

LPAT Case Nos. PL171084
PL180158
PL180580
MM180022
MM170004

**WITNESS STATEMENT OF
PETER F. SMITH**

Background and Qualifications

1. This witness statement has been prepared by:

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2. I am a consulting land use planner and partner with Bousfields Inc., with over 40 years' experience in a wide variety of planning matters. I have a degree in Environmental Studies (Urban and Regional Planning) from the University of Waterloo and am a member of the Canadian Institute of Planners and a Registered Professional Planner. A copy of my *Curriculum Vitae* is attached hereto as **Attachment "A"**. My Acknowledgement of Expert's Duty is attached as **Attachment "B"**.
3. I have experience in policy formulation and the preparation of Official Plans and Community Plans, including the Development Permit Demonstration Project for the Ministry of Municipal Affairs and Housing, the Provincial Policy Statement Five-Year Review Stakeholder Consultation for the Ministry of Municipal Affairs and Housing, the Prince Edward County Growth & Settlement/ Servicing Strategy, the Nobleton Community Plan for the Township of King and the Riverside South Community Design Plan and Core Area Design Guidelines for the City of Ottawa.
4. I have been the planner for a number of applications for new golf courses, residential intensification on existing golf courses and redevelopment of golf courses, including Angus Glen Golf Club in the City of Markham (a new golf course), King Valley Golf Club in the Township of King and Emerald Hills Golf Club in the Town of Whitchurch-Stouffville (residential intensification on existing golf courses) and Aurora Golf and

Country Club in the Town of Aurora and Kanata Golf and Country Club in the City of Ottawa (redevelopment of existing golf courses).

5. Over the course of my career, I have been the planner for a number of development applications in the Town of Oakville (the “Town”), including the Waterstone Court infill residential development (1997-2000), the Sharkey’s redevelopment at 111 Forsythe Street (2002-2009), the Shores condominium in Bronte Village (2004-2013), a townhouse development on North Ridge Trail/Spring Blossom Crescent (2005-2007), a commercial shopping centre at Rebecca and Burloak (2008-2012) and an ongoing employment land conversion in the northwest quadrant of Dundas Street West and Bronte Road (since 2010).
6. I have been involved in a number of growth management studies and policy proposals, including giving evidence at the Ontario Municipal Board hearings on City of Ottawa Official Plan Amendment No. 76, as well as urban boundary expansions in the Town of Grimsby and the City of Niagara Falls. More recently, I have been involved in municipal comprehensive reviews/urban boundary expansions in the Region of Waterloo (Kitchener Southwest and Woolwich Township) and the City of Guelph (Dolime lands). I was the planner for the Building Industry and Land Development Association (BILD) with respect to the City of Toronto’s Official Plan Review (2012-2020).
7. I was retained by ClubLink Corporation ULC and ClubLink Holdings Limited (“ClubLink”) in this matter on December 15, 2020. Prior to and following the date of my retainer, I have reviewed reports prepared in support of the Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications (the “Applications”), the Town’s staff report on the Applications and the Town’s urban structure review (May 2017), among numerous other documents (see list at the end of this witness statement). I visited the Glen Abbey site on March 25, 2021, and have walked and/or ridden around the entire property.
8. In the course of preparing this witness statement, I have reviewed the witness statements of David Capper, Ute Maya-Giambattista, Robyn Brown, Mark Jamieson, and Steve Schaefer.

Summary Opinion

9. In my opinion, the Applications to permit the redevelopment of the Glen Abbey Golf Club (the “subject site”) for a mix of residential, commercial, natural heritage and

open space uses is appropriate and desirable from a land use planning perspective and should be approved.

10. From a first principles planning perspective, the proposed redevelopment of the subject site would optimize and make efficient use of land and infrastructure within the existing Town of Oakville urban area and would add to the range of housing options available in the Town and the Regional Municipality of Halton (the "Region"). Redevelopment of the subject site would allow for the more intensive use of lands within the urban area and, in so doing, would reduce the pressure for outward expansion of the urban area.
11. Given the size of the lands (92.7 hectares), the direction to make efficient use of land and infrastructure means that the proposed Glen Abbey redevelopment will result in a significant number of new housing units (3,222 units) and additional population (approximately 5,719 persons). In my opinion, such an outcome represents good planning, provided that the proposed density can be accommodated by the transportation network and municipal and community services, and that the resulting built form impacts associated with the proposed density are acceptable. In these respects, I will be relying on the evidence to be provided by David Capper, Ute Maya-Giambattista, Robyn Brown, Mark Jamieson and Steve Schaefer, among others.
12. From a planning policy perspective, it is my opinion that the proposed redevelopment is supportive of the policy framework expressed in the Provincial Policy Statement (2020) ("PPS"), the Growth Plan for the Greater Golden Horseshoe (2019) ("Growth Plan") and the Region of Halton Official Plan, all of which promote the efficient use and optimization of land and infrastructure.
13. The proposed redevelopment would contribute to the achievement of the Growth Plan's intensification targets for the Town and Region. Since the subject site is located within the Built Boundary, intensification on the subject site will assist the Town and Region in achieving, and potentially surpassing, the targets for growth within the delineated built-up area. In my opinion, it would be desirable and would represent good planning if the Town and Region were to surpass the minimum intensification targets.
14. As a result of increases to the intensification targets and population forecasts in the 2019 Growth Plan which have occurred subsequent to the submission of the Applications in 2016, a significant number of additional residential units will need to

be developed in the Town over the period to 2051 in order to achieve the intensification target. The proposed Glen Abbey redevelopment will assist in achieving those increased targets.

15. The redevelopment of large sites within the urban area that are not currently being used for residential purposes represents a potential opportunity for intensification. Because of the nature of such uses, the availability of such large sites for redevelopment typically cannot be predicted in advance. Rather, as is the case with the proposed Glen Abbey redevelopment, it is appropriate to consider such redevelopments through site-specific development applications.
16. In my opinion, the proposed Official Plan Amendment for the Glen Abbey redevelopment provides appropriate policy direction for the redevelopment and intensification of the subject site.
17. While in my opinion the subject site falls within the definition of a “strategic growth area” in the Growth Plan, it is not necessary for the site to be designated as a Growth Area in the Livable Oakville Official Plan in order to permit the scale of redevelopment being proposed.

Organization of this Witness Statement

18. This witness statement has been organized to directly address the matters that I consider to be of fundamental importance from a planning policy and growth management perspective.
19. Accordingly, this witness statement begins with a consideration of how urban areas grow and intensify over time, with a particular focus on the redevelopment of large sites, such as golf courses, within the midst of existing urban areas.
20. Subsequently, it considers the applicable Provincial and Regional policy framework and what it directs regarding the appropriate approach to density when considering a proposal to redevelop a large site within an existing urban area.
21. Then, it addresses how the proposed redevelopment fits within the existing and planned urban structure of the Region and the Town and determines what, if any, planning impacts flow from that analysis.

22. The witness statement then concludes with my opinion regarding specific issues on the Issues List.

Urban Area Growth and Intensification

23. The Town of Oakville is located within the midst of a rapidly growing urban region. The Greater Golden Horseshoe is forecast to grow from a 2016 population of 9,469,000 to 14,870,000 by 2051, an increase of over 50%. Within the Greater Golden Horseshoe, the forecasted growth for the Region of Halton would see its population almost double from 565,000 in 2016 to 1,100,000 in 2051.

24. Hemson Consulting Ltd.'s *Greater Golden Horseshoe: Growth Forecasts to 2051* (August 2020), which provides the technical support for the 2051 forecasts, notes the following with respect to Halton Region:

“The 2020 forecasts assume more rapid growth moving forward as the expansion of Regional services in the north accelerates the development of ground-related housing and plans to intensify urban areas in the south are realized. Growth will be fuelled by in-migration from elsewhere in the GTAH, principally Toronto and Peel, and by long-term ... infrastructure investments such as the expansion of regional (GO) transit services.” (My emphasis.)

25. The Town of Oakville's population is forecast to grow from approximately 165,000 in 2006 to 255,000 in 2031. The 2016 Census population is 193,832 (excluding undercount), or approximately 200,000 including undercount. No forecast has yet been prepared for the Town to the year 2051, although the Region is forecasting a population of up to 342,800 by 2041 (see paragraph 97 below).
26. Growth within the urban region can occur in a variety of forms. It can take place through outward expansion of the urban area (greenfield development) and through site-specific intensification projects (ranging from high-rise redevelopment through to low-rise “missing middle” projects). Intensification can also take place through the redevelopment of large sites within the existing urban area.
27. These large sites may include former industrial sites, institutional uses, retail malls and recreational sites, such as race tracks and golf courses. Because they are large sites, their redevelopment can result in a large number of new units within existing urban areas.

28. Most often, it cannot be predicted when or if such facilities will close and become available for redevelopment. As a result, such intensification will, to some extent, be “unplanned”, but only in the sense that it generally will not have been anticipated in the applicable Official Plan designation. Where it has not been anticipated in municipal planning documents, the appropriate approach to plan for the redevelopment of large sites is through the adoption of site-specific Official Plan Amendments redesignating the sites for urban intensification uses, together with the requisite supporting studies and public review process.
29. In my opinion, such redevelopment is a good and healthy result in growth management terms. It can create entire new neighbourhoods that can add to the range of housing options and employment opportunities within the existing urban area.
30. Importantly, such redevelopment can use existing infrastructure and community services, rather than relying on the outward expansion of services. The more efficiently such sites are used, the lesser the need for outward expansion of the urban area.
31. From a first principles planning perspective, it is in the public interest to ensure that such sites are used efficiently, and that the use of land and infrastructure is optimized.
32. As set out in the following sections, the redevelopment of large sites within existing urban areas, such as the proposed Glen Abbey redevelopment, is a relatively common occurrence. Such redevelopment has been successfully planned and achieved in the past.
33. In Mississauga, the 29 hectare former Imperial Oil refinery located on the south side of Lakeshore Road West at Mississauga Road is being redeveloped for total of 3,000 residential units and 27,870 square metres of retail, restaurants, and office, together with 7.3 hectares of parks and outdoor amenities (known as Brightwater). Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications were approved by the LPAT in 2019 (PL180196).
34. Also in Mississauga, the former Lakeview Generating Station, a 71.6 hectare site located on the south side of Lakeshore Road East at Hydro Road, is the subject of an ongoing master planning process for which Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications have been submitted

(Lakeview Village). A total of 8,026 residential units are proposed in the form of townhouses, mid-rise and high-rise buildings, along with 162,917 square metres of office and institutional space. The lands are approximately 1.5 kilometres from the Long Branch GO Station and are supported by existing bus routes (GO, MiWay and TTC).

