



Tuesday, October 29, 2024

**Town of Oakville**  
1225 Trafalgar Road,  
Oakville, Ontario  
L6H 0H3

**Attention:** Sarah Burrell, Policy Planner

**Re:** **Special Council Meeting October 29, 2024 – Response Letter Submission**  
Town initiated Draft Official Plan Amendment - Midtown Oakville and Community Planning  
Permit System – Update  
  
349 Davis Road

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On behalf of 1539059 Ontario Inc. (Client), Corbett Land Strategies Inc. (CLS) is pleased to submit this letter to the Mayor and Members of Council containing our response to the new Draft Secondary Plan Amendment (OPA) for Midtown Oakville, released on September 26, 2024. This submission relates to the lands legally described as Part of Lot 12 Concession 3 South of Dundas Street, Town of Oakville, and municipally known as 349 Davis Road (the 'subject lands').

The new draft of the Midtown OPA designates the subject lands as part of the 'Urban Core,' specifically within the 'Trafalgar Precinct.' This area is envisioned to be a mix of various land uses, creating a highly walkable community in Midtown Oakville. It will include a variety of office, civic, cultural, residential, and recreational spaces, along with public areas. Additionally, the updated draft schedules indicate that the proposed density for the Trafalgar Precinct will have a minimum of 3 FSI and a maximum of 4 FSI. The building height is set to range from a minimum of 5 storeys to a maximum of 20 storeys.

We strongly believe that the current approach to guiding development and managing growth in Midtown deviates from the Provincial priority on the creation of housing as well as the policies set out in the New Provincial Planning Statement (2024). In previous drafts for Midtown Oakville, prior to April 2024, the proposed strategies were more closely aligned with the Province's objectives, as they were able to promote growth through the appropriate intensification of strategic growth areas. This in turn ensured that the future community needs were met while encouraging diversity in housing options.

The current approach raises concerns that it may potentially limit the pathways for development, it threatens to prohibit opportunities for both residential growth and the availability of affordable housing options within Midtown. This could result in a negative impact on the community's overall livability and economic vitality. Therefore, it is crucial to reconsider this direction to ensure it supports the broader goals of sustainable and inclusive community development.

The following are our responses to the specific items in the new draft OPA for Midtown Oakville:

1. Schedule L2 and L3 : Density Provision

According to Watson Consulting's analysis based on Joint Best Planning Estimates (JBPE), the overall growth forecast for Oakville is projected to reach 442,941 residents and 212,116 jobs. This estimate is significantly higher than the Provincial forecast provided in ROPA 49, which anticipated 349,990 residents and 181,120 jobs. Additionally, Watson's observations indicate a decline in certain population cohorts in Oakville, specifically among 20-34 year-olds and 55-64 year-olds. This trend suggests a shift in the market towards renters and first-time homebuyers, as well as residents looking to downsize and seeking affordable housing in a comprehensive community area.

The proposed density regulations for Midtown Oakville could significantly limit the area's capacity to provide a variety of housing options, which is a crucial need in our community. We argue that setting a density cap at a maximum of 4 FSI does not take full advantage of Midtown's potential, especially given its strategic location within the Major Transit Station Area (MTSA) and its proximity to Highway 403. These factors position Midtown as an ideal site for growth and development. To truly realize its possibilities, the Town should prioritize intensification, aiming to create a vibrant, diverse community that meets the housing demands of residents. By embracing higher density, we can foster a more inclusive and sustainable urban environment that supports public transit use and helps alleviate housing shortages.

2. Proposed Road Network Re-alignment

In our previous formal submission, we raised concerns about the proposed road network, which we believe undermines the development potential of the property at 349 Davis Road. We acknowledge that adjustments have been made to the road alignment of the Argus Road and Davis Road underpass, however, the concerns persists as the alignment still reduces the development potential of the Subject Lands (see Schedule A).

We continue to request that staff make further adjustments to the relevant road network schedules to eliminate any ambiguity regarding the development potential of the subject lands as currently proposed. Implementing these changes will also help avoid a significant public financial commitment to construct a vehicular underpass that would not bring any meaningful improvement to the overall functioning of the road network.

