

**LPAT Case Nos. PL171084  
PL180158  
PL180580  
MM180022  
MM170004**

## **LOCAL PLANNING APPEAL TRIBUNAL**

Tribunal d'appel de l'aménagement local

**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 17(36) 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. 15  
Municipality: Town of Oakville  
LPAT Case No.: PL180580  
LPAT File No.: PL180580

**PROCEEDING COMMENCED UNDER** subsection 17(36) 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. 16  
Municipality: Town of Oakville  
L.P.A.T. Case No.: PL180580  
L.P.A.T. File No.: PL180581

**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

**PROCEEDING COMMENCED UNDER** subsection 69(3) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Appellant: ClubLink Corporation ULC & ClubLink Holdings Ltd.  
Subject: Appeal against the levying of an application fee  
Municipality: Town of Oakville  
LPAT Case No.: MM170004  
LPAT File No.: MM170004

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**Witness Statement of**  
**ANDY GLYNN, CEMC**

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**A. QUALIFICATIONS**

1. I am the Deputy Fire Chief for the Oakville Fire Department and I have held this position for 15 years. I have over 33 years of professional experience in fire protection and prevention services including over 5 years as Program Specialist with the Provincial Office of the Fire Marshal. My professional designations include Fire Protection Engineering Technologist and I am a Member of the Institution of Fire Engineers.
2. My duties as Deputy Fire Chief include but are not limited to Community Emergency Management Coordinator as described in the *Emergency Management and Civil Protection Act*, Managing Fire Department Facilities, overseeing fire department special projects related to fire safety and acting as Fire Chief in their absence.
3. My curriculum vitae is **Attachment “A”**, and an executed Acknowledgement of Expert’s Duty is **Attachment “B”**.

**B. LIST OF MATTERS TO BE ADDRESSED IN EVIDENCE**

4. My evidence will address whether there has been sufficient analysis of the capacity of the existing fire protection and prevention services arising from the Glen Abbey development applications.
5. I have reviewed the IBI Group *Community Services and Facilities Study*, February 17, 2021 (the “CSFS”), and I have some concerns regarding Oakville Fire’s ability

to provide adequate fire protection services to the redevelopment proposed on the Glen Abbey Golf Course lands, should the redevelopment applications be approved.

6. In particular, the CSFS states that IBI Group does not anticipate that a new fire station is required on the subject site to 2031 as the site is geographically located in an area that is adequately serviced by existing fire services. In my opinion, the need for a new fire station within the subject lands cannot be determined at this time without a comprehensive review of the potential impact arising from the proposed development. As a result, the Oakville Fire may be deficient in providing an adequate level of fire protection for the proposed site. This could negatively affect life safety and property conservation.

### **C. FIRE MASTER PLANNING**

7. The *Fire Protection and Prevention Act* (FPPA) requires every municipality to provide fire protection services it determines may be necessary in accordance with its needs and circumstance. The Oakville Fire Master Plan (FMP) is intended to provide guidance as part of the Department's overall 10 and 15 year strategic planning process, and is one of the tools used by the Town to manage growth. The FMP outlines a framework and recommended action plans for the delivery of fire protection services within the Town of Oakville (Town). The FMP is also based on community needs resulting from impacts of existing and planned future growth. The Town's most recent FMP was completed in 2016 and will be updated this year.
8. As well, the FMP is based on existing research, information, issues and strategies to ensure best practices are being followed or are recommended for adoption. Additionally, the findings of the FMP ensure the Town of Oakville is providing a level of fire protection commensurate with its legislated responsibilities. The FMP uses GIS technology, road network information, historic call volumes and response times to determine modelling and methodology to assess existing and proposed future emergency response coverage and to test various combinations of fire suppression resources.

9. Fire protection involves more than just fire-fighting services and includes the following divisions: Administration; Emergency Planning; Fire Prevention; Training; Fire Suppression, Apparatus and Equipment; and Communications and Technology. The FMP includes recommended infrastructure and facility requirements to accommodate planned greenfield growth (North Oakville) and intensification in the Town.