35. In the City of Toronto, the former 24 hectare Celestica campus, located at the northwest corner of Eglinton Avenue East and Don Mills Road, is being redeveloped for 4,974 residential units in a combination of townhouses, mid-rise and tall-rise buildings, approximately 60,000 square metres of office space, 11,000 square metres of commercial space, a 12,000 square metre community centre, and 25,720 square metres of affordable housing (Wynford Green). These lands were formerly home to Celestica's manufacturing, corporate headquarters and warehousing operations and are located along the Eglinton Crosstown LRT, currently under construction. Bousfields (Tyler Grinyer and I) filed Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications, which were approved by the LPAT on consent with the City in 2018 and 2019 (PL171369).
36. To the north of the Wynford Green development is a predominantly residential project involving the redevelopment of the southerly portion of the Don Mills Centre shopping centre. The Don Mills Centre site is located within the southwest quadrant of Lawrence Avenue and Don Mills Road and is served by bus routes on both streets. My partner Tony Volpentesta was responsible for the planning approvals for the redevelopment of the commercial component as a "lifestyle centre". I was responsible for the planning approvals for the residential component, which will include 2,050 residential units and up to 7,200 square metres of commercial space, together with a new public park and a community centre. The Official Plan Amendment and Zoning By-law Amendment were approved by the Ontario Municipal Board ("OMB") on consent with the City in March 2011 (PL070673).
37. There are numerous other examples of redevelopment of large shopping centre sites, including The Galleria and Agincourt Mall, among others.
38. The Galleria Mall is a 4.9 hectare community shopping centre in midtown Toronto, located along two Toronto Transit Commission ("TTC") bus routes at the southwest corner of Dufferin Street and Dupont Street and is approximately 850 metres from the Dufferin Subway Station. In July 2019, the City adopted Official Plan and Zoning By-law Amendments to permit the redevelopment of the mall and associated surface parking areas for a maximum of 2,896 residential units, including 150 affordable

units, along with a minimum of 25,000 square metres of retail and office space, a 7,000 square metre community centre and 3.16 hectares of parkland, including the reconfiguration of the abutting Wallace Emerson Park.

39. Agincourt Mall in North Scarborough is the subject of active Official Plan Amendment and rezoning applications to permit the redevelopment of the 10.6 hectare site for 4,375 residential units, 10,222 square metres of office space, 24,190 square metres of retail space and 2,173 square metres of community space, together with a 1.46 hectare public park and a 0.58 hectare POPS (Privately-Owned Publicly Accessible Open Space). The site is located along TTC bus routes and is 500 metres from the Agincourt GO station. The Sheppard East LRT line is currently on hold.
40. Urban areas can also grow and intensify through the redevelopment of large sites that were formerly used for space-extensive recreational uses. One of the densest apartment neighbourhoods in the City of Toronto is developed on the site of the former Thorncliffe Park race track, which operated from 1917 to 1952 before being sold in 1952 for redevelopment. Thorncliffe Park was master planned with low-rise and high-rise residential uses and approximately 6,000 residential units were constructed in the 1950s along with significant retail, commercial and industrial space.
41. Portions of the City of Toronto is developed on lands which were formerly used for golf courses. For example, Graydon Hall Manor, located in the southwest quadrant of Highway 401 and the Don Valley Parkway, was formerly a 38.9 hectare site that included a 29-room manor, 10-car garage, indoor pool, stables for 30 horses, a large farmhouse and a private golf course built in 1936 by Henry Rupert Bain. In 1964, the property was sold to a developer. Although the original manor and gardens remain as an entertainment and event venue, the remainder of the land was redeveloped for apartments and condominiums totalling approximately 1,800 units located on what is now known as Graydon Hall Drive.
42. In the City of Markham, in October 2019, the LPAT approved Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications for the former York Downs Golf Course, a private 27-hole course located on 169 hectares of land at the northwest corner of 16th Avenue and Kennedy Road (PL170580). A total of 2,279 units are proposed with a combination of detached dwellings, townhouses, stacked townhouses, back-to-back-townhouses, and mid-rise, mixed-use buildings. The area is serviced by local York Region Transit ("YRT")

bus routes. Formerly, York Downs had been located in what is now the City of Toronto between 1922 and 1969, prior to relocating to Markham in 1970.

43. In January 2017, the OMB approved Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications which would facilitate the redevelopment of the 41 hectare Highland Gate Golf Club in the Town of Aurora located on the west side of Yonge Street at Golf Links Road (PL151160). A total of 159 single detached dwellings and a 7-storey, 114-unit high-density residential block were approved. Forty percent of the site is to be conveyed to the Town to be used as parkettes, open space and Environmental Protection Areas. The lands are surrounded by residential development constructed in the 1980s which were developed when parts of the former golf course were closed. The area is serviced by local YRT routes, including the bus rapid transit line on Yonge Street.
44. In July 2017, the OMB approved Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications for the 15.5 hectare Canterbury Common Golf Course in the community of Port Perry in the Township of Scugog (PL160394). A total of 99 residential units were approved, along with a 4-storey senior citizens' residence, 7.58 hectares of open space and 2.78 hectares of Environmental Protection Area.
45. In November 2014, the OMB approved Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications to facilitate the redevelopment of Glenway Country Club, located on the south side of Davis Drive West between Bathurst Street and Yonge Street in the Town of Newmarket (PL130413 and PL100685). The applications facilitated the creation of 742 residential units (233 detached dwellings with medium density and high density blocks), a 0.65 hectare commercial block and 1.2 hectares of parkland. The OMB hearing and decision engaged many of the same issues regarding growth management as are being engaged with the subject proposal.
46. Specifically in Oakville, portions of the existing urban area were formerly used as golf courses, including the White Oaks Golf and Country Club (north side of Dundas Street west of Ninth Line), the Richview Golf and Country Club (northwest quadrant of Upper Middle Road and Bronte Road) and the Saw Whet Golf Course, which is addressed in detail in paragraphs 140 and 141 below. Saw Whet is a 54.8 hectare property, which was approved for redevelopment for 1,181 residential units (Bronte Green).

47. Common to many of the foregoing examples is the fact that these large sites were not initially planned for redevelopment and intensification prior to their closure and/or transition to another use and, accordingly, were the subject of detailed review through site-specific Official Plan Amendment and rezoning applications, as is the case with the subject proposal for Glen Abbey.
48. From a policy perspective, the York Region Planning and Economic Development Department prepared a report titled “Residential Unit Supply Inventory” dated March 5, 2015 and made the recommendation that Council endorse the residential supply inventory as input into the growth scenario and land budget component of the Regional Municipal Comprehensive Review and Regional Plan Update. In order to effectively plan for amended forecast population, it is necessary to understand where and how residential growth will occur in the Region. A number of sources were used in their calculations and estimates including active development applications (registered unbuilt units, draft approved units, proposed units, site plan and condominium units).
49. On page 11 of this report, it was acknowledged that there are other areas within the built-up area that may be candidates for future redevelopment but have not yet been identified as intensification areas with specific targets (i.e. properties with single-storey buildings and could be redeveloped at higher densities, private golf courses inside the built-up area, and other properties not yet been identified specifically for intensification). The report states that the Region possesses the capacity to accommodate a variety of unit types, and densities through intensification, infill and redevelopment plans in the future, up to and beyond the current planning horizon of 2041.

Growth Management Policy Framework

50. In the Greater Toronto and Hamilton area, there is an increasing amount of land use policy. However, it is important to not lose sight of the fact that policy is written for a reason. It is purposive. In the end, it is all about trying to achieve desirable planning outcomes.
51. Faced with an opportunity to redevelop a large site within an existing urban area, the fundamental policy direction is to use urban land and infrastructure efficiently. Accordingly, one must recognize that because the sites are large, their potential to create new housing and jobs is large as well.

52. The policy direction is not, nor should it be, to minimize densities or to use land and infrastructure inefficiently with the objective of generating fewer jobs and fewer housing units; quite the opposite.

Provincial Policy Statement

53. In my evidence, I will review the applicable policies in the 2020 Provincial Policy Statement (PPS). It is noted that, at the time of submission of the Applications, the applicable PPS was the 2014 version. As compared with the 2014 PPS, the 2020 PPS includes an increased emphasis on transit-supportive development, encouraging an increase in the mix and supply of housing, protecting the environment and public safety, reducing barriers and costs for development, and providing greater certainty, and supporting the economy and job creation.
54. In my opinion, the proposed Official Plan and Zoning By-law Amendments are consistent with the PPS, in particular Policies 1.1.1(a), (b) and (e), 1.1.2, 1.1.3.2, 1.1.3.3, 1.1.3.4, 1.1.3.5, 1.2.1, 1.2.4, 1.4.3, 1.5.1, 1.6.3, 1.6.7.4, 1.7.1, 1.8.1, 2.1.1, 2.1.8, 2.6.1, 4.2 and 4.6. Policy 4.2 provides that the PPS is to be read in its entirety and all relevant policies are to be applied to each situation.
55. One of the key policy directions of the PPS is promoting efficient patterns of development and land use. In Part IV of the PPS, which sets out the vision for Ontario's land use planning system, the PPS states:

“The Provincial Policy Statement focuses growth and development within urban and rural settlement areas while supporting the viability of rural areas. It recognizes that the wise management of land use change may involve directing, promoting, or sustaining development. Land use must be carefully managed to accommodate appropriate development to meet the full range of current and future needs, while achieving efficient development patterns and avoiding significant or sensitive resources and areas which may pose a risk to public health and safety. Planning authorities are encouraged to permit and facilitate a range of housing options, including new development as well as residential intensification, to respond to current and future needs.” (My emphasis.)

