

Good morning, on behalf of the Owner of the lands municipally known as 354 Davis Road, in the Town of Oakville, we are pleased to provide the attached Comment Letter on the ongoing Midtown Oakville Growth Area Review initiative.

Thank you for the opportunity to provide comments. Please do not hesitate to contact me if there are any questions or concerns.

Best regards,  
Stephanie

**Steph Matveeva, MCIP, RPP | Associate**

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February 26, 2024

GSAI File: 1370 – 001

(Via Email)

Building, Planning & Development Department

Town of Oakville

1225 Trafalgar Road

Oakville, ON L6H 0H3

**RE: Midtown Oakville Growth Area Review Comment Letter  
David Road GP Inc.  
354 Davis Road, Town of Oakville**

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Glen Schnarr & Associates Inc. ('GSAI') are the planning consultants to Davis Road GP Inc., the Owner (the 'Owner') of the lands municipally known as 354 Davis Road, in the Town of Oakville (the 'Subject Lands' or the 'Site'). The Subject Lands are located on the south side of Davis Road, east of South Service Road East. As such, the Subject Lands are centrally located within the Midtown Oakville community of the Town of Oakville ('Town'). For context, the Subject Lands are currently improved with a 6-storey office structure and surface parking areas. As the structure was built in 2013 and is relatively new, the Owner does not contemplate redevelopment of the Subject Lands.

On behalf of the Owner and further to our previous correspondence, we are pleased to provide this Comment Letter in relation to the ongoing Midtown Oakville Growth Area Review (the 'Midtown Review').

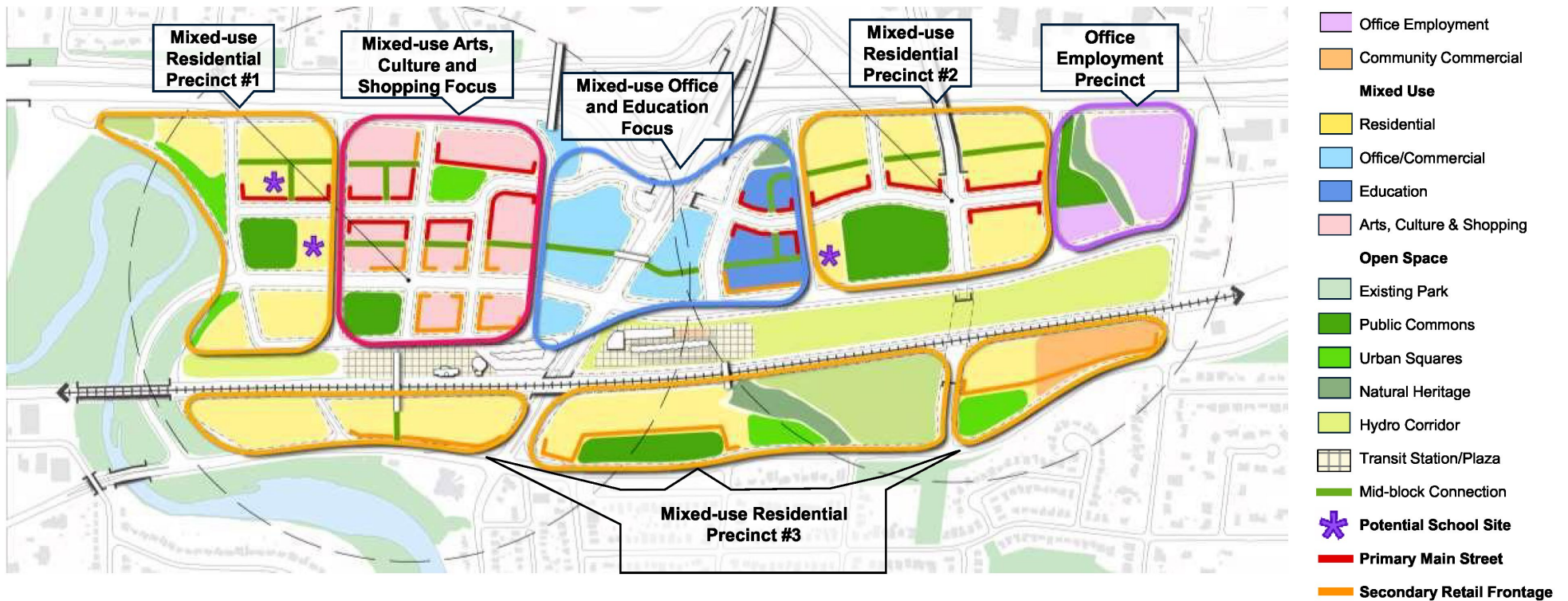
GSAI has been actively participating in the Midtown Review and the concurrent Town Official Plan Review processes. We understand that, when complete, the Midtown Review will culminate in a Town-initiated Official Plan Amendment ('OPA') that will modify policy permissions for lands across the Midtown Oakville community, including the Subject Lands.