10. As noted in the FMP:

The majority of risks associated with the geography, topography and road infrastructure within the Town are a result of the large overall size of the Town and the expected growth. Long response times from the fire stations can occur in newly developed areas, and this requires pre-planning and monitoring of the Town's growth. The Town is expected to focus growth north of Dundas Street (in a large greenfield area), and through intensification of the Midtown Oakville, Uptown Core, Palermo Village, Kerr Village and Downtown Oakville areas. (p.22).

11. The CSFS states:

**“Emergency facilities:** Master plans for police, fire and paramedic services do not identify the need for a facility on site. Any planned upgrades to existing facilities within the study area have been captured by the capital programs in the Town and Regional development charge studies.”

12. The CSFS correctly notes a master plan process is used to plan facilities for fire protection services. While the CSFS also correctly notes that the Town's current FMP does not identify the need for a new fire facility within the Glen Abbey lands, it would not have even considered the possibility since no development is planned on the lands. The Glen Abbey Golf Course lands would have been assumed to be used for golf course purposes in the 2016 Fire Master Plan, and would not have been treated as a location for development.

#### **D. NEED FOR ADDITIONAL FIRE SERVICES**

13. While the CSFS correctly states that planned upgrades to existing fire service facilities within the study area are captured by the capital programs in the Town's development charge background study, the impact of the proposed development of the Glen Abbey Golf Course on the need for additional fire service facilities has not been studied by the Town and is not studied in the CSFS.

14. The CSFS simply concludes that:

With the planned expansion of Fire Station No. 4, IBI Group does not anticipate that a new station is required on the subject site to 2031 as the site is geographically located in an area that is adequately serviced by existing fire services.

15. The CSFS correctly notes that 2016 Fire Master Plan recommends an expansion to Fire Station No. 4, which is in the study area, and the 2017 DC Background Study includes funding for this expansion. Station 4 is the busiest Fire Station in the Town. However, improvements to Fire Station No. 4 have not proceeded, and since the completion of the Background Study further work has been undertaken by the Town in respect of expanding Fire Station No. 4, and the Town has concluded it is not feasible given site constraints.

16. The 2016 FMP identifies part of the Glen Abbey site as deficient in meeting the NFPA standard. The National Fire Protection Association (NFPA) is an industry wide organization focused on life safety and property protection through application of code and best practice. The NFPA 1710 standard is a standard for organization and deployment of fire suppression operations. It refers to the minimal staffing level for response to a structure fire. In Oakville's case, this is 14 Firefighters on scene in 8 minutes of travel time in order to perform critical tasks for a moderate level risk.

17. The 8 min travel time determination would be difficult to complete without the proposed road network and site plan within the subject lands incorporated into an

assessment of response computer model program. The response coverage reviews several factors and requires a further study that includes various scenarios for existing and future conditions to determine the depth of coverage and response times. The study would include applying the NFPA 1710 standard as the baseline for determining coverage. I note that comments from the Town regarding ClubLink's proposed terms of the reference for the CSFS advised that the NFPA 1710 standard should be applied for fire protection facilities in the study. The level of review in the CSFS and suggestion that 3 Fire stations are within an 8 min drive is rudimentary and cannot be used to determine if the standard is met.

18. Conclusions regarding the need for additional fire service facilities for the proposed redevelopment of the Glen Abbey Golf Course lands cannot be reached without the type of comprehensive study that is included in a fire master plan being undertaken, which considers all three lines of defence (fire education; fire prevention; enforcement and suppression). The need for the study is particularly important given the amount of high density and high risk development within the proposal, which has different needs than ground related housing. The master plan study would model response times and apply NFPA as well as any other legislative requirements to determine if the fire department can respond to a structure fire with adequate resources within a certain timeframe. The study would also make recommendations that may include and determine:
  - a. if a new fire station is required,
  - b. if an existing fire station should be moved to provide an adequate standard of coverage,
  - c. if additional resources should be added to an existing station,
  - d. if additional suppression staff are required, and
  - e. if additional fire prevention officers are required.

