



May 23, 2023

To: Oakville Planning and Development Council

Re: Agenda Item 4.1, Planning & Development Council May 23, 2023 Meeting

Public Meeting Report – Town-initiated Official Plan Amendment – Midtown Oakville Urban
Growth Centre (File No. 42.15.59)

Thank you for the opportunity to provide feedback on the Town's proposed OPA for the future Midtown community.

JCRA's key issues and questions on Midtown with the information that has been presented on Midtown to date:

1. Density is the most critical issue because it is the most impactful on the existing and future community with respect to the infrastructure and services – road network, transit, schools, health care, emergency services, libraries, parks, recreation facilities – that are needed by the community, and which function most effectively if they are sufficient for the size of the community. Analysis undertaken by a local resident shows the effect of the newly proposed density permitted at Midtown. The significant increases in permitted floor area coverage could result in over 120,000 residents. This is substantially higher than the original 20,000 people and jobs and almost double the 68,000 advised by the Town at last week's CLRT meeting. This would result in extreme density of 1,300 people per hectare, 6.5 times greater than the Town's stated target of 200 per hectare.
2. Infrastructure capacity is a major concern as a massive expansion in population could potentially overwhelm the existing community. A community of this size would require its own fire and police department, new schools, new community services and facilities, more transit, a large hospital expansion, more doctors, nurses, teachers and other support services etc. What pressures can the surrounding established communities be expected to absorb with regard to accessibility of existing town infrastructure and facilities if new infrastructure is not aligned with the population and density permitted by the OPA.
3. What is the mandated population for Midtown and will the density that results from the proposed OPA provide for that population? Will it exceed that population? What population will result if ---

all property owners are provided exemptions or additional density in exchange for providing needed amenities and services. Is there a ceiling on the population additional density will yield. Do population targets include employment or is just residential? How will employment be mandated given the 2023 Provincial Planning Statement is proposing to remove all employment uses except industrial, manufacturing and large-scale warehousing. population targets. We need to have an accurate population number for Midtown so the density permitted in the OPA ensures population is on target. target.

4. Floor Story Index (FSI) - is proposed to be a range across Midtown, dependent on whether a property is located north or south of the railway tracks. The range on all Midtown properties north of the railway is 4 – 10 FSI and land south of the railway with a range of 2.5 – 6 FSI. FSI will determine the density at Midtown. We have to assume that all properties will be developed at the maximum Floor Story Index (FSI) permitted. Indeed, we already have Site Plan Applications for six buildings ranging from 44 – 58 stories and recent public meeting for 349 Davis Rd, also 58 storey building.
At the same time, the FSI maximum must yield less than the mandated population targets given the Town is proposing additional density in exchange for property owners to give up land for other uses and include amenities that are needed to create a complete community. Getting the FSI at the right level in the OPA is critical because we cannot go back and “downsize” what is permitted.
5. Building heights – area a key driver of density. Higher building heights in Midtown versus other areas in Oakville are appropriate given the proximity to Oakville GO station, the busiest station after Union. The target of 20,000 residents and jobs originally set for Midtown would have been achieved with the originally proposed 12 to 20 storey buildings. Increasing the building heights to 58 plus storeys will exponentially increase the density and population of Midtown, unnecessarily so, in turn leading to a significant shortage of community services (as specified earlier), particularly given the Town’s reduced ability to extract the development charges needed to ensure growth pays for growth. While Oakville’s growth targets have recently been raised by the Province, the entirety of Midtown is now proposed to be Mixed Use on both sides of Trafalgar Rd to accommodate increased population. What is the rationale for excessive building heights? Adding density to midtown will not stop increased density in other areas of Oakville. Bill 23 permits every property in Ontario to add two more units as of right. In the JCRA community, currently there are approximately 2000 homes and because of Bill 23, we can grow by 4000 homes. Density at Midtown does not alter the increased density now permitted.
6. Unit sizes - A broad mixture of unit sizes must be a requirement; for example, 1-bedroom-units with 2- and 3-bedroom units, the latter at minimum 20% of all units for example. Additionally, each building should have a requirement for a percentage of affordable units e.g., minimum 10%. Requiring a range of size and price should not require the Town to provide density increases. It should simply be a requirement to get site plan approval, not a mechanism to increase density. The requirements do not need to be onerous and must be accepted by the developers. Setting small minimums for every building is achievable and can deliver a good mix of housing options throughout Midtown.

7. If the goal is to phase in this density over the next 30 years, how will that phasing be managed with respect to population data, timelines for site plan applications and construction, and critically, for accessing the Oakville GO station?
8. Expanding the existing road network in Midtown is required, unless it really will be 100% pedestrian only. Providing that land, or funding to purchase the needed land can be a requirement for site plan approval. The cost of roads is part of the development and must be funded by property owners up front. If the Province prohibits the Town from including these costs in development charges, then they must reimburse the Town. Without roads, there can be no development.
9. We have concerns regarding suggested density transfer. Proposing to provide additional density in exchange for roads, school sites, community facilities, amenities such as day cares and grocery stores is concerning when the density permitted by the currently proposed FSI maximums. Should land for schools and roads not be a requirement for site plan approval? Are there are other incentives that can be offered instead of more density? If additional density is the only available tool, the then lower FSI maximums across Midtown, i.e., FSI 4 north of the railway and FSI 2 south of the railway to ensure added density is not more than is required.
10. The amended OPA should use clear, specific and strong language to ensure the Town's vision is communicated in a way that may deter a property owner unhappy with a Town planning decision from going to the Ontario Land Tribunal (OLT) and will hold up in any OLT hearings.
11. JCRA has advocated for external reviews on site plan applications that have significant impacts on residents. Given Midtown's impact will be felt across the entirety of Oakville, will there be an additional level of review for Midtown? As noted previously, getting the FSI right is critical. Taking more time upfront to ensure population targets, FSI levels and density reflect Oakville's vision for Midtown and to ensuring we are employing best practices and innovative options can help ensure the development of Midtown and future growth in Oakville are in the best interests of current and future residents.

Thank you for your consideration.

Elizabeth Chalmers
President, Joshua Creek Residents Association