

**LPAT Case Nos. PL171084  
PL180158  
MM180022**

**LOCAL PLANNING APPEAL TRIBUNAL**

**PROCEEDING COMMENCED UNDER** subsection 22(7) of the *Planning Act*, R.S.O. 1990, c. P. 13, as amended

Applicant and Appellant: Clublink Corporation ULC and Clublink Holdings Ltd.  
Subject: Request to amend the Official Plan - Refusal of request by the Town of Oakville

Existing Designation: Private Open Space and Natural Area  
Proposed Designation: Site Specific (to be determined) – including Residential, Mixed Use and Community Commercial

Purpose: To permit the redevelopment of the Subject Lands for a mix of residential, commercial and open space uses

Property Address/Description: 1333 Dorval Drive  
Municipality: Town of Oakville  
Approval Authority File No.: OPA.1519.09  
LPAT Case No.: PL171084  
LPAT File No.: PL171084  
LPAT Case Name: Clublink Corporation ULC v. Oakville (Town)

**PROCEEDING COMMENCED UNDER** subsection 34(11) of the *Planning Act*, R.S.O. 1990, c. P. 13, as amended

Applicant and Appellant: Clublink Corporation ULC and Clublink Holdings Ltd.  
Subject: Application to amend Zoning By-law No. 2014-014 - Refusal of Application by the Town of Oakville

Existing Zoning: Private Open Space (O2), Private Open Space-Special (O2- Sp. 114), and Natural Area (N)

Proposed Zoning: Site Specific (to be determined)  
Purpose: To permit the redevelopment of the Subject Lands for a mix of residential, commercial and open space uses

Property Address/Description: 1333 Dorval Drive  
Municipality: Town of Oakville  
Municipality File No.: Z.1519.09  
LPAT Case No.: PL171084  
LPAT File No.: PL171085

**PROCEEDING COMMENCED UNDER** subsection 51(34) of the *Planning Act*, R.S.O. 1990, c. P. 13, as amended

Applicant and Appellant: Clublink Corporation ULC and Clublink Holdings Ltd.  
Subject: Proposed Plan of Subdivision - Failure of the Town of Oakville to make a decision  
Purpose: To permit the redevelopment of the Subject Lands for a mix of residential, commercial and open space uses  
Property Address/Description: 1333 Dorval Drive  
Municipality: Town of Oakville  
Municipality File No.: 24T-17003/1519  
LPAT Case No.: PL171084  
LPAT File No.: PL171086

**PROCEEDING COMMENCED UNDER** subsection 51(34) of the *Planning Act*, R.S.O. 1990, c. P. 13, as amended

Applicant and Appellant: Clublink Corporation ULC and Clublink Holdings Ltd.  
Subject: Proposed Plan of Subdivision - Failure of the Town of Oakville to make a decision  
Purpose: To permit the redevelopment of the Subject Lands for a mix of residential, commercial and open space uses  
Property Address/Description: 1333 Dorval Drive  
Municipality: Town of Oakville  
Municipality File No.: 24T-17003/1519  
LPAT Case No.: PL171084  
LPAT File No.: PL171167

**PROCEEDING COMMENCED UNDER** subsection 51(39) of the *Planning Act*, R.S.O. 1990, c. P. 13, as amended

Applicant and Appellant: Clublink Corporation ULC and Clublink Holdings Ltd.  
Subject: Proposed Plan of Subdivision  
Property Address/Description: 1333 Dorval Drive  
Municipality: Town of Oakville  
Municipality File No.: 24T-17003/1519  
LPAT Case No.: PL171084  
LPAT File No.: PL180034

**PROCEEDING COMMENCED UNDER** subsection 17(24) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Appellant: ClubLink Corporation ULC & ClubLink Holdings Ltd.  
Subject: Proposed Official Plan Amendment No. 24  
Municipality: Town of Oakville  
LPAT Case No.: PL180158  
LPAT File No.: PL180158  
LPAT Case Name: ClubLink Corporation ULC et al. v. Oakville (Town)

**PROCEEDING COMMENCED UNDER** subsection 34(19) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Appellant: ClubLink Corporation ULC & ClubLink Holdings Ltd.  
Subject: By-law No. 2018-016  
Municipality: Town of Oakville  
LPAT Case No.: PL180158  
LPAT File No.: PL180159

