

Planning and Development Council Meeting
Monday, September 22, 2025

Comments Received Regarding Item 8.2

Uptown Core Strategic Growth Area Review
Town-initiated
File No. 42.15.66

September 16, 2025

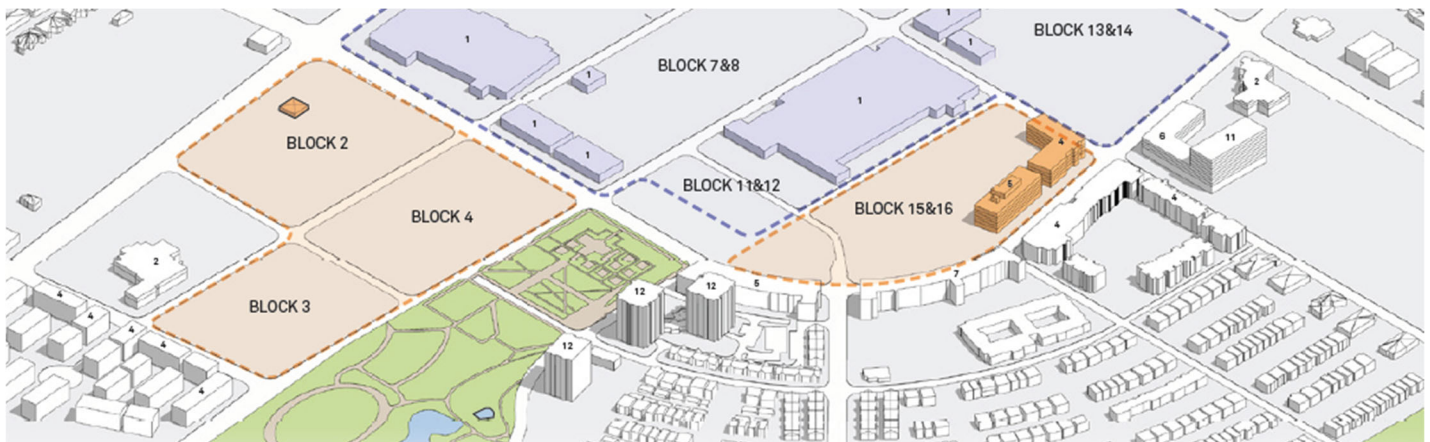
Mayor Rob Burton and Members of Council
Town of Oakville
1225 Trafalgar Road
Oakville, Ontario
L6H 0H3

Sent to Town Clerk: townclerk@oakville.ca

Dear Mayor Burton and Members of Council:

**RE: PLANNING AND DEVELOPMENT COUNCIL MEETING AGENDA ITEM 8.2
UPTOWN CORE STRATEGIC GROWTH AREA REVIEW – PROJECT UPDATE
OUR FILE 18207'A'**

We are the Planning Consultants for Silwell Developments Limited, Pouncet Main Street Inc. and Pouncet Main Street II Inc. (collectively "Metrontario"), the registered owner of Blocks 2, 3, 4, 15 and 16 (as shown in orange below) located within the southwest quadrant of the Trafalgar Road and Dundas Street East intersection (collectively, the "Subject Properties") in the Town of Oakville's Uptown Core.



We had prepared a detailed submission outlining our client's concerns and commentary regarding the Uptown Core Strategic Growth Review Preliminary Land Use Scenarios. We attach our submission to Town staff to this letter such that it is on the formal record and that Council is aware of our client's interest in this matter.

We look forward to further discussions and dialogue with Council and Town staff as the public consultation process continues on this matter in order that our client's concerns and commentary can be addressed in a mutually agreeable manner.

We further request notice of all future public meetings and reporting on this matter going forward.

Thank you.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read "David A. McKay", is written over a light beige rectangular background.

David A. McKay, MSc, MLAI, MCIP, RPP
Vice President & Partner

cc: Clients

Encl.