56. Part IV goes on to state:

“Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. These land use patterns

promote a mix of housing, including affordable housing, employment, recreation, parks and open spaces, and transportation choices that increase the use of active transportation and transit before other modes of travel. They support the financial well-being of the Province and municipalities over the long term, and minimize the undesirable effects of development, including impacts on air, water, and other resources. They also permit better adaptation and response to the impacts of a changing climate, which will vary from region to region.” (My emphasis.)

57. The emphasis in the PPS - - one of its purposes - - is to promote intensification, while permitting greenfield development where necessary. Policy 1.1.2 states that, “within settlement areas, sufficient land shall be made available through intensification and redevelopment and, if necessary, designated growth areas” (my emphasis).
58. In my opinion, the following policies are particularly relevant:
- Policy 1.1.1, which states that healthy liveable and safe communities are sustained by, among other matters: (a) promoting efficient development and land use patterns; (b) accommodating an appropriate range and mix of residential types and other uses; and (e) promoting the integration of land use planning, growth management, transit-supportive development, intensification and infrastructure planning to achieve cost-effective development patterns, optimization of transit investments, and standards to minimize land consumption and servicing costs.
 - Policy 1.1.3.2, which promotes densities, and a mix of land uses which, among other matters: (a) efficiently use land and resources; (b) are appropriate for and efficiently use infrastructure and public service facilities; (c) minimize negative impacts to air quality and climate change and promote energy efficiency; (e) support active transportation; and (f) are transit-supportive, where transit exists or is planned.
 - Policy 1.1.3.3, which directs planning authorities to identify and promote opportunities for transit-supportive development, accommodating a significant supply and range of housing options through intensification and redevelopment, where this can be accommodated taking into account existing building stock or areas and the availability of suitable existing or planned infrastructure and public service facilities.

- Policy 1.4.3, which encourages the provision of an appropriate range and mix of housing options and densities to meet projected needs by, among other things: (d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities and support the use of active transportation and transit in areas where it exists or is to be developed; (e) requiring transit-supportive development and prioritizing intensification in proximity to transit, including corridors and stations; and (f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety.
- Policy 1.6.7.4, which promotes a land use pattern, density and mix of uses that minimize the length and number of vehicle trips and support the current and future use of transit and active transportation.
- Policy 1.7.1, which states that long-term prosperity should be supported by, among other matters: (c) optimizing the long-term availability and use of land, resources, infrastructure and public service facilities.
- Policy 1.8.1, which directs planning authorities to support energy conservation and efficiency, improved air quality, reduced greenhouse gas emissions, and climate change adaptation through land use and development patterns which: (a) promote compact form and a structure of nodes and corridors; (b) promote the use of active transportation and transit in and between residential, employment and other areas; and (e) encourage transit supportive development and intensification to improve the mix of employment and housing uses to shorten commute journeys and decrease transportation congestion.

Growth Plan for the Greater Golden Horseshoe

59. In my evidence, I will review the applicable policies in the 2019 Growth Plan, which was amended by Amendment No. 1 in August 2020. In my opinion, the proposed Official Plan and Zoning By-law Amendments conform with the Growth Plan and, in particular, Policies 2.2.1(2)(c), 2.2.1(3)(c), 2.2.1(4), 2.2.2(1), 2.2.2(2), 2.2.2(3), 2.2.6(1), 2.2.6(2), 3.2.2(1), 3.2.2(3), 3.2.3(1), 3.2.3(2), 4.2.7(1), 4.2.10(1), 5.2.1(1), 5.2.3(2), 5.2.5(1), 5.2.5(3) and 5.2.5(6).

60. As compared with the 2006 Growth Plan which was in effect at the time of submission of the Applications and at the time of adoption and approval of the in-force Region of Halton Official Plan and the Livable Oakville Official Plan, the current 2019 Growth Plan (as amended) includes an increased emphasis on the integration of land use and infrastructure planning and the importance of “optimizing” the use of the urban land supply and infrastructure.
61. In particular, the intensification target (i.e. the proportion of all residential development occurring annually within each upper-tier municipality to be achieved within the built-up area) has been increased from 40% to 50%. In addition, the population forecast for Halton Region to be used for planning and managing growth has been increased from 780,000 in 2031 to 1,100,000 in 2051 (Schedule 3).
62. One of the main themes running throughout the Growth Plan is the optimization of urban land and infrastructure. In Section 2.1, which provides the context for the policies that follow regarding “where and how to grow”, the Plan states that:

“It is important to optimize the use of the existing urban land supply as well as the existing building and housing stock to avoid over-designating land for future urban development while also providing flexibility for local decision-makers to respond to housing need and market demand. This Plan’s emphasis on optimizing the use of the existing urban land supply represents an intensification first approach to development and city-building, one which focuses on making better use of our existing infrastructure and public service facilities, and less on continuously expanding the urban area.” (My emphasis.)

63. The proposed redevelopment would represent “intensification”, as defined by the Growth Plan, in that it would constitute redevelopment. In turn, “redevelopment” is defined as “the creation of new units, uses or lots on previously developed land in existing communities”. Both terms and the associated definitions are identical in the PPS and the Growth Plan.
64. The subject site is located within the “delineated built-up area” of the Town i.e. within the “delineated built boundary”. The “delineated built boundary” mapping for the Region of Halton issued by the Ministry of Public Infrastructure Renewal on April 2, 2008, includes the subject site within the Delineated Built-up Area. The backgrounder released with the mapping, which outlines the methodology used to define the built boundary, specifically indicates that golf courses are considered built-up when inside a settlement area.

65. Policy 2.2.2(1) provides that, by the time the next municipal comprehensive review is approved and in effect, and for each year thereafter, the applicable minimum intensification target is for a minimum of 50% of all residential development occurring annually within the Region of to be within the delineated built-up area (my emphasis).
66. Policy 2.2.2(2) further provides that, until the next municipal comprehensive review is approved and in effect, the annual minimum intensification target contained in the applicable upper- or single-tier official plan that is approved and in effect as of July 1, 2017, will continue to apply. As set out in paragraphs 94 to 105 below, the Halton Region Official Plan is currently under review and new intensification targets will be established to conform with the 2019 Growth Plan.
67. For greater clarity, Policy 5.2.5(1) states that “the minimum intensification and density targets in this Plan ... are minimum standards and municipalities are encouraged to go beyond these minimum targets, where appropriate, except where doing so would conflict with any policy of this Plan, the PPS or any other provincial plan” (my emphasis).
68. Accordingly, the proposed redevelopment of the Glen Abbey Golf Club would contribute to the achievement of the above-noted intensification targets and, to the extent that approval of the redevelopment may result in the Town and Region “going beyond” the minimum intensification target, such a result would be not only permitted but encouraged by the Growth Plan.
69. Policy 2.2.2(3) requires municipalities to “develop a strategy to achieve the minimum intensification target and intensification throughout delineated built-up areas” (my emphasis). The aforementioned strategy will both (a) “identify strategic growth areas to support achievement of the intensification target and recognize them as a key focus for development” and (c) “encourage intensification generally throughout the delineated built-up area”.
70. Following therefrom, it is my opinion that, while the subject site falls within the meaning of a “strategic growth area” under the Growth Plan, as explained below, Policy 2.2.2(3)(c) would encourage intensification of the subject site even if it did not.

71. In that regard, the definition of “strategic growth areas” includes “urban growth centres, major transit station areas, and other major opportunities that may include infill, redevelopment, brownfield sites, the expansion or conversion of existing buildings, or greyfields”. As well, lands “along major roads, arterials, or other areas with existing or planned frequent transit service or higher order transit corridors may also be identified as strategic growth areas”. Strategic growth areas are intended to be the focus for accommodating intensification and higher-density mixed uses in a more compact built form.
72. In my opinion, the subject site is a “major opportunity” and constitutes “redevelopment”. As well, it is noted that “greyfields” are defined as “previously developed properties that are not contaminated”. The definition goes on to say that they are “usually, but not exclusively, former commercial properties that may be underutilized, derelict, or vacant”.
73. Finally, the subject site is located along two major roads (Dorval Drive and Upper Middle Road), which are both served by transit (Oakville Transit Routes 6, 13, 18 and 28), which connect various area neighbourhoods to commercial uses, Sheridan College, the Bronte GO Station and the Oakville GO Station, which is approximately four kilometres (2.5 miles) away. A transit route is proposed along the major collector road that will form the spine of the proposed redevelopment.
74. The introductory text in Section 5.1 states that:

“Where a municipality must decide on a planning matter before its official plan has been amended to conform with this Plan, or before other applicable planning instruments have been updated accordingly, it must still consider the impact of the decision as it relates to the policies of this Plan which require comprehensive municipal implementation.”

Halton Region Official Plan

75. In my opinion, the proposed Official Plan and Zoning By-law Amendments conform with the Halton Region Official Plan and, in particular, with Sections 51, 55, 55.1, 72, 77, 78, 80, 81, 84, 85 and 86. Specifically, the Regional Official Plan includes a number of policies that promote compact, transit-supportive growth and intensification, as well as increased densities.

