

## REPORT

### Planning and Development Council

Meeting Date: March 3, 2025

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**FROM:** Planning and Development Department

**DATE:** February 18, 2025

**SUBJECT:** Recommendation Report for Official Plan Amendment and Zoning By-law Amendment - 15 Loyalist Trail, Rowhedge Construction Ltd., File Nos.: OPA.1215.05 and Z.1215.05

**LOCATION:** 15 Loyalist Trail

**WARD:** Ward 7 .

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#### RECOMMENDATION:

1. That the Official Plan Amendment and Zoning By-law Amendment applications submitted by Rowhedge Construction Ltd. (File Nos.: OPA 1215.05 and Z.1215.05) be refused;
2. That the notice of Council's decision reflect that Council has fully considered all of the written and verbal submissions relating to these matters and that those comments have been appropriately addressed; and
3. That, in accordance with Section 34(17) of the *Planning Act*, no further notice is determined to be necessary.

#### KEY FACTS:

The following are key points for consideration with respect to this report:

- **Location:** The subject property is located on the north side of Loyalist Trail, east of Sixth Line and is municipally known as 15 Loyalist Trail.
- **Policy Context:** The subject property is designated 'Urban Area' in the Region of Halton Official Plan, identified as 'Employment Area' in the Urban Structure of the Livable Oakville Official Plan, and designated 'Employment District' within the North Oakville East Secondary Plan.

- **Zoning:** The subject property is zoned '*Service Area Employment (SA)*' which permits commercial and light employment uses.
- **Previous Applications:** The site was the subject of a Plan of Subdivision and Zoning By-law Amendment (24T-13002/1215 and Z.1215.01) that was approved by the former Ontario Municipal Board (OMB). The subject lands were also part of a larger parcel created by the subdivision. The western portion was sold to the Town for the purposes of a new Fire Hall at the corner of Sixth Line and Loyalist Trail. A Site Plan (SP.1215.005/01) for the Fire Hall is currently under review.
- **Current Application:** The applicant has submitted an Official Plan Amendment and Zoning By-law Amendment to redesignate and rezone the lands from employment to residential to permit the development of 40 stacked townhouse dwelling units with two parking spaces per unit and three visitor parking spaces for the entire development.
- **Public Consultation:** A developer-hosted Public Information Meeting was held on October 8, 2024, with 14 attendees, including the Ward Councillors and staff. The Statutory Public Meeting was held on February 3, 2024 and no members of the public attended. Two written submissions have been received from the public at the time of the writing of this report and are included within Appendix 'A'. Their concerns included traffic, privacy, and impacts to the natural heritage system.
- **Timing:** The subject applications were deemed complete on November 11, 2024. Pursuant to the *Planning Act*, Council has 120 days to make a decision on the applications. If no decision is made by March 11, 2025, the applicant can appeal for a non-decision.
- **Staff Recommendation:** Staff recommend that redesignation and rezoning of the subject lands from employment to residential is not appropriate for the site, and does not conform to the *Planning Act*, is not consistent with the Provincial Planning Statement 2024, and does not conform to the Region of Halton Official Plan, the Livable Oakville Official Plan or the North Oakville East Secondary Plan and, therefore, should be refused.

## BACKGROUND:

The purpose of this report is to provide a recommendation on the proposed Official Plan Amendment and Zoning By-law Amendment applications for 15 Loyalist Trail. The Statutory Public Meeting was held on February 3, 2025.

The subject lands were part of a larger parcel (Block 154) created by Plan of Subdivision known as Star Oak North Phase 1 (20M-1221), which was draft approved by the OMB in 2017 together with a Zoning By-law Amendment for residential, employment and natural heritage system uses that implemented the North Oakville East Secondary Plan (NOESP).

Prior to the approval of the Plan of Subdivision and Zoning By-law Amendment for the subject lands, the applicant was a participant in the Region's Municipal Comprehensive Review (MCR) in 2015 for the purpose of converting the subject lands from '*Regional Employment Area*' to '*Urban Area*'. The conversion was approved and implemented through ROPA 48 in 2018. The town provided comments to the Region on the conversion request and identified that further study of the subject lands would be completed through the NOESP Review, which would include an assessment of the entire employment district.

Recently, the new Provincial Planning Statement (PPS) 2024 came into effect along with changes to the *Planning Act* and introduced a new policy framework for lands within and adjacent to an "Area of Employment". In response, Council adopted OPA 332 (as well as OPA 68 and 333) to ensure the town's employment areas, including the subject site, align with the new definition for "Area of Employment". These OPAs are currently under appeal. Staff will be undertaking a comprehensive evaluation of the town's employment areas to ensure alignment with the current provincial policy regime. At this time, it has not been determined that the subject lands are not needed for employment uses at a local level. Further discussion about the OPAs and pending employment area study is provided later in this report.

## **Proposal**

The applicant has submitted Official Plan Amendment and Zoning By-law Amendment applications to redesignate and rezone the subject lands from '*Employment District*' to permit the development of 40 stacked townhouse dwelling units, with two parking spaces per unit and three visitor parking spaces for the entire site.

The applicant's proposed Official Plan Amendment application includes:

- Amend Schedule A1 of the Livable Oakville Official Plan for a change from Employment Areas to Residential Areas;
- Amend Figure NOE1 (North Oakville East 1) Community Structure of the North Oakville East Secondary Plan to remove the lands from Employment District; and
- Amend Figure NOE2 (North Oakville East 2) Land Use Plan of the North Oakville East Secondary Plan to change the designation from "*Employment District*" to "*Transitional Area*".

The applicant's proposed Zoning By-law Amendment application is to rezone the site from *SA - Service Area Employment* to *NC - Neighbourhood Commercial* with site-specific regulations to permit stacked townhouse dwelling units. The proposal also includes changes to height, setbacks, and porch dimensions. The applicant is not proposing any commercial uses as part of their application.

The applicant's concept plan is provided in Figure 12.

### **Location & Site Description**

The subject lands are located on the north side of Loyalist Trail, east of Sixth Line within the Star Oak North (Phase 1) subdivision. The lands were previously known as Block 154 in Plan 20M-1221 and extended to Sixth Line as shown in Figure 1 below to provide a cluster of Service Area Employment uses. In 2020, the western portion of lands were sold by the applicant to the Town to facilitate the development of a new Fire Hall (Part 1). The subject lands are now legally described as Parts 2, 3 and 6 of Plan 20R-21707 and are known municipally as 15 Loyalist Trail.

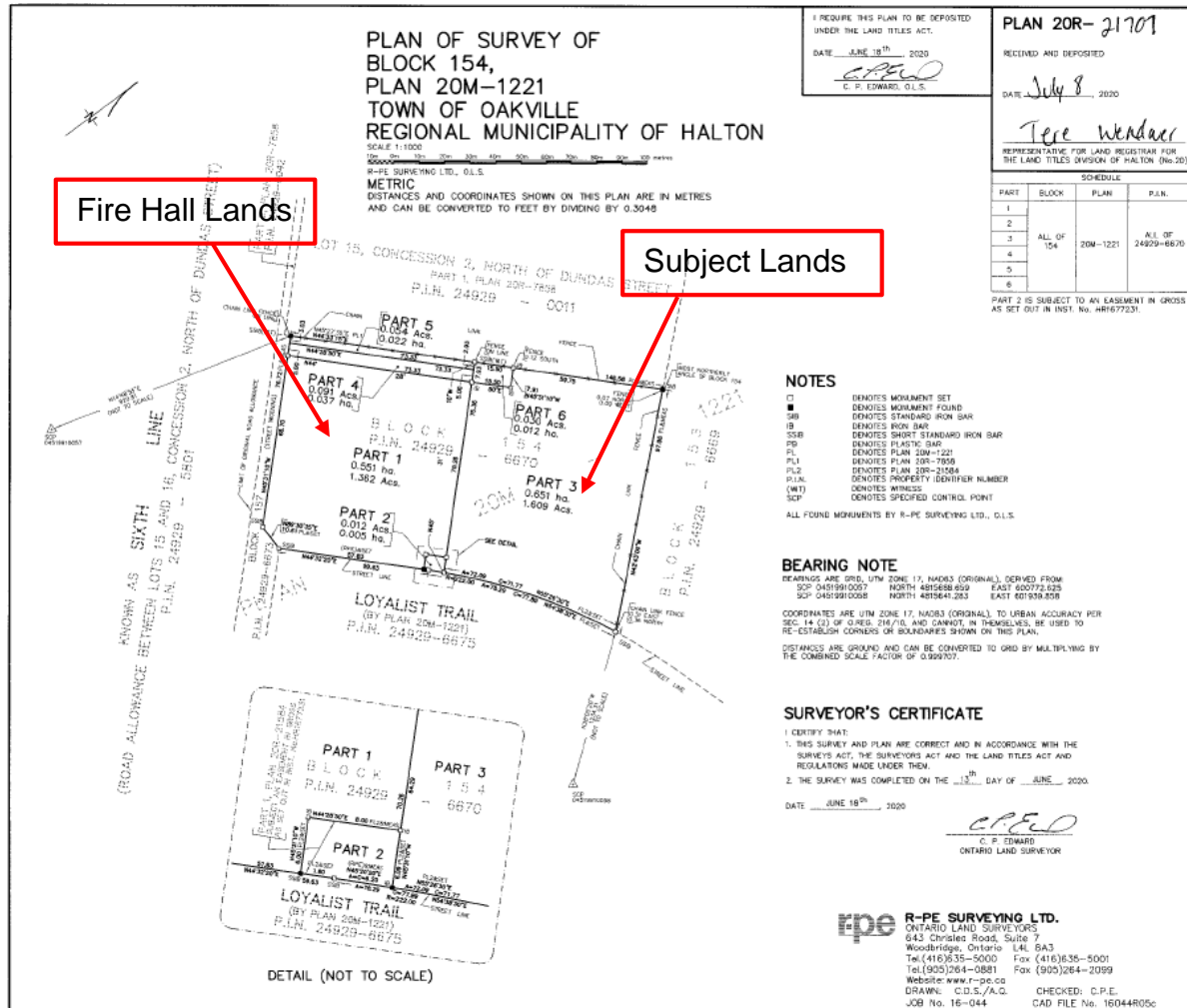


Figure 1 – Site Survey

## Surrounding Land Uses

The land uses surrounding the subject lands include the following:

North – Employment (Regional Reservoir Facility), Natural Heritage System, beyond which is future employment uses

East – Natural Heritage System, beyond which is constructed employment uses

South – Townhouse and detached residential uses

West – Employment (Future Fire Hall), Sixth Line, future HDSB High School

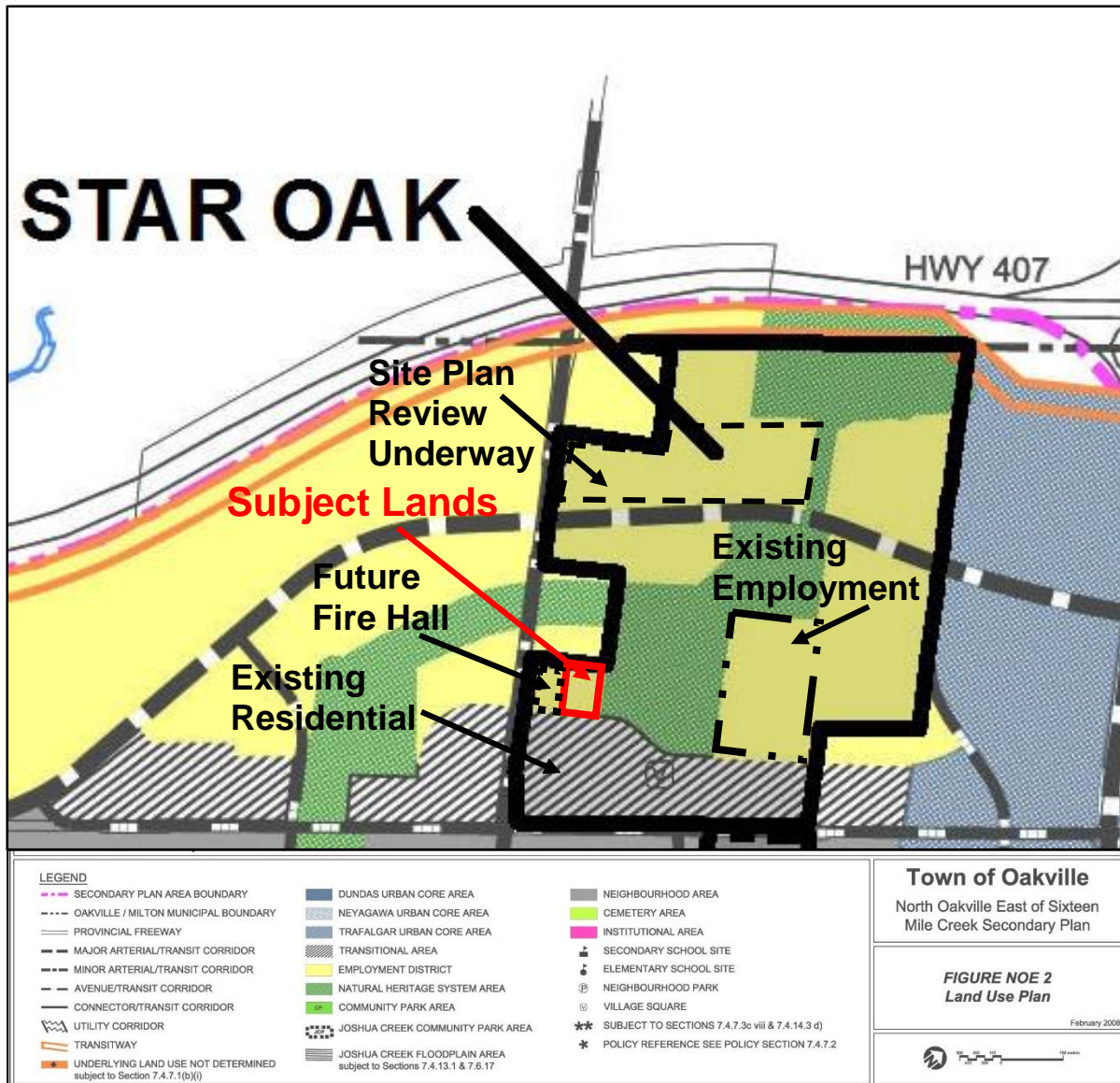


Figure 2 – Context Plan

To further describe the surrounding context, Figure 2 shows the subject lands relative to existing and future development. Staff note that the decision of the OMB to approve the zoning for the subject lands also permitted the development of residential uses on the south side of Loyalist Trail in the lands designated as 'Transitional Area'. The 'Transitional Area' designation permits a range of commercial and residential uses to act as a buffer to the employment area to the north, subject to an Area Design Plan. It was determined that the Loyalist Trail right-of-way provided an adequate buffer to the 'Employment District' designated area. This allowed for residential uses and a Village Square to be situated along the south side of Loyalist Trail, with only one block of live-work units fronting onto Burnhamthorpe Road.

## PLANNING POLICY & ANALYSIS:

The property is subject to the following policy and regulatory framework:

- The *Planning Act*
- Provincial Planning Statement (2024)
- Halton Region Official Plan (implemented by the Town)
- Livable Oakville Plan
- North Oakville East Secondary Plan
- Zoning By-law 2009-189

### Planning Act, R.S.O, 1990

As of October 20, 2024, the effective date, the new definition for “Area of Employment” means:

*“an area of land designated in an official plan for clusters of business and economic uses, those being uses that meet the following criteria:*

1. *The uses consist of business and economic uses, other than uses referred to in paragraph 2, including any of the following:*
  - i. *Manufacturing uses.*
  - ii. *Uses related to research and development in connection with manufacturing anything.*
  - iii. *Warehousing uses, including uses related to the movement of goods.*
  - iv. *Retail uses and office uses that are associated with uses mentioned in subparagraphs i to iii.*
  - v. *Facilities that are ancillary to the uses mentioned in subparagraphs i to iv.*
  - vi. *Any other prescribed business and economic uses.*
2. *The uses are not any of the following uses:*
  - i. *Institutional uses.*
  - ii. *Commercial uses, including retail and office uses not referred to in subparagraph 1 iv.”*

The new definition differs from the previous definition in that it explicitly excludes institutional and commercial uses from an “Area of Employment”. Previously, those uses were not excluded and could be located within an “Area of Employment”

without risking non-conformity with the provincial definition and loss of status as a protected employment area.

Further, the transition provision for the change in definition for “Area of Employment” under subsections 1 (1.1) and (1.2) of the *Planning Act* allows municipalities to have policies in their official plans that allow employment areas to continue as an “Area of Employment”. This applies even if lands are occupied by uses excluded from the new definition if the use was “lawfully established” before the effective date and if official plan policies do not authorize uses that are excluded from the new definition on or after the effective date within those employment areas.

On October 15, 2024 Town Council adopted OPAs 68 (Livable Oakville), 332 (NOESP), and 333 (NOWSP) to allow the town’s employment areas to continue as an “Area of Employment”, and provide time for staff to align the town’s employment policy framework with the provincial changes. The OPAs have been appealed to the OLT and, if approved, will be deemed to take effect as of October 15, 2024 – prior to the subject application being submitted and deemed complete. The applicant is one of the appellants of OPA 68 and 332.

Further, under Section 2 of the *Planning Act*, decision makers shall have regard for matters of Provincial Interest such as:

- “(k) *the adequate provision of employment opportunities;*
- “(l) *the protection of the financial and economic well-being of the Province and its municipalities;*
- “(m) *the co-ordination of planning activities of public bodies;*
- “(n) *the resolution of planning conflicts involving public and private interests;*
- “(o) *the protection of public health and safety;*
- “(p) *the appropriate location of growth and development;”*

As previously provided, the town is engaging in a comprehensive employment area review to determine (but not limited to):

- The town’s long term employment needs;
- Where lands to support those long term needs should be located;
- How to address lands deemed not suitable for employment (per the new definition), but also not suitable for sensitive land uses, given proximity to employment areas; and
- Where lands should be located for complementary commercial and institutional uses.

Without the results of the comprehensive review, it is not known whether the subject lands are required for the adequate provision of employment opportunities.



At this time, it is staff's opinion that the proposed redesignation and rezoning of the subject lands from an employment area to residential does not have regard for matters of Provincial Interest, and does not protect lands considered an "Area of Employment" which could impact the ability to protect the broader "Area of Employment" as set out by the *Planning Act*. It is staff's opinion that the proposal does not conform to the *Planning Act*.

### **Provincial Planning Statement, 2024**

The new Provincial Planning Statement (2024) (PPS), is intended to promote a policy-led system, which recognizes that there are complex relationships among environmental, economic, and social factors in land use planning. The PPS encourages the wise management of land to achieve efficient development and land use patterns by directing growth to settlement areas and by promoting a compact development form. All planning decisions must be consistent with the PPS.

The new PPS definition for employment areas is the same as the *Planning Act* "Area of Employment" definition and also recognizes the transition provision under 1(1.1) and (1.2) in the *Planning Act*. The subject lands were previously identified to be within a Provincially Significant Employment Zone, which has since been removed in favour of the new PPS policies and the changes to the *Planning Act* noted above. The PPS continues to provide that municipalities should plan, protect, and preserve employment areas for current and future needs. In doing so, the PPS also directs municipalities to ensure that appropriate transition and land use compatibility is provided between residential or sensitive land uses and surrounding employment areas.

