

May 31, 2024

Our Project: OL.OA

VIA EMAIL – townclerk@oakville.ca
midtown@oakville.ca

Re: Midtown Oakville Considerations Special Council Meeting – June 3, 2024

Dear Town Clerk & Midtown Oakville Project Team

SGL Planning & Design Inc. represents Oak-Lane Park Investments Inc., the owners of 570 Trafalgar Road (the 'subject site') within the Midtown Oakville Trafalgar Precinct Area. We have been participating in the Midtown Oakville Secondary Plan process for the past several years and have provided numerous submissions on behalf of our client. We appreciate the time and effort that Staff and the consultant team have dedicated to this project and we also appreciate the opportunity to provide feedback on the revised concept for Midtown Oakville.

We have reviewed the revised concept which illustrates a potential built form accommodating a total of 35,000 people and jobs within Midtown Oakville. We believe having a lower population target is not viable and does not represent good planning for Midtown Oakville. We request that Council reconsider the April 2 draft Official Plan Amendment as Town Staff and the consultant team have undertaken detailed analysis for the proposed densities and heights.

Reducing Midtown Oakville's target to 35,000 people and jobs has the following negative impacts:

1. Deflects growth to other parts of Oakville which may not have the adequate infrastructure or transit service

The Joint Best Planning Estimates (JBPE) were informed by the Growth Plan studies on where future population growth should be located and allocates forecasted growth to lower tier municipalities as well as providing policy direction to assist them in achieving complete communities and provincial plan minimum density targets. In determining JBPE for Midtown Oakville, consideration of the local context, availability of existing and planned transit and servicing infrastructure and housing market trends were taken into account. Altering the growth target for Midtown Oakville would have a ripple effect on other areas within the town in meeting their growth targets, potentially altering the growth targets of other areas where infrastructure is already at capacity or with less transit capacity.

2. Produces an unattractive urban form

In order to meet the overall density targets of provincial plans, the Halton Official Plan and the Livable Oakville Plan, a mix of low to high rise developments are required to be located within Midtown Oakville. Limiting heights to 20 storeys across the entirety of Midtown Oakville does not create an attractive, distinct built form nor does it provide a distinct skyline with varying building heights. Applying a 35 metre separation distance between towers is excessive for 20 storey buildings and is not a typical standard in the GTA. This does not represent an efficient use of land and resources, and it also does not represent good community planning.

3. Does not decrease infrastructure cost, only provides lower development base to pay for infrastructure

As Town Staff outlined in their report titled “Midtown Oakville Considerations” dated May 21, 2024, the initial long-term cost of hard and soft infrastructure for Midtown Oakville is \$770 million over the next 30 years shared between the Town, Region, Province and developers. However, the estimated cost remains the same even with a smaller number of units and population as certain improvements in Midtown are required no matter the scale of population growth.

Development charges paid by developers account for most of the funding to pay for infrastructure improvements in Midtown. Reducing the growth to 35,000 residents and jobs, results in less development charges whereas infrastructure costs for Midtown Oakville remain the same.

4. Failure of Comprehensive Planning

The proposed revision could result in increased appeals to the Ontario Land Tribunal, ultimately allowing the tribunal to govern development within the Town without any reasonable comprehensive planning.

Thank you for the opportunity to provide feedback on the proposed revised concept. We maintain that the April 2 draft Official Plan Amendment prepared by Staff and the Town’s consultant be recommended as detailed analysis has been undertaken and the proposed levels of growth are warranted for Midtown Oakville.

Yours very truly,

SGL PLANNING & DESIGN INC.



Paul Lowes, MES, MCIP, RPP
Principal

c.c. Stephen Waque