this message in error, please notify the sender immediately. Thank you for your assistance.

From: Betty Warling [REDACTED]
Sent: Wednesday, October 29, 2025 5:37 PM

To: Jessica Tijanac <Jessica.Tijanac@milton.ca>

Subject: Re: Reminder - Town Council Meeting on Nov 3rd at 7 pm

On Wed, Oct 29, 2025 at 5:36 PM Betty Warling [REDACTED] wrote:

----- Forwarded message -----

From: **Betty Warling** [REDACTED]

Date: Wed, Oct 29, 2025 at 5:23 PM

Subject: Re: Reminder - Town Council Meeting on Nov 3rd at 7 pm

To: <no-reply@conciergeplus.com>

Hello Jessica

I am very upset with the zoning change regarding Slessor Square and would like my name put on the Interested Party List

as I have many concerns regarding it.

Thank you

Betty Warling

[REDACTED]

[REDACTED]

[REDACTED]

bwar40@gmail.com

On Tue, Oct 28, 2025 at 3:29 PM Property Management <no-reply@conciergeplus.com> wrote:



Reminder - Town Council Meeting on Nov 3rd at 7 pm

Dear Residents and Owners,

A reminder of the Town Council Meeting on Nov 3rd at 7 pm. This meeting is regarding the Slessor Square developer request to change the zoning to high density from the current mid to low designation.

Meeting details:

Date: Monday November 3, 2025

Time: 7:00 p.m.

Place: Council Chambers, [150 Mary Street, Milton](#)

Our Residents Committee has been working on a submission to Town Council on behalf of our condo. There will be 5 speakers at the meeting who will outline our issues.

If you are concerned about this change in zoning, please submit your comments by email to Jessica Tijanic at Jessica.Tijanic@milton.ca. Include your full name, address, email and your concerns about this proposal. Jessica will respond to you and indicate you are included in the Interested Partys List which will allow you to make comments and or submissions on any future appeals by the developer to the Ontario Land Tribunal or Town Council. It's imperative as many residents as possible email Jessica so we have a voice in any future changes this developer puts forward.

If you wish to speak before Council or wish to submit a response on your own, you must fill out the delegation form

online at <https://forms.milton.ca/Community/Delegate-Request-Application> by Thursday October 30, at noon. If you miss the deadline, the Clerk can always add you

as a delegate on the spot at the public meeting. Council allows for 5 minutes for each delegate to provide their comments.

You're receiving this email because you are a member of the HSCC 596 community, [383 Main Street East, Milton, ON.](#)

NEIGHBOURHOOD TECHNICAL SUBMISSION

Re: Proposed "Main & Prince" Development

Applicant: Slessor Square LP Inc. Applications: LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389-409 Pearl / 17 Prince

Submitted by: Andrew & Emily Savage, [REDACTED] Milton, [REDACTED]

Date: Oct 30/25

Submission Type: Written Statement to Town Clerk for Council Record

1. Executive Summary

This submission requests that Council refuse the Official Plan and Zoning By-law amendments sought for the Main & Prince proposal (two residential towers of 16 and 18 storeys atop a six-storey podium, with near full-lot coverage), on the grounds that the application:

- Conflicts with the Town's Official Plan and Downtown planning framework that require compatible scale and a defensible transition to established low-rise areas;
- Overburdens local streets and municipal servicing (stormwater, water, sanitary), lacks a viable winter operations plan, and risks unacceptable construction and safety impacts;
- Creates adverse built-form, shadow, wind, livability, and heritage-setting impacts that cannot be mitigated at the proposed scale; and

- Relies on an irregular MTSA “bump-out” mapping to justify tower-scale density at a site lacking direct transit integration.

Residents support responsible, context-sensitive mid-rise redevelopment (4–6 storeys) with Main Street-oriented retail, step-backs, and angular planes that respect adjacent homes.

Requested Council Actions (Summary):

- REFUSE the proposed amendments as filed;
- DIRECT staff to work with Halton Region to review and rationalize the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent, publicly released peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, and construction logistics), followed by genuine public consultation.

2. Site & Proposal Overview

- Site: The subject property occupies a prominent corner in Old Milton, with frontages on Main Street East, Pearl Street, and Prince Street. The site directly borders established 1- and 2-storey residential homes and sits within a heritage streetscape characterized by small-lot houses, mature trees, and human-scale façades. The property forms a transition zone between the Main Street commercial corridor and adjacent residential blocks to the south.

Proposal: The applicant proposes to redevelop the site with two high-rise residential towers of 16 and 18 storeys atop a six-storey podium, containing approximately 570 condominium units and 815 m² of ground-floor commercial space. The development would cover nearly the full lot area from Main to Pearl and Prince, with minimal setbacks and no significant open-space buffers to neighbouring homes.

3. Policy & Guideline Framework

This assessment references (non-exhaustive): Town of Milton Official Plan (compatibility, character, transition), Downtown planning directions, Urban Design Manual and tall-building/angular-plane guidance, Heritage policies/Master Plan, and applicable transportation/servicing standards.

4. Detailed Findings

4.1 Height and Scale

- The proposed 16- and 18-storey towers vastly exceed the existing 1–2 storey context.
- Fails to respect the “transition in height and density” policies of Milton’s Official Plan.
- Establishes a precedent for over-intensification in Old Milton, contrary to its small-town, heritage character.
- Creates an overbearing visual presence incompatible with the pedestrian scale of Main, Pearl, and Prince Streets.

4.2 Built Form and Transition

- No meaningful step-backs or angular planes to protect adjacent low-rise residential properties.
- Podium height (6 storeys) is too tall for the surrounding context — should be reduced to a maximum of 4 storeys.
- Shadow and overlook impacts on homes and yards along Pearl and Prince are excessive.
- The mass and floorplate size do not comply with recommended tall-building guidelines.

4.3 Traffic, Parking, and Access

- Pearl and Prince are narrow residential streets not designed for large traffic volumes.
- Additional vehicle movements and deliveries would worsen congestion and reduce safety.
- Increased risk for pedestrians and children — especially near schools and crossings.
- Construction staging and trucks would cause noise, dust, and road obstruction.
- Access points must be restricted to Main or Bruce Street only — no Pearl or Prince access.

4.4 Infrastructure and Servicing

- Local stormwater, water, and sanitary systems are already near capacity.
- Increased density will strain municipal services without demonstrated capacity.
- The Town must require peer-reviewed servicing studies confirming system adequacy.
- Without upgrades, there's risk of flooding, runoff, and pressure drops in nearby homes.
- Snow accumulation and removal from a large-scale development will further burden local infrastructure and narrow residential streets.
- Added population will increase strain on nearby schools and educational resources already operating near capacity.

4.5 Shadow, Wind, and Environmental Impacts

- Tall towers will create prolonged shadows on neighbouring properties and streets.
- Reduced natural light and livability for existing homes.
- Potential wind-tunnel effects around the podium and public realm, requiring detailed testing.
- Independent shadow and wind studies should be peer-reviewed before approval.

4.6 Heritage and Character

- The site borders Old Milton’s heritage core, where existing buildings reflect a human-scaled, small-town fabric.
- The project disrupts the visual harmony of the area and erodes Milton’s historical identity.
- Violates Official Plan policies emphasizing preservation of community character and cultural heritage.
- A more context-sensitive design would align with Milton’s Civic Precinct and Reimagining Main Street goals.

4.7 Public Realm and Livability

- The development prioritizes density over public realm improvements.
- Insufficient setbacks and landscaping for pedestrian comfort and greenery.
- Commercial frontages should face Main Street, not residential side streets.
- Lacks community amenities or meaningful contributions to local infrastructure.

4.8 Process and Community Consultation

- The community has not been adequately consulted — the scale of opposition indicates a disconnect.
- Residents request deferral until proper consultation and peer review occur.
- Approval without these steps would undermine public trust and transparency.

4.9 Precedent and Cumulative Impact

- Approval would signal to other developers that extreme height and density are acceptable in Old Milton.
- Would accelerate uncoordinated intensification, threatening the character and infrastructure capacity of nearby blocks.
- Sets a dangerous precedent for future development applications.

4.10 Reasonable Alternative

- Support mid-rise redevelopment (4–6 storeys max) that aligns with Milton's urban design guidelines.
- Encourage mixed-use density along Main Street while maintaining transitions to Pearl and Prince.
- Residents are not anti-development — they're seeking responsible, contextual growth.

4.11 Snow Management and Winter Safety

- The proposed development provides no realistic on-site solution for snow storage or removal.
- Full-lot coverage and underground parking ramps eliminate safe areas for accumulation or containment.
- Frequent truck haulage would add winter noise, emissions, and congestion on local streets.

- Meltwater runoff risks refreezing on sidewalks, driveways, and roadways, creating hazardous conditions.
- Tower shadows will delay snowmelt, prolonging icy surfaces throughout the winter months.
- Narrow residential streets like Pearl and Prince cannot accommodate additional plowing, piling, or haulage operations.
- Tower residents removing snow from balconies could drop snow and ice onto surrounding sidewalks and properties, creating serious public safety hazards.
- No winter operations plan has been provided to address snow management or pedestrian safety impacts.

4.12 Zoning Amendments and MTSA Boundary Misalignment

- The proposal depends entirely on major zoning by-law amendments to permit height, density, setbacks, and parking far beyond existing zoning.
- Current designations (DC-FU and RO) permit low- to mid-rise mixed-use, not 16–18 storey towers on a six-storey podium.
- These amendments would override both the Downtown Secondary Plan and Milton's Official Plan, which require compatible scale and gradual height transition.
- Approving the requested rezoning would pre-approve the developer's current massing, eliminating Council's ability to negotiate reductions later.

- The developer's justification relies on the site's inclusion in an arbitrary MTSA "bump-out" west of Main Street that captures this parcel while excluding others closer to the station.
- This mapping irregularity creates a false basis for "transit-oriented" tower density on a site lacking direct GO access or pedestrian integration.
- Council can refuse the zoning amendments and request a boundary review by Halton Region to correct the MTSA map and exclude this parcel, restoring conformity with local planning intent.
- A refusal maintains Council's planning authority, prevents a dangerous precedent for high-rise approvals west of Main Street, and reinforces the policy intent of balanced, context-sensitive growth.

4.13 Quality of Life & Community Impact

- Noise, light, and privacy intrusions into neighbouring backyards and windows.
- Loss of small-town character and walkable setting residents value.
- Congestion and daily disruption from vehicles, deliveries, and extended construction.
- Diminished livability from shadowing, wind effects, and loss of open sky.
- Social fabric strain as tower-scale density disconnects from the existing street network.

- Human health and well-being effects should be considered in planning decisions.