Policy 2.8.1 states:

1. *"Planning authorities shall promote economic development and competitiveness by:*
  - a) *providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*
  - b) *providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;*
  - c) *identifying strategic sites for investment, monitoring the availability and suitability of employment sites, including market-ready sites, and seeking to address potential barriers to investment;*

- d) *encouraging intensification of employment uses and compatible, compact, mixed-use development to support the achievement of complete communities; and*
  - e) *addressing land use compatibility adjacent to employment areas by providing an appropriate transition to sensitive land uses.*
- 2. *Industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects are encouraged in strategic growth areas and other mixed-use areas where frequent transit service is available, outside of employment areas.*
- 3. *In addition to policy 3.5, on lands within 300 metres of employment areas, development shall avoid, or where avoidance is not possible, minimize and mitigate potential impacts on the long-term economic viability of employment uses within existing or planned employment areas, in accordance with provincial guidelines.”*

Staff note that the subject lands are not within a strategic growth area or mixed-use area where consideration is given to mitigate the impacts of land use compatibility. If the proposal is approved for residential uses, it would represent a sensitive land use adjacent to and within 300 metres of an “Area of Employment” as shown in Figure 3 below.

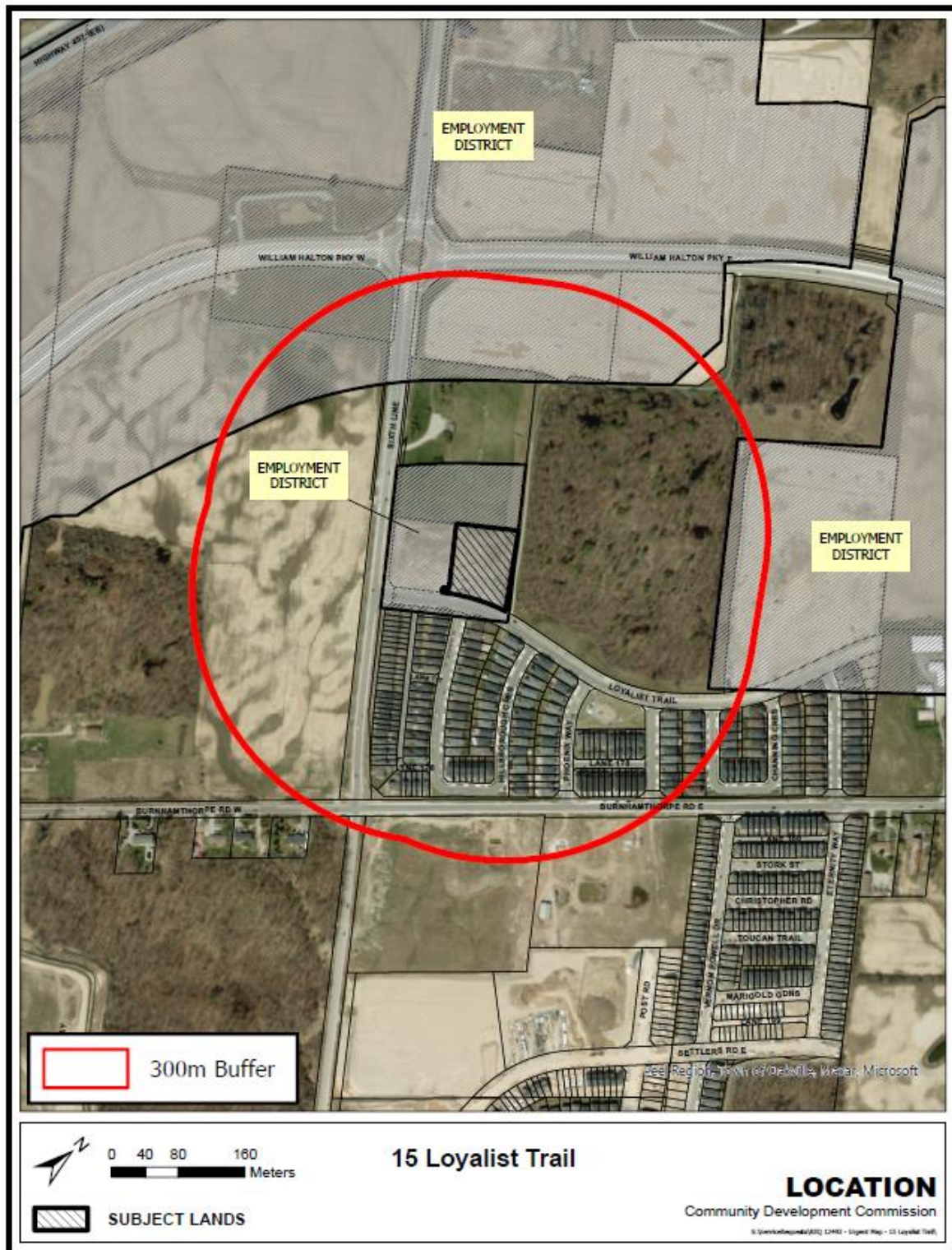


Figure 3 – Aerial Photo with 300 metre employment area buffer

As prescribed by the PPS, development of lands within 300 metres of an “Area of Employment” shall avoid impacts on the long-term economic viability of employment uses in accordance with provincial guidelines (such as the Ontario D6 Compatibility Guidelines). As shown in Figure 3, should the subject lands be redesignated to residential uses, the 300 metre buffer area shows the impact on adjacent and nearby employment areas.

Additionally, Section 2.8.2 directs the town to plan, preserve, and protect employment areas for current and future uses. This includes assessing and updating employment areas identified in Official Plans to ensure that the designations are appropriate for the planned function while maintaining land use compatibility between sensitive land uses and employment areas. Land use compatibility is required to maintain the long-term viability of employment areas.

Further, Policy 2.8.2.5 states:

*“Planning authorities may remove lands from employment areas only where it has been demonstrated that:*

*a) there is an identified need for the removal and the land is not required for employment area uses over the long term;*

*b) the proposed uses would not negatively impact the overall viability of the employment area by:*

*1. avoiding, or where avoidance is not possible, minimizing and mitigating potential impacts to existing or planned employment area uses in accordance with policy 3.5;*

*2. maintaining access to major goods movement facilities and corridors;*

*c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses; and*

*d) the municipality has sufficient employment lands to accommodate projected employment growth to the horizon of the approved official plan.”*

In accordance with Policy 2.8.2.5 a), the town may remove lands from employment areas where there has been an identified need for the removal **and** the land is not required for employment. [emphasis added] The town has not identified any reason for the lands to be removed at this time, but rather has historically indicated that

further study was required. Additionally, staff required the submission of a Commercial Market Study. Details of this analysis is provided later in this report.

As stated in Policy 2.8.1.3, Section 3.5 also applies where sensitive land uses are proposed within 300 metres of an “Area of Employment” and states:

- “1. Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities in accordance with provincial guidelines, standards and procedures.*
- 2. Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.”*

This new policy direction establishes a more restrictive land use compatibility approach, such that all sensitive land uses shall be separated from an employment area by a minimum of 300 metres regardless of the classification of the employment use as set out by Ontario’s D-6 Compatibility Guidelines. If the applications are approved, it will result in a new sensitive land use within the minimum 300 metre buffer.

It is staff’s opinion that the proposed redesignation and rezoning is not consistent with the PPS.

### **Halton Region Official Plan**

As of July 1, 2024 (Bill 185), the responsibility of the Regional Official Plan rests with the Town of Oakville.

The subject lands are designated as ‘Urban Area’. The ‘Urban Area’ is:

*“planned to accommodate the distribution of population and employment for the Region and the four Local Municipalities.”*



The Regional Urban Structure implements Halton's planning vision and growth management strategy to ensure efficient use of land and the long-term protection of lands for employment uses. One of the objectives of the Regional Urban Structure is to identify and protect 'Regional Employment Areas', which includes ensuring adequate transition to sensitive land uses such as residential.

Commencing in 2014, the Region of Halton began its Municipal Comprehensive Review (MCR), which included the evaluation of conversion requests to change specific sites from 'Regional Employment Area' to 'Urban Area'. As noted earlier, the applicant took part in this process for the subject lands, with the intention of providing both residential and commercial uses on the site. In 2018, the Region of Halton Official Plan Amendment 48 (ROPA 48) removed the lands from the 'Regional Employment Area' on the Future Strategic Employment Areas Map 1C and the Regional Employment Area Map 6k (Figures 4 and 5 below).

