



March 6, 2026

Town of Milton
Planning & Development Department
150 Mary Street
Milton, ON L9T 6Z5

Attn: Mr. Christian Lupis
Director, Development Review

RE: Shearling Heights Estates Ltd. Official Plan Amendment Application
Bronte Street and Britannia Road, Block 360, Registered Plan 20M-1184, Town of Milton

Trinity Point Developments is the development manager for Shearling Heights Estate Limited in respect of the captioned application to permit the development of Block 360 on Plan 20M-1184, located at the northeast corner of Bronte Street South and Britannia Road (herein referred to as the ‘Subject Property’).

Through the processing of the Draft Plan of Subdivision (24T-14006/M) in September 2018, Block 360 was rezoned from “Future Development (FD) Zone” to the “Mixed Use (MU) Zone” under the Town of Milton Zoning By-law 102-2018. An application to amend the Zoning By-law 016-2014 was subsequently submitted and approved in 2022 to facilitate the development of mixed-use mid-rise buildings, varying types of residential townhouses and permit specific architectural considerations.

In response to discussions with Town Planning staff as well as current economic conditions, additional changes have been made to the development proposal to better meet today’s housing demands. These changes necessitate an OPA application to establish a Specific Policy Area provision that will amend the ground-related housing limit for a Major Node designation under *C.10.5.5.1 e) iii) and C.10.5.6*. More specifically, the applicant is requesting to increasing the threshold from twenty (20) percent to thirty-four (34) percent through a Specific Policy Area.

Despite this change, the analysis and findings of the July 2021 Planning Justification Report, previously submitted as part of the Zoning By-law Amendment (Town File: Z-15/21), remains applicable. The revised proposal maintains conformity with the 2024 Provincial Planning Statement, the Region of Halton Official Plan, Town of Milton Official Plan, and Boyne Survey Secondary Plan.

To support these changes and to facilitate the approval of an OPA and implement Specific Policy Area, Trinity Point Developments submits the following Planning Justification Brief as well as the enclosed material identified in **Appendix A**.

Description of the Revised Development Proposal

Similar to previous iterations, the proposed development site maintains a similar structure and consists of two types of built forms:

- i. One (1), seven (7) storey mixed-use, mid-rise building; and
- ii. Thirteen (13) rear lane, double-car garage townhouse rows, three storeys in height plus a basement.

A total of **223 residential units** is proposed for the site along with **808 m² of commercial/retail space** within the ground floor of the mid-rise building. The thirteen (13) double-car garage townhouse rows provide **71 family-sized, ground-related residential units** ranging from **1,780 sf to 1,878 sf** in size while the mid-rise offers **152 residential units** ranging from studio to two-bedroom suites. As a result, the proposed development is approximately **32% ground-related housing**.

The development proposal maintains articulation of the intersection of Bronte Street South and Britannia Street South with the mid-rise building. In addition, a residential lobby and amenity space that occupies the west ground floor of the mid-rise is provided, with two accesses fronting both Bronte Street South and the internal, private roadway. Retail uses wrap the corner of the building to the south-west wing of the mid-rise, providing frontage along the intersection and Bronte Road as well as internally towards the park. These uses are highly visible from the street further activating the streetscape.

The lowered height of the corner mid-rise building, complimented by its proposed orientation and step back on the north side of the 7th level, provide for appropriate transition to the surrounding street townhouses. It also encourages more favourable sun and shadow conditions as well as comfortable wind conditions throughout the year. A **Sun Shadow Analysis** prepared by **R. Bouwmeester & Associates** as well as a **Pedestrian Wind Level Assessment** prepared by **Theakston Environmental** has been provided as part of the application package.

The proposal maintains two vehicular access points to the site along Chretien Street. In addition, a total of **349 parking spaces** is provided, majority of which will be located within one level of underground parking and within the private garages of the townhomes. Visitor parking for both commercial and residential uses is exclusively provided at-grade for ease of access. Parking proposed for the Subject Property is in keeping with the Town of Milton's Zoning By-law Amendment 009-2025 to the existing By-law 016-2014, Sections 5.8.1 and 5.8.2, which was recently approved by Council in December 2025.

A total of **1,362 m² of outdoor amenity** is proposed throughout the site. This includes a communal linear park, central to the proposed development as well as three passive open space plazas that provide connection to Bronte Street South, Chretien Street, and Britannia Road. The mid-rise will also contain **204 m²** of indoor amenity space for the exclusive use of its residential tenants.