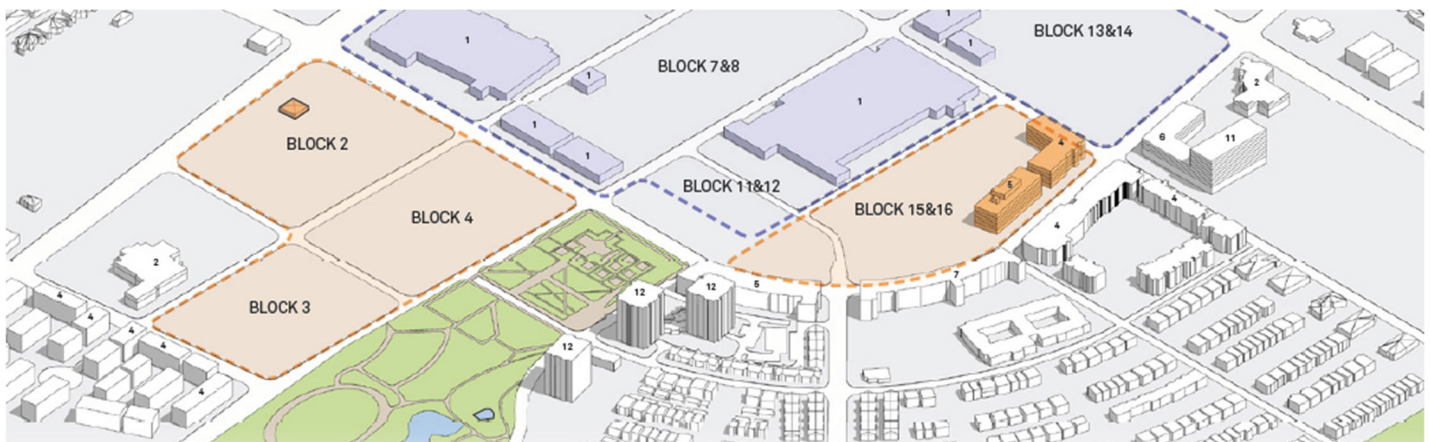
June 27, 2025

Amaraine Laven, MCIP, RPP
Policy Planner
Planning and Development
Town of Oakville
1225 Trafalgar Road
Oakville, ON
L6H 0H3

Dear Ms. Laven:

**RE: TOWN OF OAKVILLE - UPTOWN CORE GROWTH AREA REVIEW
PRELIMINARY LAND USE SCENARIOS
OUR FILE: 18207A**

We are the Planning Consultants for Silwell Developments Limited, Pouncet Main Street Inc. and Pouncet Main Street II Inc. (collectively "Metrontario"), the registered owner of Blocks 2, 3, 4, 15 and 16 (as shown in orange below) located within the southwest quadrant of the Trafalgar Road and Dundas Street East intersection (collectively, the "Subject Properties") in the Town of Oakville's Uptown Core.



On behalf of our client, we appreciate the opportunity to provide comments on the Preliminary Land Use Scenarios prepared as part of the Uptown Core Growth Area Review (the "Uptown Review").

Metrontario has been actively developing their lands over the last few decades and has been specifically involved in the Uptown Review process since 2018, including through continued discussions with Town staff regarding the long-term development interests of its lands within the

existing Uptown Core. Further to our review of the Preliminary Land Use Scenarios, dated June 2025, we wish to express our client's comments on the current direction of the Uptown Review and the emerging directives intended to guide development-related decisions for the Uptown Core, including those affecting the future development of Metrontario's lands.