**PROCEEDING COMMENCED UNDER** subsection 34.1(1) of the *Ontario Heritage Act*, R.S.O. 1990, c. O.18, as amended

Appellant: ClubLink Corporation ULC & ClubLink Holdings Ltd.  
Subject: Appeal of a decision of Council on an application to demolish a building or structure  
Municipality: Town of Oakville  
LPAT Case No.: MM180022  
LPAT File No.: MM180022

## **WITNESS STATEMENT OF JENNIFER CAMPITELLI**

### **INTRODUCTION**

1. I, Jennifer Campitelli, am a member of the Fairway Hills Community Association (the “**Association**”) and I hereby provide an overview of the evidence I seek to provide the Local Planning Appeal Tribunal (the “**LPAT**” or “**Tribunal**”) in respect of the official plan amendment, rezoning, draft plan of subdivision and application to demolish a heritage structure appealed before this Tribunal and consolidated under the above-referenced LPAT Case Nos. I provide my evidence on behalf of the Association. I have been authorized by the Association to speak on its behalf.
2. I understand that the subject applications have been filed by ClubLink Corporation ULC and Club Holdings Limited (collectively “**Clublink**”) with respect to the redevelopment of the Glen Abbey Golf Course at 1333 Dorval Drive, Oakville (the “**Site**” or

“**Glen Abbey Golf Course**”). I also understand that Clublink’s redevelopment of the Site consists of the following:

- a. 141 detached dwellings; 299 townhouses, street townhouses, and back-to-back townhouses dwellings; 2782 apartment dwellings; 5429 m<sup>2</sup> of office commercial space; 5,481 m<sup>2</sup> of retail commercial use space in a mixed use residential and commercial format; 546 m<sup>2</sup> of neighborhood amenity uses; and the conveyance of certain lands to public authorities (collectively, the **Proposed Development**”).
3. In summary, the Association is not opposed to the redevelopment of the Site, provided that any redevelopment can be done in the context of the heritage designation on the Site and is otherwise compatible with the surrounding neighbourhood. The Association understands that the Town of Oakville (“**Town**”) needs to accept its appropriate share of intensification as per the requirements of provincial policy, including the Growth Plan for the Greater Golden Horseshoe (the “**Growth Plan**”). However, the Association is specifically opposed to the subject applications and the Proposed Development for reasons that include the following:
- a. The Proposed Development does not conserve the cultural heritage value and the heritage attributes of the cultural heritage landscape at the Site, as established by the Town’s heritage designation by-law no. 2017-138. The cultural heritage resources should be conserved as required under the Growth Plan and the Provincial Policy Statement 2020 (“**PPS**”), and accordingly should not be demolished.
  - b. The intensity and scale of development proposed for the Site is too high and was not contemplated in the Town’s official plan. A more modest form of development

that is compatible with the surrounding neighborhood and conserves the cultural heritage resources on Site, would be appropriate for the Site.

- c. The proposed population, density and built form, including building heights for some of the proposed buildings simply are not compatible with and do not preserve the unique character of the surrounding neighborhood.
  - d. The Proposed Development does not appropriately interface with the existing stable residential neighborhood surrounding the Site, including in particular the Fairway Hills neighbourhood.
  - e. The inclusion of a portion of the rear yard of 1301 Greeneagle Drive in the development application may adversely impact the Fairway Hills neighbourhood depending on what type of structures, if any, are proposed to be developed on these lands. We note that these lands are currently identified for stormwater management infrastructure – it is unclear what structures this might include or whether this intended use might change.
4. This witness statement addresses in summary the Associations issues as contained in the procedural order issues March 8, 2021.

## **BACKGROUND**

5. I have been a resident of Oakville since 2008. I have been a resident of the Fairway Hills neighbourhood since 2014, and more specifically I reside at [REDACTED].

6. The Association consists of residents who reside in the Fairway Hills neighborhood, which neighbourhood sits directly adjacent to, and west of, the Site. This neighbourhood consists of 128 homes on the following streets: Golfview Court; Abbeydale Court; Master Green; the Links Drive; Gallery Hill; and Greeneagle Drive. The Fairway Hills neighbourhood is perhaps most impacted by the Proposed Development should it be permitted to proceed.
7. The Association was incorporated on October 17, 1988. It has a mandate to improve the quality of life for residents of Fairway Hills by maintaining common spaces, gardens, and planning events to build neighborliness. The Association also seeks to encourage a sense of belonging and pride in the wider Oakville community.