19. There are many factors that are considered in determining the facility needs to support fire services. As noted in the FMP, the factors considered include property stock, building height and area, building age and construction, building exposure and geography/topography/road profile. Based on the proposed draft plan of subdivision, a fully staffed fire station may be required and located centrally within the subdivision in order to provide timely and adequate fire suppression to the proposed area. This includes appropriate number of firefighters performing fireground critical tasks and arriving in a timely manner to the associated risk.
20. Based on the draft plan, the community risk profile associated with population growth, density, fire load, single family residential and multi-storey residential buildings along with mixed use occupancy, are key factors in leading me to determine a comprehensive study is required to fully understand the fire protection impacts. This includes but not limited to an assessment of response coverage and depth of response staffing coverage.
21. The development, if approved, must be assessed through the FMP in order for Oakville Fire to reach a conclusion as to whether or not an additional fire station would be required within the Glen Abbey lands to provide an adequate level of fire protection service.
22. Accordingly, if development is approved on the lands, the fire protection service needs for the development, which might include a new fire station or other fire protection services, would be assessed in the first FMP to be undertaken by the Town following that approval.
23. Should the development proposed be approved, the Town will be seeking that draft plan conditions be imposed requiring that a potential fire station site of approximately 1.5 acres in size be reserved, with a configuration and location to the satisfaction of the Town. The 1.5 acres is based on a recent fire station land acquisition as well as previous architect's recommendation. If the FMP concludes that a fire station is not required, then the site would be released for development.

If the FMP concludes that a new fire station is required, the site would need to be continued to be reserved until purchased by the Town.

24. If it is determined through a comprehensive study that a fire station is needed and one is not provided, then the fire department may be deficient in providing adequate level of fire protection for the proposed site. This could negatively affect the protection of life and property. A request of the developer to reserve a 1.5 acres site was made by counsel for the Town and was refused as set out **Attachment "C"**.

**Attachment "A"**  
**Curriculum Vitae of Andy Glynn**

# Andy Glynn, MIFireE, CEMC

(905) 339-3279 ♦ [aglynn66@gmail.com](mailto:aglynn66@gmail.com) ♦ <https://ca.linkedin.com/in/andyglynn1>

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## PROFESSIONAL SUMMARY

### Experienced, Dedicated and Visionary Fire Service Leader

With over 30 years in municipal and provincial government, I have extensive experience in administrative, operational and support capacities. A natural and versatile leader, I have successfully introduced and implemented cutting-edge programs while maintaining a focus on exceptional customer service, international best practices and stakeholder consultation.

A strong advocate of lifelong learning, among my professional designations are *Fire Protection Engineering Technologist* and *Member, Institution of Fire Engineers*. I have enjoyed many successes to date as a leader in fire safety and emergency management and look forward to continued contribution to my profession.

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## AREAS OF EXPERTISE

- Emergency Planning
  - Fire Administration
  - Labour Relations
  - Effective Communications
  - Strategic Planning and Execution
  - Professional Development
  - Facilitation & Stakeholder Engagement
  - Staff Training & Development
  - Project Management
  - Cost Control & Efficiency
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## CAREER EXPERIENCE

### OAKVILLE FIRE DEPARTMENT

2006 – present

**Deputy Fire Chief**, Emergency Management, Administration and Special Projects  
(2011 – present)

- Act as Community Emergency Management Coordinator, ensuring compliance with legislation and enhancing community resilience
- Lead emergency management and preparedness initiatives for the Town; train and implement the Incident Management System in the Emergency Operation Centre as necessary
- Analyze statistical data and Key Performance Indicators to maintain highly efficient and effective operations; lead course corrections as necessary
- Oversee capital and operating budgets, providing rationale for projects and expenditures
- Lead the design and build of fire stations utilizing the Integrated Project Delivery process to ensure projects are on time and budget
- Lead special projects, including effective emergency and fire safety planning for the PAN AM Games and four Canadian Open golf tournaments

