

Town of Oakville
Planning and Development Council
1225 Trafalgar Road
Oakville, ON
L6H 0H3

October 15, 2024

Dear Members of Planning and Development Council,

**Re: Proposed Official Plan Amendment 68
Town-Initiated OPAs to Preserve the Town's Protected Employment Areas
File Number 52.57.03**

Sajecki Planning is the planning consultant for Holiday Inn & Suites Oakville @ Bronte, who represent the registered owners of the property (the "owners") located at 2515-2525 Wyecroft Road in the Town of Oakville, (the "Property"). The boundaries of the Property as well as the list of registered owners for each associated property are illustrated in **Attachment A**.

We are submitting this letter to express concerns with proposed Official Plan Amendment (OPA) 68. As detailed below, the proposed OPA will significantly restrict the future development of the Property. In addition, we feel that the proposed OPA is contrary to the spirit and intent of recent legislative and policy changes that have been introduced by the Province to promote the development of housing to achieve the Province's goal of building 1.5 million homes by 2031.

The Property is located south of the QEW, east of Bronte Road, north of Wyecroft Road, and west of South Service Road West. It is approximately 1.5 km west of the Bronte GO station and is situated along the Bronte Road Regional Transit Priority Corridor (as shown in Schedule A1 of the Official Plan), which is a focus area for transit-supportive development. The Property is designated Business Employment in the Town of Oakville Official Plan. The Property currently contains hotel, hospitality and conference centre uses within three buildings, along with a large surface parking area serving the existing hospitality and commercial uses. The existing uses do not meet the definition of "area of employment" in the *Planning Act* as it will read on October 20, 2024.

Proposed OPA 68

On October 15, 2024, a recommendation report and an associated OPA are being brought forward to Planning and Development Council for a decision. OPA 68 is meant to respond to the new definition of "area of employment" in the *Planning Act* enacted through Bill 97 and carried forward into the new *Provincial Planning Statement, 2024*. The new definition of "area of employment" includes manufacturing, warehousing and industrial uses, and explicitly excludes institutional and commercial uses, including retail and office uses not associated with heavier industrial uses. The new definition will come into effect on October 20, 2024.

The proposed OPA is intended to preserve the Town's existing employment areas until such time that the Town completes an employment area review that will determine how to implement the provincial direction with respect to employment areas. OPA 68 will impact designated Employment Areas in the following significant ways:

1. Restricting the development of uses that are excluded from the new definition of "area of employment" in the *Planning Act*, including new retail, office and institutional uses;
2. Permitting existing uses which do not meet the new definition of "area of employment" to continue, provided that the use was lawfully established on the lands before October 20, 2024; and,
3. Allowing for the application of employment land conversion policies to all lands that are currently designated in the Official Plan as being within an employment area, including the continued restriction of appeals to the Ontario Land Tribunal.

Concerns with Proposed OPA 68

We have several concerns with the proposed recommendation report and implementing policy amendments, as summarized below:

- 1. Removal of Existing Development Permissions** – OPA 68 will remove existing land use permissions on the Property and significantly restrict the range of uses that may be developed on the Property. Once OPA 68 is implemented, development of new or expanded commercial, retail and office uses would be prohibited. As the site currently contains hotel, hospitality and conference centre uses, commercial, retail, office and other sensitive land uses represent appropriate forms of infill on the Property.
- 2. Incorrect Classification of the Subject Site as an Employment Area** – The three existing buildings on our client's property are used entirely for commercial and hospitality purposes. Two of the buildings are hotel facilities while the third is a conference centre and banquet hall. These existing uses are no longer considered employment uses as per the new definition of "area of employment" in the *Planning Act*. Instead, the Property should be considered as an appropriate location for mixed-use development, in keeping with the new *Planning Act* regulations and Provincial policy direction.
- 3. Uncertain Timing** – It is unclear how long a comprehensive review of the Town's employment areas will take. The staff report speaks to the advancement of a comprehensive, multi-stage process involving an employment area review and comprehensive official plan and zoning by-law amendments. This process could take numerous months or even years to complete, which would largely freeze new development on the Property indefinitely.