### **THE INVOLVEMENT OF THE FAIRWAY HILLS COMMUNITY IN THE DEVELOPMENT APPLICATION/LPAT PROCEEDINGS**

#### **Development Proposal and Town Review**

8. Resident members of the Association were notified of Clublink's applications, which sought a number of approvals to proceed with a significant and aggressive redevelopment of the Glen Abbey Golf Course in a form substantially similar to the Proposed Development described above. Our residents and I attended numerous information sessions hosted by Town staff and spoke at various Town Council meetings where either the issue of the Proposed Development was tabled or municipally initiated planning instruments that were applicable to the Site were considered. Of note, in particular:

- a. Council meeting where Interim Control By-Law 2016-024 was passed with respect to the Site (February 1, 2016);
  - b. Council meeting where Interim Control By-Law is extended with respect to the Site (November 2016);
  - c. Council meeting where a resolution was passed recognizing Glen Abbey Golf Course as a significant cultural heritage landscape (May 15, 2017);
  - d. Council meetings where Council considered and adopted staff recommendations to file a notice of intention to designate the Glen Abbey Golf Course under Part IV of the *Ontario Heritage Act* (August 21 and 24, 2017);
  - e. Council meeting where Council refused Clublink's subdivision application (November 6, 2017); and
  - f. Council meetings where Council adopted Official Plan amendment and approved a heritage conservation plan for the Site. (January 30, 2018)
9. Our residents and/or the Association also attended the following statutory public meetings and information sessions regarding the Site::
- a. Statutory public meeting regarding the Town's proposed zoning by-law amendment with respect to the Site (December 5, 2017); and
  - b. Town public information meeting/open house regarding official plan amendments and cultural heritage landscape protection measures with respect to the Site (January 10, 2018).

10. Finally, our residents and/or the Association attended proceedings in the Ontario Superior Court of Justice and at the Ontario Court of Appeal with respect to motions brought by the Town of Oakville and Clublink.
11. As a result of the aforementioned activities our residents and/or the Association has had an ongoing involvement and expression of concern regarding the Proposed Development of the Site. To date Clublink's has not appropriately responded to those concerns by, for example, making significant modifications to its applications to address issues of conserving the cultural heritage landscape, and/or proposing a development of an intensity and scale that is compatible with the adjacent Fairway Hills neighbourhood. Clublink could have engaged the Association in discussions in the form of, for example, a design charette, stakeholder consultation and/or an open dialogue regarding what could be developed on the Site. Clublink has not engaged the Association in discussions despite the Association's considerable involvement in the Proposed Development from the outset.

### **Heritage Designation**

12. The Association has actively supported the recommendations of Town Staff contained in the Town staff report of August 10, 2017, which concluded the Site warranted a heritage designation under Section 29, Part IV of the *Ontario Heritage Act*.
13. When this matter was brought before the LPAT by Clublink, the Association immediately sought party status, so the residents could participate in a meaningful way.

### **DOCUMENTS REVIEW**

14. In the preparation of my witness statement and in advance of providing evidence to this Tribunal, I have reviewed the following material:

- a. Town of Oakville Staff Report re Notice of Intention to Designate 1333 Dorval Drive (Glen Abbey Golf Course) and dated August 16, 2017.
- b. *Glen Abbey Golf Course Heritage Review* prepared by Ken Moodie, Creative Golf Design Ltd and dated August 9, 2017.
- c. *Cultural Heritage Landscape Values and Attributes of the Glen Abbey Property* prepared by Mr. Julian Smith and dated August 10, 2017.
- d. *Final Report: Cultural Heritage and Strategy Implementation – Phase II: Cultural Heritage Evaluation Report.* Letourneau Heritage Consulting Inc. May 2017
- e. Town of Oakville Staff Report re Recommendation Report- ClubLink Corporation ULC and ClubLink Holdings Limited, Proposed Draft Plan of Subdivision and dated October 18, 2017.
- f. Town of Oakville Staff Report re Public Meeting and Recommendation Report- ClubLink Corporation ULC and ClubLink Holding Limited, Proposed Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision – 1333 Dorval Drive and dated September 12, 2017.
- g. Planning Justification Report prepared by GSAI and dated November 2016.
- h. Cultural Heritage Landscape Assessment and Heritage Impact Assessment prepared by ERA and dated November 9, 2016.
- i. Clublink's Draft Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision Plan.
- j. Town of Oakville heritage designation by-law no.2017-138.

