

October 27, 2020

VIA EMAIL

Town of Oakville  
Planning Services Department  
1225 Trafalgar Road  
Oakville, Ontario  
L6H 0H3

Attention: Kate Cockburn, MCIP, RPP  
Planner, Planning Services

**Re: Zoning By-law Amendment Application and Redlined Draft Plan of Subdivision  
EMGO (North Oakville I) Ltd.  
Part of Lot 15, Concession 1, NDS  
Town of Oakville  
Related File Nos: 24T-12012/1315 & Z.1315.03**

Dear Ms. Cockburn,

In response to the comments received at our Public Meeting on Tuesday, September 8, 2020, we are pleased to offer further information regarding the following:

**A. A Detailed Parking Plan is to be provided in the recommendation report**

A Detailed Parking Plan, including parking details, has been provided and is appended to this letter as *Attachment 1*. Visitor parking will be accommodated within the on-street parking spaces illustrated on the Detailed Parking Plan.

**B. Staff are to provide a market justification for the changes proposed.**

Since the plan was approved ARGO has acquired the West Morrison Creek on the west side of Sixth Line. The acquisition of these lands provided an opportunity to create more flexible commercial spaces for the activity node in a mixed use building at the northwest corner of Sixth Line and Marvin, in addition to maintaining a select number of live/work units in the proposed development with larger, more feasible commercial square footage.

Commercial needs are constantly evolving and have transformed significantly since the original draft plan application (May 2016) which provided for 20 live/work units. Small live/work units with limited square footage are difficult to lease or occupy and this leads to persistent vacancies, significant turnover and reoccupation of these units as home offices, which does not support the function of the Activity Node and makes these areas less desirable to visit or walk to. There are a number of factors that make leasing or owning townhouse live-work units challenging including:

- **Small Unit Sizes:** Commercial units at the base of the townhouse units provide very small floorplates (400-600 square feet) which makes leasing these units less desirable to retail tenants.
- **Difficult to Accommodate Restaurants:** Restaurants require their own ventilation and servicing to operate which is difficult to accommodate in small units and is often incompatible with residential users.
- **Location:** Retailers often want to be located along major roadways.
- **Ownership:** These units are individually owned and do not benefit from leasing plans or arrangement found in commercial shopping centres.

Instead of developing 20 traditional live/works, EMGO and their team of architects have created a more functional commercial/residential unit that considers the above factors to provide a larger more viable commercial space on the ground floor with 2 residential units above. The proposed plan includes 4 of these units. These live/work units are connected to the lane-based townhouse blocks at the intersection of the Marvin Avenue and Sixth Line. Moreover, the connected lane-based townhouses will be designed with the flexibility of using the ground floor space as commercial space, at the option of the unit owners.

These 4 units paired with the commercial uses proposed within the mixed use building on the west side of Sixth Line is a preferred alternative to 20 traditional live/work units. Together, the mixed-use building and 4 live/work units will provide approximately 464.5 square metres (5000 square feet) of commercial space at the relocated activity node with unit sizes capable of supporting the viability of a wide range of commercial uses. The proposed change is in keeping with the intent of the Neighbourhood Area in the North Oakville East Secondary Plan (NOESP) which states that:

*The neighbourhoods will each include a neighbourhood central activity node, a **five minute walk from most residences**, which will include public facilities that serve the neighbourhood. Live/work units and limited commercial uses will also be encouraged to locate in this area.*

The proposed activity node is located along Sixth Line, which is a minor arterial road. By having mixed use development on both sides of Sixth Line, this ensures that residents on both sides will have easy access to commercial/non-residential uses without having to cross a minor arterial road. The proposed change to the live-work units within the EMGO (North Oakville I) Ltd. site allows for more flexibility in the uses that can locate within these buildings by providing a larger 90 square metre commercial space. The reduced number of live-work units, together with the increased commercial unit size, will provide more desirable market conditions to reduce the potential for vacancies and turnovers which can affect the viability and function of the Activity Node.

