

March 15, 2024

Town of Oakville
1225 Trafalgar Road
Oakville, ON
L6H 0H3

Attention: Mayor and Members of Council

Re: Halton Region 2023 Allocation Program
Staff Recommendation Report (dated March 5th, 2024)
Planning and Development Council Meeting March 18, 2024 - Item 7.3

Dear Mayor and Members of Council,

Argo Development Corporation (“Argo”) would like to thank Council and Town staff for the opportunity to provide input on the report referenced above. As Council is likely aware, Argo is a Halton based Community Builder that has developed over 300 acres in Oakville (in both greenfield and built boundary), delivering over 2500 servicing units. As a result, Argo has extensive experience in previous Allocation Programs including the 2012 Allocation Program as well as being identified as one of the “big six” participants of the current 2020 Allocation Program.

Argo also continues to be one the largest Landowners of future community area in Oakville with over 650 acres and a potential for over 14,000 units. As part of the next wave of upcoming communities, Argo has filed an Expression of Interest in the 2023 Allocation Program in the magnitude of 1330 units in the form of SDE’s and 260 units in the form of IDU’s for the following properties:

- Palermo Village;
- Argo Neyagawa;
- Argo Oakville Woods (210 Burnamthorpe East); and
- Argo Joshua Creek

Argo's Allocation Expression of Interest (EOI) Request compared to Staff Recommendation

The following is a summary of the Argo Oakville Expression of Interest and Staff Recommendation as provided in Appendix C of the Staff Report:

Property	Argo SDE Request	Argo IDU Request	Town Recommended 2024 Allocation (SDE's)	Recommended IDU
Palermo	835		0	334
Neyagawa	295		0	275
Oakville Woods	0	260	260	0
Joshua Creek	200		200	0
Total	1330	260	460	609

As noted above, Argo requested 835 Units for Palermo and 295 Units for Neyagawa in the form of SDE's. In response, **staff is recommending 0 Units in the form of SDE's and alternatively suggest that Argo be provided 40% of our Expression of Interest in the form of IDU's.**

It is vitally important to this discussion to understand that units in the form of SDE's will be considered as part of this Allocation Program with the ability to utilize the existing capacity within the system, whereas utilizing units in the form of IDU's will be as per the staff report: *"dependent on the ability of 'new' capacity which either will be beyond the current program, whether created through enhancements to the system, or brought on-line with the construction of new infrastructure."* This implies that the units in the form of IDU's may not be turned into actual allocation until the next Allocation Program delivers additional infrastructure which adds another layer of uncertainty in terms of cost and timing of development.

In accordance with the significant negotiations with the Region and in accordance with the draft Allocation Agreement, we understand there to be no cap intended for the number of IDU units. Staff provide no rationale in their report to support this recommendation. It is our view that should Argo's Palermo and Neyagawa sites not be allocated SDE's at this time, that both sites be allocated 100% of our SDE request in the form of IDU's.

Inconsistency in Staff Report Rationale and Recommendations

Based on the Staff Recommendation, Argo is not supportive of staff's recommendation for the Allocation request regarding Palermo and Neyagawa and is in disagreement with the rationale being used by Staff to support their recommendation. It is also inconsistent with the recommendations put forward as to how units within the Built Boundary are being reserved.

For example, when describing the Built Boundary unit allocation and distribution, the following is stated:

“Staff has accounted for development that has been built, approved, appealed and is currently under review for lands south of Dundas, as of November 2022.

Built 23

Approved 3,177

Appealed 8,542

Under Review 4,142

Total 15,884

These units are deducted from the total 26,178 units apportioned to Oakville, and the balance of units that can be distributed to the Designated Greenfield Area is 10,294. The number of requested units confirmed through the expression of interest is 28,312.”

As noted from the extract above, within the Built Boundary there is a total of 15,884 being recommended as SDE's with 8542 of those units under appealed to the OLT. In addition to the appeal, some of the core areas that Allocation is being recommended have no approved or adopted planning policy.

The primary inconsistency stems from the rationale provided in the staff Report summarized below:

“As part of the Council resolution adopted through the 2020 Allocation Program, Halton Region was requested to accelerate the servicing of lands north of Dundas Street between Tremaine Road and Regional Road 25. To support these efforts Council approved the Palermo Village Growth

*Area Review through Official Plan Amendments 34, 37 and 38. These policies would guide development-related decision making in Palermo Village north of Dundas Street, **however they were appealed to the Ontario Land Tribunal (OLT), and as such, there are no land use policies in place which permit residential development.***

*With the Council-approved land use policy framework under appeal, and no certainty of timing of an OLT decision, **there is a risk that allocating to this area could lock up allocation that could otherwise be used for lands in the NOESP where the land use policy is already in-effect and servicing has been defined or built.** This will prevent the Town from achieving its Housing Pledge.*

Although no immediate allocation is recommended for Palermo north of Dundas Street at this time, staff suggest providing IDUs to two appealed development proposals in this area. This will allow the town to continue to work towards informing engineering solutions in the event there is a resolution to the appeals of the Palermo OPAs and the developments.”