- k. Various Court decisions related to the designation of the Site or the management or preservation of heritages attributes on the Site.

## **CULTURAL HERITAGE DESIGNATION – GLEN ABBEY PROPERTY**

### **Process – Town of Oakville**

15. The Association has actively supported the recommendations of Town Staff contained in the Town Staff report of August 10, 2017, which concluded the Glen Abbey Golf Course warranted a heritage designation under Section 29, Part IV of the *Ontario Heritage Act*.
16. There is a cultural heritage landscape on the Site, and Clublink's Proposed Development does not conserve that cultural heritage landscape as it is required to do under the Growth Plan and the PPS. It is not appropriate to demolish that cultural heritage landscape.
17. The residents of the Fairway Hills neighbourhood and/or the Association became aware that, in January of 2014, the Town of Oakville endorsed the Cultural Heritage Landscapes strategy, which is implemented in three Phases. During Phase I of that strategy, significant cultural heritage landscapes were evaluated, and the Glen Abbey Golf Course was one of those landscapes. On February 16, 2016, the Site was identified as "high priority" to proceed to Phase II of the Cultural Heritage Landscapes Strategy – Research and Assessment.
18. The residents of the Fairway Hills neighbourhood also became aware that, on May 15, 2017, after a thorough and objective review of the history, existing site conditions, and potential cultural heritage value associated with the Site– Letourneau

Heritage Consulting, who assembled a team of experts, concluded that, in their professional opinion, the Site is a significant cultural heritage landscape as defined within the 2014 Provincial Policy Statement.<sup>1</sup>, which was the relevant Provincial Policy Statement at that time.

19. As a result, on May 25, 2017 the final resolution of Town Council was that the Site was recognized as a significant cultural heritage landscape and moved to Phase III of the Cultural Heritage Landscapes Strategy: Implementation of Protection Measures.

20. On behalf of the residents of my community, I reviewed the staff report of August 10, 2017 with respect to Phase III of the Cultural Heritage Landscapes Strategy, as well as both Appendices to that report: 1) the *Heritage Review of the Glen Abbey Golf Course* prepared by Mr. Ken Moodie, and 2) the *Cultural Heritage Landscape Values and Attributes of the Glen Abbey Property* prepared by Mr. Julian Smith, and I can advise that the Association agrees and supports the conclusions contained in these reports.

21. More specifically, with respect to heritage review conducted by Mr. Ken Moodie, Mr. Moodie makes several conclusions including but not limited to the following:

- a. *Glen Abbey was representative of a key era in golf course design. It was at the forefront of the development of stadium golf courses...*<sup>2</sup>

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<sup>1</sup> *Final Report: Cultural Heritage and Strategy Implementation – Phase II: Cultural Heritage Evaluation Report.* Letourneau Heritage Consulting Inc. May 2017

<sup>2</sup> *Glen Abbey Golf Course Heritage Report.* Ken Moodie, Creative Golf Design, August 9, 2017. Page 16, paragraph 2.3.1.

- b. *The spectator mounds, that give the golf course its stadium style design (which Glen Abbey and Jack Nicklaus were at the forefront of starting) are very important structural elements of the golf course, and their retention is important not only to the interpretation of the design, but also to maintaining the integrity of the golf course layout and its design.*<sup>3</sup>
- c. *The Glen Abbey course “is an early and representative example of a style of layout with its novel, purposeful spoke and wheel design”*<sup>4</sup>
- d. *Furthermore, Mr. Moodie finds that “since the layout of the holes is a key heritage attribute of the golf course, which gives it its “spoke and wheel design”, the arrangement of all the holes and the relationship between them needs to be protected...*<sup>5</sup>
- e. *Since it was Jack Nicklaus’ first solo project, and he has proved to be extremely influential in the design and development of golf courses worldwide, the golf course is an early and representative example of the work of a golf course architect of national and international significance*<sup>6</sup>
- f. *Glen Abbey’s design and operation as a tournament course designed to accommodate PGA tour events and accommodate the viewing needs of spectators*

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<sup>3</sup> *Glen Abbey Golf Course Heritage Report.* Ken Moodie, Creative Golf Design, August 9, 2017. Page 16, paragraph 5.2.

<sup>4</sup> *Glen Abbey Golf Course Heritage Report.* Ken Moodie, Creative Golf Design, August 9, 2017. Page 16, paragraph 2.3.2.