76. The Halton Region Official Plan is based on The Regional Plan (1995), which was adopted by Regional Council on March 30, 1994, and was subsequently approved, with modifications, by the Minister of Municipal Affairs and Housing on November 27, 1995. Between 2006 and 2009, the Region undertook a planning exercise called Sustainable Halton, which led to another major review of The Regional Plan and resulted in the adoption of Regional Official Plan Amendment 38 by Regional Council on December 16, 2009. The amendment was approved by the Minister of Municipal Affairs and Housing in November 2011 and subsequently appealed to and adjudicated by the OMB from 2012 through 2017, with certain site-specific appeals still outstanding.
77. As a result of the foregoing approval history, the in-force Halton Region Official Plan is consistent with 2005 PPS and conforms with the 2006 Growth Plan. The Region is currently undertaking a Regional Official Plan Review to bring the Plan into consistency/conformity with the 2020 PPS and the 2019 Growth Plan, as detailed in paragraphs 94 to 105 below.
78. Map 1 (Regional Structure) indicates that the subject site is located within the Built Boundary for the Town of Oakville. The subject site is designated *Urban Area*, and the Sixteen Mile Creek adjacent to the proposed redevelopment is designated *Regional Natural Heritage System*.
79. Map 3 (Functional Plan of Major Transportation Facilities) designates both Dorval Drive and Upper Middle Road as “Major Arterials”. Map 5 (Regional Phasing) includes the subject site within “Urban Area with Regional Phasing to 2021”, as distinct from other lands which are identified as “Urban Area with Regional Phasing between 2021 and 2031”.
80. In terms of the relationship between the Regional Official Plan and the Town of Oakville Official Plan, Section 44 states that “the Region's primary role is to provide broad policy directions on strategic matters such as management of land and natural resources, growth strategies, housing, economic development, water and wastewater services, solid waste management, transportation, and health and social services”. Recognizing the above, it goes on to direct that the Local Municipalities are to deal with their local environments to best express their own individualities; for instance, “the structuring of communities and neighbourhoods and the internal configuration of each of the Local Municipalities ... are the responsibilities of the Municipalities as long as the overall planning vision for Halton and policies of this Plan are adhered to”.

81. Section 51 states that the Regional Structure consists of a number of “mutually exclusive” land use designations, including *Urban Area* (where “urban services are provided to accommodate concentrations of existing and future development”) and *Regional Natural Heritage System* (a “system of connected natural areas and open space to preserve and enhance the biological diversity and ecological functions within Halton”).
82. As referenced in Section 55, Table 1 indicates that Halton Region is forecast to grow from a population of 456,000 in 2006 to 780,000 in 2031 (i.e. in accordance with the 2006 Growth Plan forecasts). The Town of Oakville’s population is forecast to grow from 172,000 to 255,000 over that same period.
83. As referenced in Section 55.1, Table 2 indicates that a minimum of 32,000 new housing units are to be added to the Built-Up Area in Halton Region between 2015 and 2031 (representing 40% of the new housing units occurring within Halton Region over that timeframe), of which 13,500 will be in the Town of Oakville.
84. Finally, as referenced in Section 55.2, Table 2A sets out the Regional phasing by 5-year periods between the Built-Up Areas and the Designated Greenfield Areas (for Oakville, 5,068 units inside the Built Boundary from 2017-2021, 4,323 units from 2022-2026 and 4,189 units from 2027-2031).
85. Section 72 sets out a number of objectives for the *Urban Area*, including:
 - accommodating growth in accordance with the Region's desire to improve and maintain regional unity, retain local community identity, create healthy communities, promote economic prosperity, maintain a high quality, sustainable natural environment, and preserve certain landscapes permanently;
 - supporting a form of growth that is compact and supportive of transit usage and non-motorized modes of travel, reduces the dependence on the automobile, makes efficient use of space and services, promotes live-work relationships, and fosters a strong and competitive economy;
 - providing a range of identifiable, inter-connected and complete communities of various sizes, types, and characters, which afford maximum choices for residence, work, and leisure;
 - ensuring that growth takes place “commensurately” both within and outside the *Built Boundary*;

- identifying an urban structure that supports the development of *Intensification Areas*;
 - promoting the adaptive re-use of brownfield and greyfield sites; and
 - facilitating and promoting intensification and increased densities.
86. Section 77(2.1) provides that it is the policy of the Region to direct a minimum of 40% of new residential development occurring annually within Halton in 2015 and every year thereafter to the *Built-Up Area*, through Table 2 and Table 2A (i.e. in accordance with the 2006 Growth Plan).
87. Monitoring policies are set out in Section 77(2.2). The focus of the policies in Sections 77(2.2) and 77(2.3) is on potential “deficits” of new housing units occurring in the *Built-Up Area* and on potential actions to redress such deficits, including limiting the annual number of new housing units occurring in the *Designated Greenfield Area*. In my opinion, it is noteworthy that, while deficits in achieving the intensification target are identified as a potential cause for concern, the policies do not express any concern should the intensification target be surpassed.
88. Sections 78 to 81 address *Intensification Areas*. Section 80 indicates that *Intensification Areas* are parts of the *Urban Area* and consist of *Urban Growth Centres* and *Major Transit Station Areas*, as well as Mixed Use Nodes and *Intensification Corridors* as identified in Local Official Plans, which consist of areas along *Higher Order Transit Corridors* and “selected *Arterial Roads*” within *Urban Areas*, as shown on Map 3.
89. *Intensification Areas* are defined as lands identified by the Region or its Local Municipalities within the *Urban Area* that are to be the focus for accommodating intensification, including *Urban Growth Centres*, *Major Transit Station Areas* (including Metrolinx-designated Mobility Hubs), *Intensification Corridors* and Mixed Use Nodes. In turn, *Intensification Corridors* are defined as identified *Intensification Areas* along major roads, arterials or higher order transit corridors that have the potential to provide a focus for higher density mixed-use development consistent with planned transit service levels.
90. Section 81 states that it is the policy of the Region to direct development with higher densities and mixed uses to *Intensification Areas* and to require the Local Municipalities to prepare detailed official plan policies or an *Area-Specific Plan* for the development of a new *Intensification Area*.

91. An *Area-Specific Plan* is defined as a Local Official Plan Amendment applying to a specific geographic area such as a secondary plan or a Regional Official Plan Amendment applying to a specific geographic area.
92. Sections 84 to 86 address housing. The stated goal in Section 84 is to supply the people of Halton with an adequate mix and variety of housing to satisfy differing physical, social, and economic needs. The objectives in Section 85 include making more efficient use of existing developed lands, housing stock and available services to increase the supply of housing, while maintaining the physical character of existing neighbourhoods.
93. Among other matters, Section 86 provides that it is the policy of Regional Council to adopt as a housing target that at least 50% of new housing units produced annually in Halton be in the form of townhouses or multi-storey buildings.

Regional Official Plan Review

94. The Region of Halton is currently undertaking its Five-Year Official Plan Review, which was initiated on April 16, 2014.
95. The Growth Scenarios Report prepared by Hemson Consulting et al, dated June 2019, stated that meeting Growth Plan intensification policies will require a shift in housing patterns in the Region - - away from single-detached houses and towards apartment forms. Given that a relatively high proportion of households will continue to be families, which have historically preferred ground-related housing, the report commented that achieving this shift in Halton will pose a challenge.
96. In this regard, the Growth Scenarios Report (p. 70) noted that the share of residential building permits inside the built boundary has fallen short of the 50% target in the 2019 Growth Plan between 2011-2018 i.e. 36% Region-wide from 2011-2015 (42% in the Town) and 39% from 2016-2018 (36% in the Town).
97. The report forecast that Oakville's population will increase from 223,700 in 2021 to 267,900 in 2031 and 318,200-340,800 by 2041 (Scenario A). The population range for Scenario B is slightly higher (319,200-342,800). Most of the new growth will be within the built boundary (68% from 2021-2031 and 55%-66% from 2031-2041), amounting to 11,700 units from 2021-2031 and 12,150-14,570 units from 2031-2041 i.e. 24,850-26,270 units from 2021-2041.

98. A total capacity of 39,239 additional units is identified in the six Growth Areas and the Trafalgar Road Corridor, 98.7% of which are apartments. The potential supply of units in Midtown Oakville is estimated to be 11,000, of which 5,680 new units are anticipated by 2031. Additional intensification potential of up to 9,162 units exists outside of the Identified Nodes in the Town's four Neighbourhoods, as well as 3,225 units in the Bronte GO MTSA.
99. Draft Regional Official Plan Amendment No. 48 (ROPA 48) was brought forward to Regional Council on February 17, 2021, and was released for consultation. Draft ROPA 48 is being considered as an amendment to the Regional Official Plan to implement components of the Regional Urban Structure that establishes a hierarchy of strategic growth areas in the Regional Official Plan, which are elements that the Region is required to identify to achieve conformity to the Growth Plan, 2019.
100. Draft ROPA 48 includes a proposed revision to Table 1 to update population and employment "allocations" assigned to Halton Region to 2051 by the Growth Plan, 2019. Further revisions to Table 1 that assign 2051 population and employment "allocations" to Halton's local municipalities are not included as these will be determined at the conclusion of the Integrated Growth Management Strategy, which is currently ongoing.
101. Revisions to the Urban Area policies are proposed to define a Regional Urban Structure that identifies a hierarchy of Strategic Growth Areas, differentiates between elements of a Regional Urban Structure and Local Urban Structure, and establishes objectives and policies to require local urban structures to be municipality initiated.
102. A new Map 1H (Regional Urban Structure) is proposed to be added to the Regional Official Plan, which would identify Urban Growth Centres, Major Transit Station Areas (MTSA's), Primary Regional Nodes, Secondary Regional Nodes and Higher Order Transit Corridors, among other matters.
103. Components of the Regional Urban Structure not initially covered through draft ROPA 48 will be considered through the balance of the Regional Official Plan Review that is continuing, in part, through the Integrated Growth Management Strategy work. Regional staff report No. LPS17-21 (February 17, 2021) states that it is expected that a subsequent amendment will be presented later in 2021.