***Deputy Fire Chief***, Training and Professional Development, Fire Prevention and Public Education, (2006-2011)

- Led overall divisional management, including divisional budget and Key Performance Indicators, analytics, long-range plan and department recruitment and retention
- Implemented an in-house Company Officer Training Program accredited by the Ontario Fire College
- Instituted a Home Awareness Program that included proactive home visits by suppression crews to enhance public fire safety
- Co-chaired the Occupational Health and Safety Committee to ensure a safe workplace for all staff

**OFFICE OF THE FIRE MARSHAL** (2001 – 2006)

***Program Specialist (Acting Manager)***, Emergency Management and Response Unit (2002-2006)

- Responded to province-wide emergencies and provided advice and assistance to municipal government and senior fire service leaders; experience in the Provincial Emergency Operation Centre during large-scale events such as 2003 Provincial Blackout and SARS
- Developed business plans, project charters and exercises on terrorism response strategies to ensure provincial preparedness for chemical, biological, radiological and nuclear events
- Monitored municipalities through the application of the *Fire Protection and Prevention Act* to ensure compliance based on municipal needs and circumstances
- Reviewed and approved Mutual Aid and Automatic Aid agreements to support effective resource-sharing across municipalities
- Helped develop and refine the Unit's strategic direction to ensure alignment with provincial direction and international best practices
- Managed divisional budget and purchasing to ensure expenditures were strategic, responsible, and appropriate

***Ontario Fire College Instructor***, Office of the Fire Marshal Facilitator and Course Administrator, Company Officer Program (2001 – 2002)

- Developed, implemented, examined, and evaluated Company Officer training programs to ensure their continued excellence and relevance to the service
- Specialized in the delivery of Incident Management, Specialized Rescue and Hazardous Materials courses
- Represented the Province on several multi-stakeholder committees, including those for high-profile events such as World Youth Day and the 2002 Papal visit

**CITY OF VAUGHAN FIRE AND RESCUE SERVICE** (1987 – 2001)

***Firefighter, (Acting) Captain***

- Contributed as a suppression firefighter, acting captain and shift training instructor; awarded a Commendation for actions while off duty

## **EDUCATION AND PROFESSIONAL DEVELOPMENT**

**Fire Protection Engineering Technologist**, Seneca College  
**Institution of Fire Engineers**, *Member*, Institution of Fire Engineers, International  
**Community Emergency Management Coordinator (CEMC)**, Emergency Management Ontario  
**Canadian Emergency Management College**, Emergency Operation Centre Management  
**Local Government Finance**, Dalhousie University  
**Ontario Public Sector Project Management**, Project Planning  
**Hazardous Materials Incident Commander**, Certified, American Railroad Association  
**Municipal Administration Program**, Association of Municipal Managers, Clerks, and Treasurers of Ontario  
**Domestic Operations Program**, Canadian Land Forces Command and Staff College  
**Company Officer Program**, Ontario Fire College (Student and Facilitator)  
**Native Awareness Course**, Ontario Provincial Police  
**Certified Instructor**, Incident Management System, Emergency Management Ontario  
**Certified Radiation Safety Officer**, Radiation Safety Institute of Canada  
**Infrastructure Asset Management Course**, CH2M Strategic Asset Management

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## **PROFESSIONAL AFFILIATIONS**

### **CIVICACTION LEADERSHIP FOUNDATION (2017 – 2018)**

#### **DiverseCity Fellow**

- Collaborate with a diverse, multi-disciplinary team to tackle pressing social, environmental and economic issues in the GTHA
- Engage with the region's top influencers and visionaries to strengthen our collective understanding of current civic challenges
- Commit to leading change through inclusion and diversity
- Contribute as a member of the Eliminate Racial Profiling working group