<sup>5</sup> *Glen Abbey Golf Course Heritage Report.* Ken Moodie, Creative Golf Design, August 9, 2017. Page 16, paragraph 5.1

<sup>6</sup> *Glen Abbey Golf Course Heritage Report.* Ken Moodie, Creative Golf Design, August 9, 2017. Page 16, paragraph 2.3.4.

*has, and will continue to provide, an educational resource for golf course architects, landscape architects and turf specialists who can come to study and learn from its design attributes and challenging environmental conditions for turf growth and management<sup>7</sup>*

22. I will review the salient points from Mr. Moodie's report in my oral testimony.

23. On my review of Mr. Julian Smith's report on the Cultural Heritage Landscapes Values and Attributes of the Glen Abbey Golf Course, I note that Mr. Smith concludes as follows:

- a. *If Glen Abbey were a building, designed by someone as notable as Jack Nicklaus, and was considered to be one of that designer's most creative and important works, it would almost certainly be designated and conserved<sup>8</sup>*
- b. *As acknowledged by Golf Canada, Glen Abbey is Canada's most famous golf course. It provides a clear and compelling example of a designed cultural heritage landscape with high design, historical and contextual value. It retains very high levels of authenticity and integrity, continuing to serve as a challenging setting for championship golf in tune with its original design intentions.<sup>9</sup>*

24. Based on the information contained in both reports, and after following the objective process conducted by the Town of Oakville with respect to the Glen Abbey Golf Course, on behalf the residents of the Fairway Hills neighbourhood, I would like to

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<sup>7</sup> *Glen Abbey Golf Course Heritage Report*. Ken Moodie, Creative Golf Design, August 9, 2017. Page 16, paragraph 2.3.5.

<sup>8</sup> *Cultural Heritage Landscape Values and Attributes of the Glen Abbey Property*. Julian Smith, Julian Smith and Associates Architects. August 10, 2017. Page 40

<sup>9</sup> *Cultural Heritage Landscape Values and Attributes of the Glen Abbey Property*. Julian Smith, Julian Smith and Associates Architects. August 10, 2017. Page 40

re-iterate our support for the Town concluding that the Site warranted a designation under Section 29, Part IV of the *Ontario Heritage Act* as reflected in heritage designation by-law no.2017-138.

25. In my oral testimony I will review the components of the Town of Oakville heritage designation by-law no.2017-138 that are of particular importance to the Association, including the statement of cultural heritage value or interest, and the identified heritage attributes. This includes, but is not limited to, the following attributes identified in heritage designation by-law no.2017-138:

- a. *The visual and historical connections to the surrounding residential neighbourhood.*
- b. *The nature of the open space within the surrounding residential neighbourhoods related to a distinct sporting culture with a unique type of parkland setting;*
- c. *The key views that represent that designed cultural heritage landscape as experienced from the public realm and within the course:...*
- d. *Jack Nicklaus's unique integration of land use, traditional practices, land patterns, spatial organization, visual relationships, circulation, ecological features, vegetation, landforms, water features, and built features.*
- e. *The pioneering stadium-style golf course design with its unique hub and spoke layout;*
- f. *The organization of the various open parkland holes, water holes and valley holes to provide a dramatic championship sequence;*

26. Given the heritage designation and the cultural heritage landscape on the Site, in my opinion and in the opinion of the Association, it would be inappropriate to demolish that cultural heritage landscape and permit the Proposed Development to proceed in a way that does not conserve the cultural heritage resources.

**Resident Commentary – Cultural Heritage Attributes of the Glen Abbey Property**

27. As residents of Oakville, and Fairway Hills more specifically, I and members of the Association feel that the Glen Abbey Golf Course is an integral part of our cultural identity. Simply put, its presence defines our community. Our neighbourhood is called Fairway Hills, and our small community is located within the greater Glen Abbey area within the Town of Oakville. If the Proposed Development on the Site is permitted to proceed as is currently proposed, without conserving the significant cultural heritage features, the entire Glen Abbey community will be compromised.
28. Members of our community have expressed that they had the absolute pleasure of personally experiencing the Canadian Open in 2000, when Tiger Woods hit his famous bunker shot. One resident expressed that he was fortunate enough to experience that bunker shot personally. Some 15 years later, he walked the grounds again during the Canadian Open – this time as a father, hand in hand with our children.
29. Families in our community enjoy bike rides and walks over the Smith Triller Viaduct, where they are able to take in the over whelming beauty of the Glen Abbey Golf Course and the associated open space. Members of our community recall creating memories together standing and admiring both the valley and tablelands in the distance. On a personal note, when our children see the Glen Abbey Golf Course, they know that they are home.
30. Finally, in the personal and professional circles I have travelled, Glen Abbey has always put the Town of Oakville on the map Provincially, Nationally, and Internationally. Simply put, the Glen Abbey Golf Course is a cultural and historical landmark

within the Town of Oakville. Without the presence of this historic golf course in a form which preserves its unique cultural heritage identity as set out in the heritage designating by-law, our community will be forever altered.