A summary of the notable statistics of the proposal are outlined in the following table:

Table 1: Site and Building Statistics	
Total Site Area	21,103 m ²
Residential GFA	25,886 m ²
Non-Residential GFA	808 m ²
Total Proposed GFA	26,694 m ²
FSI	1.26
Total Units	223
Mid-rise Dwelling Units	152
1-Bedroom	110 (49%)
2-Bedroom	42 (19%)
Rear-Lane Double Car Garage Townhouse Units	71
3-Bedroom or more	71 (32%)
Indoor Amenity Space	204 m ²
Outdoor Amenity Space	1,362 m ²
Ground Floor Height	4.5 m
Building Height (excluding MPH)	24.83 m (7-storeys)
Building Height (including MPH)	30.48 m
Total Vehicle Parking Spaces	349
Visitor Parking	55
Residential Parking - Mid-rise	152
Residential Parking - Townhouses	142
Number of Bicycle Parking Spaces	196
Residential	152
Visitor	44

Construction Management Plan and Development Phasing

The construction of the site will occur in three (3) phases described as follows:

- Phase 1 – Construction of Double-Car Garage Townhouse Row Building 12 which will serve as a model home/sales centre during marketing period.
- Phase 2 – Construction of underground parking garage of the mid-rise building, followed by the Double-Car Garage Townhouse Row Buildings no. 1 – 11, 13, roads and greenspace areas.
- Phase 3 – Construction of the mid-rise building.

Sequencing construction of the site in the above noted way allows the applicant to nimbly respond to current market demand and deliver more housing options quickly. It also supports fundamental policy of the Secondary Plan to promote a complete, healthy community by managing the progress of development with measured improvements to a vacant site and gradually transitioning density into the existing neighbourhood.

Aligning the construction strategy with demonstrated housing demands supports quicker market absorption while also progressing completion of the Secondary Plan's Major Node block and therefore contributing to the completion of the broader Plan's community as envisioned and planned for.

A preliminary Construction Management Plan has been prepared detailing the access and staging of the site during Phase 1 and Phase 2's underground parking component of construction. A more detailed plan can be provided during SPA review.

Policy Context

The Subject Lands are within the Urban Area of the Town of Milton and further located within the Boyne Secondary Plan Area. Further, the Subject Lands are identified as being within the Ford neighbourhood of Schedule C.10.A of the Secondary Plan and are also located on the corner of Britannia Road (Major Arterial Road) and Bronte Street South (Minor Arterial Road) as shown on Schedule C.10.B of the Secondary Plan. The Subject Lands are designated as Major Node Area on Schedule C.10.C and are within Phase 3A area as noted on Schedule C.10.D. The Subject Lands are zoned as Mixed Use (MU) as a result of a previous Zoning By-law Amendment approved for the property.

The purpose of this letter is to provide an addendum to the Planning Justification Report (dated July 2021). The analysis and findings of the July 2021 Planning Justification Report remain applicable and continue to be relied upon in support of the proposed development. This addendum letter particularly focuses on the growth and density policy framework of the Boyne Survey Secondary Plan.

More specifically, the Secondary Plan outlines the following policy framework for development within a *Major Node Area*:

C.10.5.6.2 Permitted Uses

*The Major Node Area designation on Schedule "C.10.C" means that the main uses permitted may include **a variety of high density residential**, institutional and office uses and community facilities. The following additional uses may also be permitted subject to a comprehensive development plan for the entire node in accordance with the policies of C.10.5.6.5:" **[emphasis added]***

*a) Medium Density Residential II uses, including limited grade-related multiple attached housing forms subject to the policies of Section C.10.5.1.1. b) and C.10.5.5.1 e). **[As amended through OPA 48]***

e) Retail and service commercial uses, generally not exceeding a combined total gross floor area of 2,787 square metres within a single node, located on the main floor of a multi-storey

building. A market impact study will not be required unless this maximum is proposed to be exceeded;

Through C.10.5.6.2, high density residential uses are noted to be among the main permitted within the “Major Node Area” designation. The high-density residential regulations and the applicable policies are outlined in Section C.10.5.1.1 c), as amended through OPA 48, which states:

- “C.10.5.1.1 c) High Density Residential uses consisting of apartment buildings
And stacked townhouse dwelling units with a common underground
parking area, generally containing the equivalent of the required tenant parking, with a
density range of greater than 100 to 200 units per net hectare in accordance with the
policies of Section C.10.5.1.4.”

The revised development proposal now achieves a density of 105 units per net hectare whereas the Secondary Plan permits a maximum of 200 units per net hectare.