### **ONTARIO ASSOCIATION OF FIRE CHIEFS (O AFC) 2006 - present**

#### ***Board member, 1<sup>st</sup> Vice President, Executive Board (2012-2014)***

- Represented over 750 Chief Officers across Ontario as first vice president
- Strategically participated in high-priority projects, including the Elliot Lake inquiry, and the development of an Integrated Risk Management tool focused on the 3-lines of defence.
- Actively contributed to advocacy, government relations and media relations efforts
- Chaired the Member Services Committee
- Participated as an active member of Diversity and Inclusion working group
- Contributed as a member of the Provincial Incident Management System steering committee

## **FIRE MARSHAL'S PUBLIC FIRE SAFETY COUNCIL (2004 – 2014)**

### ***Executive Board Member, 2013 – 2014***

- Chair, *Wake Up* smoke alarm initiative (provincial)
- Chair, *Remembering When* fall and fire prevention program for seniors (provincial)
- Co-Chair, Community Relations Committee

## **2015 PAN AM / PARA PAN AM GAMES**

### ***Chair, Ontario Fire Services Advisory Committee (2012 – 2015)***

- Represented the fire service and chiefs of venue locations at stakeholder meetings; contributed to successful strategic planning and preparations for the 2015 games
- Successfully lobbied the provincial government for municipal fire service funding to support enhanced public safety during the Games

## **INSTITUTION OF FIRE ENGINEERS (1994-present)**

### ***President, Ontario Branch, (2004 – 2006)***

- Achieved *Member* status, a rank internationally recognized for significant professional contributions
- Successfully lobbied for the amalgamation all provincial and territorial branches into a united Canadian Branch

## **HALTON REGION *Joint Emergency Services Operational Advisory Group (JESOAG)* (2007-present) *Chair, (2015 – 2018)***

- Lead Police, Fire and EMS senior officers in joint policy and training initiatives
- Identify joint multi-agency operational issues and collaboratively develop solutions
- Successfully promoted and led a tri-service joint exercise initiative

## **CANADIAN ASSOCIATION OF FIRE CHIEFS (CAFC) (2012 – present)**

### ***Member***

Educated Members of Parliament on issues affecting the safety of all Canadians as a delegate in the Parliament Hill CAFC Government Relations Week

## **INTERNATIONAL ASSOCIATION OF EMERGENCY MANAGERS (2012-present)**

### ***Member***

Participate in international conferences to stay abreast of best practices; implemented the Incident Management System within the municipal Emergency Operation Centre as a result

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## OTHER ACCOMPLISHMENTS

- Received the Ontario Association of Fire Chiefs' 2016 Mark Diotte Leadership Award; selected by peers for leadership during preparations for the PAN AM/Para PAN AM games
- Nominated for Province of Ontario's 2015 Amethyst Award in recognition of extraordinary public service
- Nominated four times for a CAO's Staff Excellence Award with the Town of Oakville for leadership and project management
- Published articles in national trade publication *Firefighting in Canada*
- Received a Recognition Award from the Office of the Fire Marshal for contributing to a successful *Essentials of Municipal Fire Protection* project
- Awarded a Commendation of Valour, City of Vaughan
- Received a Letter of Appreciation from the Province of Ontario, Logistics Command for leadership within the Provincial Emergency Operations Centre during the 2003 provincial power outage
- Received Letter of Appreciation from City of Ottawa for development and delivery of a provincial Hazardous Material Technician pilot course

## **Attachment “B”**

Acknowledgement of Expert’s Duty



Local Planning Appeal Tribunal  
Tribunal d'appel de l'aménagement local

**ACKNOWLEDGMENT OF EXPERT'S DUTY**

<b>Case Number</b>	<b>Municipality</b>
<b>PL171084 PL180158 PL180580 MM180022 MM170004</b>	<b>Regional Municipality of Halton, Town of Oakville</b>