We hope the following comments will be considered in approving the Draft Midtown Oakville Growth OPA. Please do not hesitate to contact the undersigned with questions or if you require clarification regarding our comments and submissions.

Sincerely,

*John Corbett*

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**John B. Corbett, M.C.I.P., R.P.P.**

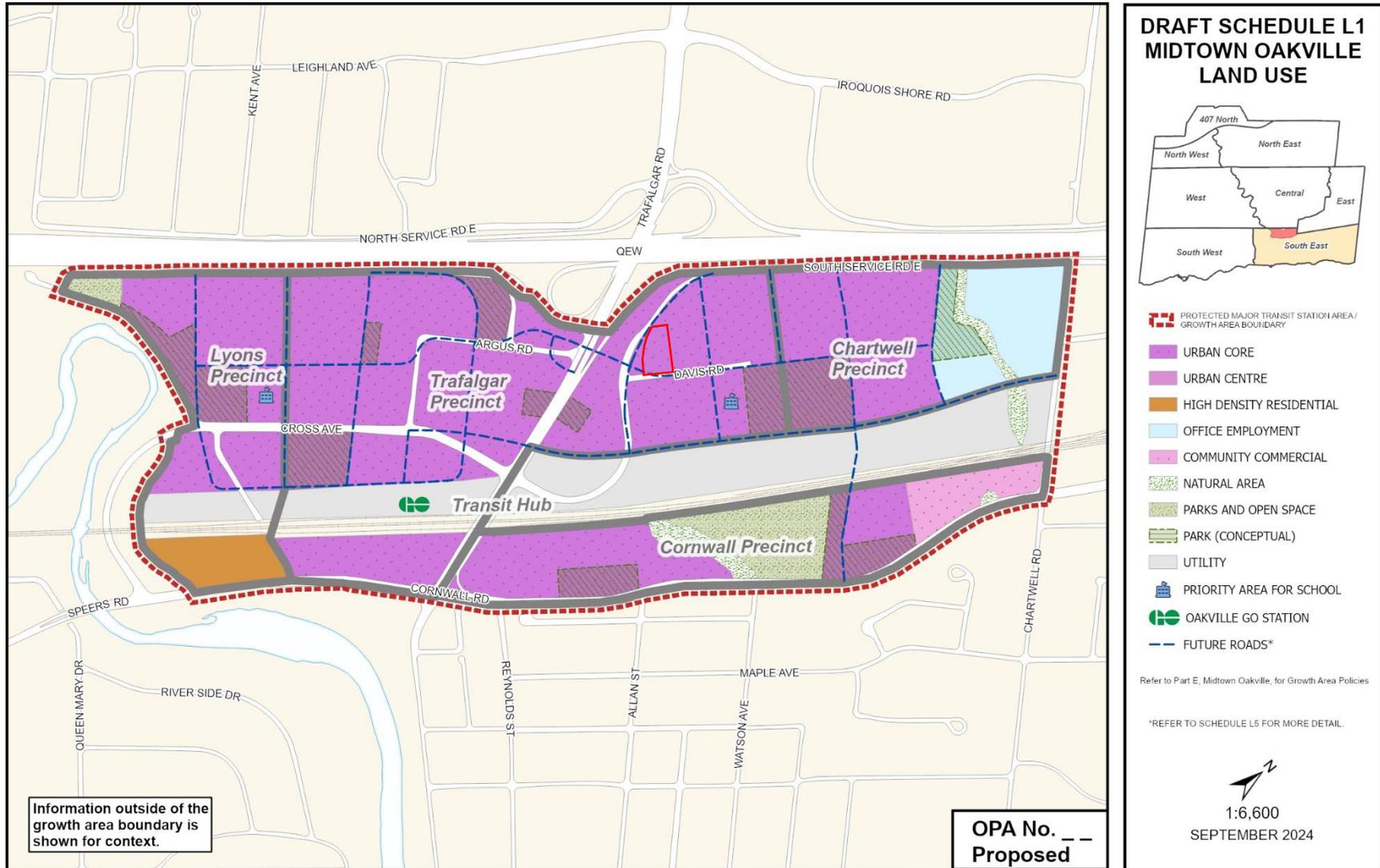
Corbett Land Strategies Inc.