4.14 Safety

- Pearl, Prince, and Main were not designed for tower-scale traffic, density, and service vehicles.
- Minimal setbacks and no internal loading/turnaround space obstruct emergency access.
- Heavy construction and daily vehicle movements threaten safety near schools, parks, and community facilities.
- People before buildings: growth must enhance, not endanger, Milton's walkability and livability.

4.15 Constructibility and Feasibility

- The site is too small, irregular, and bounded by heritage streets to safely accommodate deep excavation and heavy staging for two towers.
- Multi-year excavation and crane operations would cause lane closures, noise, vibration, and dust for 5–7 years.
- No safe route or on-site space for construction vehicles without blocking public roads.
- Deep shoring, dewatering, and vibration could compromise nearby heritage foundations and utilities.

- A mid-rise (5–6 storey) design could be safely built within the site’s limits, adding housing without years of disruption.

4.16 Responsible Alternative

- Replace the 16–18 storey towers with low-rise, human-scale options — e.g., townhomes, semis, singles — or a modest 5–6-storey mixed-use / small commercial building.
- This approach aligns with Milton’s Official Plan and Reimagining Main Street vision for balanced, pedestrian-friendly growth that respects adjacent heritage homes and neighbourhood character.
- Aligned with Milton’s Official Plan and Reimagining Main Street vision (low- to mid-rise, pedestrian-friendly growth in heritage areas).
- Delivers new housing, jobs, and tax revenue without overloading traffic, infrastructure, or shadowing neighbours.
- Constructive path: Council can direct the applicant to redesign within these parameters — saying “yes, but responsibly.”

5. Conclusions & Requested Council Directions

- REFUSE the proposed Official Plan and Zoning By-law amendments for the Main & Prince application as inconsistent with policy intent for compatibility, transition, safety, and livability;
- DIRECT Town staff to collaborate with Halton Region on a review and rationalization of the GO MTSA boundary west of Main Street;

- IF NOT REFUSED, DEFER pending independent peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, construction logistics), all publicly released, followed by meaningful public consultation;

- SUPPORT a redesigned, low- to mid-rise (4–6 storey) alternative — such as townhomes, semis, or a modest mixed-use / small commercial building — featuring Main Street-oriented retail, step-backs, and angular planes that respect surrounding homes.

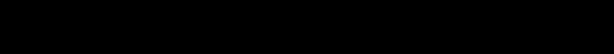
6. Declarations

I, Andrew Savage, certify that the statements herein are true and made in good faith as a resident directly affected by the proposed development.

Signature: 

Date: _Oct 30/25_____

Address: , Milton, 

Email/Phone: 

Jessica Tijanic

From: Ken and Marguerite Flynn [REDACTED]
Sent: Thursday, October 30, 2025 9:36 AM
To: Jessica Tijanic
Subject: 388 Main Street East - condo proposal

Please add my name to the interested party list for this condo proposal.

I am a resident of [REDACTED] I have a number of issues with the proposed application to place an 16 - 18 storey condo residence at 388 Main Street East.

The following are my concerns:

1. Traffic Congestion -- I would like to see the town complete a study of the traffic at Main and Prince street - ideally during 5 p.m. rush hour. The traffic at this time is already at a stand still. I can not see on the traffic impact study, that the study included Main and Prince Street. I am very concerned about the time it will take an emergency vehicle to get to my condo.
2. The water table will be impacted - has the town done a study?
3. I am a senior, who uses the sidewalks on Main street on a daily basis. During the winter there are often high banks on either side of the sidewalk. According to the plans, this condo is right on the street. Where will people walk, if the snow banks are so high and there is no place to walk.between the building entrance and the snowbank.
4. Parking - there is no parking for this condo, except underground. Where does this developer think people are going to park when they have visitors or for proposed retail outlets.

I know that the town needs more housing but there are plenty of other places to build. This construction would create havoc for the entire town.

Hello Ms. Tijanic, Jessica.tijanic@milton.ca

My name is Helen Uong. I live at [REDACTED] since May 2024, for almost 1 ½ years. I can be reached at [REDACTED]

I am extremely concerned about Slessor Square's proposed change in zoning, and I plead that you add me to the Interested Party's list to oppose the developer's attempts to appeal to your decision about their application.

Although I am not a senior, I have musculoskeletal issues and have been nursing a medical injury to my neck and back for the past 6 ½ years. I cannot drive beyond fifteen minutes, and must rely on reaching local needs on foot, Uber or other rides to get me to medical appointments. Having my income cut more than half due to the medical injury and reliance on low CCP disability benefits, I am extremely worried about several issues this proposed development would cause.

The issues are:

1. Its proposed scale and massing would reduce natural light which would leave us in the dark for extended periods of time (especially in the cold months for more than half a year). Its
 - a. 3-meter stepback above the 6th floor is seven (7) meters lower than the required 10-meter zoning by-law for Main Street and
 - b. the 17.5-meters separation between its proposed two towers is far lower than the required 25 meters between buildings.

Both of these would make it unsafe for us to use the sidewalks safely to access local businesses on foot and add stress to drivers. They would:

- i. create such an imposing street wall
 - ii. cast long shadows for pedestrians, vehicles and adjacent properties for most of the year, and
 - iii. block sightlines to drivers.
2. Moreover, the long shadows would impact my access to natural sunlight, which in turn would reduce our quality of life and eliminate a natural source to improving our mental and physical well-being
3. Its 1.2-meter setback from the sidewalk to the podium is way too close to the sidewalks and will cause injury from falling snow and ice from upper balconies to the pedestrians below
4. The sidewalks would be unusable, unsafe and lacking in public space. The proposal needs a full pedestrian safety audit.
 - a. Sidewalks would take on extra foot and cyclist traffic from sidewalks that would be unprotected and closed during construction
 - b. Sidewalks would be less accessible when
 - i. blocked by spill over parking onto neighbourhood streets that are already narrow and
 - ii. further restricted to accommodate parking of construction vehicles, and
 - iii. would be further restricted in the winter by snow buildup

5. The prolonged shadow impact and dust settling on our building's solar panels would directly make our panels ineffective, raise costs of solar maintenance and eliminate hydro savings that our solar panels provide. These things would raise costs for us and especially me when I am on a dramatically reduced budget
6. Having lived in Mississauga, Oakville and Milton, I chose this Milton condo building for its green initiatives, cost savings from the solar panels, this particular neighbourhood for its Old Milton small-town character, and access to neighbourhood streets in this small community for my exercise especially when no public parks exist close by. This proposal would threaten my quality of life, my neighbours and future residents
7. Its traffic study opted to consider the less used 377 Main Street East driveway for Wisla Store instead:
 - a. It fails to consider the current real traffic flow at our location and how unsafe and difficult it is to turn left into and out of the 383 Main Street East driveway for residents, visitors, EMS vehicles, couriers and contractors for our condo building
 - b. It doesn't factor the already risky convergence of vehicle traffic from three driveways—from and to the plaza west of us, our driveway and that for the Wisla store
 - c. It doesn't factor the already critical traffic count levels (intersection level of service, LOS D and F) for the intersection of Main and Ontario Street during PM peak hours, which frustrate drivers and cause negligence to stop for pedestrians using the crosswalk immediately west of our 383 Main Street East driveway. Many near misses had occurred to pedestrians at the crosswalk and we fear each time of being hit by vehicles that fail to stop
 - d. The restriction of sunlight by the shadow cast by two proposed buildings over 6-storeys tall (in this case 16- and 18 storeys tall) would affect our sightlines when driving
 - e. This proposal would exacerbate traffic deadlock and stress to drivers and pedestrians, if further combined with
 - i. more cars, delivery trucks and service vehicles during construction and
 - ii. increased access needed by ambulance or fire trucks to accommodate the density and scale of this magnitude. They are proposing to build 18 storeys and 16 storeys, that far exceeds Milton's Official Plan or urban design guidelines—in a neighbourhood that has 6 storeys in our condo building, low-rise commercial properties next to and opposite us, and neighbourhood streets lined with houses 1- or 2- storeys tall
8. The proposal wrongly assumes and relies on drastically underestimated parking needs,
 - a. by basing on resident and visitor parking rates from large cities like Toronto and Mississauga that have robust transit networks accounts which Milton doesn't have and lower car ownership. Its calculation of parking demands doesn't reflect the high car ownership in our area
 - b. Also, periodically, we need to use neighbourhood street parking to accommodate maintenance or repairs to our underground parking and above-ground parking.

We are not against a development that is in line with our Town's small town feel, provided it would meet the height and density, transition, setback requirements, etc. set by the Town and its buildings are

within the zoning by-law of a maximum of 6 storeys and 3.0 FSI. Also, we need a development to protect and mitigate risks to me (a person with disability and a low budget) and other vulnerable road users (including daycare, school children and seniors), and to prevent injuries and harm to our sustainability and quality of life.

Thank you,

Helen Uong

Re: Proposed “Main & Prince” Development

Applicant: Slessor Square LP Inc. Applications: LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389-409 Pearl / 17 Prince

Submitted by: Edward Fiore, [REDACTED] Milton, [REDACTED]

Date: October 31, 2025

Submission Type: A Written Statement to Town Clerk for Council Record

1. Executive Summary

This submission requests that Council refuse the Official Plan and Zoning By-law amendments sought for the Main & Prince proposal (two residential towers of 16 and 18 storeys atop a six-storey podium, with near full-lot coverage), on the grounds that the application:

- Conflicts with the Town’s Official Plan and Downtown planning framework that require compatible scale and a defensible transition to established low-rise areas;
- Strains local streets and municipal servicing (stormwater, water, sanitary), lacks a viable winter operations plan, and risks unacceptable construction and safety impacts;
- Creates adverse built-form, shadow, wind, livability, and heritage-setting impacts that cannot be mitigated at the proposed scale; and
- Relies on an irregular MTSA “bump-out” mapping to justify tower-scale density at a site lacking direct transit integration.

We support responsible, context-sensitive mid-rise redevelopment (4 storeys) with Main Street-oriented retail, step-backs, and angular planes that respect its neighbours

Requested Council Actions:

- REFUSE the proposed amendments as filed;
- DIRECT staff to work with Halton Region to review and rationalize the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent, publicly released peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, and construction logistics), followed by genuine public consultation.

2. Site & Proposal Overview

• Site: The subject property occupies a prominent corner in Old Milton, with frontages on Main Street East, Pearl Street, and Prince Street. The site directly borders established 1- and 2-storey residential homes and sits within a heritage streetscape characterized by small-lot houses, mature trees, and human-scale façades. The property forms a transition zone between the Main Street commercial corridor and adjacent residential blocks to the south.

Proposal: The applicant proposes to redevelop the site with two high-rise residential towers of 16 and 18 storeys atop a six-storey podium, containing approximately 570 condominium units and 815 m² of ground-floor commercial space. The development would cover nearly the full lot area from Main to Pearl and Prince, with minimal setbacks and no significant open-space buffers to neighbouring homes.