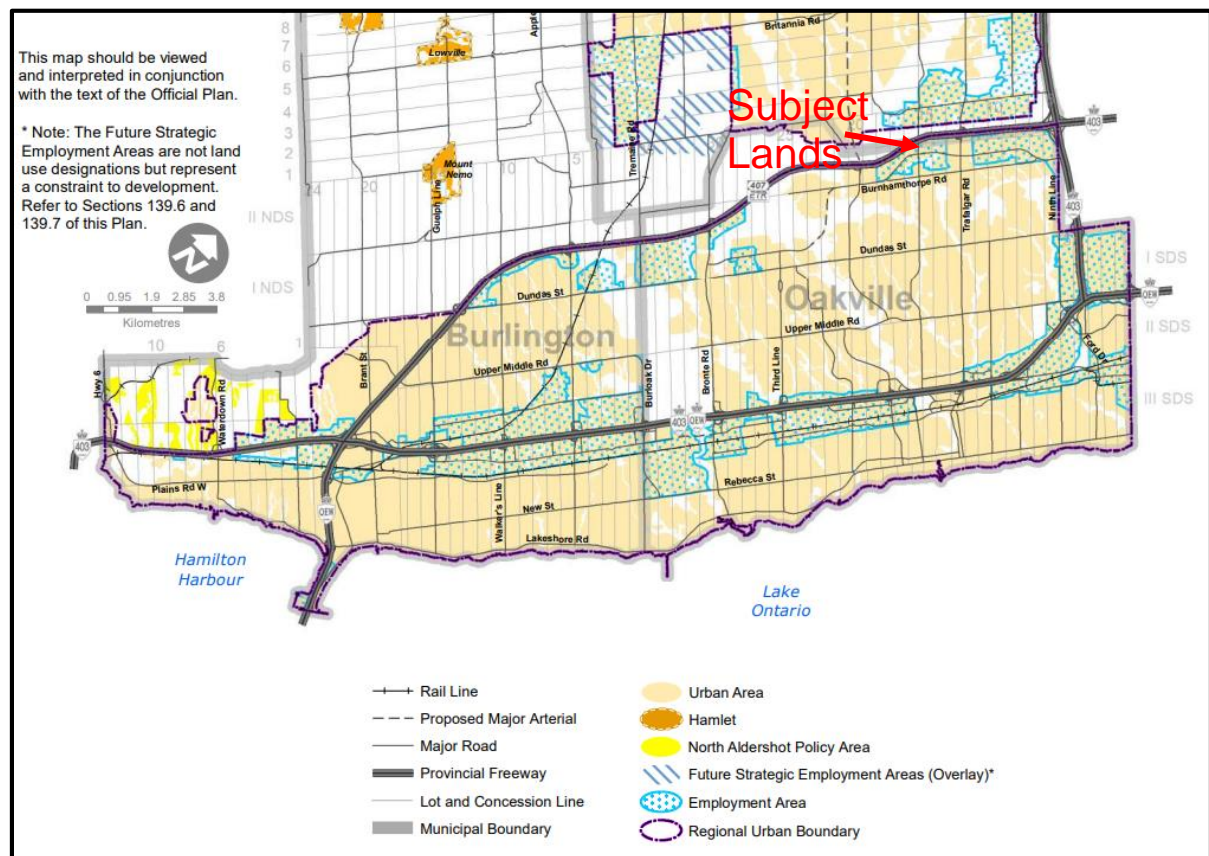


Figure 4 – Excerpt of Future Strategic Employment Areas Map 1C

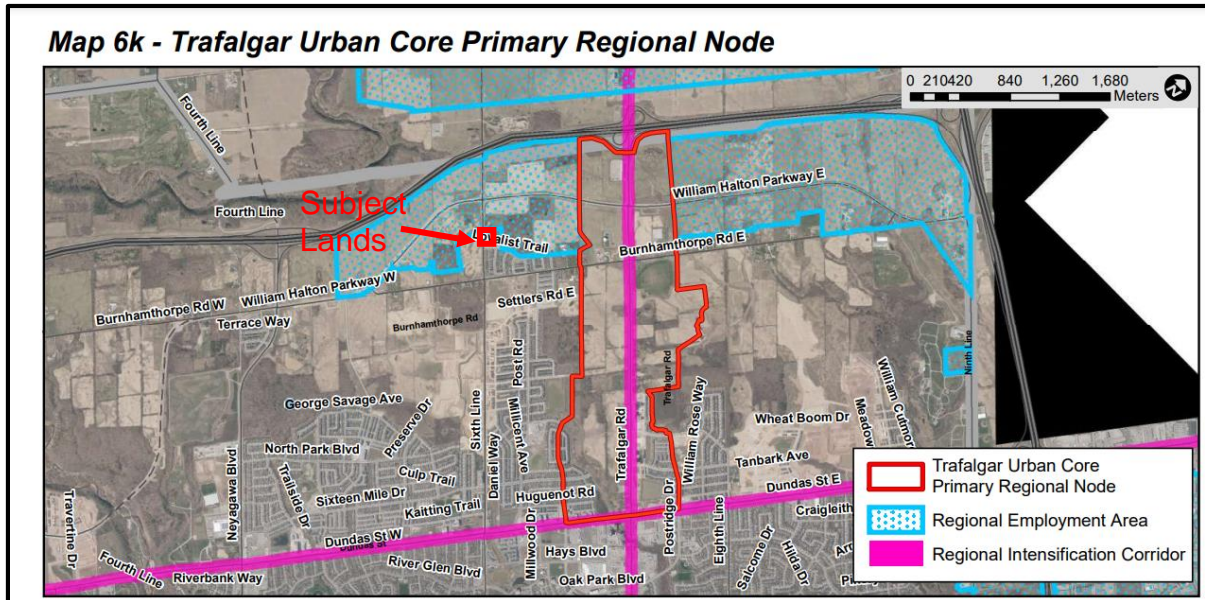


Figure 5 – Regional Employment Area

The lands were also previously listed within the Provincially Significant Employment Zone, shown in Figure 6, which is no longer in effect.

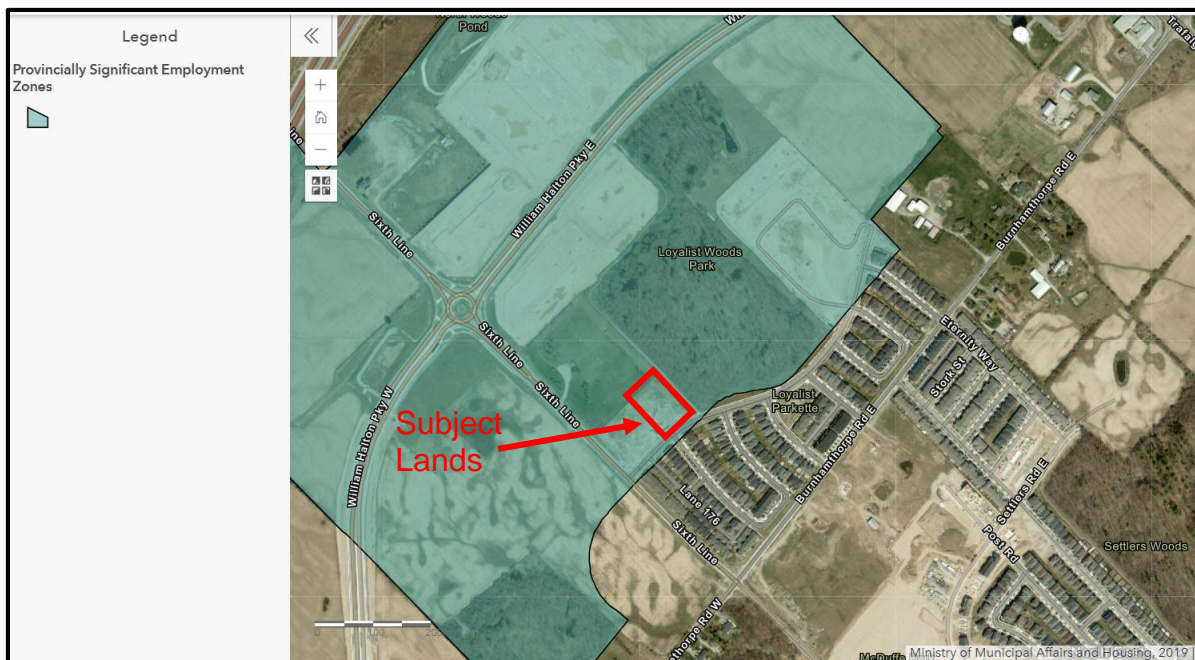


Figure 6 – Extract from Ontario.ca Growth Planning Mapping Tool, 2019

Town Council supported the removal of the lands from the Region's employment area through the approval of the Employment Commercial Review in 2018, on the

basis that further study would be undertaken through the North Oakville Secondary Plan Review. The review will determine a suitable range of uses to maintain land use compatibility as the lands remain adjacent to the 'Regional Employment Area'. The employment lands study is required at a local level to determine the ultimate land use for the site to implement the 'Urban Area' designation.

The 'Urban Area' provides for a wide range of land uses to support complete communities. One of the objectives of the Urban Area (Policy 72(1)) is to:

*"accommodate growth in accordance with the Region's desire to improve and maintain regional unity, retain local community identity, create healthy communities, promote economic prosperity, maintain a high quality, sustainable natural environment, and preserve certain landscapes permanently".*

Despite provincial and regional policy changes, the NOESP retains the 'Employment District' land use designation for the site (shown in Figure 2 above) as it continues to contribute to the town's total overall employment areas and supports the surrounding employment area. The in-effect zoning for the property allows for a range of uses to better support the residential uses to the south as well as the future high school and employment uses. These uses include daycare, medical office, and commercial school (among others), that are also compatible with the surrounding existing and future employment uses.

Policy 83.2.6 requires the town to plan for employment areas by developing policies that:

*"[iv] ensure an appropriate interface is provided between the Employment Areas and adjacent non-employment areas and between specific employment designations in the Local Official Plan to maintain land use compatibility."*

As noted above, the lands are adjacent to Future Strategic Employment Areas identified in Map 1C of the Plan. The Plan notes that the Future Strategic Employment Areas is not land use designation but is intended to identify a constraint to development. In accordance with Policy 139.6, the purpose of the Future Strategic Employment Area is to:

*"identify and protect from incompatible uses certain lands that are strategically located with respect to major transportation facilities and existing Employment Areas."*

Additionally, Policy 143 states that the Region will:



*“(10) Develop, in consultation with the Local Municipalities, the Province, Federal government and the railway agencies, Land Use Compatibility Guidelines to minimize the adverse effects of noise, vibration, odour and air pollution from industrial, transportation and utility sources on sensitive land uses, including the application of separation distance between these non-compatible uses.”*

The applicant submitted a Land Use Compatibility Study as required by the Land Use Compatibility Guidelines. Staff note that the Land Use Compatibility Study was prepared prior to the October 20, 2024 policy changes and does not reflect on the 300 metre separation of sensitive land uses and an “Area of Employment”. Further, the Land Use Compatibility Study identified that an Environmental Noise Study is required to assess road noise from Sixth Line and William Halton Parkway, but did not recommend a Noise Study for the noise that would be generated from the future fire hall. An Environmental Noise Study was not submitted with the application. Staff will require a peer review of both an updated Land Use Compatibility Study and the Environmental Noise Study, if they are provided. At this time, staff do not accept the findings of the Land Use Compatibility Study as it has not considered the current employment policy regime.

Policy 143 (12) continues to guide land use compatibility between employment areas and sensitive land uses. For example, Policy 12 (b) stipulates that when locating employment uses in proximity to sensitive land uses, alternative locations must be considered, and only pursued if no other options are available. It is staff’s opinion that the rationale provided by the policy framework can be equally considered when proposing a new sensitive land use adjacent to an established employment area, as is the case with this application. The applicant has not demonstrated that the site is required for residential uses and has not considered other residential areas for an alternative location for the proposed use.

It is staff’s opinion that the redesignation and rezoning of employment lands for residential uses adjacent to the ‘*Regional Employment Area*’ could introduce incompatible land uses in close proximity to employment areas that would undermine the function of these employment areas, as set out in Policy 83.2 and would not conform with Policy 143.