1. My name is Andy Glynn  
I live at the Town of Oakville  
in the Regional Municipality of Halton  
in the Province of Ontario
2. I have been engaged by or on behalf of...Town of Oakville.... (*name of party/parties*) to provide evidence in relation to the above-noted LPAT proceeding.
3. I acknowledge that it is my duty to provide evidence in relation to this proceeding as follows:
  - a. to provide opinion evidence that is fair, objective and non-partisan;
  - b. to provide opinion evidence that is related only to matters that are within my area of expertise; and
  - c. to provide such additional assistance as the LPAT may reasonably require, to determine a matter in issue.
  - d. not to seek or receive assistance or communication, except technical support, while under cross examination, through any means including any electronic means, from any third party, including but not limited to legal counsel or client.
4. I acknowledge that the duty referred to above prevails over any obligation which I may owe to any party by whom or on whose behalf I am engaged.

A handwritten signature in blue ink, appearing to be 'Aylf.', is positioned above the signature label.

Date.....May 17 2021.....

.....  
Signature

## Attachment "C"

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**From:** Kyle Gossen <KyleG@davieshowe.com>  
**Sent:** Wednesday, May 12, 2021 10:01 PM  
**To:** Howe, Robert  
**Cc:** Lyons, Kate; Nadia Chandra; Mark Flowers  
**Subject:** RE: LPAT Case Nos. PL171084, PL180158, PL180580, MM180022, MM170004 - Town of Oakville

Rob,

Based on the Town's responses to our questions, ClubLink is not currently in a position to agree to the Town's request to reserve a fire station site of approximately 1.5 acres on the Glen Abbey property.

Kyle

**Kyle Gossen**

416.263.4519 | [Bio](#)



Davies Howe LLP  
The Tenth Floor  
425 Adelaide Street West  
Toronto, Ontario M5V 3C1  
416.977.7088

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**From:** Howe, Robert <rhowe@goodmans.ca>  
**Sent:** May 11, 2021 1:28 PM  
**To:** Kyle Gossen <KyleG@davieshowe.com>  
**Cc:** Lyons, Kate <clyons@goodmans.ca>; Nadia Chandra <nadia.chandra@oakville.ca>; Mark Flowers <markf@davieshowe.com>  
**Subject:** RE: LPAT Case Nos. PL171084, PL180158, PL180580, MM180022, MM170004 - Town of Oakville

Kyle,

I am following up on my email below.

We would prefer not to have to file evidence on this issue if we can agree. If more time is required we could agree to delay filing evidence on it. Can you let me know.

Rob

**Rob Howe**  
Goodmans LLP

416.597.5158 direct

**From:** Howe, Robert  
**Sent:** Tuesday, May 4, 2021 11:10 AM  
**To:** 'Kyle Gossen' <[KyleG@davieshowe.com](mailto:KyleG@davieshowe.com)>  
**Cc:** Lyons, Kate <[clyons@goodmans.ca](mailto:clyons@goodmans.ca)>; Nadia Chandra <[nadia.chandra@oakville.ca](mailto:nadia.chandra@oakville.ca)>; Mark Flowers <[markf@davieshowe.com](mailto:markf@davieshowe.com)>  
**Subject:** RE: LPAT Case Nos. PL171084, PL180158, PL180580, MM180022, MM170004 - Town of Oakville

Kyle,

Responses to your questions regarding the potential need for a fire station site are set out below:

*1. On what basis does the Town claim it potentially needs a fire station on the Glen Abbey property? Our initial review suggests that the site is within an 8-minute drive of three existing fire stations. Has the Town done any analysis to determine if the proposed development could be serviced by existing stations?*

The Town's Deputy Fire Chief has advised that an additional fire station may potentially be required on the Glen Abbey property based on the fire response modelling in the 2016 Fire Master Plan. The Fire Master Plan identifies the Glen Abbey lands as a location where the depth of response standard (at least eight firefighters reaching the area within eight minutes of travel time) is deficient. The Town has not prepared modelling based on ClubLink's proposed draft plan of subdivision. If the development is approved the modelling would need to be updated in the context of Town's overall system of fire protection services, which is done through the Fire Master Plan.