3. Policy & Guideline Framework

This assessment references a non-exhaustive: Town of Milton Official Plan (compatibility, character, transition), Downtown planning directions, Urban Design Manual and tall-building/angular-plane guidance, Heritage policies/Master Plan, and applicable transportation/servicing standards.

4. Detailed Findings

4a) Process and Community Consultation

- The community has not been adequately consulted — the scale of opposition indicates a disconnect.
- We kindly request deferral until proper consultation and peer review occur.
- An approval without these steps would undermine public trust and transparency.

4b) Heritage and Character

- The site borders Old Milton’s heritage core, where existing buildings reflect a human-scaled, small-town fabric.
- The project Violates Official Plan policies emphasizing preservation of community character and cultural heritage.
- The project disrupts the visual harmony of the area and erodes Milton’s historical identity.
- A more context-sensitive design would align with Milton’s Civic Precinct and Reimagining Main Street goals. We would prefer town houses if anything.

4c) Public Realm and Livability

- The development prioritizes density over public realm improvements.
- Insufficient setbacks and landscaping for pedestrian comfort and greenery.
- Commercial frontages should face Main Street, not residential side streets.
- Lacks community amenities or meaningful contributions to local infrastructure.

4d) Height and Scale

- The proposed 16- and 18-storey towers vastly exceed the existing 1–2 storey context.
- Establishes a precedent for over-intensification in Old Milton, contrary to its small-town, heritage character.
- Fails to respect the “transition in height and density” policies of Milton’s Official Plan.
- Creates an overbearing visual presence incompatible with the pedestrian scale of Main, Pearl, and Prince Streets.

4e) Built Form and Transition

- The mass and floorplate size do not comply with recommended tall-building guidelines.
- Podium height (6 storeys) is too tall for the surrounding context — should be reduced to a maximum of 4 storeys.
- No meaningful step-backs or angular planes to protect adjacent low-rise residential properties.
- Shadow and overlook impacts on homes and yards along Pearl and Prince are excessive.

4f) Traffic, Parking, and Access

- Pearl and Prince are narrow residential streets not designed for large traffic volumes. Lots of accidents on these streets, streets do not have speed bumps or stop signs that residents would like. Lots of kids live in this neighbourhood.
- Main street is only 1 lane each way and is already very busy during business hours, pre and post work.
- Feeder streets like Pine St and Oak Street all already too busy with unsafe drivers trying to avoid Main St Traffic.
- Additional vehicle movements and deliveries would worsen congestion and reduce safety. Again lots of children in the area which makes for a dangerous outdoor setting.
- Increased risk for pedestrians and children — especially near schools and crossings.
- Not nearly enough safe crossing zones currently exist
- Construction staging and trucks would cause noise, dust, and road obstruction.
- Access points must be restricted to Main or Bruce Street only — no Pearl or Prince access.
 - o Main Concern: The traffic study underestimates growth, omits key intersections, and ignores local congestion and pedestrian safety. Parking supply is insufficient.
 - o Recommendation: Require independent peer review, updated traffic data, and binding transportation demand management plans.
 - o The proposed development provides 417 parking spaces for 570 units, representing a 27% deficit relative to the Town's Zoning By-law 89-2022 requirements. The consultant invokes Bill 185 to claim that no parking is required within a Protected Major Transit Station Area. However, no rapid transit currently exists, and no mitigation strategy is proposed to address on-street parking displacement on Court, Prince, Pearl, and Pine Streets.
 - o In addition there is no street level parking provided for the 8000 sqft of commercial space that is provided.

4g) Infrastructure and Servicing

- Local stormwater, water, and sanitary systems are already near capacity.
- The Town must require peer-reviewed servicing studies confirming system adequacy.
- Without upgrades, there's risk of flooding, runoff, and pressure drops in nearby homes.
- Increased density will strain municipal services without demonstrated capacity.
- Snow accumulation and removal from a large-scale development will further burden local infrastructure and narrow residential streets.
- Added population will increase strain on nearby schools and educational resources already operating near capacity.

4h) Shadow, Wind, and Environmental Impacts

- Tall towers will create prolonged shadows on neighbouring properties and streets.
- Reduced natural light and livability for existing homes.
- Potential for wind-tunnel effects around the podium and public realm, requiring detailed testing.

- Before approval independent shadow and wind studies should be peer-reviewed.

4j) Snow Management and Winter Safety

- The proposed development provides no realistic on-site solution for snow storage or removal.
- Full-lot coverage and underground parking ramps eliminate safe areas for accumulation or containment.
- Frequent truck haulage would add winter noise, emissions, and congestion on local streets.
- Meltwater runoff risks refreezing on sidewalks, driveways, and roadways, creating hazardous conditions.
- Tower shadows will delay snowmelt, prolonging icy surfaces throughout the winter months.
- Narrow residential streets like Pearl and Prince cannot accommodate additional plowing, piling, or haulage operations.
- Tower residents removing snow from balconies could drop snow and ice onto surrounding sidewalks and properties, creating serious public safety hazards.
- No winter operations plan has been provided to address snow management or pedestrian safety impacts.

4j) Zoning Amendments and MTSA Boundary Misalignment

- The proposal depends entirely on major zoning by-law amendments to permit height, density, setbacks, and parking far beyond existing zoning.
- Current designations (DC-FU and RO) permit low- to mid-rise mixed-use, not 16–18 storey towers on a six-storey podium.
- These amendments would override both the Downtown Secondary Plan and Milton’s Official Plan, which require compatible scale and gradual height transition.
- Approving the requested rezoning would pre-approve the developer’s current massing, eliminating Council’s ability to negotiate reductions later.
- The developer’s justification relies on the site’s inclusion in an arbitrary MTSA “bump-out” west of Main Street that captures this parcel while excluding others closer to the station.
- This mapping irregularity creates a false basis for “transit-oriented” tower density on a site lacking direct GO access or pedestrian integration.
- Council can refuse the zoning amendments and request a boundary review by Halton Region to correct the MTSA map and exclude this parcel, restoring conformity with local planning intent.
- A refusal maintains Council’s planning authority, prevents a dangerous precedent for high-rise approvals west of Main Street, and reinforces the policy intent of balanced, context-sensitive growth.

4k) Constructibility and Feasibility

- The site is too small, irregular, and bounded by heritage streets to safely accommodate deep excavation and heavy staging for two towers.
- Multi-year excavation and crane operations would cause lane closures, noise, vibration, and dust for 5–7 years.

- No safe route or on-site space for construction vehicles without blocking public roads.
- Deep shoring, dewatering, and vibration could compromise nearby heritage foundations and utilities.
- A mid-rise (5–6 storey) design could be safely built within the site’s limits, adding housing without years of disruption.

4l) Safety

- Pearl, Prince, and Main were not designed for tower-scale traffic, density, and service vehicles.
- Minimal setbacks and no internal loading/turnaround space obstruct emergency access
- Heavy construction and daily vehicle movements threaten safety near schools, parks, and community facilities.
- People before buildings: growth must enhance, not endanger, Milton’s walkability and livability.

4m) Quality of Life & Community Impact

- Noise, light, and privacy intrusions into neighbouring backyards and windows.
- Loss of small-town character and walkable setting residents value.
- Congestion and daily disruption from vehicles, deliveries, and extended construction.
- Diminished livability from shadowing, wind effects, and loss of open sky.
- Social fabric strain as tower-scale density disconnects from the existing street network.
- Human health and well-being effects should be considered in planning decisions.

4n) Precedent and Cumulative Impact

- Approving this project would signal to other developers that extreme height and density are acceptable in Old Milton.
- It would accelerate uncoordinated intensification, threatening the character and infrastructure capacity of nearby blocks.
- This sets a dangerous precedent for future development applications.

4o) Responsible Alternative

- Replace the 16–18 storey towers with low-rise, human-scale options — e.g., townhomes, semis, singles — or a modest 4-storey mixed-use / small commercial building.
- This approach aligns with Milton’s Official Plan and Reimagining Main Street vision for balanced, pedestrian-friendly growth that respects adjacent heritage homes and neighbourhood character.
- Aligned with Milton’s Official Plan and Reimagining Main Street vision (low- to mid-rise, pedestrian-friendly growth in heritage areas).
- Delivers new housing, jobs, and tax revenue without overloading traffic, infrastructure, or shadowing neighbours.
- Constructive path: Council can direct the applicant to redesign within these parameters — saying “yes, but responsibly.”
- Encourage mixed-use density along Main Street while maintaining transitions to Pearl and Prince.
- We aren’t anti-development, we simply want responsible, contextual growth.

5. Conclusions & Requested Council Directions

- REFUSE the proposed Official Plan and Zoning By-law amendments for the Main & Prince application as inconsistent with policy intent for compatibility, transition, safety, and livability;
- DIRECT Town staff to collaborate with Halton Region on a review and rationalization of the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, construction logistics), all publicly released, followed by meaningful public consultation;
- SUPPORT a redesigned, low to mid-rise (4–6 storey) alternative — such as townhomes, semis, or a modest mixed-use / small commercial building — featuring Main Street-oriented retail, step-backs, and angular planes that respect surrounding homes.

I, Edward Fiore, certify that the statements herein are true and made in good faith as a resident directly affected by the proposed development.

Address: [REDACTED]



DR. YVONNE LAM AND ASSOCIATES
SMILE WITH CONFIDENCE

Jessica Tjanic
Senior planner, Development Planning
150 Mary Street
Milton. ON L9T 6Z5

Dear Ms Tjanic,

I am writing to express my concerns regarding the proposed development of 388 Main St East. I am a dentist serving the Milton community for over 18 years. My office is located at 106 Wakefield Road, 450m from the proposed entrance to this site. We have been in operation at this location for over 40 years.

My concerns centre around the proximity of this large development to single unit residential housing and single story structures. It does not keep with the character of the historic downtown neighbourhood. Any proposed developments should be keeping with other low rises in the area that are approximately six to eight stories.

The road infrastructure surrounding the site is undersized for the scale of the proposed development. With the current design, the main vehicular access is directly across the street from an elementary school. In addition to the safety concerns, traffic will be congested as Pearl Street is narrow and not designed to handle this volume. The entrance should be relocated to Bruce, Prince or Main Street as they are already zoned for commercial use.

As a business owner, the construction process will create excessive noise and vibration. It can make a routine dental appointment uncomfortable. Additionally, vibration has the potential to damage our building. Ongoing construction lasting of a couple of years would impact our sustainability and limit our ability to serve the residents of Milton. A closure of our office due to damage would be detrimental to our business and livelihood.

With construction comes many large work vehicles coming up and down these small streets leading to congestion and dirt. We have also noted that every time there is construction nearby (eg current road repair on Ontario St), workers park their vehicles in our parking lot and patients can not find parking. Arrangements for parking should be made offsite (perhaps at the Milton Mall). Bruce and Prince at Main should be used for work vehicles, not through the narrow streets of this quaint neighbourhood.