President

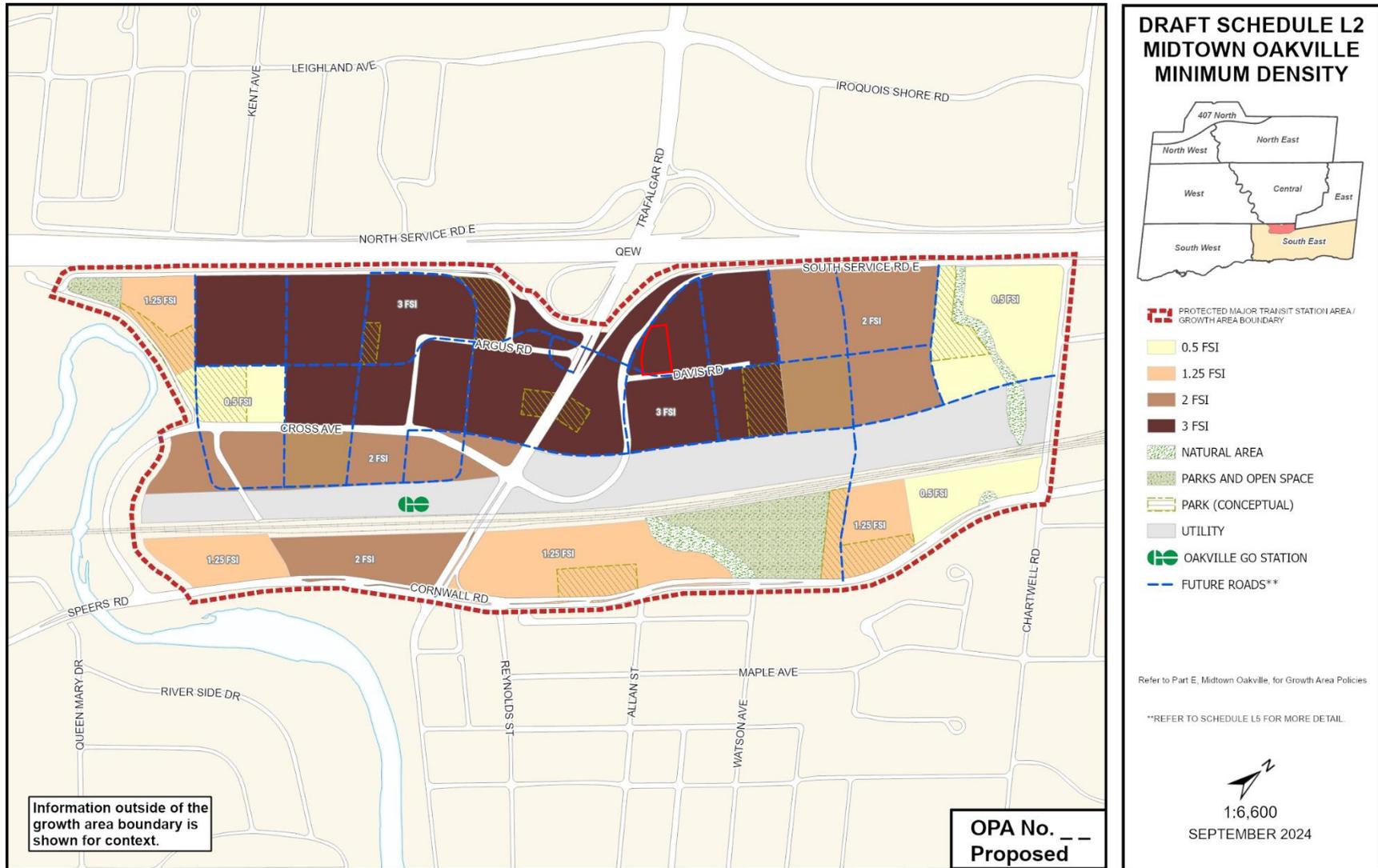
[john@corbettlandstrategies.ca](mailto:john@corbettlandstrategies.ca)