On this basis, it is staff’s opinion that the proposed redesignation and rezoning does not conform to the Region of Halton Official Plan.

### **Livable Oakville Official Plan**

The applicant is proposing an amendment to the town’s Urban Structure, which was adopted by Council through OPA 15, to change from Employment Areas to Residential Areas.

As stated in Section 3 of the Livable Oakville Plan:

*“The urban structure sets out the framework for where and how the Town will grow and how to determine Oakville’s character and form.*

*Urban structure elements are not intended to be land use designations, and are not intended to grant development rights or to predetermine the specific land uses that will be permitted on any particular parcel of land.”*

The subject lands are identified as Employment Areas on Schedule A1 Urban Structure of the Livable Oakville Plan.

Policy 3.7 states that:

*“It is anticipated that development in the Employment Areas shall continue to reflect an evolving Town-wide macro-economy premised on decreased industrial and manufacturing growth and increased demand in the office sector.”*

It is staff’s opinion that changes to the Urban Structure shall be completed in a comprehensive manner. In response to recent changes to the *Planning Act* the town brought forward town-initiated amendment OPA 68 (under appeal) to the Livable Oakville Plan to maintain the employment areas as lands within an “Area of Employment” as currently delineated and defined in the Urban Structure. Staff acknowledge that a comprehensive review of the employment areas is required to better conform with the new provincial policy regime regarding employment areas.

Until such time as the town completes the employment area review, the proposal to amend the Urban Structure for residential uses is premature and not in the public interest.

### **North Oakville East Secondary Plan**

The applicant proposes to amend the NOESP to redesignate the lands from ‘*Employment District*’ to ‘*Transitional Area*’ for the purpose of providing residential uses only, which are a sensitive land use.

The North Oakville area consists of land located between Dundas Street to the south and Highway 407 to the north, from Ninth Line in the east to Tremaine Road in the west. In 1987, these lands were set for growth through the Halton Urban Structure Plan (HUSP), which assessed growth potential and infrastructure needs across Halton’s municipalities, including Oakville. HUSP identified North Oakville as

an area for urban expansion, recognizing the need for careful planning to address the connection between growth and infrastructure.

Following the HUSP recommended regional structure, Oakville conducted a detailed land-use planning process in the 1990s and 2000s. This involved public consultations, technical studies, and policy development, culminating in the creation of the North Oakville East Secondary Plan (NOESP) and the North Oakville West Secondary Plan (NOWSP), both approved by the OMB (now the Ontario Land Tribunal) in 2008 and 2009, respectively. These plans focus on sustainability, promoting a mix of land uses, protecting the natural environment, and implementing a modified grid road system to improve transit that enhances transportation options for transit and pedestrians.

The vision for North Oakville is to establish a compact, urban, pedestrian-friendly and complete community with a mix of uses that sustain a variety of neighbourhoods and employment opportunities. The neighbourhoods will contain walkable streets and central areas that include civic uses, small shops and services. These nodes will generally be located within a five-minute walk of the entire neighbourhood. The town has identified 16 neighbourhoods that will be developed for the five-minute pedestrian shed, and two ten-minute pedestrian shed areas, shown on Figure NOE1 Community Structure, shown in Figure 7.

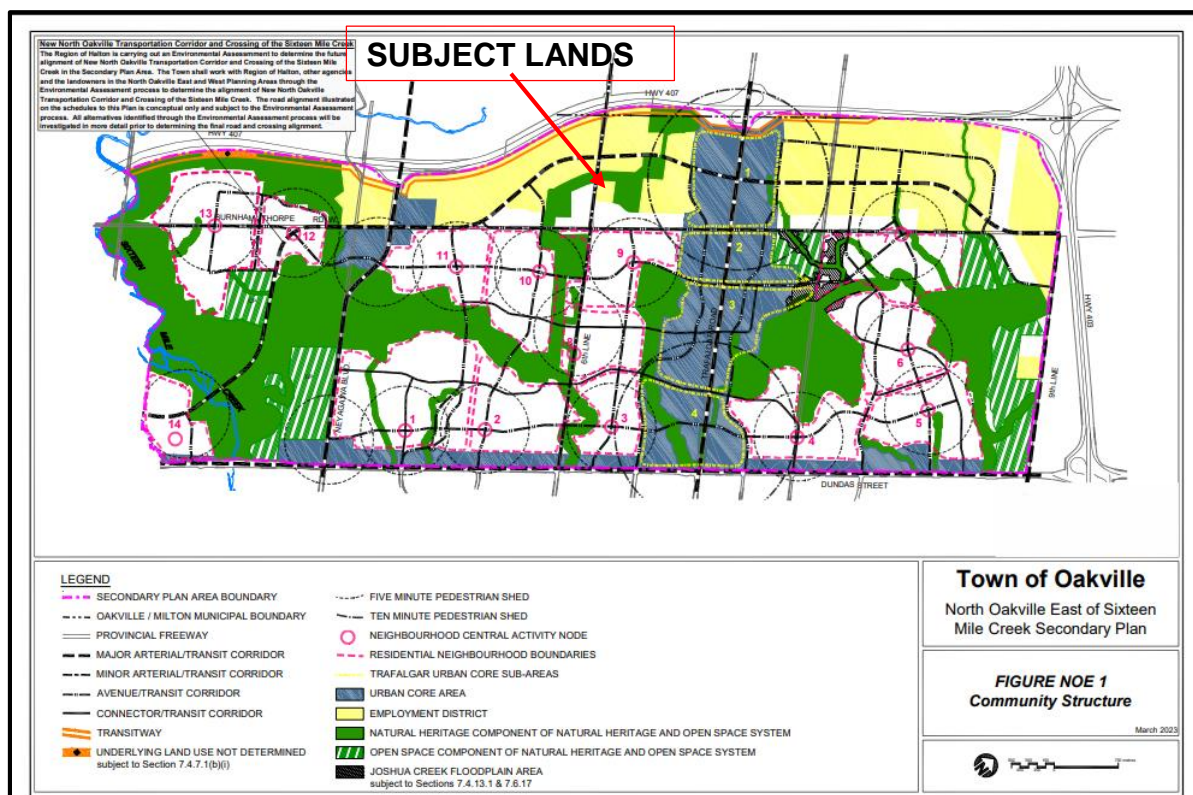


Figure 7 – Figure NOE 1 Community Structure, NOESP

The subject lands are designated as '*Employment District*' and located outside both the five-minute and ten-minute pedestrian shed identified as Neighbourhood 9 and Core Area 1 on Figure NOE1 Community Structure (Figure 7).

Policy 7.3.4 states that:

*"Employment Districts refer to land designed to accommodate development of predominantly employment generating uses including a wide range of industrial and office development. Limited retail and service commercial uses designed to serve the businesses and employees will also be permitted within the Employment Districts."*

Additionally, Policy 7.5.17 states:

*"The Employment District will permit a full range of employment uses. In addition, limited retail and service commercial uses serving the employment area shall be clustered at the intersections with Arterial, Avenue and Connector roads. These sites and uses will be zoned in a separate zone in the implementing Zoning By-law."*

*The Urban Design and Open Space Guidelines and Zoning By-law will also apply standards designed to enhance the compatibility of permitted employment uses with residential and other sensitive development located within nearby Transitional, Residential or Institutional designations including prohibition of outdoor storage adjacent to such uses."*

One of the primary elements for designating lands within the '*Employment District*' is to protect and establish a range of employment opportunities, which are strategically located adjacent to and in proximity to compatible land uses. The subject lands as well as the '*Transitional Area*' are notably outside of the neighbourhood shed areas (Figure 7 above), as they are intended to provide a different function and purpose to complement the North Oakville vision.

As shown in Figure 2 above, the lands immediately south of the subject lands include Loyalist Trail and '*Transitional Area*' lands. As mentioned previously, the '*Transitional Area*' designation is intended to provide a suitable and compatible buffer of land uses from the neighbourhood areas south of Burnhamthorpe Road to the '*Employment District*' primarily aligned along William Halton Parkway to the north. While the '*Transitional Area*' permits residential uses, Policy 7.6.9.3 a) states:

*"It is not intended that the full range of permitted uses will be permitted in all locations so designated. The precise range of uses and form of development*

*shall be determined through an area design plan for the area which must be completed prior to any major new development. The area design plan will:*

- *Create a logical land use boundary with the adjacent Employment District, provided that there shall be no significant reduction in either the Employment Area or Transitional Area designations;*
- *Establish design parameters to mitigate environmental impacts on proposed residential and other sensitive development. In particular, consideration will be given to locating roads which serve both the Transitional Area and Employment District so that they create a buffer between residential development and lands in the Employment District designation. The design parameters will serve as a basis for the development of specific regulations in the zoning by-law and the Urban Design and Open Space Guidelines;*
- *Address Provincial noise and air quality guidelines and regulations; and*
- *Consider compatibility with existing uses including an appropriate range of adjacent uses and an illustration of how proposed development can be integrated with existing uses which are being maintained.”*

With the original Star Oak subdivision and rezoning application in 2013, the applicant completed an area design plan (Figure 8) that provided for light employment and service area employment land uses on the north side of Loyalist Trail, making the right-of-way the buffer to employment areas on the north side up to Highway 407.



*Figure 8 – Area Design Plan, 2013, Prepared by KLM Planning Partners Ltd.*

Supporting new residential uses on the north side of Loyalist Trail does not provide the needed separation distance between sensitive and non-sensitive land uses and has the potential to erode and undermine the planned function and integrity of the employment area.

It is staff's opinion that the proposal does not conform to the NOESP.

### **Zoning By-law 2009-189**

The North Oakville Zoning By-law was approved to implement the policies of the NOESP and the NOWSP. The zones and associated regulations have been prepared to reflect the growth and employment opportunities planned for North Oakville. The subject lands together with the lands to the west are zoned SA (*Service Area Employment*) to provide a cluster of uses supportive to the surrounding employment area, including the employment lands to the east which have already been developed, thereby implementing the NOESP.