Specifically, Section C.10.5.5.1 e) (iii) (noted below), provides further policy direction for limited grade-related housing within a Major Node (per Sec. C.10.5.6.2 (a)), as follows:

*C.10.5.5.1 e) Notwithstanding the policies of C.10.5.5.1 b), the Town may consider permitting a limited extent of Residential Medium Density II uses, including grade-related multiple-attached housing forms such as townhouses, stacked townhouses, and back-to-back townhouses in accordance with the policies of C.10.5.1.1 b) within the Secondary Mixed Use Nodes subject to a comprehensive development plan in accordance with the policies of C.10.5.6.5 and the following: **[As amended through OPA 48]***

- i. the size and configuration of the node is sufficient to accommodate the planned concentration of land uses and built form;*
- ii. the node has sufficient frontage to provide safe and direct access from the adjoining road system;*
- iii. **the total number of grade-related dwelling units does not exceed 20 percent of the total number of dwelling units within the specific quadrant of the node in which it is proposed; [emphasis added]***
- iv. a concentrated massing of taller buildings is located at key intersections with grade-related forms being located interior to the site such that a transition in heights is created that respects the context of the surrounding lower density neighbourhood;*
- v. generally continuous street walls are provided along major corridors to provide pedestrian-friendly, visually connected and coherent streetscapes;*

- vi. *the proposed introduction of grade-related housing maintains the nodal hierarchy established by the Secondary Plan;*
- vii. *the grade-related housing form supports and enhances the balance of the existing or planned development within the node;*

The revised development proposal provides a total of 223 dwelling units and of that, a total of 71 “grade-related dwelling units” – in this case the rear lane double-car garage townhouses – are proposed. This accounts for 32% of the total number of dwelling units within the Major Node Area, exceeding the permissions of ground-related units under policy of Section C.10.5.1.1. e) iii), necessitating this application for an OPA. All other policies under Section of Section C.10.5.1.1. e) are upheld by the proposed development.

Section C.10.5.6.3 of the Secondary Plan establishes criteria for development within a “Major Node Area” to ensure compatibility and transition between the Major Node and adjacent development. The proposed development is required to be evaluated in the context of the policies related to development within a “Major Node Area”. The analysis within the July 2021 Planning Justification Report continues to be relied upon; however, the analysis specific to C.10.5.6.3 b), c) and f) has been updated to reflect the revised development proposal.

b) A variety of building heights and forms is encouraged with the highest buildings being orientated to the primary intersection, and stepped back or terraced abutting development outside of the Node;

The proposed mid-rise building height and built form is oriented to Bronte Street South and Britannia Road (the primary intersection) and has been designed with a step back on the 7th storey to achieve an appropriate transition in built form. The double-car garage townhouse units remain at three-storey built form within the Node, adding variety and providing compatibility to the existing residential built form north and east of the Subject Property.

In support of the revised proposal, an update to the Urban Design Brief (prepared by John G. Williams Limited) and Sun Shadow Study (prepared by R. Bouwmeester & Associates) was completed. The Sun Shadow Study confirms the additional heights in the revised development concept meet the Town of Milton’s “Shadow Impact Analysis Guidelines”. The Urban Design Brief supports the variation in height as it provides for a transition in massing with the surrounding neighbourhood.

c) Buildings shall have a minimum height of three storeys and a minimum FSI of 1.0, however development with additional height and density is encouraged to a maximum height of 15 storeys and a maximum FSI of 3.0. For the purposes of this policy, the FSI shall be calculated on the basis of the ultimate development of the entire Node as illustrated on a detailed concept plan in accordance with this Plan and the entire Node Area shall be zoned to ensure the achievement of the FSI at the time of the approval of the first development application or any phase thereof;

Theakston Environmental assessed the environmental standards with regard to pedestrian level wind velocities relative to comfort and safety, in accordance with the Town's "Terms of Reference: Wind Study" (January 2023). Based on their initial analysis for a 12-storey midrise building, wind conditions on and around the Development site are considered mainly suitable for sitting or standing throughout the year in the existing setting, with localised walking conditions predicted in the winter within the more open surrounds to the south of the Development site. With the reduction of height to 7-storeys Theakston Environmental determined in a January 6, 2026 addendum letter that the height revisions are expected to result in pedestrian wind comfort conditions at and within the vicinity of the proposed Development that are similar to, or improved upon those discussed in the aforementioned January report analysis. This is included in the submission package for further review.