Apart from the corner units of a traditional live/work, the average commercial space for the interior units is 60 square metres which limits uses to office or personal service uses. This does not meet the intent of Section 3.4.1.2 of the North Oakville Urban Design and Open Space Guidelines which states that active commercial uses are encouraged at grade whereas office and/or residential space is encouraged above the first storey. The limited size of these units would limit their use to office space or personal service uses which are not considered active at-grade uses. The revised commercial/residential unit will better achieve the intent of these guidelines and allow for the greatest opportunity of long term success of the desired commercial uses

In support of the Phase 2 proposal to reduce the number of live-work units in the vicinity of Marvin Avenue and Sixth Line from 20 to 4 units, a Market Assessment has been completed and is appended to this report as *Attachment II*.

**C. Information on how the notices are sent out to potential purchasers is to be provided in the recommendation report.**

As confirmed via e-mail on Thursday September 10, 2020, we are not required to send out additional notices. Any notices provided to the owners or builders will be forwarded to any future owners with purchase and sale agreements.

Please feel free to contact me directly should you have any questions or require any further information.

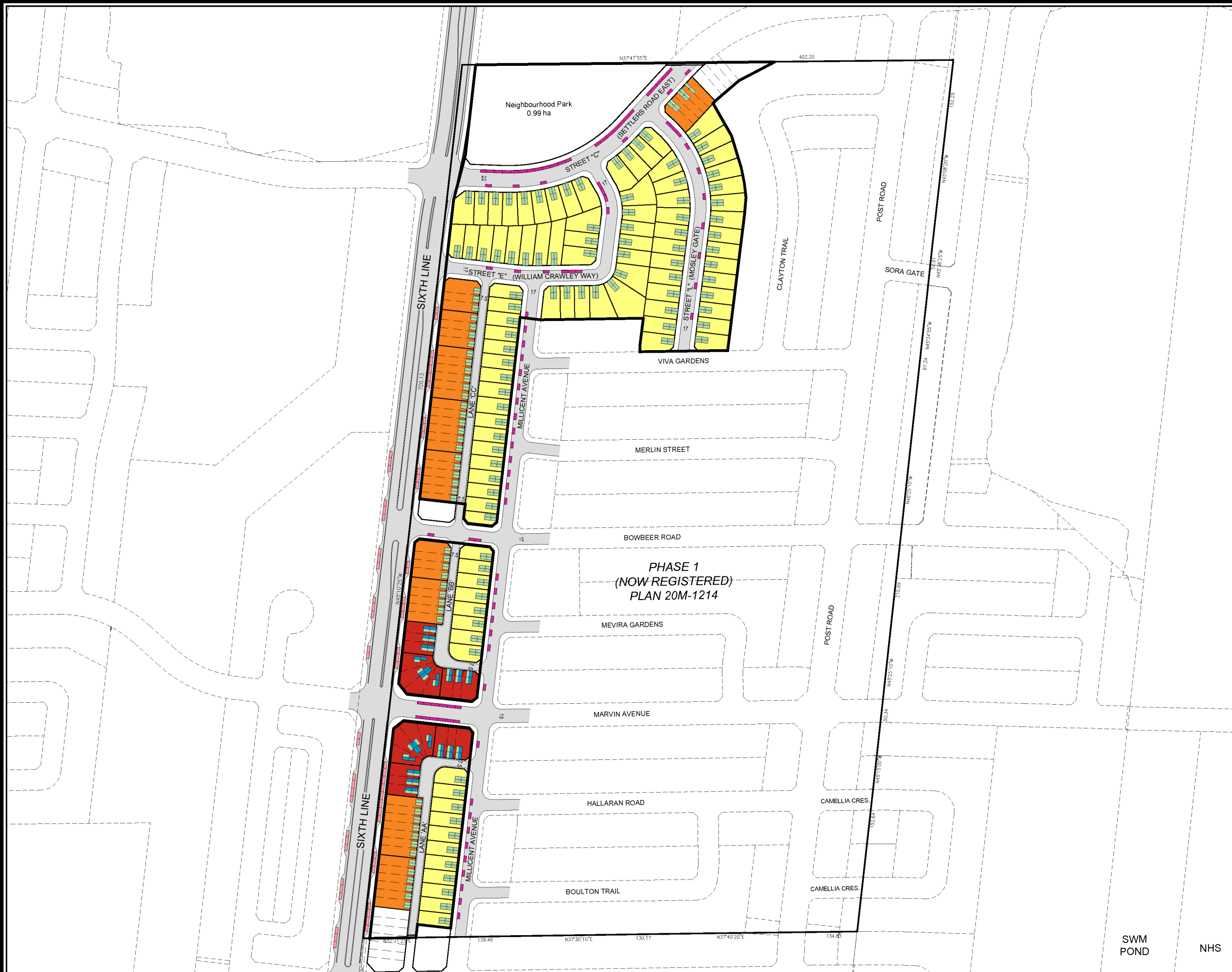
Sincerely yours,

**KORSIAK URBAN PLANNING**



Jacob Kaven, MES, RPP  
Encl.