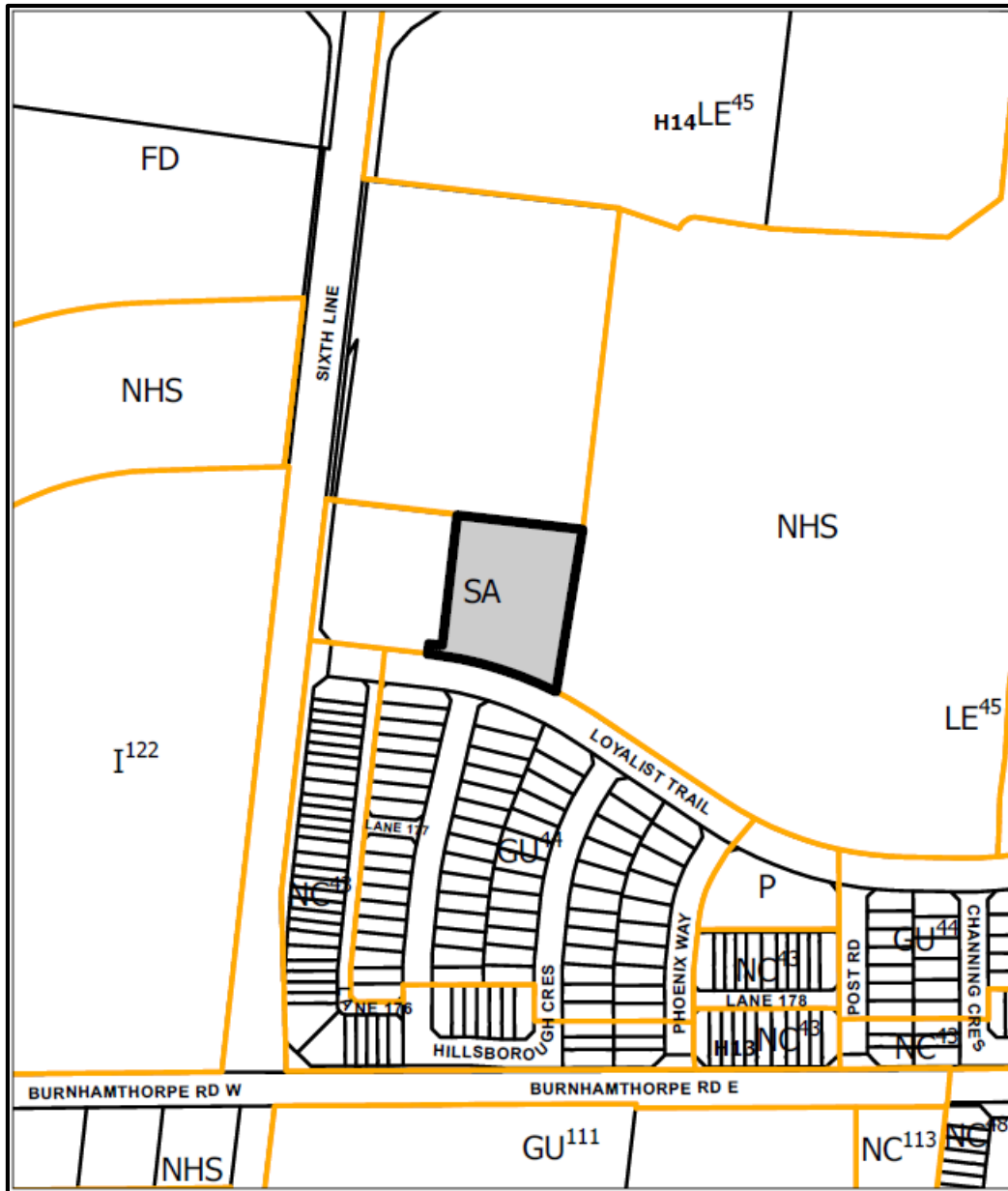


Figure 9 – Zoning By-law Excerpt

As previously stated, the subject lands were zoned SA through the previous development applications for the Star Oak Development, as approved by the OMB. The lands were originally contemplated to include a range of employment and commercial uses to support the surrounding 'Transitional Area' and 'Employment Area' as shown in their 2013 area design plan submitted for the previous applications (Figure 10 below).





*Figure 10 – Excerpt from 2013 Area Design Plan prepared by KLM Planning Partners Ltd.*

When the applicant submitted its conversion request to the Region, both residential and commercial uses were contemplated for the site, whereas the applicant is now requesting exclusively residential uses.

The applicant proposes an amendment to Zoning By-law 2009-189 to permit 40 stacked townhouse dwelling units with two parking spaces per unit, and a total of three visitor parking spaces for the development, with no commercial uses. The applicant proposes a change from SA to NC (*Neighbourhood Centre*) with modifications to permit stacked townhouse dwellings as a permitted building type, along with other modifications for setbacks, height and lot area regulations, and porch dimensions.

Later in this report, it is discussed why a commercial plaza may not be suitable for the site, and why the lands may be able to accommodate a range of uses on a stand-alone basis that are currently permitted in the SA zone, such as medical or



dental offices, a daycare, and commercial school, that could benefit the existing residential areas, the future high school and existing and future employment uses. On this basis, staff are not supportive of the proposed residential use of the site and therefore not supportive of the requested modifications as they do not implement the NOESP.

An amendment to the Zoning By-law to permit residential uses does not conform to the NOESP and should not be approved.

### **TECHNICAL & PUBLIC COMMENTS:**

The development application was circulated to internal departments and external agencies for a full assessment of the proposal. The town also required a peer review of the applicant's Commercial Market Study. Additionally, as mentioned earlier in this report, staff required the submission of a Land Use Compatibility Study. This study recommended the submission of an Environmental Noise Study; however, a Noise Study was not provided for review.

The Commercial Market Study and the Land Use Compatibility Study were completed prior to the *Planning Act* changes and PPS 2024 coming into effect on October 20, 2024, whereas the Planning Justification Report (PJR) was prepared after October 20, 2024. It is noted throughout the PJR that the applicant's planner relied on the recommendations of both the Commercial Market Study and the Land Use Compatibility Study. It is unclear from the materials submitted if the Commercial Market Study and Land Use Compatibility Study would provide the same recommendations when considering the current policy framework. As stated previously, staff do not accept the recommendations of the Land Use Compatibility Study, and require an amended Compatibility Study and Noise Study to be peer reviewed. Further details of the Commercial Study are provided later in this report.

### **Issues Under Review / Matters to be Considered**

Staff acknowledge that the changes in provincial policy have identified some challenges with respect to how employment areas are currently laid out throughout the town, as well as any land use compatibility matters resulting from the change in definition of "Area of Employment". On this basis, staff continue to rely on the existing town and regional policies to inform land use planning matters related to incorporating new sensitive land uses within and adjacent to areas designated for employment uses.

The following is an overview of the matters identified by Staff and Council at the February 3, 2025, Statutory Public Meeting.

## **1. Impact on adjoining and adjacent properties, including surrounding employment lands, and land use compatibility.**

As shown in Figure 9, the subject lands are bounded by NHS to the east, Region of Halton Reservoir to the north, future Fire Hall to the west, and Loyalist Trail to the south. The Region's reservoir is currently designated as '*Employment District*' and '*NHS Area*' in the NOESP, and is within the Region's Employment Areas in the Region OP. While the site is presently zoned FD (Future Development) in the town's Zoning By-law 2009-189, there is potential for the site to accommodate employment development. Should the subject lands be approved for residential uses, it would have the effect of limiting the employment opportunities on the reservoir lands.

The site is within 300 metres of employment uses to the east (currently developed), employment areas to the north and northwest (vacant), future HDSB High School to the west, and detached and townhouse dwellings to the south.

The only site developed with existing employment uses are the lands to the east, known municipally as 65 Loyalist Trail. The site is under construction for a variety of warehouse and other employment uses. Additionally, 65 Loyalist Trail is currently subject to a Zoning By-law Amendment application proposing to add new commercial uses not permitted in the *LE – Light Employment* zone and currently excluded by the *Planning Act* definition for "Area of Employment". In addition to 65 Loyalist Trail, the town is also reviewing a Holding By-law Removal application for the lands located at the southeast corner of Sixth Line and William Halton Parkway (within the 300 metre employment area buffer) to facilitate future employment development. Beyond the 300 metre buffer, the town is reviewing site plan applications for two developments on the north side of William Halton Parkway, east of Sixth Line for warehousing and other employment uses, which are nearing final approval. Staff is encouraged to see the progress of employment development in North Oakville to support the vision and development of complete communities.

As provided in this staff report, the proposed residential uses are considered a sensitive land use. Sensitive land uses are discouraged to be located in proximity of employment areas, and prohibited within employment areas. Staff has identified the in-effect policy framework for employment areas in the *Planning Act*, the PPS, the Region of Halton Official Plan, and the town's Official Plan and Secondary Plan. This policy regime continues to reflect the importance of protecting and preserving employment lands, as well as providing direction regarding sensitive land uses located in proximity to employment areas. The policy regime also provides greater emphasis on the need for separation between sensitive land uses and employment areas by requiring a 300 metre buffer regardless of the classification of employment use.

Staff also identified the need for further study of the subject lands, among other sites designated for employment uses, through the North Oakville Secondary Plan Review. The review remains underway, with the employment portion pending with anticipated completion by the end of 2025.

It is staff's opinion that the proposed redesignation and rezoning from employment to residential is not appropriate for the subject site, and is not in the public interest at this location. Introducing new residential uses on the subject lands does not protect the employment opportunities for the subject lands, or the abutting and surrounding employment area.