Summary Conclusion & Request

Having reviewed the two conceptual land use scenarios, our client has concerns with how the proposed policy directions are illustrated and applied. While we support the Town's efforts to advance a vision for mixed use intensification supported by future higher-order transit, the Preliminary Land Use Scenarios appear to adopt a prescriptive approach to matters such as building heights, the mandated inclusion of retail uses, the configuration of the street network, the approach to parkland provision, and the design of the public realm. Moreover, the scenarios do not sufficiently account for evolving development patterns, the efficient use of existing and planned transit infrastructure and municipal servicing, or the dynamic nature of market and economic conditions. **We therefore respectfully recommend that the Town consider a more flexible and adaptive policy framework to ensure that development can proceed in a form that optimizes land use efficiency and supports economically viable, higher-intensity growth, while aligning with broader growth management objectives.**

Transit Supportive Development Requires Flexibility

In this context, it is essential that the Uptown Review establish a policy framework that is sufficiently flexible to support transit-oriented, high-density mixed-use development that reflects the area's strategic role within the broader Regional Urban Structure.

The Subject Properties and the existing Uptown Core are designated within the *Uptown Core Primary Regional Node* in the Halton Regional Official Plan, identified as a *Strategic Growth Area* in both the Regional Plan and Livable Oakville. This designation is intended to accommodate significant mixed-use intensification and support the Region's higher-order transit network. The area is planned to achieve a minimum density target of 160 residents and jobs per hectare, with an approximate distribution of 85 percent residential and 15 percent employment uses. As such, the Subject Properties are expected to serve as a key focal point for accommodating a concentration of public service facilities and transit-supportive development, playing a critical role in advancing both local and regional growth management objectives.

Moreover, the Subject Properties are located immediately southeast of the Trafalgar Road and Dundas Street East intersection, both identified as *Regional Intensification Corridors* and designated as *Strategic Growth Areas*. Block 2, in particular, primarily fronts along Dundas Street East and forms part of this prominent intensification area. These corridors have been identified for Bus Rapid Transit ("BRT") infrastructure through Metrolinx's 2041 Regional Transportation Plan, as well as through Halton Region's 2017 Mobility Management Study and the 2019 Defining Major Transit Requirements in Halton Study. This further underscores the need for a planning framework that allows development to proceed in a phased and responsive manner, aligned with the staged delivery of new higher-order transit infrastructure.

Given that a BRT stop is anticipated at the Trafalgar Road and Dundas Street East intersection, the Subject Properties are expected to fall within the boundaries of a future defined *Major Transit Station Area* ("MTSA"). As such, they will be subject to minimum density targets designed to support transit-oriented development and optimize public investment in higher-order transit infrastructure. It is therefore imperative that the Uptown Review establish a policy framework that not only enables viable and coordinated development on these lands but also positions them to meet or exceed these targets. Doing so will be critical to unlocking the full potential of the MTSA and advancing broader objectives related to intensification, infrastructure efficiency, and regional growth management.

In light of this long-established planning context, the current policy direction should aim to reinforce and enhance the Uptown Core's role by enabling practical and achievable development outcomes. A more flexible and adaptive policy framework will be essential to ensure development can proceed efficiently, in a manner that aligns with both existing conditions and future infrastructure investment.

Building Height Distribution

Metrontario has concerns with the manner in which building heights are distributed in the Preliminary Land Use Scenarios. As currently illustrated, the proposed height framework does not reflect future development realities, particularly in light of the planned implementation of two BRT routes along Trafalgar Road and Dundas Street East. These future transit investments will significantly enhance the area's connectivity and regional accessibility, reinforcing its suitability for high-density, transit-supportive development.

The proposed height strategy positions the Subject Properties as secondary to more northerly sites of the Uptown Core, despite their location within the most established portion of the Uptown Core and their proximity to future higher-order transit infrastructure. This approach is inconsistent with the Town's intensification objectives and does not align with the intended function of the area as a *Strategic Growth Area*. The framework also fails to provide appropriate height permissions along the Dundas Street East frontage, where greater height and density would be both contextually appropriate and supportive of the emerging urban structure.