Water availability is another key concern for our business. Dentistry requires a strong water supply and if there is inadequate or contaminated water, we cannot serve the community. A thorough study of the water sources must be studied before a large development of this size should be considered. The groundwater supply likely cannot handle this large project. Milton required the addition of water supply twenty years ago to build out our new communities.

Should you require any comments or clarification, please contact me at 905 878 0555.

Sincerely yours,

Dr Yvonne Lam

GUNDING & HANS LLP

BARRISTERS & SOLICITORS
NOTARIES PUBLIC

TELEPHONE (905) 875-4678
FAX (905) 878-3723

NIGEL A. GUNDING, B.A. (Hons), LL.B.
HARPREET K. HANS, LL.B.

407 PINE STREET
MILTON, ONTARIO
L9T 1L3

October 31, 2025

Jessica Tjanic
Senior Planner
Town of Milton
150 Mary Street
Milton, ON
L9T 6Z5

Dear Madam:

**RE: Application for Official Plan Amendment and Zoning By-Law Amendment – 388 Main Street East, 389, 395, 399, 405, 409 Pearl Street and 17 Prince Street, Milton, Ontario
Town File LOPA-07/25 and Z-18-25**

We are writing in response to the Notice of Application that we received from the Town of Milton, dated September 23, 2025.

We are operating a very busy law practice from our offices at 407 Pine Street. Whereas our property does not abut the proposed lands, we are in very close proximity to the proposed development and would be directly impacted by the increased traffic congestion and the inevitable erosion of the environment that a high-rise building in the nearby vicinity would create.

We wish to make clear that we have no issues with development of the site in general. Our main objection focuses on the proposed height and density of the new development. More specifically, we take issue with the fact of a 16-storey building, an 18-storey building and three levels of underground parking. A lower rise building may be quite an improvement for the surrounding area.

Traffic & Congestion

The subject lands are in an area where Main Street is highly congested already. Between the hours of 3-7pm on any given weekday, Main Street is significantly backed up. There does not seem to be an ability to expand Main Street to add additional lanes. Constructing a high-density development on the footstep of Main Street will only add traffic congestion, lane closures, detours and other factors that will only worsen the existing traffic congestion. Furthermore, the proposed site is surrounded by single lane roads with older residential homes. The intersection of Main Street and Ontario Street is already an over-stressed intersection. Pedestrians crossing Main Street may find safety to be a factor with higher congestion than already exists. We have witnessed near misses of pedestrian and vehicle collisions on the existing crosswalk in front of Prince Street.

Environmental Impact

We would leave it to other more qualified parties to comment on technical aspects of the environmental impact but will simply add that existing businesses and residences will experience significant disruption to daily life, such as dust, debris, noise, and vibration. It is critical that the development process does not cause difficulty with connection to hydro and internet as our business relies entirely on internet-based applications and significant monetary damages would ensue from interruption to these services. Furthermore, we question how the development will sustain water and sewage. Schools in the area are at maximum capacity, and we question how school children living in the proposed development will be accommodated in these overcrowded schools.

Neighbourhood Character

The proposed development would be within "Old Milton". This is the area where the streets are smaller, the houses are charming, there are no cookie-cutter developments, and pride of ownership and charm are highly respected and coveted. Adding high rise buildings in this area is highly out of character for the neighbourhood. The "small town feel" of the neighbourhood will disappear rapidly. The high-rise development will add to the feeling that Milton chooses to grow without regard for the appropriate location in which to place the growth. Old Milton should not feel like a "Frankenstein" development area where proposed buildings are too tall for the surrounding area.

Thank you for considering these concerns in determining how to handle the application before the Town of Milton and Council.

Yours very truly,
Gunding & Hans LLP



Nigel A. Gunding & Harpreet K. Hans

NAG/HKH:mgf

Re: Proposed “Main & Prince” Development

Applicant: Slessor Square LP Inc. Applications: LOPA-07/25 & Z-18/25

Location: 388 Main St E / 389-409 Pearl / 17 Prince

Submitted by: Tessa Fiore, [REDACTED] Milton, [REDACTED]

Date: October 31, 2025

Submission Type: A Written Statement to Town Clerk for Council Record

1. Executive Summary

This submission requests that Council refuse the Official Plan and Zoning By-law amendments sought for the Main & Prince proposal (two residential towers of 16 and 18 storeys atop a six-storey podium, with near full-lot coverage), on the grounds that the application:

- Conflicts with the Town’s Official Plan and Downtown planning framework that require compatible scale and a defensible transition to established low-rise areas;
- Strains local streets and municipal servicing (stormwater, water, sanitary), lacks a viable winter operations plan, and risks unacceptable construction and safety impacts;
- Creates adverse built-form, shadow, wind, livability, and heritage-setting impacts that cannot be mitigated at the proposed scale; and
- Relies on an irregular MTSA “bump-out” mapping to justify tower-scale density at a site lacking direct transit integration.

We support responsible, context-sensitive mid-rise redevelopment (4 storeys) with Main Street-oriented retail, step-backs, and angular planes that respect its neighbours

Requested Council Actions:

- REFUSE the proposed amendments as filed;
- DIRECT staff to work with Halton Region to review and rationalize the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent, publicly released peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, and construction logistics), followed by genuine public consultation.

2. Site & Proposal Overview

• Site: The subject property occupies a prominent corner in Old Milton, with frontages on Main Street East, Pearl Street, and Prince Street. The site directly borders established 1- and 2-storey residential homes and sits within a heritage streetscape characterized by small-lot houses, mature trees, and human-scale façades. The property forms a transition zone between the Main Street commercial corridor and adjacent residential blocks to the south.

Proposal: The applicant proposes to redevelop the site with two high-rise residential towers of 16 and 18 storeys atop a six-storey podium, containing approximately 570 condominium units and 815 m² of ground-floor commercial space. The development would cover nearly the full lot area from Main to Pearl and Prince, with minimal setbacks and no significant open-space buffers to neighbouring homes.

3. Policy & Guideline Framework

This assessment references a non-exhaustive: Town of Milton Official Plan (compatibility, character, transition), Downtown planning directions, Urban Design Manual and tall-building/angular-plane guidance, Heritage policies/Master Plan, and applicable transportation/servicing standards.

4. Detailed Findings

4a) Process and Community Consultation

- The community has not been adequately consulted — the scale of opposition indicates a disconnect.
- We kindly request deferral until proper consultation and peer review occur.
- An approval without these steps would undermine public trust and transparency.

4b) Heritage and Character

- The site borders Old Milton’s heritage core, where existing buildings reflect a human-scaled, small-town fabric.
- The project Violates Official Plan policies emphasizing preservation of community character and cultural heritage.
- The project disrupts the visual harmony of the area and erodes Milton’s historical identity.
- A more context-sensitive design would align with Milton’s Civic Precinct and Reimagining Main Street goals. We would prefer town houses if anything.

4c) Public Realm and Livability

- The development prioritizes density over public realm improvements.
- Insufficient setbacks and landscaping for pedestrian comfort and greenery.
- Commercial frontages should face Main Street, not residential side streets.
- Lacks community amenities or meaningful contributions to local infrastructure.

4d) Height and Scale

- The proposed 16- and 18-storey towers vastly exceed the existing 1–2 storey context.
- Establishes a precedent for over-intensification in Old Milton, contrary to its small-town, heritage character.
- Fails to respect the “transition in height and density” policies of Milton’s Official Plan.
- Creates an overbearing visual presence incompatible with the pedestrian scale of Main, Pearl, and Prince Streets.

4e) Built Form and Transition

- The mass and floorplate size do not comply with recommended tall-building guidelines.
- Podium height (6 storeys) is too tall for the surrounding context — should be reduced to a maximum of 4 storeys.
- No meaningful step-backs or angular planes to protect adjacent low-rise residential properties.
- Shadow and overlook impacts on homes and yards along Pearl and Prince are excessive.

4f) Traffic, Parking, and Access

- Pearl and Prince are narrow residential streets not designed for large traffic volumes. Lots of accidents on these streets, streets do not have speed bumps or stop signs that residents would like. Lots of kids live in this neighbourhood.
- Main street is only 1 lane each way and is already very busy during business hours, pre and post work.
- Feeder streets like Pine St and Oak Street all already too busy with unsafe drivers trying to avoid Main St Traffic.
- Additional vehicle movements and deliveries would worsen congestion and reduce safety. Again lots of children in the area which makes for a dangerous outdoor setting.
- Increased risk for pedestrians and children — especially near schools and crossings.
- Not nearly enough safe crossing zones currently exist
- Construction staging and trucks would cause noise, dust, and road obstruction.
- Access points must be restricted to Main or Bruce Street only — no Pearl or Prince access.
 - o Main Concern: The traffic study underestimates growth, omits key intersections, and ignores local congestion and pedestrian safety. Parking supply is insufficient.
 - o Recommendation: Require independent peer review, updated traffic data, and binding transportation demand management plans.
 - o The proposed development provides 417 parking spaces for 570 units, representing a 27% deficit relative to the Town's Zoning By-law 89-2022 requirements. The consultant invokes Bill 185 to claim that no parking is required within a Protected Major Transit Station Area. However, no rapid transit currently exists, and no mitigation strategy is proposed to address on-street parking displacement on Court, Prince, Pearl, and Pine Streets.
 - o In addition there is no street level parking provided for the 8000 sqft of commercial space that is provided.

4g) Infrastructure and Servicing

- Local stormwater, water, and sanitary systems are already near capacity.
- The Town must require peer-reviewed servicing studies confirming system adequacy.
- Without upgrades, there's risk of flooding, runoff, and pressure drops in nearby homes.
- Increased density will strain municipal services without demonstrated capacity.
- Snow accumulation and removal from a large-scale development will further burden local infrastructure and narrow residential streets.
- Added population will increase strain on nearby schools and educational resources already operating near capacity.

4h) Shadow, Wind, and Environmental Impacts

- Tall towers will create prolonged shadows on neighbouring properties and streets.
- Reduced natural light and livability for existing homes.
- Potential for wind-tunnel effects around the podium and public realm, requiring detailed testing.

- Before approval independent shadow and wind studies should be peer-reviewed.

4j) Snow Management and Winter Safety

- The proposed development provides no realistic on-site solution for snow storage or removal.
- Full-lot coverage and underground parking ramps eliminate safe areas for accumulation or containment.
- Frequent truck haulage would add winter noise, emissions, and congestion on local streets.
- Meltwater runoff risks refreezing on sidewalks, driveways, and roadways, creating hazardous conditions.
- Tower shadows will delay snowmelt, prolonging icy surfaces throughout the winter months.
- Narrow residential streets like Pearl and Prince cannot accommodate additional plowing, piling, or haulage operations.
- Tower residents removing snow from balconies could drop snow and ice onto surrounding sidewalks and properties, creating serious public safety hazards.
- No winter operations plan has been provided to address snow management or pedestrian safety impacts.