*2. How did the Town determine that approximately 1.5 acres is the necessary size for the fire station site? Our initial review suggests that no other stand-alone fire station sites are this large.*

The most recent parcel of land acquired by the Town for a fire station (proposed Fire Station No. 9 in North Oakville) is approximately 1.58 acres. The exact size that would be required but depends on the configuration of the parcel.

*3. If there is to be a fire station, where on the Draft Plan of Subdivision would the Town propose that the fire station site be located?*

The preferred location for a fire station, if it were required, is along Street 'A', on a corner block with two street accesses. The precise location is best determined through the Fire Master Plan update, however on a preliminary basis Oakville Fire staff believe a central location (i.e., across from the Central Park) is a potential option. The Town is prepared to defer showing a precise location on the draft plan, but to have a draft plan condition requiring the block be identified to the Town's satisfaction prior to registration of the plan if required by the Town. If the draft plan is approved and the reservation of a block for a potential fire station is determined to be necessary, the Town would work with ClubLink to identify the block and required revisions to the draft plan.

*4. Is there an ongoing Fire Master Plan update? If not, when is the next review taking place? If so, and if ClubLink agreed to reserve a fire station site, would the Town include the proposed redevelopment as part of the ongoing Fire Master Plan update (on a without prejudice basis)?*

The Town is updating its Fire Master Plan in 2021. However, the Fire Master Plan only assesses the need for fire protection services in respect of planned development, and a decision will not be made in respect of the ClubLink proposal this year. An update to the Master Plan is undertaken every five years. It is not reasonable to expect the Town to prepare a version of its Fire Master Plan assessing the potential fire protection needs of development that is not planned. That isn't how infrastructure master planning works.

*5. For how long would the Town expect ClubLink to hold the fire station site?*

If the development is approved, and the subsequent Fire Master Plan update determines a new first station is not required, a site will not need to be reserved after that time. If it is determined that a new fire station is required the expectation is that it would be reserved until acquired by the Town. The Town cannot determine when the site will be required, as it has no idea how quickly the lands would be developed, if approved.

*6. How would the cost of the fire station site be determined (e.g. in an equivalent manner as under the Expropriations Act?) and what mechanism(s) would be used if the parties could not agree on the appropriate compensation?*

The Town expects it will be required to pay fair market value for the block. Obviously the Town would prefer to avoid an expropriation process. The Town's preference would be to enter into an option agreement with ClubLink for the acquisition of the block prior to the registration of the phase of the subdivision in which it is located. The option agreement would contain a process to determine fair market value.

*We also understand that Mr. Glynn indicated that the type of fire trucks required to service apartment towers may not be available in the vicinity of the site. If that is the case, how are tall buildings in the Uptown Core to be serviced by Fire Services? What building heights are the different trucks capable of servicing, and which fire stations currently have the trucks in question?*

The point Mr. Glynn was making is that as part of assessing the fire protection requirements of the development in the context of the Fire Master Plan process, consideration would be given to the availability of the equipment necessary to respond to a fire in a high-risk (i.e., high-rise) structure. The Town currently has three ladder trucks in its fleet. There is one located at Station No. 3, and the other two are at Station No. 4 and Station No. 6.