104. In its comments on the Integrated Growth Management Strategy dated July 15, 2019, Town Planning staff concluded that expanding the existing designated greenfield within Halton “does not make sense for Oakville”. Furthermore, “redirecting growth that might otherwise occur in Oakville also does not make sense for Oakville”. The report goes on to state that “Oakville must be ‘all-in’ with respect to accepting growth – simply choosing a ‘middle-ground’ or ‘no-growth’ position would be detrimental to Oakville”.
105. The Discussion Paper (Appendix A) states that “saying ‘no to growth’ will not save Oakville from the effects of growth” and, further, that “the way forward for Oakville requires a change from the status quo” and that Oakville “must fully embrace a shift to apartment style housing from ground oriented housing as the primary way to accommodate growth, particularly in our planned nodes and corridors”. The *Discussion Paper* observes that:

“Simply accommodating growth through car-dependent, lower-density, ground-oriented neighbourhoods by expanding greenfield areas and building predominantly ground-oriented housing in our existing greenfield areas is not good enough... It is not enough to just grow to minimum densities that in theory can support transit. We actually need to get people to choose to live without a car – we need people to shift to a new lifestyle in Oakville and the region. This can only be accomplished by creating complete communities with enough people living in a small area that can accomplish their daily lives either through walking, rolling, biking, and taking transit. Vertical forms of housing — such as apartment housing — is a vital ingredient to building complete communities that will enable a large number of people to choose to live without a car.”

Livable Oakville Official Plan

106. In my opinion, the proposed Official Plan and Zoning By-law Amendments are generally in keeping with the Livable Oakville Official Plan, with the exception of the existing *Private Open Space* designation on the tablelands portion of the subject site, which reflects the previous and current use of the subject site.
107. The proposed Official Plan Amendment would redesignate the subject site to “Low Density Residential”, “Medium Density Residential”, “High Density Residential”, “Main Street 2 – Exception XX”, “Community Commercial – Exception XX”, “Open Space” and “Natural Area”. As well, the Official Plan Amendment would add policy

exceptions applicable to the proposed *Main Street 2* and *Community Commercial* designations.

108. David Capper will address the details of the Official Plan Amendment and Parts D and E of the Livable Oakville Plan (among other portions), while I will focus on Parts B and C of the Plan and, to a lesser extent, Part F.
109. The Livable Oakville Plan (2009 Town of Oakville Official Plan) was prepared to conform with the Growth Plan for the Greater Golden Horseshoe, 2006, as required by the *Places to Grow Act*, 2005. It replaced the policies contained in the 1984 Town of Oakville Official Plan, and applies to all lands within the Town except the North Oakville East and West Secondary Plan areas.
110. The Livable Oakville Plan was adopted by Town Council on June 22, 2009. It was approved by the Region on November 30, 2009, with modifications. A number of parties appealed the Region's approval of the Livable Oakville Plan to the OMB, which approved the Livable Oakville Plan with further modifications, on May 10, 2011.
111. On Schedule A1 (Urban Structure), the subject site is designated *Residential Areas*. In addition to the Residential Areas, six Growth Areas are designated (Midtown Oakville, Downtown Oakville, Uptown Core, Kerr Village, Bronte Village and Palermo Village) as well as five Major Commercial Areas and five Employment Areas.
112. On Schedule A2 (Built Boundary and Urban Growth Centre), the subject site is located within the Built Boundary.
113. On Schedule C (Transportation Plan), Dorval Drive and Upper Middle Road are identified as Major Arterials.
114. In Part B, Section 2, three Guiding Principles are set out in Policies 2.2.1, 2.2.2 and 2.2.3. The Guiding Principles include preserving and creating a livable community in order to direct the majority of growth to identified locations where higher density, transit and pedestrian oriented development can be accommodated; providing choice throughout the Town in order to enable the availability and accessibility of a wide range of housing, jobs and community resources to meet the diverse needs of the community through all stages of life; and achieving sustainability in order to achieve sustainable building and community design.

115. In Part B, Section 4.4 addresses Intensification Targets. Table 3 indicates a target of 14,390 new residential units within the Built Boundary between 2015 and 2031. The table includes a footnote that the intensification targets within the Growth Areas do not include potential bonused residential units.
116. The section goes on to state that the intensification target of 14,390 residential units within the built boundary is intended to provide for units “which can be built as a result of developments that conform to this Plan”. It goes on to provide that the minimum heights and densities as set out in the land use designations in Part D and the policies set out in Part E of the Plan shall be maintained to achieve the minimum intensification target of 13,500 units, as required by the Region of Halton Official Plan, and that no zoning by-law shall be approved which would preclude meeting this minimum intensification target.

Urban Structure

117. In Part C of the Livable Oakville Official Plan, Section 3 includes a description of the Town’s urban structure. While the description references the Residential Areas, Major Commercial Areas, Employment Areas and Growth Areas shown on Schedule A1, it does not provide a detailed description of these three structural elements.
118. The description is limited to the following:
- “Oakville is also characterized by major activity centres that are located at the intersections of the QEW with Trafalgar Road and with Dorval Drive, and in the historic downtowns of Oakville and Bronte. The major employment areas generally lie adjacent to the QEW and Highway 403, providing excellent access to the Greater Toronto Area. The Town has a number of stable residential communities with distinct neighbourhoods as well as Growth Areas characterized by a concentration of mixed uses.”*
119. Section 3 does not include detailed policies associated with the Residential Areas, Employment Areas and Growth Areas. Rather, it goes on to list and describe nine categories of land use designations, “which recognize and shape Oakville’s urban structure”.
120. For the Residential land use designations, Section 3.1 states that the majority of the residential neighbourhoods in the Town are designated for low density residential

uses to ensure a continuation of the existing neighbourhood structure. It goes on to say that medium and high density areas are also provided for in existing communities “primarily to reflect developments that are already in place”.

121. In my opinion, despite the statement that medium and high density areas “primarily” reflect existing developments, the foregoing description does not preclude the designation of new medium or high density residential areas. In fact, as described in paragraphs 139 to 144 below, there are numerous existing and approved medium and high density areas located within the Residential Areas outside of the Growth Areas.
122. Section 3.2 addresses the Mixed Use designations and states that they are to be “primarily focused” within the Growth Areas and in specified locations reflective of an area’s planned function. It goes on to say that the six Growth Areas shown on Schedule A1 provide for a concentration of mixed use, higher density, development.
123. The Natural Area and Open Space designations are described in Sections 3.6 and 3.7. The Natural Area designation identifies and ensures the long-term preservation of the existing natural heritage system, which includes natural features such as wetlands, woodlands and valleylands, while the Open Space system provides land and locations for public and private recreational opportunities and physical linkages that enhance the community and neighbourhood character.
124. In my opinion, the proposed redevelopment conforms with the Urban Structure policies set out in Section 3, and no amendment to Schedule A1 (Urban Structure) is proposed.
125. Section 4, Managing Growth and Change, indicates the policies of the Official Plan relating to the management of growth and change are intended to implement the mission statement and guiding principles of Part B, and that many of the principles reflect those of Provincial policies and plans which provide for a significant shift to a more compact urban form and intensification within the built-up area.
126. The Plan’s land use planning framework is intended to direct and manage growth to 2031, based on a forecast population growth from 165,000 in 2006 to 255,000 in 2031.
127. It goes on to say that the population and employment growth in the Town is intended to be accommodated through the development of the Residential and Employment

Areas within the existing built boundary shown on Schedule A2 (Built Boundary and Urban Growth Centre), as well as within greenfield areas.

128. Furthermore, Section 4 states that, within the existing built boundary shown on Schedule A2, growth is to occur “primarily” within the defined Growth Areas in Part E (Midtown Oakville, the Uptown Core, Palermo Village, Kerr Village, Bronte Village and Downtown Oakville) and that “intensification outside of the Growth Areas is to be provided in accordance with the policies as set out in this Plan”.
129. In this regard, the Official Plan provides limited policy direction regarding intensification outside of the Growth Areas, such as is proposed by the Applications. The Plan states that, “in managing growth and change, the use of existing infrastructure and public service facilities should be optimized wherever feasible before consideration is given to the development of new infrastructure”.
130. Section 4.1 states that “the majority of intensification” in the Town is to occur within the Growth Areas as defined in Part E, while Section 4.3 states that it is the policy of the Plan that “the key focus” for development and redevelopment to accommodate intensification will be the locations identified as Growth Areas.
131. The policy is premised on the statement that lands outside of Growth Areas are “predominantly stable residential communities which consist of established neighbourhoods”. While the Plan encourages intensification generally throughout the built-up area, it also recognizes that some growth and change may occur in these areas provided the character of the areas is preserved and the overall urban structure of the Town is upheld.
132. The Glen Abbey Golf Club is not an “established neighbourhood”, although is part of the Glen Abbey Residential Area on Schedule A1. Only the final sentence of Section 4.3 appears to contemplate situations such as the proposed Glen Abbey redevelopment. It provides simply that “intensification outside of the Growth Areas, including additional intensification opportunities such as infill, redevelopment and greyfield and brownfield sites, will be considered in the context of this Plan”.
133. As noted previously, it is my opinion that the proposal constitutes “redevelopment”. It is noted that the terms “infill” and “redevelopment” are not defined by the Livable Oakville Plan.