## **2. Conformity with the town's Urban Structure, and applicable and emerging policy**

In 2015 the Town began its Official Plan Review, which included the evaluation of conversion requests and changes related to employment uses within the Livable Oakville Official Plan and the North Oakville Secondary Plan area as follows:

- The completion of the Employment Commercial Review Report, prepared by Dillon Consulting in 2016 concluded that the town had sufficient employment land to support growth and change to 2041, specifically noting opportunities for North Oakville's employment supply:
  - The supply in North Oakville provides many larger parcels.
  - The supply in North Oakville provides good highway access and visibility.
  - There are opportunities for intensification and redevelopment.
  - There are opportunities to improve existing employment areas.
  - The emergence of Innovation Districts as a new form of employment
  - development for Ontario provides an opportunity for clustered knowledge-based
  - employment growth.
- Adoption of the Town's Urban Structure (OPA 15) and approval by the Region in 2018
- Amendments to the Employment Designations in the Livable Oakville Official Plan (OPA 26) in 2018
- Endorsement of Appendix "F" of Staff Report dated March 22, 2018 stating:

*“That Appendix F to the report from Planning Services Department dated March 22, 2018 be endorsed as Council’s position with respect to the employment land conversion requests originally submitted to the town, and that it be provided along with the relevant supporting material as input to Halton Region’s municipal comprehensive review.”*

Appendix “F” to the March 22, 2018 staff report included the subject lands with the following information for the Region’s consideration:

#	Applicant	Address/ Location	Existing Official Plan Designation	Proposal	Staff Recommendation	Size (ha)
9	Star Oak	East side of Sixth Line, north of Burnhamthorpe Rd.	Employment District	Medium/High Density Residential + Service Commercial	Study further / A local position with respect to this request may be provided to Halton Region once considered through the North Oakville Secondary Plans Review.	1.27

Figure 11 – Excerpt from Appendix “F”, Staff Report March 22, 2018

Also in 2015, the subject site was included with the development application appeals for Draft Plan of Subdivision and Zoning By-law Amendment for Star Oak Development (originally submitted in 2013). During the appeal process the landowners had requested conversions from employment uses to permit medium/high density residential development together with complimentary retail and service establishment uses. At that time, town staff did not support the conversion request on the basis that phasing policies included within the NOESP would not be met if the Star Oak Development proposal did not proceed without providing the required 25 hectares of employment land to support further residential development in the NOESP area.

Following the March 22, 2018 staff report, Appendix “F” was forwarded to the Region to assist with its Municipal Comprehensive Review (MCR) process, which included the recommendations for the subject lands as shown in Figure 11 above. The Region identified the lands as O-17 for the MCR process and the town remained consistent in its comments for the subject lands that further study would be required through the North Oakville Secondary Plans Review.

In 2021, the Region of Halton adopted ROPA 48 which resulted in the removal of the subject lands from the Region’s Employment Area.

As discussed previously, on October 15, 2024 the town brought forward Official Plan Amendments (OPA 68, 332, and 333) to, in the interim, protect the existing employment area as delineated, designated, and defined in the Livable Oakville,

NOESP and NOWSP areas pending a comprehensive employment area review, which is now currently underway. The OPAs were subsequently appealed.

On October 20, 2024, the *Planning Act* was changed to include a new definition for “Area of Employment” and the Provincial Planning Statement (2024) came into effect replacing the former Provincial Policy Statement (2020) and the Growth Plan for the Greater Golden Horseshoe (2019). The new PPS provides new policy related to employment areas and uses in conformity with the *Planning Act*. Staff have initiated a study of the employment areas to ensure that the current policies are in conformity with the new PPS and the *Planning Act*.

On November 11, 2024, the applicant submitted the subject applications for amendments to the NOESP and Livable Oakville Plan for the purpose of redesignating and rezoning the lands from employment to exclusively residential uses, with no complementary retail or service establishment uses as originally contemplated by the previous conversion requests.

The new *Planning Act* definition of “Area of Employment” puts onus on local municipalities to identify employment areas by definition, rather than relying on Provincial or upper tier mapping, such as the previous Provincially Significant Employment Zone map. The October 15, 2024 town-initiated amendments (OPAs 68, 332, and 333) as an interim, bring the current employment area designated lands into alignment with the definition of “Area of Employment” as set out by the Transition Policies of the *Planning Act*. Despite the OPAs being under appeal, the adopted policy should also be considered in the evaluation of this application as it intends to protect the town’s employment areas.

The PPS provides that conversion of employment lands needs to demonstrate that there is an identified need for the removal, and that the proposed use would not impact the viability of the employment area. At this time, there is no demonstrated need for the removal of the subject lands from the employment area. Further, it is staff’s opinion that the introduction of residential uses within 300 metres of employment areas would have an impact of the viability of the surrounding employment areas. Conversely, the applicant has not demonstrated that the existing residential areas and strategic growth areas, are not adequate to accommodate the proposed residential uses.

As provided earlier in the report, the NOESP was developed over an extended period of time to provide for a comprehensive and complete community that would align neighbourhoods with employment opportunities in a transit supportive and pedestrian oriented form. Land uses north of Burnhamthorpe Road in the vicinity of Sixth Line were planned to be transitional to provide an adequate buffer from the residential neighbourhoods south of Burnhamthorpe

Road to William Halton Parkway to the north, in accordance with an approved Area Design Plan.

In review of this application, staff have considered not only the importance of land use compatibility between sensitive land uses and employment areas, but also the historical, current, and emerging policy. Staff has identified the need to complete a review of the employment policies to conform to the changes to the PPS and *Planning Act*. It is staff's opinion that the proposal is premature, is not in the public interest, and presents land use compatibility concerns that conflict with the *Planning Act*, PPS, Region of Halton Official Plan, Livable Oakville Official Plan, and the NOESP.

### **3. Land Use Planning implications, including protection of surrounding employment area function, and commercial viability for the site**

Land use planning is a fundamental aspect of ensuring that residential, commercial, employment, and natural and open space areas are strategically arranged to support complete communities while ensuring appropriate land use compatibility between uses. Routine policy reviews are conducted to ensure that sufficient lands are available for the long-term growth and economic needs of a municipality. In the North Oakville context, the review of the NOESP and NOWSP are currently on-going, with the more recent completion of the North Oakville Commercial Review. Staff note that a comprehensive employment area review is anticipated to begin in 2025.

In response to the new provincial definition and policy regime for employment areas, staff have initiated a study of all employment areas, further to the 2018 Employment Commercial Review to ensure conformity with the *Planning Act* and PPS, 2024. Staff acknowledge that the new definition puts additional pressure on maintaining employment areas to meet the definition of "Area of Employment" while still providing sufficient lands to support both employment and residential areas by providing a range of lands to accommodate service commercial uses, office and retail uses. Staff also recognize that delineating these areas in a manner which conforms to the *Planning Act* may require further amendments to both the Livable Oakville and the North Oakville Secondary Plans. However, given the new definition, it is crucial to the review process that the evaluation of land uses and delineating the employment area be completed as part of a comprehensive process and not in a piecemeal manner such as stand-alone applications like the subject application.

Town staff have remained consistent that the conversion of the subject land requires further study. Since the North Oakville Secondary Plan review has not been completed, the pending employment review will serve as the basis for any amendments required to the Plan and this site. Until such time as the

comprehensive review of the entire employment area is completed, it is premature to consider a stand-alone amendment for the subject lands. Additionally, it is also staff's opinion that the redesignation and rezoning of the subject lands will establish sensitive land uses (residential uses) with the potential to undermine employment opportunities in conflict with Policy 3.5 'Land Use Compatibility' of the PPS.

The applicant submitted a Commercial Market Study to support its applications, which concludes that retail commercial uses permitted in the SA zone would not be viable due to visibility issues from Sixth Line and the size of the lot. The Study also concludes that the surrounding residential population is "too small to support anything more than convenience retail", but does not include an assessment of the population that would be added to the area by the future high school, and the employees and users of the surrounding employment area.

Staff note that the study was completed prior to the Provincial changes and does not provide an assessment of the in-effect policies to support its conclusions. Staff have undertaken a peer review of the study which has not been fully completed. However, based on the consultant's preliminary assessment, the site could be used for other non-retail uses permitted as of right within the SA zone as noted earlier in this report. The Study does not provide an assessment on the viability of the site being used for non-retail uses such as a daycare, medical office, or commercial school and its potential benefits to the existing and future population in the area. The Study also concludes that the surrounding residential area is currently under-served by greater commercial options such as banks, restaurants, and pharmacies. All of which are permitted as-of-right on the subject lands. At this time, the applicant has not demonstrated that the lands are not required or could not be developed for the uses currently permitted as-of-right.

The applicant has also not demonstrated that the site must be used for residential purposes. The town supports opportunities for additional housing, but they should be directed to strategic growth areas, or within the delineated neighbourhood areas where the majority of residential growth is intended to be accommodated. As discussed earlier, the lands are outside of strategic growth areas and the delineated neighbourhood areas.

On this basis, it is staff's opinion that the land use implications of supporting the proposal does not protect the surrounding employment area function.

#### **4. Site Conditions**

Should the application be approved for a change in land use, staff provides the following comments on additional matters related to traffic, parking, waste

collection, density, height, site layout, and sustainability. The applicant's concept site plan is shown in Figure 12 below.