## **NATURE OF THE PROPOSED DEVELOPMENT – THE GLEN ABBEY GOLF**

### **COURSE**

31. As noted above, the Association is not opposed to *any* redevelopment on the Site.

Rather, we are opposed to the Proposed Development in the form and intensity proposed by Clublink as it fails to conserve the significant cultural heritage resources identified in the heritage designating by-law.

### **Planning, Urban Design, Community Facilities/Growth Management, Urban Structure, Cultural Heritage**

32. The character of the Fairway Hills neighbourhood, as its name suggests, is very closely linked to the Glen Abbey Golf Course. The existing residential development was constructed with the golf course in mind, as the homes in Fairway Hills preserve and protect the integrity of Glen Abbey Golf Course. That character is one of single detached housing, with broad open spaces, and architectural design that compliments the historic nature of the Glen Abbey Golf Course. It is also a neighbourhood that preserves the Glen Abbey Golf Course in situ.

33. The Proposed Development by Clublink would completely alter the character of not just the Fairway Hills neighbourhood, but also the greater Glen Abbey community at large. It would eliminate the Glen Abbey Golf Course and the cultural heritage land-

scape associated therewith and instead implement development that is of an intensity and scale that is not keeping or preserving of the character of the Fairway Hills neighbourhood.

34. In particular the Association expresses this view specifically as it relates to the proposed location of mid to high density development within the vicinity of the Fairway Hills neighbourhood, as such density or form of development is not characteristic of the current Fairway Hills neighbourhood and would not fit the character of that neighbourhood. Moreover, Clublink's Proposed Development does not protect and preserve the cultural heritage attributes of the Site, which were highlighted by experts in the field and are reviewed previously.

35. Moreover, the current policy framework and the Town's Official Plan did not contemplate or provide for the scale of development on the Site that Clublink proposes. There is no doubt that the Site was never an identified area of growth for a development of this magnitude. The Association and residents of Fairway Hills wish to emphasize that Official Plans, specifically in so far as their urban structure elements, should be reliable and static documents, which plan for development in a way that residents of communities can make informed decisions.

#### *Pedestrian Connection to Dorval Drive Proposed via the Fairway Hills Community*

36. Currently, the Fairway Hills neighbourhood from a transportation and pedestrian connection perspective is disconnected from the Site. There are no common access points and each property functions independently with respect to any pedestrian or vehicle traffic. The proposed flow of pedestrian traffic through the Fairway

Hills neighbourhood suggests a merging of these two properties, which the residents of Fairway Hills specifically oppose. Merging the properties in this way would alter the character of the Fairway Hill neighbourhood, which currently features one exit point to encourage local traffic only.

## **CONCLUSION**

37. Notwithstanding our response to specific points of issue on the subject applications, the residents of the Fairway Hills neighbourhood and our Association could find support in principle for a development, which would occur on the fringe parts of the Site (for example, the areas already zoned for a hotel), in a way that allows for the cultural heritage resources to be conserved. It is of note that the heritage designating by-law that was passed by the Town was not opposed by Clublink and therefore there is no justification to develop the Site in any way that does not conserve this cultural heritage resource. It is recognized that there is opportunity for some development on the Site while still maintaining the cultural heritage attributes of the Site and the cultural identity and character of the Fairway Hills neighbourhood, however the Proposed Development does not do so.

38. The Association supports the Town's designation of the Site as a Cultural Heritage Landscape that should be conserved and not demolished. Moreover, the Association believes that the Proposed Development would compromise the character and cultural identity of the Fairway Hills neighbourhood and the greater Glen Abbey community. We oppose the Proposed Development in the form proposed by Clublink and request the Tribunal to refuse the subject applications filed by Clublink that are before it.

All of which is respectfully submitted.

A handwritten signature in black ink, appearing to read "Campitelli". The signature is written in a cursive style with a large initial 'C'.

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JENNIFER CAMPITELLI