134. Based on the foregoing, it is my opinion that the scale of development being proposed with the proposed Glen Abbey redevelopment does not neatly fit within the dichotomy that has arguably been set up in Section 4 as between Growth Areas and stable residential communities. The potential for redevelopment of large sites is not directly addressed by the Official Plan, other than the singular reference to “redevelopment” as noted above.
135. In my opinion, the Official Plan’s urban structure policies would permit the proposed redevelopment to proceed without an amendment to Schedule A1 (Urban Structure) or the associated policies, given that the policies provide simply that growth is to occur “primarily” in the designated Growth Areas and that “the majority of intensification” will occur in the designated Growth Areas. With the proposed development of 3,222 residential units on the Glen Abbey lands, those statements will remain true.
136. In that regard, the Region’s June 2019 Growth Scenarios report identified a total capacity of 51,626 additional units within the Town’s built boundary at that time, including a total capacity of 39,239 units in the six Growth Areas and the Trafalgar Road Corridor, 3,225 units in the Bronte GO MTSA (as planned at that time) and 9,162 units outside of the Identified Nodes. This information is noted as being provided by Town staff.
137. As indicated in paragraph 151 below, the Town is now proposing that the Bronte GO MTSA be planned for 5,800 units and that it be identified as a Growth Area (Node). That would bring the total potential capacity to 54,201 units, of which 9,162 units would be located outside the designated Growth Areas.
138. The 3,222 units would represent 5.6% of the total capacity and, together with the existing 9,162 units outside of the Identified Nodes, would result in a total of 21.6% of the total being outside the designated Growth Areas. Accordingly, “the majority of intensification” (78.4%) would continue to be planned within the designated Growth Areas.
139. Furthermore, as noted in paragraph 121 above, despite the statement in Section 3.1 of the Official Plan that medium and high density areas “primarily” reflect existing developments, there are numerous High Density Residential and Medium Density Residential designations located outside of the Growth Areas, including a number of such designations that were not yet developed at the time of adoption of the Official Plan and some that still remain to be developed.

140. In particular, the Bronte Green development was approved by the OMB in June 2017 on consent with the Town through OPA 13 (LPAT File PL141318). Bronte Green is located on the east side of Bronte Road, with limited frontage on Upper Middle Road. It was formerly the Saw Whet Golf Course and, like the subject site, was a large site that was formerly designated *Private Open Space* with no residential permissions.
141. However, it was considerably smaller than the subject site (54.8 hectares vs. 92.7 hectares) and was initially proposed by the applicant for predominantly low density residential uses, with a total of only 800-875 residential units. As part of the settlement with the Town, the Town required an increase in the number of residential units to approximately 1,181 units in total, including two High Density Residential blocks located along the Bronte Road frontage and a third High Density Residential block at the corner of Bronte Road and Upper Middle Road.
142. Another recent case has to do with a proposed redevelopment at 2220 Marine Drive (LPAT File PL171222). In that case, the site was located within a sizeable apartment neighbourhood just outside of the Bronte Village Growth Area, which includes an existing 19-storey, 149-unit apartment building at 2220 Marine Drive, two 22-storey buildings at 2170 and 2180 Marine Drive, a 17-storey building at 2263 Marine Drive, a seniors' residence with buildings of 9 and 12 storeys (2220-2222 Lakeshore Road West) and two 15-storey buildings at 2175 and 2185 Marine Drive. The intensification proposed in that case was for a 4-storey 27-unit building which required an Official Plan Amendment to increase the permitted density in the High Density Residential designation. On appeal, the LPAT approved the requested Official Plan Amendment and rezoning notwithstanding the Town's opposition based on growth management principles.
143. Other Official Plan Amendments approving intensification on lands outside of the Growth Areas identified in the Livable Oakville Plan include OPA 2 (Nautical Lake Investments) which took effect October 16, 2012 (By-law 2012-054). OPA 2 redesignated the lands located at the northeast corner of Great Lakes Boulevard and Nautical Boulevard from *Neighbourhood Commercial* to *Medium Density Residential* to facilitate the development of 36 multiple attached residential dwellings.
144. OPA 23, adopted on December 15, 2017, redesignated the 6.7 hectare site of the former Oakville Trafalgar Memorial Hospital (OTMH) from *Institutional* to *Low Density Residential* and *Medium Density Residential* to allow for public uses (a

community centre and park) and residential uses (19 detached dwellings, 16 townhouses and seniors-oriented housing).

145. For the reasons noted above, it would not be necessary in my opinion to amend Schedule A1 to identify Glen Abbey as a Growth Area in order to permit the proposed redevelopment. In particular, there is no policy requirement to do so and no such amendment was required for Bronte Green. As well, a Growth Area designation would not be a particularly good fit, recognizing that the Growth Areas are planned as mixed use areas, while the proposed Glen Abbey development is predominantly residential. Furthermore, based on my review of other large scale redevelopment sites in other municipalities, such an approach would not be typical.
146. While it would not be necessary, I would not be opposed to an amendment to Schedule A1 to identify Glen Abbey as a Growth Area if such an amendment were determined by the LPAT to be desirable. Similarly, I would not be opposed to identifying Glen Abbey as a Special Intensification Area or some similar identification.

Oakville Official Plan Review

147. On May 11, 2015, Planning and Development Council received a staff report at a Special Public Meeting launching the Official Plan Review. The intent of the Official Plan Review is to consolidate and harmonize the Town's official plan documents under the Livable Oakville Plan and to ensure conformity with current and updated provincial legislation, the Halton Region Official Plan and eventually Halton Region's five-year municipal comprehensive review.
148. In addition to OPA 15 (described in paragraphs 152 to 165 below), the Town has adopted OPA 16 (Cultural Heritage Policy Update) as well as Official Plan Amendments applying to the Bronte Village, Kerr Village and Downtown Oakville Growth Areas (OPA's 18, 19 and 20, respectively) and the Speers Road Corridor (OPA 27). It has also adopted OPA 26, amending the Commercial and Employment policies.
149. The Town is currently proposing to amend the Official Plan to add two more Growth Areas (the Bronte GO Major Transit Station Area and the Hospital District), bringing the total to 8 Growth Areas.

150. A draft Official Plan Amendment for the Hospital District was brought forward to Planning and Development Council on November 23, 2020, and was referred to a Special Planning and Development Council workshop on February 2, 2021. The proposed development would include 4,797 residential units (all apartments), resulting in a population of 6,856, together with 10,659 jobs.
151. The draft Official Plan Amendment for the Bronte GO Major Transit Station Area, which was brought forward to Planning and Development Council on May 10, 2021, indicates that it is planned to accommodate approximately 5,800 residential units and 997,000 square metres of retail, service commercial and employment space, resulting in approximately 8,200 residents and 18,600 jobs, for an estimated 26,800 residents and jobs.

OPA 15

152. Official Plan Amendment No. 15 (OPA 15) was adopted on September 27, 2017, approximately 11 months after the submission of the Applications and at the same meeting at which Town Council refused ClubLink's Applications. OPA 15 was approved by the Region on April 26, 2018. ClubLink appealed OPA 15, in part, to the OMB (now the Local Planning Appeal Tribunal) and those portions are therefore not in force (i.e. Items 1, 2 and 6).
153. I will assess the portions of OPA 15 that remain under appeal for consistency with the PPS and conformity with the Growth Plan.
154. In addition, although OPA 15 was not in effect on the date the Applications were submitted, I will assess the Applications in the context of OPA 15 in the event that the Tribunal determines it is relevant or applicable to the Applications.
155. The amended Schedule A1 would continue to identify the Glen Abbey lands as Residential Areas, with the 16 Mile Creek valley identified as part of the Natural Heritage System. A symbol is proposed to be added in the general vicinity of the subject site along its Dorval Drive frontage indicating "Heritage Conservation Districts/Cultural Heritage Landscapes". Dorval Drive and Upper Middle Road are identified as Major Transportation Corridors and Upper Middle Road is also identified as a Major Active Transportation Connection.
156. The amendments to Schedule A1 would also introduce a "Parks, Open Space and Cemeteries" structural element; however, it is not proposed to apply to the subject

site. Parks, Open Space and Cemetery areas are described in the proposed text as including “publicly accessible land and locations for recreational opportunities and physical linkages that enhance the Town’s character and quality of life, as well as contributing to sustainability”.

157. The amended Schedule A1 would have considerably more detail than the current Schedule A1. Instead of the Growth Area category, which would be deleted, the six existing Growth Areas would be identified as part of a “Nodes and Corridors” structural element. That element would also include a Corridor along both sides of Trafalgar Road and along portions of the north side of Dundas Street West in North Oakville. A Node is also shown at the intersection of Neyagawa Boulevard and Burnhamthorpe Road in North Oakville.
158. “Nodes and Corridors for Further Study” include the Health Oriented Mixed Use Node at Third Line and William Halton Parkway, the Bronte GO Station and Cornwall Road.
159. The proposed Urban Structure policies would add a statement that the urban structure elements “are not intended to be land use designations and are not intended to grant development rights or to predetermine the specific land uses that will be permitted on any particular parcel of land”. Rather than referencing nine land use designation categories, the revised policies would reference 15 structural elements.
160. The Residential Areas element is described as including low, medium and high density residential uses as well as a range of compatible facilities such as schools, places of worship, recreational and commercial uses that serve the residents of the Town. It goes on to indicate that “some growth and change may occur in the Residential Areas provided the character of the area is preserved and the overall urban structure of the town is upheld”. It also indicates that the character of the Residential Areas will be significantly influenced by their relationship to the Natural Heritage System, parks and open space areas.
161. The Nodes and Corridors element is described as being “key areas of the Town identified as the focus for mixed use development and intensification” and are referred to in the Official Plan as Growth Areas and corridors. OPA 15 also proposes that a statement be added to the effect that “the Nodes and Corridors identified in this Plan and in the North Oakville Plans comprise the town’s strategic growth areas as that term is defined in the Growth Plan, 2017”.