4j) Zoning Amendments and MTSA Boundary Misalignment

- The proposal depends entirely on major zoning by-law amendments to permit height, density, setbacks, and parking far beyond existing zoning.
- Current designations (DC-FU and RO) permit low- to mid-rise mixed-use, not 16–18 storey towers on a six-storey podium.
- These amendments would override both the Downtown Secondary Plan and Milton’s Official Plan, which require compatible scale and gradual height transition.
- Approving the requested rezoning would pre-approve the developer’s current massing, eliminating Council’s ability to negotiate reductions later.
- The developer’s justification relies on the site’s inclusion in an arbitrary MTSA “bump-out” west of Main Street that captures this parcel while excluding others closer to the station.
- This mapping irregularity creates a false basis for “transit-oriented” tower density on a site lacking direct GO access or pedestrian integration.
- Council can refuse the zoning amendments and request a boundary review by Halton Region to correct the MTSA map and exclude this parcel, restoring conformity with local planning intent.
- A refusal maintains Council’s planning authority, prevents a dangerous precedent for high-rise approvals west of Main Street, and reinforces the policy intent of balanced, context-sensitive growth.

4k) Constructibility and Feasibility

- The site is too small, irregular, and bounded by heritage streets to safely accommodate deep excavation and heavy staging for two towers.
- Multi-year excavation and crane operations would cause lane closures, noise, vibration, and dust for 5–7 years.

- No safe route or on-site space for construction vehicles without blocking public roads.
- Deep shoring, dewatering, and vibration could compromise nearby heritage foundations and utilities.
- A mid-rise (5–6 storey) design could be safely built within the site’s limits, adding housing without years of disruption.

4l) Safety

- Pearl, Prince, and Main were not designed for tower-scale traffic, density, and service vehicles.
- Minimal setbacks and no internal loading/turnaround space obstruct emergency access
- Heavy construction and daily vehicle movements threaten safety near schools, parks, and community facilities.
- People before buildings: growth must enhance, not endanger, Milton’s walkability and livability.

4m) Quality of Life & Community Impact

- Noise, light, and privacy intrusions into neighbouring backyards and windows.
- Loss of small-town character and walkable setting residents value.
- Congestion and daily disruption from vehicles, deliveries, and extended construction.
- Diminished livability from shadowing, wind effects, and loss of open sky.
- Social fabric strain as tower-scale density disconnects from the existing street network.
- Human health and well-being effects should be considered in planning decisions.

4n) Precedent and Cumulative Impact

- Approving this project would signal to other developers that extreme height and density are acceptable in Old Milton.
- It would accelerate uncoordinated intensification, threatening the character and infrastructure capacity of nearby blocks.
- This sets a dangerous precedent for future development applications.

4o) Responsible Alternative

- Replace the 16–18 storey towers with low-rise, human-scale options — e.g., townhomes, semis, singles — or a modest 4-storey mixed-use / small commercial building.
- This approach aligns with Milton’s Official Plan and Reimagining Main Street vision for balanced, pedestrian-friendly growth that respects adjacent heritage homes and neighbourhood character.
- Aligned with Milton’s Official Plan and Reimagining Main Street vision (low- to mid-rise, pedestrian-friendly growth in heritage areas).
- Delivers new housing, jobs, and tax revenue without overloading traffic, infrastructure, or shadowing neighbours.
- Constructive path: Council can direct the applicant to redesign within these parameters — saying “yes, but responsibly.”
- Encourage mixed-use density along Main Street while maintaining transitions to Pearl and Prince.
- We aren’t anti-development, we simply want responsible, contextual growth.

5. Conclusions & Requested Council Directions

- REFUSE the proposed Official Plan and Zoning By-law amendments for the Main & Prince application as inconsistent with policy intent for compatibility, transition, safety, and livability;
- DIRECT Town staff to collaborate with Halton Region on a review and rationalization of the GO MTSA boundary west of Main Street;
- IF NOT REFUSED, DEFER pending independent peer reviews (traffic/safety, wind/shadow, servicing & hydrogeology, winter operations, construction logistics), all publicly released, followed by meaningful public consultation;
- SUPPORT a redesigned, low to mid-rise (4–6 storey) alternative — such as townhomes, semis, or a modest mixed-use / small commercial building — featuring Main Street-oriented retail, step-backs, and angular planes that respect surrounding homes.

I, Tessa Fiore, certify that the statements herein are true and made in good faith as a resident directly affected by the proposed development.

Address: [REDACTED]; [REDACTED]

Jessica Tijanic

From: John Bennett [REDACTED]
Sent: Saturday, November 1, 2025 2:33 PM
To: Jessica Tijanic
Subject: New development question

Hi Jessica,

I have a few concerns associated with the proposed high density dwellings.

- 1, Considering the glut of new developments that have been built, and are being currently being built. What is the extent, and location, of any future sites where additional development is being considered.
- 2, Has the council considered the negative impact that more high rise residences will cause to the already overburdened infrastructure. As a long time Milton residence I have been disappointed by the councils apathy for the feelings and concerns of their residents.
- 3, It appears that the council is more interested in the provincial payments that are associated with the building of new homes in the locations close to, or actually in, current neighbourhoods.
- 4, Does the council recognize the negative impact on property values within developments in current and long established neighbourhoods. Those of us who are long time Milton residents are being sold out by Minton council who are disregarding us in favour of creating another Mississauga.
- 5, Many Milton residents will lose their privacy while living in the shadow of high rise buildings, I doubt anyone would be in favour of having direct visual access these buildings will have to our property.
- 6, The noise associated with construction has been intrusive while buildings are being built on Nipissing and at the corner of Main Street and Thompson. There is no possible mitigation to address the intrusion into our daily lives.

In my opinion, Milton is being further destroyed and devalued by the councils greed for Provincial payments and intrangence towards loyal tax paying residents.

Best regards

John Bennett
[REDACTED]

November 2, 2025

Jessica Tijanic
Senior Planner, Development Planning
150 Mary Street
Milton, ON, L9T 6Z5

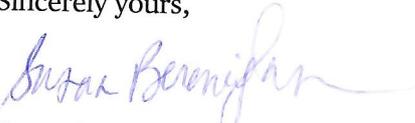
Dear Ms. Tijanic,

My name is Susan Bermingham, and I am the current owner of Wakefield Professional, a building at 106 Wakefield Road that houses a dental office and an optometrist's office. I am a dentist that has practiced in this building for over 25 years. I am writing at this time to submit my concerns around the proposed new condominium towers on Main Street (Town File LOPA-07/25 and Z-18/25). While I understand the town's need to plan for growth, this development is of a scale and intensity that is incompatible with the surrounding and supporting neighbourhood.

The height and density of the proposed towers is inconsistent with the existing neighbourhood, which consists primarily of one and two storey buildings. I fear this will impact adjacent properties through shadowing, reduced visibility and significantly increased traffic and parking pressure. Given it's current status and small footprint, Wakefield Professional relies on it's accessibility and visibility to remain viable. High rise construction near the building could disrupt operations for the professional offices within and diminish property value thus penalizing long-standing, community-serving businesses that have operated responsibly within the town's regulations. Of note, a long-standing issue for many professional offices within Milton has been the lack of available professional spaces to house professionals that serve the community. Significantly increasing residential capacity without providing the infrastructure for residents serves the interest of builders, rather than the needs of the community.

I understand that the town has an Official plan to intensify the older corridor of Milton, but poorly planned density can undermine livability and sustainability for all. Respectfully, I would ask that this plan be rejected, or deferred until all all studies have been completed to determine how this affects traffic, shadow, noise and infrastructure for surrounding residents.

Sincerely yours,



Susan Bermingham

388 Main St East Development Proposal Review

Town of Milton File Reference: Main & Prince (LOPA-07/25 & Z-18/25)

November 2 , 2025

Submission: Kimberley Savage-Pauslon, [REDACTED] Milton

I, Kimberley Savage Paulson and family have been residents of Old Milton for the past years. I purposely chose this location because of the Milton character 2 story redbrick house with a front porch, small library that was down the street, restaurants within walking distance and the small Old Milton Town vibe. I spoke with Mr. Slessor several times and he mentioned developing his land into luxury townhomes which I said I would totally support as a neighbour. He didn't want to change the neighbourhood; he wanted to restore what his renters destroyed, which was a few of the heritage homes along Pearl Street. When my family first moved in at [REDACTED] I spent much of the initial 5 years calling the cops to stop street fights, drug dealings, and drunks leaving from Nascar. Many of these people were also renters on Slessors with constant calls to the police station and ambulance for drug overdoses. It took about 8 years before I had called the police and intervened with families that eventually I would say the majority of drugs and drunkenness had moved out from our area.

This is a small area where we are a close-net group of neighbours who walk our family dogs to the cemetery and say hello to all our neighbours. We know who each other is and their pets by name. We've always wanted Slessor to develop his land and clean it up and get tenants that don't add problems to our community. Which is why we are shocked that his daughter would think that this structure with 2 towers would be a responsible proposal in such a small amount of land that lacks any greenspace around it. Conflicting with every house surrounding it.

The proposed development for the 388 Main Street site has a number of deficiencies in its current form that need to be addressed before council gives approval to any by law amendments or variances, and there are additional by law amendments that should be included to control activities at the site.

The development as currently proposed will directly contribute to a significant decline in the quality of life for current residents, and afford a quality of life for future residents of this development that is not commensurate for the type of community Milton is and hopes to be.

The construction of this development has potentially ruinous impacts to neighbouring businesses, both during construction and after completion.

Overall, the evaluation and impact assessments conducted by the developer fail to adequately consider impacts to the environment, infrastructure and the surrounding community.

[Wind load on structures](#) Please refer to this video

[A Deep Dive into Wind Effects](#)

1.1.1 Wind

The building footprint will be approximately 68m x 63m. Such a large building dominating the skyline will have significant wind effects. None of the design documentation contemplates the wind effects of the building. Given that there are no neighbouring buildings of similar size one of the potential effects will be significant down drafts. This has the potential to exacerbate issues with respect to falling ice discussed above.

In addition the reports claim to prioritize the pedestrian experience, however these wind effects, especially on the north and west faces of the building will be profound in winter, seriously discouraging pedestrian traffic. A local example of the wind effect of large buildings is the velodrome, whose height is nowhere near the proposed height of this building.

The specific location of this building will be at the crest of a hill. This combined with the height of the building means there is no wind break and wind effects are likely exacerbated.