The revised development proposal for buildings ranging from 3- to 7-storeys in height, with the greater of the heights located at the corner of Bronte Street South and Britannia Road is consistent with the policy permissions of C.10.5.6.3 c). Further, as a result of the modifications, the proposal achieves a FSI of 1.26 across the entire "Major Node Area". The height and density of the revised development proposal are in accordance with the policy directives of the Secondary Plan.

f) Parking is strongly encouraged to be located underground or within parking structures; surface parking, where permitted, should be minimized and shall be located away from the street line;

The revised development proposal provides a total of 349 parking spaces, exceeding the required total of 342 parking spaces for residents and visitors. For the midrise, the required 152 parking spaces are provided through one-level of underground parking and will be for the exclusive use of residents. Residential and commercial visitor parking is provided via 55 surface parking spaces while the seventy-one (71) rear-lane townhouses include a double-car garage. The parking provisions for mixed-use buildings (MU) conform with Council's December 2025 approval of the Town-Initiated Housekeeping Amendments to Comprehensive Zoning By-law 016-2014, as amended, and Comprehensive Zoning By-law 144-2003, as amended. Please refer to the **Traffic Impact Study** prepared by GHD for full details.

Allocation

Shearling Heights Estates Ltd. has executed Allocation Agreements with the Region of Halton for both the 2012 and 2020 Allocation Program, providing a total of 207 SDEs available for use. The following presents a summary of the SDE allocation for the revised development proposal and has been preliminary confirmed by the Region of Halton.

Density Calculation for Apartment Building:

- *The footprint of the underground parking area out to the property line is to be used to calculate density for the apartment building for allocation purposes. The area to be used for the calculation is 0.872 ha.*
- *Density 152 apt units / 0.872 ha = 172 uph*
- *The apartment building meets the density requirement to be considered a high-density product under the Region's Allocation Program.*

Allocation Summary:

- **2012 Program – Law File 2018-253 (105 STD SDEs, 43 HD SDEs):**
 - 71 Multiple (0.730 conversion factor) = 51.83 STD SDEs = rounded to **52 STD SDEs**
 - 7 Apartment (0.500 conversion factor) utilizing HD SDEs = **3.5 HD SDEs = rounded to 4 HD SDEs**

Summary: 53 STD SDEs and 39 HD SDEs remain under Law File 2018-253

- **2020 Program – Law File 2020-157 (65 HD SDEs):**
 - 145 Apartment (0.450 conversion factor) utilizing HD SDEs = 65.25 HD SDEs = rounded to **65 HD SDEs**

Summary: 0 HD SDEs remaining in Law File 2020-157

Under the Region’s advisement, the SDEs provided through 2020 program will be initially applied for the apartment building units. With the units plotted this way, SDE utilization is maximized and results in a remaining 42 STD SDE available under the 2012 program that can be applied for any products in the future (i.e. low/medium density or high density).

Scoped OPA Review & Local Official Plan Amendment Exemption

Given [Bill 185, the Cutting Red Tape to Build More Homes Act, 2024](#), which formally removes planning approval authority from upper-tier municipalities, and the scoped nature of the requested OPA, the applicant has requested that a planning review and approval not be required from the Region of Halton.

Following this request, the Town’s Planner has confirmed that there is no Regional interest on this matter. The requested local OPA, when approved from Council, will not require further review and approval by the Region of Halton, per e-mail confirmation from Taylor Wellings, Planner for Development Review at the Town of Milton (Appendix B).

Zoning & Future Minor Variances

Trinity Point is aware that as currently proposed the double-car garage, rear-lane townhouse blocks are not in compliance with the Special Site Provisions Zone standards for Townhouse Dwellings under the site-specific Mixed Use (MU*323) By-law 074-2022. This matter has been brought to the attention of Town Planning and Zoning staff and will be addressed during the review process and via a future minor variance application.

Conclusion

The proposed development, as modified, continues to be appropriate for the redevelopment of the Subject Property as it remains:



- consistent with the Provincial Planning Statement, 2024;
- in conformity with the Region of Halton Official Plan;
- in conformity with the Town of Milton Official Plan;
- in conformity with the goals and objectives of the Boyne Survey Secondary Plan and maintains the planned function of the Major Growth Node; and
- represents good planning in the public interest.

The analysis presented in this letter should be considered concurrently and as an addition to the previous planning opinion presented in the Planning Justification report dated July 2021 (provided in package). The draft site-specific OPA prepared in support of the proposed development and included in the submission is appropriate, reasonable and represents good planning.

We trust the information is sufficient for Town Staff's review of the OPA. Confirmation of receipt and complete application is requested. Should you require any additional information or clarification, please contact the undersigned.