Conclusion

We have concerns with the recommendation report and the implementing OPA 68. The proposed OPA will restrict future development on the Property, while also hindering the potential to introduce residential or mixed-use development on the lands, which is contrary to the intent of the recent Provincial legislative changes.

To address these concerns and to acknowledge the existing land uses on the site, we are requesting that the property at 2515-2525 Wycroft Road not be subject to OPA 68.

We kindly request to be included in any future notices or correspondence regarding decisions on this matter.

Sincerely,

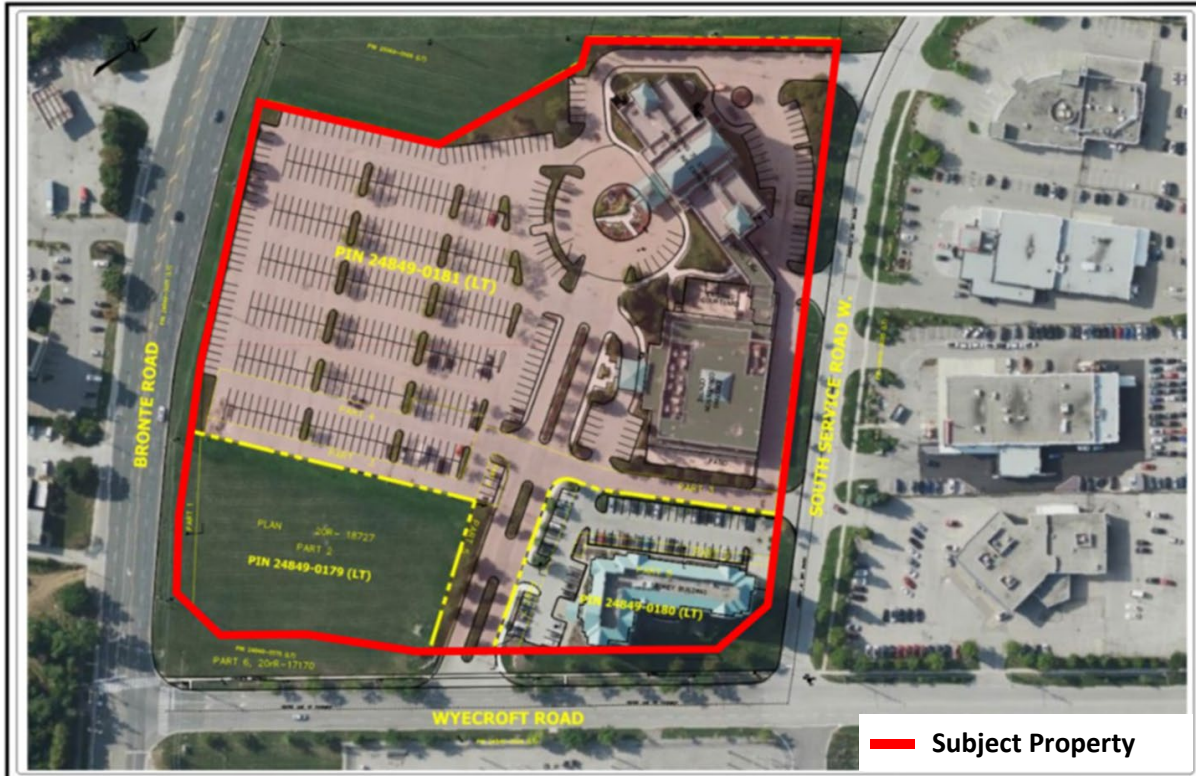


Tony De Franco
MScPl, MCIP, RPP
Development Planning Lead, Sajecki Planning Inc.

CC: David Sajecki, Sajecki Planning Inc.
Darko Vranich, Vrancor Group
Denise Baker, WeirFoulds
Peter Horn, Horn Design & Consulting Inc.

Attachment A

Property Map



List of Registered Owners

PIN 24849-0179 - 2406876 Ontario Inc

PIN 24849-0180 - 2391185 Ontario Inc

PIN 24849-0181 - Vrancor Master GP Inc./Oakville Wyecroft Hotel LP