Rob

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**Sent:** Monday, May 3, 2021 9:32 AM  
**To:** Howe, Robert <[rhowe@goodmans.ca](mailto:rhowe@goodmans.ca)>  
**Cc:** Lyons, Kate <[clyons@goodmans.ca](mailto:clyons@goodmans.ca)>; Nadia Chandra <[nadia.chandra@oakville.ca](mailto:nadia.chandra@oakville.ca)>; Mark Flowers <[markf@davieshowe.com](mailto:markf@davieshowe.com)>  
**Subject:** RE: LPAT Case Nos. PL171084, PL180158, PL180580, MM180022, MM170004 - Town of Oakville

Rob,

Before ClubLink can consider the Town's request to reserve a fire station site of approximately 1.5 acres on the Glen Abbey property, it needs to better understand the proposal. We have the following questions:

1. On what basis does the Town claim it potentially needs a fire station on the Glen Abbey property? Our initial review suggests that the site is within an 8-minute drive of three existing fire stations. Has the Town done any analysis to determine if the proposed development could be serviced by existing stations?
2. How did the Town determine that approximately 1.5 acres is the necessary size for the fire station site? Our initial review suggests that no other stand-alone fire station sites are this large.
3. If there is to be a fire station, where on the Draft Plan of Subdivision would the Town propose that the fire station site be located?
4. Is there an ongoing Fire Master Plan update? If not, when is the next review taking place? If so, and if ClubLink agreed to reserve a fire station site, would the Town include the proposed redevelopment as part of the ongoing Fire Master Plan update (on a without prejudice basis)?
5. For how long would the Town expect ClubLink to hold the fire station site?

6. How would the cost of the fire station site be determined (e.g. in an equivalent manner as under the *Expropriations Act*?) and what mechanism(s) would be used if the parties could not agree on the appropriate compensation?

We also understand that Mr. Glynn indicated that the type of fire trucks required to service apartment towers may not be available in the vicinity of the site. If that is the case, how are tall buildings in the Uptown Core to be serviced by Fire Services? What building heights are the different trucks capable of servicing, and which fire stations currently have the trucks in question?

Kyle

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**From:** Howe, Robert <[rhoew@goodmans.ca](mailto:rhoew@goodmans.ca)>  
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**Subject:** LPAT Case Nos. PL171084, PL180158, PL180580, MM180022, MM170004 - Town of Oakville

Mr. Flowers,

We understand that the Town's Deputy Fire Chief, Andy Glynn, communicated to representatives of IBI Group at the recent experts' meeting regarding Fire Services that Oakville Fire has reviewed the IBI Group *Community Services and Facilities Study*, February 17, 2021 (the "CSFS"), and has some concerns regarding its ability to provide fire protection services to the redevelopment proposed by your client on the Glen Abbey Golf Course lands, should the redevelopment applications be approved.

The CSFS states that IBI Group does not anticipate that a new fire station is required on the subject site to 2031 as the site is geographically located in an area that is adequately serviced by existing fire services. Oakville Fire does not believe it can be determined at this time whether a new fire station would be required within the subject lands. As noted in the CSFS, a master plan process is used to plan facilities for fire protection services. While the CSFS correctly notes that the Town's current Fire Master Plan does not identify the need for a new fire facility within the Glenn Abbey lands, it would not have even considered the possibility since no development is planned on the lands.

The development, if approved, must be assessed through the Fire Master Plan in order for Oakville Fire to reach a conclusion as to whether or not an additional fire station would be required within the Glen Abbey lands to provide an adequate level of fire protection service. Accordingly, if development is approved on the lands, the fire protection service needs for the development, which might include a new fire station or other fire protection services, would be assessed in the first Fire Master Plan to be undertaken by the Town following that approval.

In the meantime, should the development proposed by your client be approved, the Town will be seeking that draft plan conditions be imposed requiring that a potential fire station site of approximately 1.5 acres in size be reserved, with a configuration and location to the satisfaction of the Town. If the Fire Master Plan that assesses the need for a new fire station within the development concludes it is not required, then the site would be released for development. If the Fire Master Plan concludes that a new fire station is required, the site would need to be continued to be reserved until purchased by the Town.

If your client is prepared to agree that a potential fire station site would be reserved through appropriate conditions of draft plan approval as noted above in the event their redevelopment applications are approved, we believe the need to call evidence on this issue at the hearing could be avoided.

We look forward to hearing from you regarding your client's position on this issue.

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\*\*\*\*\* Attention \*\*\*\*\*

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