These kinds of wind effects could result in damage to neighbouring properties. These risks are not evaluated in the developer submission. Literature on research conducted on buildings smaller than the one proposed indicates “creating a severe risk of associated unexpected exterior material damage” (see reference 1)

1.1.1.1 References:

1. Wind, 2023, (<https://www.mdpi.com/2674-032X/3/1/7>), “Wind Tunnel Experiments on Interference Effects of a High-Rise Building on the Surrounding Low-Rise Buildings in an Urban Block” by Yasuyuki Ishida, Akihito Yoshida, Shuhei Kamata , Yuta Yamane and Akashi Mochida

Effect on Wind (Aerodynamics)

Buildings, especially tall or densely packed ones, significantly disrupt natural wind flow patterns, leading to several specific phenomena:

- **Downwash Effect:** Wind hitting a tall building head-on is forced downward to street level, causing strong, cold, and potentially dangerous gusts.
- **Venturi/Channeling Effect:** When wind is funneled through narrow gaps between buildings, it accelerates substantially, much like air through a nozzle, creating uncomfortably high wind speeds in street canyons or passages.
- **Corner Acceleration and Vortices:** Wind flow separates at sharp building corners, creating swirling patterns of fast-moving air (vortices) that can be hazardous for pedestrians and cause dynamic stress on the building's structure.
- **Wind Loads:** The wind pressure and suction forces on a building's surfaces exert static and dynamic loads (shear, bending, twisting forces) on the structure and its components (like windows and roofing). Engineers must design the building to resist these forces to prevent damage or collapse, especially during extreme weather events like typhoons or tornadoes.

Effect on the Environment

Beyond immediate wind effects, buildings influence the broader environment in several ways:

- Pedestrian Comfort and Safety: Engineers analyze wind patterns to ensure that outdoor areas like plazas, parks, and sidewalks are comfortable and safe for public use, rather than excessively windy or stagnant. No set backs which mean it is not safe for pedestrians when there is no snow fall- the sidewalks will not be able to be cleared as there is no space for the snow to go and the design has an elevation.
- Natural Ventilation and Air Quality: Building layouts can facilitate or block natural ventilation through urban areas. Poorly planned, dense construction can create "wind shadow" areas, reducing airflow, trapping vehicle emissions and pollutants, and exacerbating the urban heat island effect. MILTON CHRISTIAN SCHOOL less than 150 feet away from their playground and recess area
- Microclimate Alteration: The shape, height, and materials of buildings change the local temperature, humidity, and airflow patterns. Tall buildings can block sunlight, creating shaded areas, while dense urban landscapes absorb and store more heat than natural environments, contributing to higher urban temperatures.
- Blocking North America's first condo which received government for its green sustainability and also subsidies over 80% of the Green Energy Condo Corps maintenance fees this would be devastating to the current owners and occupants of the building. This was also supported by the Town of Milton as a GREEN INITIATIVE for the LONG TERM.
- Energy Efficiency: Understanding wind effects allows for optimized building design (orientation, window placement, use of natural ventilation) to improve indoor comfort, reduce the reliance on mechanical heating/cooling systems (HVAC), and thus lower energy consumption and carbon emissions.
- Damage to Adjacent Structures: Strong winds generated by a new high-rise can increase the wind pressure on surrounding low-rise buildings, potentially causing

damage to their roofs or walls if not accounted for during design. I am really concerned about how the winds can affect my shingles and our enjoyment as a family who enjoys being outside and gardening.

Engineers use tools like wind tunnels and Computational Fluid Dynamics (CFD) simulations to predict and mitigate these effects during the design phase, often incorporating design modifications like chamfered corners, podiums, canopies, or strategic landscaping to manage airflow. I would like to see these simulations be conducted at the builders expense before any building is approved.

Thank you for reading my concerns and I hope that each one is examined with care. We want to keep Milton beautiful and that's accomplished with proper planning and community involvement.

Jessica Tijanic

From: JIM LINDSAY [REDACTED]
Sent: Monday, November 3, 2025 4:21 PM
To: Jessica Tijanic
Subject: Fwd: Slessor Square Proposed Development

From: JIM [REDACTED]
To: Jessica.Trijanic <Jessica.Trijanic@milton.ca>
Date: Friday, 31 October 2025 11:42 AM EDT
Subject: Slessor Square Proposed Development

Jessica, I'm concerned about the traffic chaos this development would create to our entrance. It is already problematic for the residents to use the only access from our property enter Main street, and this proposal can only make things more difficult.

Consider that during our normal exit and entrance, we have to consider:

- Pedestrian traffic on sidewalks both ways
- Pedestrian traffic from the crosswalk
- E bikes and scooters that use the sidewalks at a significantly higher speed than walkers
- Vehicles entering right off Prince street affecting left turns
- Vehicles exiting from the immediate driveway to the right (Wisla deli)
- Vehicles exiting from the immediate left (Subway, Pharmacy, Flower shoppe)
- Vehicles turning from left and right on Main into the previously mentioned driveways
- Vehicles turning left from Main Street on to Prince street using the left turn lane which we utilize to blend with traffic when heading east
- **Rush Hour Traffic** in the morning and afternoon already backs up in front of our exit increasing the above difficulties
- **Winter** Main St sidewalk snow clearing has been poor which puts pedestrians on the road. South sidewalk was impassable for days last winter.

Adding 500+ residential units and some commercial shops facing Main street will certainly compound the above situations.

- not enough parking spots(417) for the residents let alone anyone attending or working in the commercial shops
- Vehicles stopping on Main St to drop off clients for the commercial shops affecting the traffic on Main St
- Deliveries to these shops blocking traffic on Main street
- Significantly increasing the vehicles entering from the east to or exiting from Prince street.
- The road has only 2 traffic lanes plus a turning lane that I don't think can be easily widened

Jessica, traffic is already a mess, and this development proposal can only make make life hell for the Green Life residents in downtown Milton. The town needs to look carefully at this issue before making any decision on increasing the density from the existing standards. The construction would require dump trucks and other equipment entering in to and exiting from the site that will impact the dally traffic flow on Main street. It would have to effect emergency vehicles that protect the residents.

Please pass my thoughts on to the responsible parties who ware reviewing the situation.

Thank you,

James Lindsay

[REDACTED]
[REDACTED]

Town Hall Rebuttal Brief

388 Main Street East Redevelopment – LOPA-07/25 & Z-18/25

Prepared by: Ahmed Muawiyah (Milton Resident)

1. Introduction

This Rebuttal Brief has been prepared in response to the community petition opposing the proposed redevelopment at 388 Main Street East, 389–409 Pearl Street, and 17 Prince Street. The proposal submitted by Slessor Square LP Inc. has undergone a comprehensive technical and planning review, supported by fifteen independent studies addressing environmental, heritage, transportation, and servicing considerations. This document consolidates factual findings from those reports to ensure Milton Town Council and residents have a clear, evidence-based understanding of the project’s merits.

2. Height and Scale

Petition Claim: The towers exceed Old Milton’s character and fail to transition appropriately.

Rebuttal: The Urban Design Brief (MHBC, Mar 2025, p. 9) confirms that the development introduces a deliberate transition from the Central Business District to the adjacent residential streets through podium articulation and tower stepbacks. The Design Impact Analysis (KNYMH, Dec 2, 2024, pp. 18–27) demonstrates shadow compliance and reduced perceived massing through 3–5 metre stepbacks. According to the Planning Justification Report (Arcadis, Mar 25 2025, p. 4), the subject site is within Milton’s Urban Growth Centre and Major Transit Station Area, both designated for intensification. Therefore, the proposed height and density align fully with the Town’s growth objectives and provincial planning mandates.

3. Built Form and Transition

Petition Claim: The project lacks appropriate stepbacks and transition to neighbouring homes.

Rebuttal: The Architectural Set (KNYMH, Feb 25 2025, pp. 12–15) illustrates a six-storey podium employing heritage-style brick materials. The Urban Design Brief (MHBC, p. 8) confirms step-down transitions along Pearl and Prince to three-storey townhome-scale elements. These features exceed Town design expectations and achieve a contextual relationship with the surrounding neighbourhood.

4. Traffic, Parking, and Access

Petition Claim: Local streets cannot accommodate additional traffic.

Rebuttal: The Traffic Impact and Parking Study (Paradigm, Mar 2025, pp. 22–30) reports 170 AM and 242 PM peak-hour trips, all within acceptable operational capacity. Intersection performance remains at Level of Service C or better. Pearl Street is reserved solely for underground parking access, with compliant sightlines and spacing. The report further

notes that the site's inclusion in a Protected Major Transit Station Area under Bill 185 justifies lower parking ratios, reinforcing Milton's transit-oriented vision.

5. Infrastructure and Servicing

Petition Claim: The project will strain existing water, sanitary, and storm infrastructure.

Rebuttal: The Functional Servicing and Stormwater Management Report (MTE, Feb 25 2025, pp. 11–16) confirms all municipal systems possess adequate residual capacity. Post-development discharge ($0.144 \text{ m}^3/\text{s}$) remains below pre-development levels ($0.146 \text{ m}^3/\text{s}$). Quality treatment via Stormceptor EF08 achieves 70% total suspended solids removal, meeting MOECC criteria. In short, the development enhances rather than burdens existing systems.

6. Shadow, Wind, and Environmental Impacts

Petition Claim: The towers will cause excessive shadows and wind tunnels.

Rebuttal: The Design Impact Analysis (KNYMH, Dec 2 2024, pp. 22–28) demonstrates minimal shadow impact on neighbouring properties during key sunlight hours (10 AM–3 PM). Wind studies confirm compliance with CPP pedestrian comfort thresholds, ensuring no hazardous wind zones. These findings prove environmental comfort has been fully integrated into the design process.

7. Heritage and Character

Petition Claim: The project undermines Old Milton's historic core.

Rebuttal: The Heritage Impact Assessment (MHBC, Mar 7 2025, pp. 9–14) clarifies that affected buildings are listed, not designated under the Ontario Heritage Act. The report concludes there is no loss of heritage attributes. It recommends commemorative plaques and interpretive designs to celebrate the area's history. This represents preservation through adaptive evolution, consistent with the Town's heritage principles.

8. Public Realm and Livability

Petition Claim: The plan neglects greenery and public amenities.

Rebuttal: The Landscape Plan (adesso design, Jan 23 2025, pp. 3–5) includes native trees, widened sidewalks, and heritage-style benches. The Tree Protection Plan (Dec 2 2024) enforces arborist supervision and nesting protections. Together, these features create a greener, safer, and more walkable environment than the existing condition.

9. Process and Consultation

Petition Claim: The community was not adequately consulted.

Rebuttal: The Planning Justification Report (Arcadis, Mar 25 2025, pp. 27–29) documents extensive coordination with Town staff, Halton Region, and Conservation Halton prior to submission. Fifteen independent studies ensure transparency and rigor under the Planning Act. This process represents one of Milton’s most thoroughly reviewed private applications.