Copy: Kevin Singh, EMGO (North Oakville I) Ltd. , Encl.



**PARKING ANALYSIS**  
Original (May 5, 2016)  
Emgo (North Oakville I) Ltd.

PART OF LOT 15  
CONCESSION 1, NORTH OF DUNDAS STREET

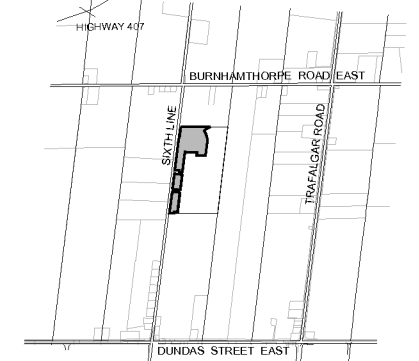
GEOGRAPHIC TOWNSHIP OF TRAFALGAR  
NOW IN THE  
TOWN OF OAKVILLE  
REGIONAL MUNICIPALITY OF HALTON

**KEY MAP**

N.T.S.



SUBJECT  
PROPERTY



Parking Type	# of Spaces Provided	# of Spaces Required*
Residential	528	268
Commercial	40	40
On-Street**	96	N/A
Neighbourhood 8 Activity Node	65	N/A
<b>Total</b>	<b>729</b>	<b>308</b>

\*Calculated based on the following parking requirements:  
Single Detached - 2 spaces per unit  
Townhouse - 1 space per unit  
Live/Work - 1 space per dwelling unit, 2 spaces for commercial

\*\*Subject to adjustment during detailed engineering design

Unit Type	# of Units
Single Detached	98
Townhouses	52
Live/Work***	20
<b>Total</b>	<b>170</b>