Sincerely,

SHEARLING HEIGHTS LTD.
C/O TRINITY POINT DEVELOPMENTS

A handwritten signature in black ink, appearing to read "Carmina Tupe", written in a cursive style.

Carmina Tupe, MCIP RPP
Development Manager

APPENDIX A: Submission Package Material

PLANS & DRAWINGS		DATE	RESPONSIBILITY	
DOCUMENTS				
1.	Completed Application Form	Mar. 2026	Trinity Point Developments	
2.	Environmental Site-Screening Questionnaire	Mar. 2024		
3.	Fees for Processing the Application	Mar. 2026		
4.	SPA Cover Letter (herein)	Mar. 2026		
5.	OPA Cover Letter & Planning Justification Report a) Draft Official Plan Amendment Text b) Draft Official Plan Amendment Schedule c) Planning Justification Report (July 2021)	Mar. 2026		
6.	Condominium Declaration and Description	Mar. 2026		
7.	Topographic Survey	Jun. 2020	RPE Surveying LTD.	
8.	Aerial Photograph / Context Plan	Jun. 2021	Glen Schnarr & Associates Inc.	
9.	Site Plan & Midrise Architectural Set, including a) Site Plan and Details b) Roof Plans c) Building & Elevations	Mar. 2026	Graziani & Corazza Architects Inc.	
10.	Townhouse Architectural Drawing Set for: a) Block Plan – Building 1 b) Interior Unit c) End Unit d) Corner Unit e) Elevations (coloured)		IAN ROBERTSON DESIGN	
11.	2D / 3D Concept Plan (Colour) with street labels	Feb. 2026	Graziani & Corazza Architects Inc.	
12.	Preliminary Construction Management Plan	Mar. 2026	Trinity Point Developments	
13.	Archaeological Clearance Letter	Aug. 2011	Ministry of Tourism & Culture	
14.	Phase 1 Environmental Site Assessment and Reliance Letter	Nov. 2021	Grounded Engineers Inc.	
15.	Geotechnical Report	Feb. 2026		
16.	Hydrogeological Report	Feb. 2026		
17.	Functional Servicing and Stormwater Management Report	Feb. 2026	Schaeffer's Consulting Engineers	
18.	Civil Drawings, including: a) Grading and Drainage Plan b) Erosion and Sediment Control c) Site Servicing Plan d) Existing Conditions and Removals Plan e) Utility Plan	Feb. 2026		
19.	Transportation Impact Study, including a) Pavement Parking and Signage Plan b) Accessibility Plan and Details	Feb. 2026		GHD LTD.

	c) Pedestrian and Cycling Circulation Plan		
20.	Landscape Plan and Details	Mar. 2026	Strybos Barron King LTD.
21.	Environmental Noise Report	Feb. 2026	Jade Acoustics
22.	Urban Design Brief & Streetscape Design Plan	Mar. 2026	Williams & Stewart Associates Ltd.
23.	Sun Shadow Analysis with: a) Addendum Letter	Sep. 2025 / Jan. 2026	R. BOUWMEESTER & ASSOCIATES
24.	Pedestrian Wind Level Assessment with: a) Addendum Letter	Oct. 2025 / Jan. 2026	Theakston Environmental
25.	Waste Management Plan	Feb. 2026	GHD LTD.
26.	Collection Vehicle and Fire Truck Loading Structural Letter	Jan. 2026	Trinity Point Developments
27.	Drive Through Agreement Template_Appendix9	Feb. 2026	
28.	Site Lighting Plan	Mar. 2026	RTG Systems
29.	Exterior Light Fixture Details	Mar. 2026	
30.	Concept Excavation and Shoring Plan	Jan. 2026	Grounded Engineers Inc.
31.	Record of Pre-Consultation Response Matrix	Mar. 2026	Trinity Point Developments

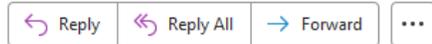


APPENDIX B: LOPA Exemption Confirmation

LOPA Exemption Note



Taylor.Wellings@milton.ca
To Carmina Tupe



Wed 2026-02-11 10:22 AM

You replied to this message on 2026-02-11 11:35 AM.

Good morning Carmina,

I was able to confirm this morning that there is now no LOPA exemption process given the changes with the Region - if there isn't a Regional interest and in this case there isn't so we don't have anything to deal with in that regards once the LOPA receives approval from Council.

Talk soon,

Taylor



Taylor Wellings, MSc(PI), MCIP, RPP
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