By imposing prescriptive height limits, the current approach may create unnecessary constraints, particularly over the longer term as development activity patterns and market needs continue to evolve. This could lead to an increased reliance on site-specific Official Plan Amendments, which are often time-consuming, costly, and resource intensive. Such outcomes would undermine the long-term flexibility and adaptability of the policy framework. We recommend that the Uptown Review conceptually identify areas where a range of built forms and typologies may be generally appropriate, without assigning rigid numerical height caps, to allow for a more responsive and efficient planning process.

To this effect, an analysis by Kirkor completed for the area (including for the SmartCentres lands – illustrative only), which shows that the Subject Properties could achieve 6.8M sq ft of density through existing zoning permissions (established over 10 years ago). However, this would result in uniform built form approach. Instead, as shown by Kirkor, more variety of height could occur and achieve similar if not additional density without undue impacts occurring. These plans were shared with Town staff previously and are attached for reference purposes (note that the heights shown are

illustrative only but show that a variety of heights can be achieved in multiple locations and still achieves good planning and urban design principles).

We respectfully request that the building height framework be revised to reflect the Subject Properties' strategic location and their demonstrated capacity to accommodate significant intensification. In particular, the policy direction should recognize ongoing development trends, planned higher-order transit investments, and the evolving role of the Uptown Core as a key urban growth node. A more flexible height framework will be essential to support the efficient use of land and to advance provincial and regional growth management objectives.

Areas of Potential Change

Our client is particularly concerned on Blocks 15 and 16 inclusive of the existing buildings municipally addressed as 209 and 231 Oakpark Boulevard have been identified as part of the *Established Areas* in the Preliminary Land Use Scenarios, and are therefore not anticipated to accommodate future change. This delineation forms part of a broader overlay area that encapsulates the low-rise residential neighbourhoods situated in the southwest portion of the Uptown Core. However, applying this delineation to portions of Metrontario's lands is inappropriate and inconsistent with the development context and long-term planning intent for the Uptown Core. These lands are neither developed as low-rise residential neighbourhoods nor constrained in a manner that would preclude further intensification through redevelopment. Rather, they form part of a larger, predominantly underutilized mixed-use block within the Uptown Core that primarily consists of surface parking, and are well-positioned to accommodate future redevelopment consistent with the objectives of mixed-use intensification and transit-supportive development. Their exclusion from the *Areas of Potential Change* may create confusion and result in unintended policy barriers to future redevelopment. We respectfully request that this mapping be revised to accurately reflect the redevelopment potential of the Subject Properties and ensure that these lands are fully included within the areas identified for future change and intensification.

Retail Mainstreets

We also wish to express our clients concerns regarding the treatment of *Mainstreet Retail Frontages* within the Preliminary Land Use Scenarios, particularly as it relates to Blocks 15 and 16. In Scenario 1, the proposed requirement for a continuous one-storey retail frontage surrounding the entire perimeter of these bifurcated development blocks is highly prescriptive and, in their view, not practically feasible. Scenario 2 designates the frontages along Taunton Road and Oak Park Boulevard as *Mainstreet Retail Frontages*. While this approach is considered preferable over Scenario 1, it continues to reflect a prescriptive approach to the placement of retail uses.

The expectation for uninterrupted active retail frontage fails to account for several key considerations, including operational site constraints, market demand for retail space, functional requirements for viable ground-floor retail, and the practical realities associated with large-format retail and mixed-use commercial development. Additionally, the presence and compatibility of the existing loading area associated with the adjacent Walmart store to the north, along with the timing and operational requirements of existing and planned development on adjacent parcels, further constrain the feasibility of achieving uninterrupted active retail frontage along the full perimeter of the block.

Rather than imposing rigid, retail-specific requirements, we recommend that the policy framework adopt a more flexible and strategically responsive approach to encouraging grade-related non-residential uses. Policy direction should promote pedestrian-oriented, active ground-floor uses in appropriate locations, while remaining adaptable to evolving market conditions, site-specific characteristics, and tenant requirements. While identifying a central focus or pedestrian-priority zone may be appropriate, it should not be so prescriptive as to predetermine the precise location, form, or mix of non-residential uses. Flexibility is essential to allow such uses to emerge organically and respond to shifting economic, spatial, and operational realities, thereby supporting a vibrant and resilient mixed-use environment.