In summary, if appeals or status of planning policy is applied consistently, then over half of the Built Boundary units will be “reserved” with no certainty on development. In our opinion, Staff’s recommendation places over half of the Built Boundary in this position of the Town allocation commitments and as such, could put the Town’s housing pledge in jeopardy.

As such, if the hypothesis above reigns true, it should be deemed appropriate to “borrow” or “redistribute” more SDE’s to the greenfield area at this time and in particular to the Palermo and Neyagawa sites without compromising the housing pledge and in fact, may accelerate timing of home construction and occupancy.

Region Special Purpose Pool

As noted in the Staff Report, the Region of Halton has reserved 5,000 units (2760 SDE’s) as part of this program, to be distributed as it’s discretion for public interest related developments. This pool provides the Region and Town staff some flexibility to process applications that provide or are in the public interest (referencing the delivery of school sites as an example). We believe that developments delivering other types of community infrastructure within the public interest are also eligible to utilize the special purpose pool.

Rationale for Argo Palermo to receive SDE Allocation

We agree that the adopted planning policy for Palermo is under appeal, however the work completed as part of the OPA's were subject to an extensive public consultation process and we believe that our proposed changes to the Town's adopted OPA's allow more flexibility on how to deliver the strategic growth area as well achieving the Town's objectives. To suggest there is no policy position is in our view, not an entirely accurate description of the current status of Palermo. It should also be noted that Argo has submitted "complete" Draft Plan and Zoning By-law Applications to the Town and have since been appealed to the OLT as a result of a refusal report from staff. In light of the above, we are of the opinion that a decision on approvals from the OLT supporting development on the site which conforms with the approved ROPA 48 and 49 planning policy could be received quicker than many of the other areas that Town has reserved Allocation in the form of SDE's for.

From an infrastructure perspective, there are existing Regional water and wastewater services that are situated along the site's frontage. This is not the case for many of the areas that staff are recommending to receive allocation in the form of SDE's in both the Built Boundary and Designated Greenfield areas.

Finally, there are a number of components to our proposed development application that will satisfy a number of public interest objectives:

1. Delivery and acceleration of water and wastewater services to the Vaishno Devi Hindu Temple;
2. Delivery and acceleration of Oakville Transit Hub; and
3. Delivery of essential community services such as a grocery store, library, community centre, office space along with commercial and active retail and restaurant opportunities

Rationale for Neyagawa to receive SDE Allocation

Similar to Palermo, Argo's Neyagawa site is immediately serviceable with no additional infrastructure required. We have also submitted a "complete" Official Planning Amendment, Draft Plan and Zoning By-law Amendment applications that are in conformity with the Region's ROPA 49 planning policy that designates the site from employment to residential use. Furthermore, Planning staff at both the Town and Regional levels have been actively

working on having the 407 Transitway Station that had been shown on a draft version of the 407 Transitway EA reinstated. They have justified having the station reinstated by responding to the Province's request for growth and density to support the station in close proximity by showing that the lands within the Neyagawa Urban Core limits (mainly including the Argo Neyagawa site) will be planning to support significant growth. Without being provided Allocation in the form of SDE's there is a risk that these lands will be delayed until 2031 should we accept the Town's recommendation of IDU's. Furthermore, if we are only permitted to taking 40% of our SDE request through IDU's, then full buildout of the remaining portion of the lands will need to occur on the basis of a delayed timeframe post 2031.

Argo's request of Council

As noted and rationalized above, it is our opinion that development proposals for both Palermo and Neyagawa provide significant public interest objectives and are in a position to be approved well in advance of the next allocation program.

Argo also understands that there are 26,312 SDE's allocated to Oakville with Staff Recommending a distribution of 15,844 to the Built Boundary and 10,294 to that Designated Greenfield Areas. We firmly believe this distribution will result in a significant amount of SDE's (particularly in the Built Boundary) that will be un-used or locked for several years and that a process will need to be established with the Region and Industry in order to outline criteria to provide a streamlined process to convert allocation in the form of IDU's to SDE's.

In light of the above, we respectfully request that:

1. Council amend Staff Recommendations to support the allocation of 100% of Argo's Expression of Interest for the Palermo and Neyagawa Sites in the form of IDU's

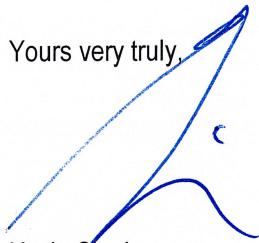
AND

2. That Council support a recommendation to Regional Staff that should the Palermo or Neyagawa lands be approved in advance of the next allocation program or if there is no re-allocation of the distribution of allocation supported by the Region's monitoring report, that the Town agree to request that a portion of the

Special purpose Pool SDE's be allocated to the Palermo and Neyagawa sites.

Argo is excited to continue to shape the future of Oakville by delivering communities that provide unique opportunities and assist with building community infrastructure that will benefit future generations of Oakville residents. We hope that you find this submission helpful and insightful on the impact that Allocation will have on being able to do so in a timely manner. Should you have any questions, please do not hesitate to contact me.

Yours very truly,



Kevin Singh

Vice President, Land Development

Argo Development Corporation