162. It is noted that, other than the above, the amended Urban Structure policies would provide no policy guidance regarding intensification outside of Nodes and Corridors (i.e. outside what the Town deems to comprise “strategic growth areas”). In this regard, the amendments to Section 29 added a definition of “strategic growth area” taken directly from the 2017 Growth Plan.
163. As adopted, the proposed amendments to Section 28 included a new Policy 28.1.3 requiring a “municipal comprehensive review” for the identification of new “strategic growth areas” and significant changes to the boundaries of existing “strategic growth areas”. I understand that the Town is no longer seeking approval of Policy 28.1.3 and I will therefore not address it, other than to say that it is my opinion that a “municipal comprehensive review” is not required for the identification of new “strategic growth areas” or changes to the boundaries of existing “strategic growth areas”, as those terms are defined in the Growth Plan and the Livable Oakville Plan.
164. As well, OPA 15 proposes to add a new Section 28.2 dealing with Site-Specific Official Plan Amendments. Policy 28.2.1 provides that “the Town shall evaluate site-specific amendments to this Plan within the context of the goals, objectives and policies of this Plan”.
165. Proposed Policy 28.2.3 would require applications for Site-Specific Official Plan Amendments to demonstrate that the proposed amendment is “consistent with the Town’s mission and guiding principles” and “does not undermine the Town’s urban structure in terms of directing growth to identified nodes and corridors, and ensuring their timely development in a manner that makes effective and efficient use of existing and planned investment and achieves the planned objectives for these areas”, among other matters.
166. In my opinion, OPA 15 as adopted is not consistent with the PPS, does not conform with the Growth Plan and does not represent good planning. It does not reflect the policy direction in the PPS and Growth Plan to optimize and make efficient use of land and infrastructure, nor does it include explicit policy direction encouraging intensification generally throughout the built-up area.
167. To the extent that the absence of any such explicit policy direction may be interpreted to limit appropriate growth and intensification throughout the Town generally and especially within the existing built-up area, or on the subject site in

particular, it is my opinion that the result would be contrary to the overarching policy intent of the PPS and the Growth Plan and would not represent good planning.

168. As well, while OPA 15 states that the identified Nodes and Corridors (which are said to “comprise the town’s strategic growth areas”) are identified as “the focus for mixed use development and intensification”, Policy 2.2.1(2)(c) of the Growth Plan directs that growth will be focused on various locations, and not only in “strategic growth areas”, including in delineated built-up areas, locations with existing or planned transit and areas with existing or planned public service facilities.
169. Further, by saying that the identified Nodes and Corridors “comprise” the strategic growth areas, OPA 15 fails to recognize the potential for other strategic growth areas. The Growth Plan definition makes it clear that “strategic growth areas” are not limited to identified “nodes and corridors”.
170. While, in my opinion, OPA 15 would not need to be modified to identify the Glen Abbey lands as “Nodes and Corridors” or in some other fashion so as to distinguish it from other lands within the Residential Areas structural element in order to permit the proposed redevelopment, I would not be opposed to such a modification if determined by the LPAT to be desirable.
171. As noted in the Town staff report dated May 4, 2017, the “Urban Structure Review Policy Directions Report”, dated May 2017, undertaken by Macaulay Shiomi Howson et al (the “Policy Directions Report”), which supported OPA 15 was undertaken both as a land use planning policy study required to review the Town’s urban structure and policies outlined in the Official Plan and as one of three land use policy studies required to be completed under Interim Control By-law 2016-024 restricting land uses on the Glen Abbey Golf Course.
172. The Policy Directions Report mentioned the Glen Abbey redevelopment proposal only once, in passing, stating as follows:

“There were other sites in Oakville that were considered as possible locations for additional/expanded nodes and corridors such as the Glen Abbey golf course lands, and the former hospital site. As these sites do not meet the above criteria, and therefore are not appropriate areas for a new node or corridor, they are not included in Table 1.”

173. Consistent with the foregoing, the report focused on Nodes (Growth Areas) and Corridors, noting that “the concept of the development of nodes and corridors reflects directions in the Places to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan), the HROP and the current and previous Town Official Plans, as well as the North Oakville Secondary Plans”.
174. In addition to the six Growth Areas, the report recommended Additional/Expanded Nodes and Corridors including the Bronte GO Station Area, the Health Oriented Mixed Use Node, the lands north of the QEW in the Trafalgar Road Corridor, including Oakville Place, and Palermo North, as well as the potential for modifications to the Uptown Core and Neyagawa Urban Core Area boundaries and recognition of the south side of Dundas Street as a corridor with its boundary to be defined through further study.
175. On page 18, the report states:
- “In accordance with Provincial, Regional and local planning policy, potential future nodes and corridors should be planned as mixed use centres with transit-supportive development focused around major transit and along corridors. Intensification outside of the nodes and corridors within residential areas should be subject to policies that are intended to ‘maintain and protect the existing character of those communities’ as established in Section 11 of the Livable Oakville Official Plan.”*
176. The Policy Directions Report did not reference nor take into consideration the Growth Plan’s direction to encourage intensification generally throughout the delineated built-up area. Nor did it address in any way the intended planning approach to large sites, such as the subject site.
177. In contrast, the Residential Intensification Study prepared in support of the Livable Oakville Plan explicitly considered future intensification in Oakville’s Residential Areas. The Background Analysis & Directions Report prepared by Macaulay Shiomi Howson et al, dated February 2009, differentiated between three categories of intensification within Residential Areas i.e. stable residential areas and transitional areas (Levels 1-3), residential area edges (up to Level 4) and “potential redevelopment areas – special sites” (up to Level 5).
178. With respect to the latter category, the Residential Intensification Study stated that:

“The concept of stable residential areas does not mean that there will be no change over time, although most change will be minor and gradual. However, situations will arise where a significant existing land use may seek to redevelop, either because the use closes, moves or wishes to redevelop on its current site. Each situation will be unique. However, certain commonalities allow a policy framework to be developed to guide the Town’s evaluation of such applications. The policy directions would require the submission of significant studies as a basis for this evaluation, particularly where changes are proposed to a public or institutional use.” (My emphasis.)

179. The Residential Intensification Study noted that, currently, it is possible to identify a number of sites which could be classified as Potential Redevelopment Sites; however, additional sites may become evident over time (e.g. institutional lands such as the rear portion of Sheridan College). Therefore, the Study stated that “it is necessary not only to recognize existing sites, but to provide a policy framework for the evaluation of redevelopment applications in the future “.
180. Level 5 is described as “redevelopment of a large individual site for high density residential/mixed development which may also include some low-medium density residential development”. Level 6 is “Redevelopment of Node and/or Corridor (e.g. Midtown) for high density mixed use development”.
181. In my opinion, the proposed Glen Abbey redevelopment would fall within the category of a “Potential Redevelopment Area – Special Site” and would be appropriate for a level of intensification up to Level 5. It is noteworthy in my opinion that this level of nuance and balance in addressing Residential Areas is absent from the May 2017 Policy Directions Report prepared in support of OPA 15.

Growth Management Impacts

182. In my opinion, the approval of the proposed Glen Abbey redevelopment would not “undermine” the Town’s urban structure.
183. In addressing this concern, it is important to recognize that the “planned urban structure” is a planning invention. A planned urban structure is appropriate as a simplifying organizing principle. However, it is of necessity a simplification of reality that lacks nuance and balance. In particular, a city or a town does not consist solely of growth areas (nodes and/or corridors) and stable residential areas. Growth areas often include within them areas that are stable, while residential areas typically

include sub-areas or individual sites that can appropriately accommodate growth and intensification. Thinking too simplistically about such matters has the potential to create a false dichotomy that does not assist in making good planning decisions but rather creates barriers that stand in the way of that objective.

184. In this regard, as noted above, the Town's built-up area already includes a balance of opportunities for intensification, including 39,239 units (81.1%) in the six Growth Areas and the Trafalgar Road Corridor (i.e. not including the Bronte GO MTSA) and 9,162 units (18.9%) outside of the Identified Nodes.
185. As currently proposed, the Bronte GO MTSA would add an additional 5,800 units within the Growth Areas, while the Glen Abbey redevelopment would add 3,222 units, marginally shifting the balance to 78.4% inside and 21.6% outside. In my opinion, that shift in balance would not result in any fundamental change to the Town's urban structure.
186. Furthermore, it is my opinion that there is no basis on which it could be concluded that approval of the proposed Glen Abbey redevelopment would redirect significant growth from other nodes and corridors and delay the achievement for the full potential of the existing system.
187. First, in my experience, development in the Greater Golden Horseshoe does not work that way. The housing market in the Town of Oakville is not a closed system. Adding new opportunities for intensification is not a zero sum game. If additional housing options are added on the subject site, or for that matter in the Bronte GO MTSA, that need not be at the expense of intensification in Midtown Oakville or the Uptown Core.
188. Because it is not a closed system, intensification on the subject site could result in growth being attracted from adjacent municipalities such as Mississauga or Hamilton. Equally, growth could be diverted from greenfield areas in the Town, resulting in the Town and Region exceeding their minimum intensification targets. As noted above, the Growth Plan is clear that the intensification target is a minimum and nothing prevents a municipality from going beyond that target.
189. Second, the policy requirement to accommodate intensification in the Town's built-up urban area has increased significantly since the Glen Abbey redevelopment was proposed and since the current intensification targets of 13,500 units and 14,390 units were established in the Town and Region Official Plans.