10. Conclusion

The collective evidence from fifteen professional reports confirms that the proposed redevelopment at 388 Main Street East is consistent with Milton’s Official Plan, the Provincial Planning Statement 2024, and Bill 185’s intensification mandates. It respects local heritage, manages traffic and servicing responsibly, and enhances the public realm. Accordingly, the concerns presented in the opposition petition are not supported by technical data or planning policy.

Respectfully submitted,

Ahmed Muawiyah (Milton Resident)

Speech to Milton Town Council

Re: Construction Impacts and Absence of a Construction Management Plan

Good evening Mayor and Members of Council,

Thank you for the opportunity to speak today. My name is Ken Boroski, and I'm a resident of [REDACTED]. I'm here to raise serious concerns about the proposed development and its lack of a construction management plan—a gap that poses real risks to our neighbourhood's safety, infrastructure, and wellbeing.

Let me begin with the most glaring omission: there is no construction management plan submitted. No evaluation of constructability. No strategy for mitigating impacts. This is deeply troubling given the proximity to residential homes, a daycare, a school, and numerous small businesses. We are not adjacent to a rail corridor or industrial zone—this is a living, breathing community.

One of the most immediate concerns is dust. A project of this scale will generate significant airborne debris, which will settle on our solar panels at 383 Main Street East. This isn't hypothetical—it's measurable. Each cleaning of our solar array costs approximately \$5,000. Without a dust mitigation strategy, we could be facing multiple cleanings per season, creating a recurring financial burden for residents and building owners. Reduced solar output directly affects affordability, especially for seniors and families on fixed incomes.

There's also no assessment of how deep excavation into the water table might affect our geothermal system. This system is essential to our building's sustainability and energy efficiency. Ignoring its vulnerability is not just negligent—it's incompatible with the Town's climate goals.

Parking is another major issue. There is no plan for where construction workers will park, where concrete trucks will stage, or how cranes and dirt-hauling vehicles will be accommodated. Our streets—Pearl, Prince, and Bruce—are narrow residential roads. They were never designed for heavy construction traffic. Increased truck volume will cause congestion, damage road surfaces, and pose safety risks for pedestrians, cyclists, and especially children attending the nearby school and daycare.

And what about pedestrian safety? There is no plan for protected walkways or safe detours. Families, seniors, and students rely on these sidewalks daily. Without a strategy, walkability and safety will be compromised.

Traffic flow and emergency access are also unaddressed. Construction will likely require street closures and rerouting onto smaller roads. Yet there is no plan for maintaining emergency vehicle access. This is a public safety issue.

The application also fails to explain how dirt and debris will be removed from the site. There are no specified routes or schedules to minimize disruption. And the location of cranes and other

large equipment is not disclosed, raising serious concerns about overhead hazards to pedestrians, vehicles, and adjacent properties.

It's worth noting that other high-rise developments in Milton have been approved in areas adjacent to rail lines or commercial zones—not beside established residential neighbourhoods, schools, or daycares. This proposal is out of step with that precedent.

Finally, from a policy standpoint, the proposal does not conform to the Official Plan's requirements for transition, compatibility, or public realm safety. The technical reports may "meet the minimum," but they fail to address cumulative impacts or real-world context. The proposed Floor Space Index of 9.37 is more than three times the guideline of 3.0 under Schedule C.7.A.1 of the Central Business District plan. That alone signals that the scale is inappropriate for this location.

Council, we are not asking for perfection—we are asking for protection. Protection of our streets, our systems, our seniors, and our children. A development of this magnitude demands a comprehensive construction plan. Without it, we are left exposed.

Thank you

Good evening, Mayor Krantz, Councillors, Town staff and fellow residents,

My name is Katherine Waszkiewicz and I am the proud owner of [REDACTED], a heritage designated home which sits approximately 50 metres from the proposed Slessor Development. Tonight, I stand before you to speak about what is perhaps the most defining issue of all — heritage and character — and why this proposal threatens to erase what makes Old Milton so special.

This site sits directly beside Old Milton's heritage core, where century homes, churches, and small-scale commercial buildings create a streetscape that still feels like a true town centre — walkable, warm, and distinctly human in scale. The buildings here aren't just old; like my own home, they tell the story of Milton's growth and community spirit. Each roofline, brick façade, and narrow lot contributes to a rhythm that has evolved over generations.

The proposed 16- and 18-storey towers — resting atop a six-storey podium — have no relationship to that rhythm. The towers represent a project that is entirely out of scale, both visually and culturally. Where the existing streetscape lives and breathes, this proposal imposes a wall of concrete and glass. Instead of complementing Old Milton's character, it dominates and diminishes it.

Milton's Official Plan is very clear on this matter; new development must preserve and enhance community character and must be compatible in scale, form, and appearance with surrounding areas. The Town's Heritage Master Plan echoes that principle, calling for sensitive design transitions and the protection of heritage settings. This proposal violates both — not just in height, but in attitude and aesthetics.

Our community's identity is not defined by tall buildings or skyline statements. It's defined by human scale — the ability to walk down Main Street, shop at the Farmers' Market, attend street festivals, see familiar faces, admire the heritage façades - all the while feeling connected to the town's roots. That's not nostalgia — that's what gives Milton its sense of place.

If approved as proposed, this project would permanently alter that experience. The towers would loom over heritage façades, casting long shadows over landmarks that have stood for over a century. What now feels intimate and authentic would become dwarfed and overshadowed. Once that kind of visual imbalance takes hold, you can't undo it — the heritage character is lost forever. A proposal such as this undermines every single heritage designation in Milton, and, if approved as is, Old Milton, its heritage buildings and historic neighbourhoods would permanently be under threat.

This isn't about opposing progress; it's about directing progress responsibly. Milton can absolutely grow while honouring its past. We've already seen examples of successful, context-sensitive development along Main Street — projects that add density and vitality without overpowering their surroundings.

A more context-sensitive design for this site — something in the mid-rise range of four to six storeys which is in keeping with the character of the neighbourhood — could achieve that balance. It could deliver new housing, ground-floor commercial space, and a refreshed streetscape while maintaining the visual harmony and small-town fabric that define Old Milton.

This approach would align perfectly with the Town's Civic Precinct Plan and the Reimagining Main Street vision, both of which emphasize revitalization that respects heritage, enhances pedestrian experience, and strengthens community character. That's the Milton residents want to see — growth that feels like it belongs here, not growth that could belong anywhere. Council has the opportunity — and the responsibility — to uphold those principles.

I urge you to defend the intent of our Official Plan, protect the legacy of our heritage district, and send this proposal back for redesign. Let's build a future that grows from Milton's roots — not one that paves them over.

Thank you.

Mr. Mayor and Councillors

I'm writing today to present my wife's and my feelings regarding the proposed development at Prince and Main in Old Milton. My wife and I have lived in Milton for over 30 years, over 10 years of it at our present address on Pearl Street in Old Milton. We are located less than a block away from the west part of the proposed tower development on the "Slessor Block". First of all, we find the design of the two concrete and steel towers an inappropriate match to the existing neighbourhood that dates back to the mid 18 hundreds. Our home itself is a historic home from 1853. We are designated Old Milton, the city should see the value in the heritage that lives here. We chose to live in an old home and neighbourhood because of the inherent charm that this area has. We would appreciate if the developers and their designers, and city hall ask for more than a group of towers that look as though they came from a downtown metropolis. We are not against growth, but for responsible and smart growth. A neighbourhood that welcomes new and old Milton citizens who appreciate the history of this growing city. We encourage the designers to incorporate characteristics of the surrounding historic neighbourhood in the details of their work. The most egregious affront to our neighbourhood is the overall scale. Old town design has been successful in Oakville, Burlington, and Georgetown to name just a few. We would like to keep the vertical limit to four to six stories to limit the visual impact and physical building impact on our very small streets. The facts will be presented, no doubt at some point, on how the population will be moved in this new and very cramped area. The developers are sadly misinformed that the tower residents will be using public transport. Milton is a bedroom community. People get in their cars and drive to work or school. The designs and information that we have read don't seem to be realistic and reflective of where we live.

Thanks for your attention to our concerns, and good evening.

Re: Slessor Square Development - Parking Impact

Good evening, Mr. Mayor, Councillors, Town staff, and fellow residents.

My name is Michael Moar; I am here representing a group of concerned residents called [REDACTED]. I am an owner and resident in the GreenLife condominium and have lived there for over 11 years. I'm here tonight to express our community's deep concern about the impact the proposed **Slessor Square Development** will have on parking — not just for our building, but for the entire surrounding neighbourhood.

Let me be clear: this is not about opposing growth. We understand the need for housing and revitalization, but growth must be responsible. A lower building, such as a 4 to 6 storey development could help deliver density, commercial vitality, and new housing — while still respecting the existing neighbourhood. In other words, it would fit right in. Responsible growth means realistic planning — and the parking assumptions in this proposal are simply not realistic for our part of historic Old Milton.

The **Traffic Impact and Parking Study** underpinning this application relies on parking demand rates drawn from large urban centers like Toronto and Mississauga — cities with extensive public transit networks and walkable commercial areas. Milton is not there yet. Our transit system is limited, and car ownership remains high. The study dramatically underestimates how many spaces will be needed for residents, visitors, and customers.

This study fails to include **visitor parking for commercial units**. That means no dedicated spaces for staff or shoppers, restaurant patrons, or office visitors. Where will those vehicles go? They will spill over into every nearby lot that looks remotely “available.” That means the lots at our building at 383 Main Street, the Subway Plaza, the Daycare, Play It Again Sports, and Wisla Delicatessen. These lots are already small and at capacity during normal days and also for planned downtown events like the farmers' market, etc.

We believe that this overflow could have a direct **negative economic impact** on the residents at the GreenLife building. To protect our limited private parking, we will have to increase enforcement patrols and monitoring — which means hiring staff, issuing warnings, and occasionally towing of unauthorized vehicles. These measures cost money. For our condominium, that means higher operating expenses, and ultimately, higher maintenance fees for every one of our 160 owners. That's not speculation — that is a real, measurable cost caused by an inadequate parking plan.

But even before the project is finished, we'll face major disruptions. For two or three years, our area will become a construction zone. Dump trucks, concrete mixers, cranes, and construction deliveries will all need space to stage and park. Main

Re: Slessor Square Development - Parking Impact

Street is already terribly congested! Bruce, Prince, and Pearl streets are narrow residential streets — completely unsuitable and not designed for heavy equipment and constant truck traffic.

Then there are the construction workers - potentially hundreds of vehicles looking for parking, five to seven days a week, for a long period of time during various construction phases. There is currently nowhere for them to park without spilling into neighbouring commercial lots or onto residential streets. And all this would be happening right beside a school and a daycare, where children walk, ride, and play. This combination of tight streets, limited visibility, constant illegal parking and heavy trucks is a serious safety hazard waiting to happen.