Parkland

With respect to parkland, we are concerned that the preliminary land use scenarios adopt an overly prescriptive approach that does not adequately reflect the practical realities of development implementation. The delineation of specific park blocks and locations should be treated as conceptual, subject to refinement through future planning processes that respond to land assembly patterns, development phasing, and the organic evolution of block structure over time. Rather than relying on fixed parkland configurations, policy should promote flexibility to accommodate a broader spectrum of public and semi-public open spaces, including privately owned publicly accessible spaces (“POPS”), urban plazas, rooftop amenities, and other innovative solutions capable of delivering high-quality public realm outcomes.

We further understand that the Town may be targeting a 12% parkland dedication rate under a separate policy initiative. While municipal policy may articulate an aspirational target that exceeds the statutory parkland dedication requirements established under the Planning Act (maximum 10% for sites under 5 ha and 15% over 5 ha), such a target should be clearly framed as non-binding. Additionally, the Town’s role in directly delivering municipal parkland should be acknowledged as contributing toward any such target.

Further, our client had pre-dedicated parkland for the development of the Subject Lands to be credited against future development (the “parkland bank”). It is important for the Town to recognize this arrangement in the policy documents.

Overall, a balanced and practical approach is essential to ensure the delivery of appropriate public amenities while maintaining the viability of future development.

Street Network

As currently illustrated, the conceptual road layout includes a new public street that bisects Blocks 15 and 16. We are concerned that this alignment does not appropriately account for the redevelopment potential of these lands or the anticipated phasing of development within the Uptown Core. Introducing a fixed road alignment at this stage may constrain the ability to achieve coherent and feasible redevelopment, particularly where flexibility in block configuration and site design is required to support future intensification. We respectfully recommend that any proposed road configurations, including ownership arrangements, within private blocks be treated as conceptual and subject to

further evaluation through detailed planning processes. The Uptown Review should include policy direction that enables coordination with affected landowners and allows the street network to evolve in a manner that facilitates, rather than impedes, viable redevelopment over time.

Relocation of Transit Terminal

With respect to Scenario 1, we note that the proposed relocation of the existing transit terminal to the east side of Trafalgar Road is not supported by Metrontario, as it is contrary to the broader objectives and vision for the Uptown Core. Relocating the terminal farther from the established Uptown Core would reduce its effectiveness in supporting transit-oriented intensification, particularly within the largest portion of the area, which is located to the southwest of the Trafalgar Road and Dundas Street East intersection. Maintaining the terminal in a location that directly serves this primary area is essential to achieving the Town's objectives for compact, transit-supportive development. We recommend that the transit terminal be retained in a location that effectively supports the Uptown Core's intended function and long-term evolution as a *Strategic Growth Area*.

Conclusion

In closing, we respectfully submit that the Uptown Review should affirm the importance of flexibility in policy direction, allowing development to proceed incrementally and responsively over time. A framework that supports adaptive, transit-oriented intensification and recognizes the evolving market, servicing, and infrastructure context will be critical to achieving the Town's long-term planning objectives.

Metrontario remains committed to working collaboratively with the Town of Oakville to support thoughtful, balanced growth that meets the needs of current and future residents. We would be pleased to further engage with staff to clarify the concerns outlined in this letter and look forward to the circulation of a revised land use scenario for additional review and comment by September.

Thank you again for your time and consideration.

Yours truly,

MHBC



David A. McKay, MSc, MLAI, MCIP, RPP
Vice President and Partner



Thomas Dybowski, MSC. PL, MCIP, RPP
Intermediate Planner

cc. Scott Zavaros, Metrontario