\*\*\*20 commercial units, 20 residential units



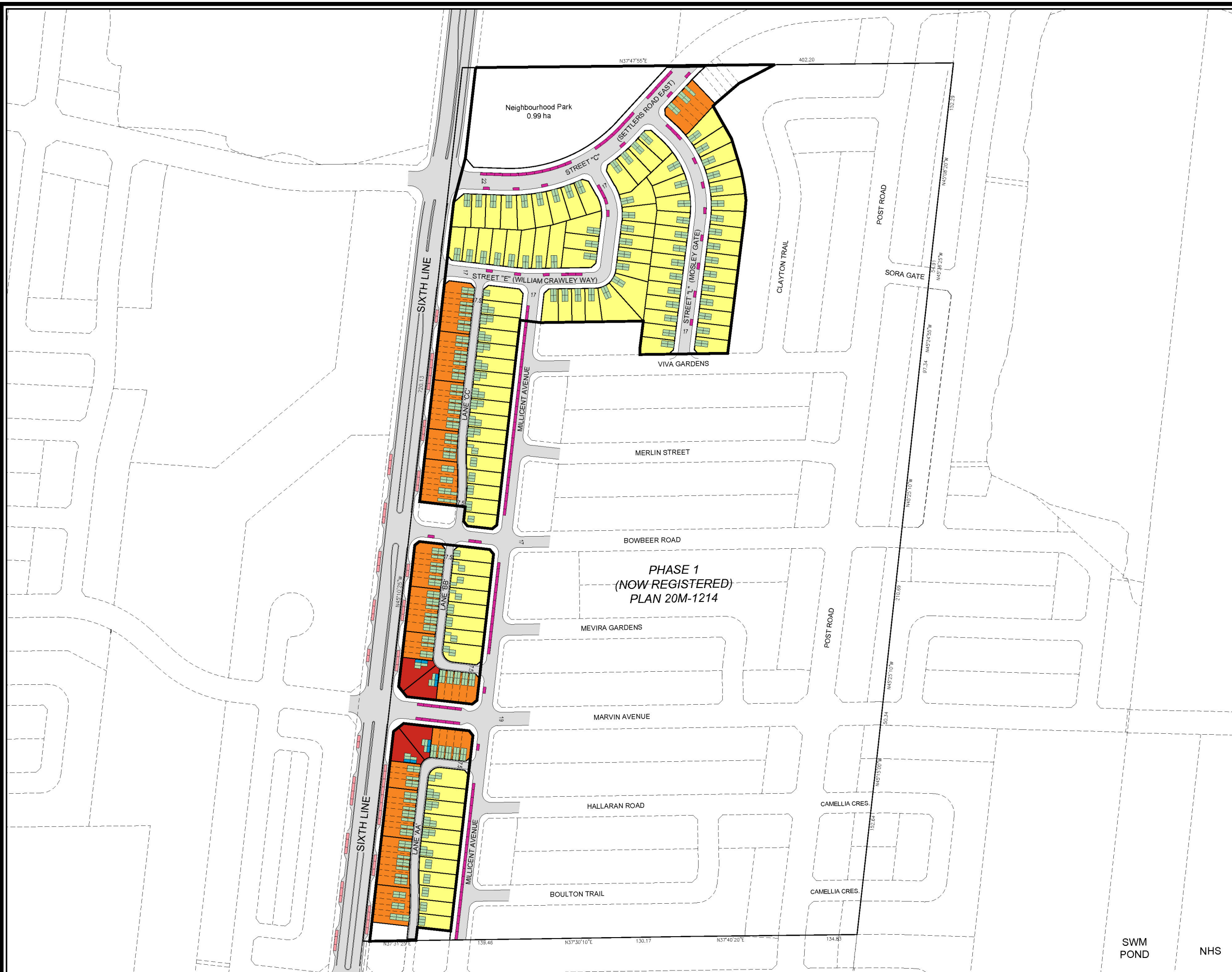
SCALE 1:3000  
August 18, 2020



SWM  
POND

NHS



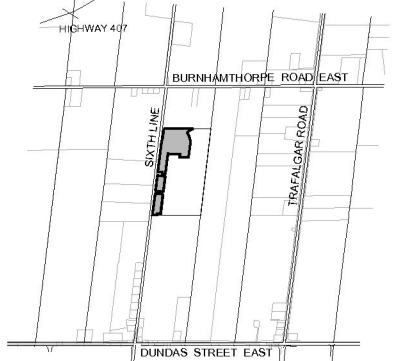


**PARKING ANALYSIS**  
Proposed (May 26, 2020)  
Emgo (North Oakville I) Ltd.

PART OF LOT 15  
CONCESSION 1, NORTH OF DUNDAS STREET

GEOGRAPHIC TOWNSHIP OF TRAFALGAR  
NOW IN THE  
TOWN OF OAKVILLE  
REGIONAL MUNICIPALITY OF HALTON

KEY MAP  
N.T.S.  
SUBJECT PROPERTY



Parking Type	# of Spaces Provided	# of Spaces Required*
Residential	659	297
Commercial	8	8
On-Street**	126	N/A
Neighbourhood 8 Activity Node	65	N/A
<b>Total</b>	<b>858</b>	<b>305</b>

\*Calculated based on the following parking requirements:  
Single Detached - 2 spaces per unit  
Townhouse - 1 space per unit  
Live/Work - 1 space per dwelling unit, 2 spaces for commercial

\*\*Subject to adjustment during detailed engineering design

Unit Type	# of Units
Single Detached	101
Townhouses	87
Live/Work***	8
<b>Total</b>	<b>196</b>

\*\*\*4 commercial units, 8 residential units



SCALE 1:3000  
August 18, 2020



SWM POND NHS



October 13, 2020

Mr. Kevin Singh  
EMGO (North Oakville I) Ltd.  
4900 Palladium Way, Suite 105  
Burlington, Ontario  
L7M 0W7

Dear Mr. Singh:

**RE: Market Assessment of Live/Work Units – Sixth Line and Marvin Avenue, Oakville**

urbanMetrics is pleased to provide an opinion on the market rationale further supporting the EMGO Phase 2 proposal to modify the draft zoning by-law to reduce the number of mandatory live-work units in the vicinity of Sixth Line and Marvin Avenue from 20 units to 4 units and to relocate the Neighbourhood Activity Node to Marvin and Sixth Line from the future intersection to the south at Carnegie and Sixth Line. The remaining 16 townhomes along Sixth Line would be designed with the flexibility of using the ground floors as commercial space at the option of the owners. As we indicated to you, urbanMetrics has had considerable experience undertaking analyses for similar mixed townhome/retail projects and will draw upon our past research to formulate our conclusions.