We also cannot look at this proposal in isolation. With the new **Civic Precinct** planned near Town Hall, public and visitor parking in the downtown core will already be under pressure. The combination of the Civic Precinct and the Slessor Square project will make parking in the immediate area increasingly unmanageable, and the overflow will only make it worse.

Council has an opportunity here to prevent a long-term problem before it starts. We ask that you:

1. Require a revised parking analysis using **Milton-appropriate data**, not downtown Toronto/Mississauga metrics.
2. Ensure **dedicated visitor and commercial parking** is properly accounted for.
3. Consider the **cumulative parking impact** of nearby neighbours, developments and civic facilities.

We want to be good neighbours, and we want this area to thrive — but that can't happen if the surrounding properties are forced to bear the burden of an unrealistic parking plan.

Please don't let our streets, our parking lots, and our residents pay the price for a miscalculation. Let's get this right — together.

Thank you.

Height and Scale

Approx: 6 ½ Mins

.....

Good evening, Mayor Krantz, Councillors, Town staff and fellow residents.

My name is Paul Hollingshead and Family, and I live on [REDACTED] only a short distance from the proposed Main and Prince development. I'm here tonight to speak about one of the most critical issues — height and scale — and how this proposal fundamentally fails to respect both the policies and the character that define Old Milton.

The developer is proposing two towers of 16 and 18 storeys sitting atop a six-storey podium, using the entire site from corner to corner — pin to pin — across the full footprint of the property. There are no meaningful setbacks, no open space, and no transition to the surrounding homes. It's a wall of mass and height that completely fills the block.

To put that in perspective: every building around this site is one or two storeys, with only a few three-storey heritage façades along Main. This project would be eight to ten times taller than its neighbours — a complete mismatch to the surrounding built form.

Milton's Official Plan and Downtown Secondary Plan clearly call for a "transition in height and density" between new and existing development. That means new buildings should step down toward lower-rise areas, respecting the existing streetscape and human scale. This proposal ignores that principle entirely. It places high-rise towers directly beside small homes on Pearl and Prince, without even the courtesy of a proper step-back or buffer.

This isn't just poor design — it's a fundamental breach of our planning intent. It would create an overpowering visual wall that looms over nearby houses and gardens. With towers running the entire length of the lot, the result would be a continuous slab of concrete and glass, dominating the skyline, blocking light, and eliminating the visual rhythm and openness that give Old Milton its charm.

We also need to consider the precedent this sets. If 18 storeys can be justified here — on a fully occupied lot within a low-rise residential setting — then where does it stop? Approval here would signal that our transition and height policies are negotiable, that "context" no longer matters. Once that line is crossed, there's no going back.

Old Milton has always been defined by its human scale — a place where you can walk Main Street, see the heritage façades, hear the church bells, and still feel connected to the town's roots. A 16- or 18-storey wall running lot-line to lot-line would permanently alter that experience. It's not a matter of taste — it's a matter of urban integrity.

We're not opposed to growth. We understand the need for housing and revitalization. But growth must be responsible. A mid-rise, 5- to -storey development could deliver

density, commercial vitality, and new housing — while still respecting the existing scale and allowing for open space, step-backs, and sunlight.

In its current form, this proposal doesn't just stretch the limits — it obliterates them. It turns a human-scaled, historic core into something that feels more like a downtown Toronto block. That's not what Milton's planning documents envision, and it's not what residents want.

I urge Council to uphold the intent of our Official Plan — to protect the scale, livability, and heritage that make Old Milton unique — and to send a clear message that growth must complement, not crush, the character of this community.

Thank you so much.

Paul Hollingshead and Family

388 Main Street East – Systemic Barriers and Key Findings

Systemic Barriers to Public Participation

The land use planning process in Ontario is highly technical and complex, making it difficult for members of the public to meaningfully engage with major development applications. These submissions often include hundreds of pages of consultant-authored studies written for professional audiences rather than for public comprehension.

This document was created to bridge that gap, not as a general call for transparency, but to clearly identify and explain specific planning, design, and technical issues within the 388 Main Street East proposal. The intent is to give residents, staff, and Council a factual and accessible summary of the concerns that arise from the applicant's own reports.

While growth and intensification are important, they must occur in a way that aligns with the community's infrastructure capacity, environmental readiness, and planning policy framework. This summary highlights where the current proposal does not yet demonstrate that alignment and where additional review or mitigation is warranted before any approval is considered.

Key Issues

- **Transit Reality Mismatch:** Developer relies on Bill 185 and MTSA policy for downtown-scale density, but Milton GO is not a high-frequency transit hub. Applying big-city intensification to small-town streets is contextually inappropriate.
- **Traffic Already Failing:** Main and Ontario intersection forecasted to reach Level of Service F (failure) by 2034 to 2039 even without this project. Traffic study admits queues exceed lane storage and proposes only signal timing adjustments.
- **Local Street Overload:** All access occurs on two-lane residential streets. The traffic study ignores courier vans, food delivery, and rideshare stops, which would create daily curb congestion not accounted for in the analysis.
- **Parking Loophole:** Developer claims no parking required under Bill 185 but still includes about 417 spaces. Zero parking is used to justify zoning changes, while real demand will leave dozens of cars without on-site space.
- **Heritage Removal:** Demolition of five municipally listed homes with no adaptive reuse or facade retention contradicts the Official Plan objective to conserve heritage character.
- **Design Subjectivity:** The Design Impact Analysis explicitly states that its findings are subjective and based on individual perspectives. No peer review or objective evidence is provided.
- **No Alternatives Studied:** The reports assess only the full 18-storey tower concept. No mid-rise, step-back, or preservation options were analyzed to determine if a less intrusive design could achieve planning goals.
- **Shadow and Livability Gaps:** Shadow diagrams do not overlay schools or parks, leaving the potential impact on nearby public spaces unexamined.
- **Noise and Comfort:** The noise study excludes balconies from mitigation and omits vibration modeling for nearby rail, reducing livability standards.
- **Modern Impacts Ignored:** A 570-unit tower would generate about 1,300 to 1,400 parcel deliveries and 200 to 500 food deliveries per week. No Delivery or Curb Management Plan is provided.

Critical Findings

- **Finding 1:** The traffic study acknowledges Level of Service F conditions but still labels the impact acceptable.

- **Finding 2:** The zero parking claim is a policy loophole, not a realistic design approach.
- **Finding 3:** The design justification is openly subjective with no independent verification or measurable criteria.
- **Finding 4:** No alternative design options or reduced-height scenarios were evaluated.

Additional Technical Findings

- **Environmental Contamination:** Phase Two Environmental Site Assessment confirms exceedances of lead, petroleum hydrocarbons, and other contaminants. A Record of Site Condition cannot be filed until further testing and remediation occur. The site is not yet suitable for residential use.
- **Geotechnical Risks:** Deep excavation through fill and silty clay soils introduces settlement and vibration risks to adjacent heritage homes. No groundwater or structural impact analysis has been completed.
- **Stormwater Management:** The Functional Servicing and SWM report allows uncontrolled drainage to flow into public rights-of-way, offloading stormwater into undersized local sewers instead of managing it on-site.

Summary: The documentation indicates that this proposal relies on subjective opinions, incomplete technical evidence, and unverified assumptions about local infrastructure capacity. Environmental, geotechnical, and servicing reports identify outstanding risks that must be addressed before rezoning proceeds. Council should require independent peer review, alternative design testing, and verified site readiness before considering approval.

Jessica Tijanic

Subject: RE: Slessor Square

From: Rod M [REDACTED]
Sent: November 5, 2025 11:40 PM
To: MB-townclerk@milton.ca <Townclerk@milton.ca>
Subject: Slessor Square

Slessor Square, as proposed, should not be approved due to its incompatible heights with the surrounding homes, many of which are heritage homes. The Milton Christian School traffic is already substantial. If you truly believe the quality of the nearby transit warrants such density, why are is the Town permitting so many condo parking spots which will lead to hundreds of vehicles going in and out daily? Either the level transit is so good that it warrants the density without such a high level of parking spots per unit, or the density should be decreased. Be visionaries and dramatically reduce the parking spaces per unit. Have courage. Future residents will thank you if for just once you have an ounce of fortitude and demand a minimum standard of excellent.

Platitudes about building “complete communities” are mirages unless you hold fast and require better. Park the campaign slogans, and work for a better Milton.

Water table issues, shadow impact, water table and supply, emergency vehicle access, road setbacks, school impacts, lack of sufficient nearby green space and park space - the list of substantial concerns is large and significant.

While an appeal by the developer should be anticipated, I think this is one worth fighting legally and on principle to at least have the density decreased because of its president setting impacts. But first dialogue should be opened to seek significant compromise by the proponent.

I am opposed to this development in its current form. Don't ruin the downtown, don't ruin Milton.

Sincerely,
Rod McLachlan
Milton Resident

Jessica Tijanic

To: Tharsikaa Irajewaran
Subject: RE: Residential towers downtown

From: Sandra Curtis [REDACTED]
Sent: November 10, 2025 4:09 PM
To: MB-townclerk@milton.ca <Townclerk@milton.ca>
Subject: Residential towers downtown

Unfortunately I was not able to attend the town meeting but would like to add my opinion.

The number of condos being developed in Milton is ridiculous and causing logistic nightmares. Why add to this already existing problem?

This proposed downtown structure is an eyeseore. Why would you destroy the quaint downtown feeling of Milton?

I work on Main street and there is already parking issues...customers are always complaining. Logistics would be a nightmare, school traffic, emergency vehicles, existing houses and neighbourhoods forever changes.

This madness has to stop! I hope this plan is rejected.

Sandra Curtis
[REDACTED]

Jessica Tijanic

Subject: RE: Proposed Slessor High Rise

-----Original Message-----

From: Ray Funnell [REDACTED]
Sent: November 11, 2025 11:36 AM
To: MB-townclerk@milton.ca <Townclerk@milton.ca>
Subject: Proposed Slessor High Rise

Sent from my iPad It is time to rethink what we have already approved Time to consider what has already been approved. For example, Greenpark on Thompson Road . Thompson Road is a highly congested route now without the added traffic once this project is completed. Look at the individual cost and projected cost of occupation. It does not appear to be viable Look at the development on Nipissing the set back does not exist. The congestion that will follow once this development is completed will have to be addressed. Nipissing is only a two lane route. To expand it to the level needed will be expensive and totally unwarranted. What is happening with the land at Wilson and Main? Will that be a high density project? What about the land at Main and Brontë? Where the Co-op once was. Will that be a high density project? What about the land on Steeles where Meritor/Rockwell once stood Time to react and take control of the future Regards