# SCHEDULE A – Midtown Oakville Official Plan Amendment DRAFT September 2024

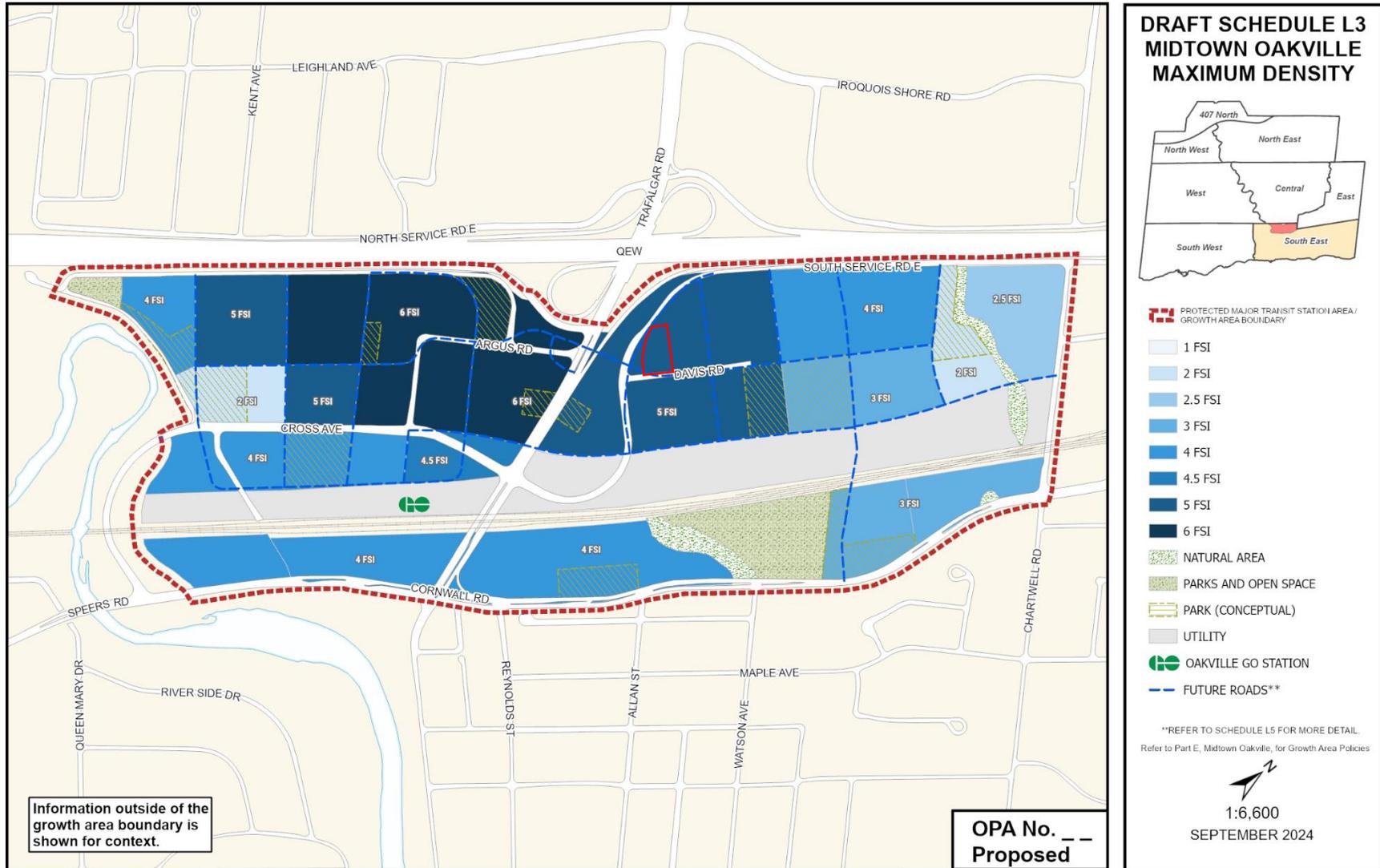
## Schedule L1 Land Use



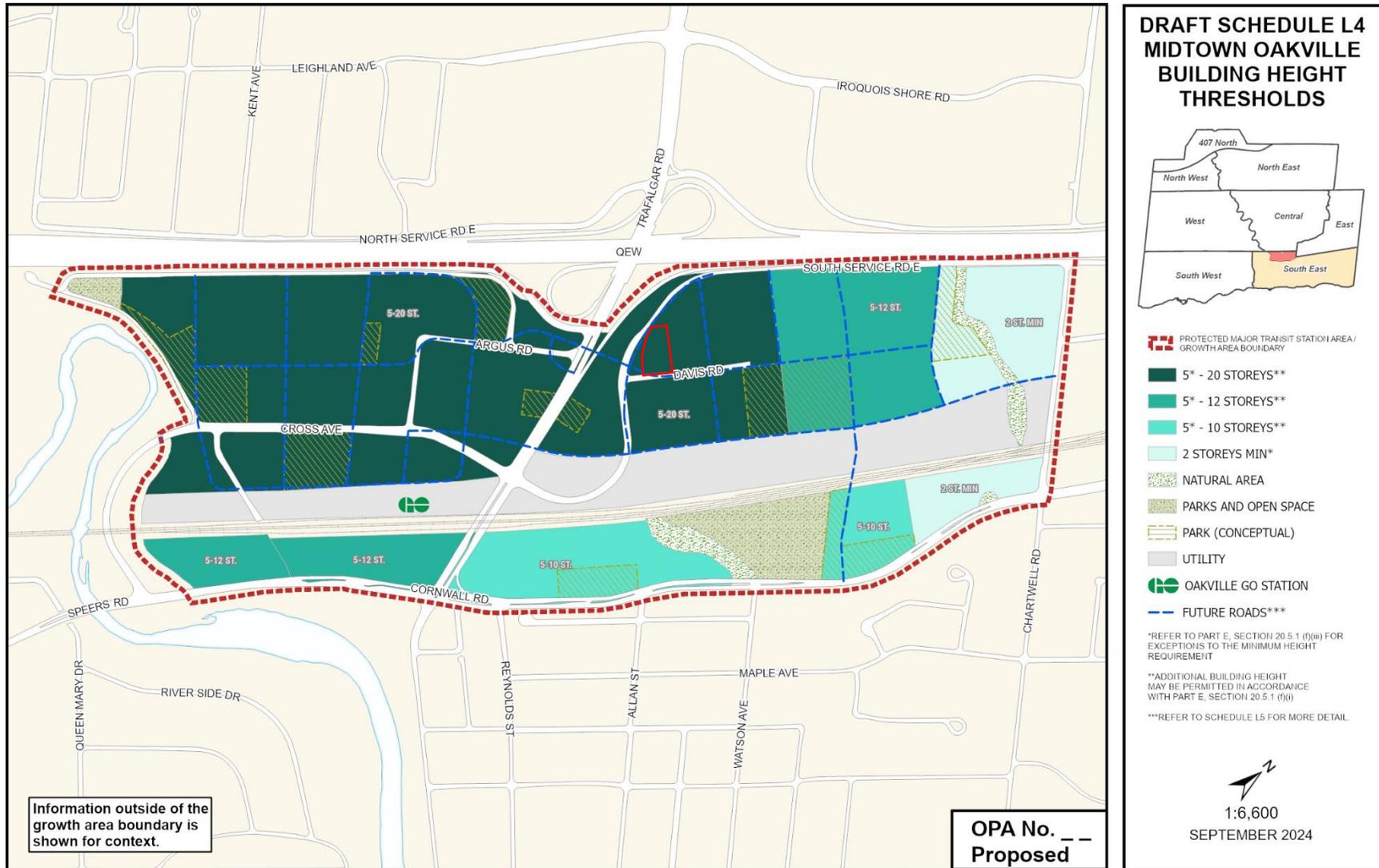
Schedule L2 Minimum Density



### Schedule L3 Maximum Density



### Schedule L 4 Building Height Thresholds



## SCHEDULE B – 58 storey Mixed Use Building