**In our opinion, the current proposal by EMGO would continue to meet the policy objectives of the North Oakville East Secondary Plan and from a market perspective provides a superior focal point for commercial uses in comparison to the previously approved Draft Plan and Zoning By-law.**

The following paragraphs summarize the rationale supporting this conclusion.

**The Proposed Rezoning would continue to be Consistent with Official Plan Policy Objectives**

The intent of Neighbourhood Activity Nodes is described in Policy 7.5.12 of the North Oakville East Secondary Plan:

*Each neighbourhood will include at its centre, approximately a five minute walk from most areas of the neighbourhood, a neighbourhood activity node which would include a transit stop and other public facilities which serve the neighbourhood such as central mail boxes or*

*mail pickup facilities. In addition, convenience commercial facilities or similar uses will be encouraged to locate at the neighbourhood activity node.*

Official Plan Amendment 321 added the following requirement with regards to Neighbourhood Activity Nodes:

*Notwithstanding the above, a minimum of one mixed use or non-residential building, in accordance with the provisions in Section 7.6.7.1.c) is required at the intersection of each neighbourhood activity node identified on Figure NOE 1. (Policy 7.6.7.1 b)*

The proposal by EMGO would exceed this policy requirement by providing four 968 square foot commercial units in live-work buildings at the intersection of Marvin Avenue and the east side of Sixth Line and an additional commercial unit of approximately 1,700 square feet at the ground floor of a mixed use building on the west side of Sixth Line just north of the intersection with Marvin Avenue.

This exceeds the requirements of the policy, which could effectively permit a single small commercial unit within the Activity Node. By comparison, the EMGO proposal would provide for over 5,000 square feet of commercial space within the Activity Node within units of a size capable of accommodating a wide range of commercial uses. This amount of commercial space would be sufficient to create an important convenience commercial hub for the surrounding neighbourhoods. Furthermore, the 16 townhome units along Sixth Line have been designed with ground level flex floor space that could be utilized as commercial space.

### **The Relocation of the Activity Node to Marvin Avenue Strengthens its Commercial Function**

As per the North Oakville East Secondary Plan, the original Activity Node was located at the intersection of what is now Carnegie Drive and Sixth Line (approximately 200 metres south of Marvin Avenue). In our opinion, the relocation of the Activity Node to Marvin Avenue improves the marketability and accessibility of the proposed commercial units as Marvin Avenue will be much better connected to the surrounding neighbourhoods than Carnegie Drive. Marvin Avenue is ultimately planned to connect with Trafalgar Road to the east and extend over a kilometre into the neighbourhoods on the west side of Sixth Line. By comparison, Carnegie Drive extends only as far as the storm pond to the east and only a few hundred metres to the west. As a result, the intersection of Marvin Avenue and Sixth Line will have much greater accessibility and exposure to neighbourhood traffic owing to the fact that Marvin Avenue will act as an important collector road and the intersection would experience more pass-by traffic. The planned commercial units at this intersection would be well positioned to serve neighbourhood residents as envisioned by the Official Plan Policies.

### **Commercial Units in Townhomes are Generally Challenging to Lease or Occupy with Neighbourhood Serving Commercial Uses**

A number of factors make commercial units in townhomes challenging to lease or occupy with neighbourhood serving uses as envisioned in planning policies. Often times these issues result in, persistent vacancies, significant tenant turnover, reoccupation by residential uses and the use of these units as home offices that do not have a community service function. These factors include:

- Small unit sizes that limit activities that can locate in them. Commercial units at the base of most townhomes tend to vary in size from about 400 to 600 square feet. Which is a very small floor plate for a retail unit, particularly if space is required for washrooms, sinks, and storage typically required by most retail tenants. In the most current EMGO plan, the largest corner townhomes have been retained, which provide for commercial units of almost 1,000 square feet. Space of this size allows for much greater street presence, visibility, flexibility in floor layout and design and would be attractive to a much greater array of potential commercial tenants than the smaller floor plates in the non-corner units.
- Food service outlets are very difficult to accommodate within townhome developments owing to ventilation and requirements, small unit sizes and incompatibility with residential users. Electrical and plumbing requirements for many tenants may also preclude townhomes from consideration for many food service tenants. Finally, townhome units are also not well set up for commercial trash collection and deliveries due to the lack of rear entrance ways. This issue is difficult to overcome. However, the larger floor plates in the corner units under the current plan would allow for more flexibility and the potential to accommodate some food preparation equipment not requiring venting.
- The location of commercial units in townhomes often do not lend themselves to the visibility and access required by retailers. As they tend to be located in residential neighbourhoods, they are not well situated with respect to major roadways with significant traffic volumes. This also limits the types of retail tenants interested in townhome units. The current proposal by EMGO would place the commercial units at an intersection that acts as a strategic gateway to neighbourhoods on either side of Sixth Line.
- Townhome commercial units are individually owned and do not benefit from typical leasing plans and arrangements found in commercial shopping centres. Often times, the market is saturated with multiple tenancies of the same type. This is common with



respect to personal service uses, such as hair salons, spas, nail salons, and health and wellness providers. The current plan by EMGO would be to focus commercial development on only the most marketable commercial units on the corners. As we understand the non-corner townhomes would be designed to facilitate ground floor commercial uses if desired.

In our opinion, the proposal by EMGO eliminates many of these issues by designing the townhomes along Sixth Line with smaller ground floor areas with options for live-work units and ensuring that the largest corner units and the commercial space in the mixed-use building become a commercial focal point for the community. This focus on the intersection rather than the extended street front further bolsters the viability of the Neighbourhood Activity Node.

### **The neighbourhoods Near the Activity Node Will Be Well Served by Day-to-Day and Weekly Shopping Opportunities**

It is also important to note that the future residents of the neighbourhoods surrounding the Activity Node proposed by EMGO, would be well served by existing and future commercial facilities in the area. They would be within two kilometres of the major commercial node at the Uptown Core at Trafalgar Road and Dundas Street and within about three kilometres of another large commercial node at Dundas Street and Neyagawa Boulevard. Effectively, they would be within a short drive or bike ride from three supermarkets and a Walmart Superstore. For many residents near to the Activity Node, the Oakville Uptown Core would be within a walkable distance. In addition, the Activity Node itself would be within about 1.2 kilometres from the Trafalgar Corridor, which is planned for significant mixed-use development, including additional commercial facilities. In general, residents in the neighbourhoods surrounding the Activity Node will be well served by day-to-day and weekly shopping facilities within a very close proximity. The planned Activity Node with over 5,000 square feet of commercial space will augment the abundant supply of commercial uses in the area.

In conclusion, the planned Neighbourhood Activity Node at Marvin Avenue and Sixth Line meets the policies of the North Oakville Secondary Plan and provides for a strong concentration of commercial space in a strategic location. It preserves the largest commercial units at an important gateway to the neighbourhoods both east and west of Sixth Line and mitigates against a number of problems inherent in townhome commercial units, such as maintaining the largest unit sizes, concentrating uses at a gateway location and minimizing the potential for saturation by retaining only the most viable units.

**In summary, from a market feasibility perspective, the proposed plan by EMGO to provide for some 5,000 square feet of commercial space at a Neighbourhood Activity Node at the intersection of Marvin Avenue and Sixth Line is preferable to the currently approved plan with 20 small commercial units primarily fronting along Sixth Line and will provide the greatest opportunity for the long term success of these commercial units and the Neighbourhood Activity Node.**

It was a pleasure to complete this research for you. If you have any questions regarding our analysis or conclusions, please do not hesitate to contact us.

Yours truly,

urbanMetrics inc.

A handwritten signature in black ink that reads "Rowan Faludi." The signature is written in a cursive, flowing style.

Rowan Faludi, MCIP, RPP, CMC, PLE

Partner

[rfaludi@urbanMetrics.ca](mailto:rfaludi@urbanMetrics.ca)