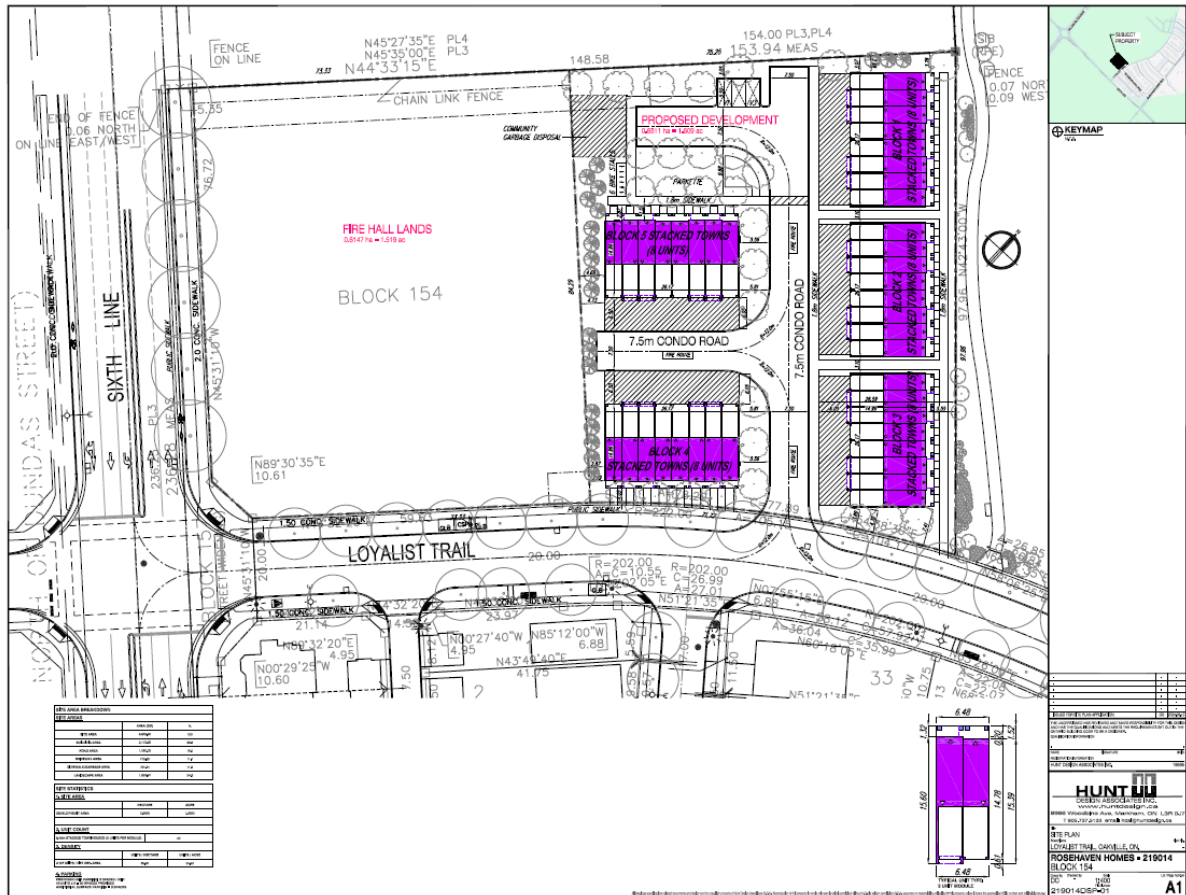


Figure 12 – Concept Site Plan

### Traffic, Parking, and Waste Collection

The applicant proposes two parking spaces per unit, and three visitor parking spaces in total, along with six bicycle parking spaces. The dedicated unit parking spaces are provided in a tandem configuration with one space within a private garage and the second space accommodated on the driveway. Visitor parking is not required for the proposed development, and the applicant is proposing a central garbage collection area at the rear of the site, which appears to conflict with an existing town easement. The applicant provided a Turning Movement Plan for a garbage truck but did not provide the Waste Management Plan to meet the Region's requirements. It is not clear from the material if the applicant is considering private waste collection for the site.

Loyalist Trail is classified as a connector road intended to accommodate vehicles that serve the existing and planned 'Employment District' and 'Transitional Area'



uses. Loyalist Trail is intended to extend easterly to Trafalgar Road to further service additional employment lands as well as uses resulting from the Trafalgar Urban Core (TUC) developments on Trafalgar Road. The concerns of area residents include the mixture of passenger vehicles with truck traffic, which staff anticipate will substantially reduce over time once Loyalist Trail is extended to Trafalgar Road.

Currently, there is no on-street parking signage provided on Loyalist Trail, but it is anticipated that a limited number of street parking spaces will be available abutting the Village Square (Loyalist Parkette) on the south side of the street and the Loyalist Woods Park Trail through the NHS on the north side of the street to encourage usage of these neighbourhood amenities. On-street parking is intended to supplement the on-site parking and is not to be relied upon for daily parking needs.

Staff have reviewed the applicant's Transportation Impact Study and identified concerns with the location of the access into the site and potential conflicts with the existing road network to the south. Staff also noted concerns with the site layout and location of private driveways conflicting with the access to Loyalist Trail. Additionally, the Region has identified concerns with respect to the turning movements required for waste collection. The site layout and density contribute to the waste collection issues which would require revisions to the plan.

Finally, while the Zoning By-law does not require visitor parking for townhouse condo developments, it is acknowledged that visitors may burden the on-street parking network by putting pressure on the available on-street parking areas within the residential area to the south. Further revisions to the plan may be required to provide additional visitor parking and/or Transportation Demand Management measures for the development.

### *Density*

The applicant is proposing 40 stacked townhouse units for the subject lands. The proposed density results in concerns related to the parking and increased traffic conditions noted above, conflicts with the road network to the south, reduced greenspace, and lack of sustainability measures such as low impact development (LIDs) or other climate change site improvements. Halton Region has also provided comments with respect to the lack of servicing allocation for the proposed development. Should the land use be approved, a Holding provision would be required to ensure adequate servicing allocation for the development.

The applicant is requesting the *NC – Neighbourhood Centre* zone with modifications for the subject lands. The *NC* zone does not permit stacked

townhouse dwelling units as a building type. However, street, lane-based, and back-to-back townhouses are permitted. There is no Floor Space Index (FSI) or Density minimum or maximum for the permitted townhouse building types in the Zoning By-law. Staff note that an apartment building is also a permitted building type in the *NC* zone, with a maximum density of 150 units per net hectare. The applicant proposes a density of 61.54 units per net hectare.

As previously stated, staff are not supportive of the change in land use, and the applicant has not demonstrated how the proposed density will mitigate the other site condition matters raised in this report.

### *Height*

The proposed height of the stacked townhouses are three storeys, which is consistent with the townhouses found south of Loyalist Trail. The permitted maximum height for the townhouse building types permitted in the *NC* zone is five storeys. In the *SA* zone the maximum permitted height is 15 storeys and a maximum FSI of 3.

When also considering the size and shape of the lot to accommodate setbacks, landscape areas, stormwater management and sustainability measures, and loading and parking areas, and the opportunity for stand-alone uses discussed earlier, it is staff's opinion that a 15 storey building is unlikely to be developed for the site. However, should a development proposal come forward for such a building, staff would evaluate the site layout and design, as well as sun/shadow analysis to mitigate impacts onto surrounding properties, including onto the NHS through the site plan process.

### *Site Layout and Sustainability*

The proposed layout of the site has not demonstrated compliance with a variety of the town's guidelines and standards, including but not limited to:

- No identified snow storage areas and removal of trees to accommodate may affect canopy coverage targets;
- Proposed tree planting locations in conflict with proposed swales and stormwater management techniques and may require removal and affect canopy coverage targets;
- Entrance driveway does not align with the road network to the south and will require site redesign to ensure safe ingress and egress to the site;
- Location of on-site driveways close to Loyalist Trail do not provide the needed separation distance and will require site redesign to provide to ensure safe ingress and egress to the site;

- No on-site sustainability measures such as LIDs, or Bird-Friendly design solutions adjacent to the NHS have been proposed;
- Garbage area appears to conflict with an existing easement and would need to be relocated.

It is staff's opinion that if the applications are approved, modifications to the site would be required to address the technical aspects discussed above.

## CONCLUSION:

Staff has provided a thorough analysis of the policy framework and an assessment of the impacts of the proposed redesignation and rezoning for residential uses for the subject lands. Fundamentally, staff do not support the applications from a land use planning perspective. Maintaining the lands as '*Employment District*' and within the SA zone will provide the opportunity for additional commercial or small-scale employment uses that supports complete communities, are in the public interest, and maintains a buffer and transition to the surrounding existing and future employment lands. The following points summarize staff's opinion:

- The applicant has not adequately demonstrated that the subject lands are not needed or viable for service area employment uses, as reflected in the current designation and zoning, to support the change in land use to residential.
- The applicant has not adequately demonstrated that the proposed residential uses cannot be located within the existing residential designated areas throughout the town, where they would be more strategically located to support complete communities.
- This application is premature and not in the public interest until such time as the town completes the North Oakville Secondary Plan review, including the employment area review, to better determine the appropriate land use designation for the site and establish appropriate transitional criteria for sensitive land uses in accordance with the in-effect policy regime.
- The redesignation and rezoning of the subject lands for residential purposes does not conform to the *Planning Act*, and is not consistent with the PPS 2024, and does not conform to the Region of Halton Official Plan, the Livable Oakville Official Plan, and the North Oakville East Secondary Plan on the basis that the introduction of a sensitive land use adjacent to and within 300 metres of existing and planned employment areas does not protect, maintain, or preserve the viability of employment areas and the long term economic goals of the town.

**CONSIDERATIONS:**

**(A) PUBLIC**

The applicant held a Public Information Meeting on October 24, 2024, with 14 attendees including area residents, Ward 7 Councillors, and staff. A Statutory Public Meeting was held on February 3, 2025 and no members of the public attended.

Notice of complete application and public meeting were distributed to property owners within 240m of the Subject Property in accordance with the town's current notice requirements and *Planning Act*. Staff have received two letters of correspondence for the subject application, included in Appendix 'A'. The concerns raised by the public included traffic, privacy, and impacts on the NHS. These matters have been addressed in the report above.

**(B) FINANCIAL**

None.

**(C) IMPACT ON OTHER DEPARTMENTS & USERS**

The application was circulated to internal and external departments and agencies for review. Should the application be approved, technical matters will be resolved through a future site plan application.

**(D) COUNCIL STRATEGIC PRIORITIES**

This report addresses Council's strategic priority/priorities: Growth Management, Community Belonging, Environmental Sustainability and Accountable Government..

**(E) CLIMATE CHANGE/ACTION**

Any future development on this site will be reviewed to ensure compliance with the Town's sustainability objectives of the NOESP.

**APPENDICES:**

Appendix 'A' – Written Correspondence

Prepared by:  
Kate Cockburn, MCIP, RPP  
Senior Planner, Current Planning

Recommended by:  
Brandon Hassan, MCIP, RPP  
Acting Manager, Current Planning – East District

Submitted by:  
Gabe Charles, MCIP, RPP  
Director, Planning & Development