We have reviewed the Public Information Centre #3 Presentation, dated February 15, 2024 as well as the Proposed Concept, and offer the following comments.

Overall, the Proposed Concept and Midtown Review directs that lands across the Midtown Oakville community can be developed to accommodate the long-term development vision for the community. The Proposed Concept, as presented on the next page, does not account for the age of the existing structure on the Subject Lands nor the Owner's desire to not redevelop the Site. The Subject Lands' inclusion in the developable land base is concerning and requires revision.

The Proposed Concept continues to direct that the greatest heights and densities are to be located within the Midtown Oakville community. Furthermore, within the Midtown Oakville community, the greatest densities are to be directed to lands along the Trafalgar Road corridor, south of the Queen Elizabeth Way (the 'QEW') and the existing rail corridor. The Subject Lands are located just south of the QEW and meet this criterion.

# The Proposed Concept promotes a mixed use community



As such, the Subject Lands are an appropriate and desirable location for designation to permit increased development densities. We support the concentration of development in the locations outlined in the Midtown Review and on the Proposed Concept. However, we request that the forthcoming Official Plan Amendment policy instrument provide for sufficient direction that development may proceed incrementally and thus, existing conditions are to be allowed to continue until such time that development is pursued.

We understand that the Proposed Concept will be utilized to formulate policy directions, including refined land use policies. Specifically, the Subject Lands are identified in the Proposed Concept as being an ideal location for land use permissions to enable residential, educational and retail-related uses. While we support the broad land use policy directions presented in the Proposed Concept, the proposed educational use permission overlay is concerning. It is understood that while educational-related uses and facilities will be needed to support the long-term evolution of the Midtown Oakville community, the appropriateness for these uses to locate within a structure or structures is better suited to a development application process. Additionally, there is no current direction provided on how the existing range of uses on the Subject Lands will be permitted to remain. Further clarity is requested on how the existing range of non-residential uses on the Subject Lands will be permitted to continue, uninterrupted until development is to be pursued, at the Owner's discretion.

The Proposed Concept continues to propose refinements to the local road network. As demonstrated on the Proposed Concept, South Service Road and Davis Road are to be re-aligned and redeveloped. Additionally, a new Arterial Road (referred to in other public consultation materials as an extended Cross Avenue) is to be provided along the southern boundary of the Subject Lands. Collectively, the re-alignment and provision of these urban-section roads will require land to be acquired from the Subject Lands which will negatively impact the current site function and circulation patterns. Further clarity is required on the ultimate Right-of-Way requirements of South Service Road, Davis Road and the newly extended Cross Avenue.

Similarly, the Proposed Concept presents a public realm network that is to compliment the land use pattern and the envisioned road network. Specifically, the Proposed Concept identifies the Subject Lands as an ideal location for a series of mid-block pedestrian connections to be provided. Should the mid-block pedestrian connections be pursued, they will bisect the Subject Lands and will negatively impact not only the existing structure but also existing site patterns and circulation patterns. Further clarity is required on the anticipated alignment and requirements of these pedestrian connections. Additionally, we require clarifying policy language be provided that clarifies the timing and location of the mid-block pedestrian connections will not be required until such time that a development application is pursued..

In summary, the Owner's concerns regarding the Midtown Review and the current iteration of the Proposed Concept remain unaddressed by previous commentary. Accordingly, we request that the modifications identified above be made to the Proposed Concept and the forthcoming Official Plan Amendment.

We thank you for the opportunity to provide comments and wish to be included in the future Midtown Oakville Growth Area Review initiative. We ask that you notify us of any future updates, meetings, staff reports and Decisions. Please feel free to contact the undersigned if you have any questions.



Yours very truly,  
**GLEN SCHNARR & ASSOCIATES INC.**

Stephanie Matveeva, MCIP, RPP  
Associate

cc. Owner  
Town Council  
Town Clerk