190. The increase in the minimum intensification target in the Growth Plan from 40% to 50% on its own represents a 25% increase in the required number of residential units i.e. an additional 3,375 to 3,600 units, more than the number of units proposed as part of the Glen Abbey redevelopment.
191. Furthermore, extending the planning horizon from 2031 to 2051 will significantly increase the number of units required to achieve the intensification target. While the intensification targets have not yet been updated, the Region's June 2019 Growth Scenarios report forecast that the number of units required between 2031 and 2041 (12,150-14,570 units within the built boundary) would exceed that required between 2021 and 2031 (11,700 units). Forecasts of required growth between 2041 and 2051, which have not yet been prepared, would add further to those requirements.
192. While the potential capacity (48,401 units excluding the Bronte GO MTSA and the Glen Abbey redevelopment) exceeds the forecast requirements to 2041, that is not unusual in my experience and is not an appropriate rationale for refusing to approve additional intensification. Recognizing that the intensification supply includes sites that require redevelopment of existing uses, it is not unusual for the potential supply to exceed the forecast demand. In fact, "excess" supply is required in order to ensure that the forecast demand can actually be met.
193. In proposing to introduce additional supply, neither the May 2017 Policy Directions Report nor the current planning initiatives for the Bronte GO Station MTSA raised any issue about the potential for those additional 5,800 units to redirect significant growth from other nodes and corridors or to delay the achievement of planned intensification in Midtown Oakville or the Uptown Core.

Housing Options

194. The analysis of intensification and urban structure as set out above has another dimension, which is reflected in the PPS and Growth Plan, that is, the provision of housing options (see, for example, Policies 1.1.3.3, 1.4.1, 1.4.3 and 1.7.1 of the PPS and Policies 2.2.1(4)(c) and 2.2.6(1) of the Growth Plan).
195. The emphasis on the provision of housing options has been added since the 2014 PPS and the 2006 Growth Plan, although Policies 1.4.1 and 1.4.3 of the 2014 PPS included reference to "housing types". In my opinion, there is a clear and deliberate policy intent in both documents to emphasize the need "to plan for a range and mix

of housing options, including additional residential units and *affordable* housing and, in particular, higher density housing options that can accommodate a range of household sizes in locations that can provide access to transit and other amenities” (Growth Plan, Section 2.1).

196. The proposed Glen Abbey redevelopment would provide a range and mix of “housing options”, including 2,782 apartments, as well as 299 townhouse forms (including street townhouses, stacked townhouses, back-to-back townhouses and stacked back-to-back townhouses) and 141 detached dwellings and would accordingly give effect to the policy directions set out in the current PPS and Growth Plan.
197. As well, in the preamble in Section 11 of the Livable Oakville Plan, a number of objectives are set out which apply to all Residential Areas in the Town, including encouraging an appropriate mix of housing types, densities, design and tenure throughout the Town and promoting housing initiatives to facilitate revitalization, compact urban form and an increased variety of housing alternatives, as well as maintaining, protecting, and enhancing the character of existing residential areas.
198. It is my opinion that a mix and range of housing options, including a sizeable proportion of apartments (86%), is necessary and desirable in order to achieve the policy direction to optimize and make efficient use of urban land and infrastructure. As recognized in the Town staff’s July 15, 2019, discussion paper responding to the Region’s Integrated Growth Management Strategy, “the way forward for Oakville requires a change from the status quo” and that Oakville “must fully embrace a shift to apartment style housing from ground oriented housing as the primary way to accommodate growth”.
199. The result of the foregoing policy direction, when applied to a large site such as the subject site, is a significant number of units. Within the policy context described in this witness statement, it is my opinion that that would be a desirable outcome from a planning policy perspective.

Review and Summary of Planning Issues

200. In my evidence, I will address the Issues List related to the proposed Official Plan Amendment and Zoning By-law Amendment, specifically Issues 3, 5-9, 43-46, 93, 94, 98, 105-107, 110, 111, 113 and 114, as summarized in paragraphs 201 to 258 below.

Issues List

Issue #3: In determining that the Applications should be refused, did the Town appropriately apply the policies of the Provincial Policy Statement and Growth Plan regarding intensification and the efficient use of land and infrastructure given the policy requirement in those documents that the significant cultural heritage landscape on the property shall be conserved?

201. No. In my opinion, the Town did not appropriately apply the policies of the Provincial Policy Statement and Growth Plan regarding intensification and the efficient use of land and infrastructure given the policy requirement in those documents that the significant cultural heritage landscape on the property shall be conserved.
202. The PPS and the Growth Plan both direct that they are to be read in their entirety and all relevant policies are to be applied to each situation. While in other cases this may require the balancing and reconciling of planning objectives, in this case the Applications achieve both the policy objectives promoting intensification and the efficient use of land and infrastructure and the policy objectives related to the conservation of significant cultural heritage landscapes.
203. Furthermore, in my opinion, the Town's decision to refuse the Applications did not give sufficient weight to the Provincial policies promoting intensification and the efficient use of land and infrastructure.

Issue #5: Do the Applications adequately consider the impact of the proposed redevelopment on the Town's urban structure as provided for in the Livable Oakville Plan, including sections 3, 4, 11 (preamble), and 11.1.8, Schedule A1, the North Oakville East Secondary Plan and North Oakville West Secondary Plan, and do the Applications uphold or undermine the Town's urban structure?

204. Yes. In my opinion, the Applications adequately consider the impact of the proposed redevelopment on the Town's urban structure as provided for in the Livable Oakville Plan, including sections 3, 4, 11 (preamble), and 11.1.8, Schedule A1, the North Oakville East Secondary Plan and North Oakville West Secondary Plan. Furthermore, it is my opinion that the Applications uphold, and do not undermine, the Town's urban structure.

205. Paragraphs 182-193 above specifically consider the impact of the proposed redevelopment on the Town's urban structure, and paragraph 182 concludes that the approval of the proposed Glen Abbey redevelopment would not "undermine" the Town's urban structure for the reasons set out in paragraphs 183-193.
206. In my opinion, the preamble to Section 11 essentially repeats the policies in Sections 4.1 and 4.3 that I have addressed at length in paragraphs 128-138 above.
207. In addition, it is my opinion that Section 11.1.8 of the Livable Oakville Plan, the North Oakville East Secondary Plan and North Oakville West Secondary Plan, which I did not address in the body of my witness statement, do not apply to the Applications. Section 11.1.8 applies to intensification within stable residential communities on lands that are already designated *Low Density Residential*, *Medium Density Residential* and *High Density Residential*. The tablelands portion of the subject site is currently designated *Private Open Space*, with the exception of a small portion that is designated *Low Density Residential* and is not currently being used for residential purposes as part of a stable residential community.

Issue #6: Do the Applications propose an unplanned strategic growth area in the context of the Town's urban structure as provided for in the Livable Oakville Plan, including sections 3, 4, 11 (preamble), and 11.1.8, Schedule A1, the North Oakville East Secondary Plan and North Oakville West Secondary Plan, considering matters such as geographic area, population and employment, built form, density, building heights, and mix of land uses proposed through the redevelopment?

208. No. In my opinion, the Applications do not propose an "unplanned strategic growth area" in the context of the Town's urban structure as provided for in the Livable Oakville Plan, including sections 3, 4, 11 (preamble), and 11.1.8, Schedule A1, the North Oakville East Secondary Plan and North Oakville West Secondary Plan, considering matters such as geographic area, population and employment, built form, density, building heights, and mix of land uses proposed through the redevelopment.
209. As stated in paragraph 28 above, intensification and redevelopment on large sites such as golf courses may be "unplanned" only in the sense that it generally will not have been anticipated in the applicable Official Plan designation. Where it has not been anticipated in municipal planning documents, the appropriate approach to plan for the redevelopment of large sites is through the adoption of site-specific Official Plan Amendments redesignating the sites for urban intensification uses, together

with the requisite supporting studies and public review process. That is the process being followed here.

210. As well, although it provides limited policy guidance, Section 4.3 of the Livable Oakville Plan recognizes that intensification outside of the Growth Areas may include additional intensification opportunities such as infill, redevelopment and greyfield and brownfield sites, which is to be considered in the context of the Plan.

Issue #7: Is the area subject to the Applications an appropriate location for a new unplanned strategic growth area?

211. Yes. In my opinion, the area subject to the Applications is an appropriate location for “a new unplanned strategic growth area”, although qualified by my earlier comments regarding the use of the term “unplanned”. As stated above, it is my opinion that intensification and redevelopment on large sites such as golf courses may be “unplanned” only in the sense that it generally will not have been anticipated in the applicable Official Plan designation.
212. In my opinion, the subject site falls within the meaning of a “strategic growth area” under the Growth Plan, for the reasons set out in paragraphs 70-73 above. However, as I stated in paragraph 70, Policy 2.2.2(3)(c) of the Growth Plan would encourage intensification of the subject site even if it were not considered a “strategic growth area”.

Issue #8: Would the creation of a new strategic growth area on the subject lands require a municipal comprehensive review by the Region of Halton, pursuant to the policies of the Growth Plan, including sections 2.2.1, 2.2.2, 5.2.3.2, and 5.2.5?

213. No. In my opinion, the creation of a new strategic growth area on the subject lands would not require a municipal comprehensive review by the Region of Halton, pursuant to the policies of the Growth Plan, including sections 2.2.1, 2.2.2, 5.2.3.2, and 5.2.5.
214. While Policy 2.2.2(3) requires municipalities to develop a strategy to achieve the minimum intensification target and intensification throughout delineated built-up areas, which will identify strategic growth areas to support achievement of the intensification target and recognize them as a key focus for development and identify the appropriate type and scale of development in strategic growth areas and transition of built form to adjacent areas, it does not require municipal action in order

to “create” a strategic growth area, nor does it tie the municipal obligation in Policy 2.2.2(3) to a municipal comprehensive review.

215. While Policy 5.2.3(2) imposes an obligation on upper-tier municipalities, in consultation with lower-tier municipalities, to identify minimum density targets for strategic growth areas through a municipal comprehensive review, the “creation” of strategic growth areas is not addressed by Policy 5.2.3(2).
216. Similarly, while Policy 5.2.5(3) imposes an obligation on upper-tier municipalities to delineate strategic growth areas through a municipal comprehensive review, the “creation” of strategic growth areas is not addressed by Policy 5.2.3(2).
217. The preamble in Section 5.1 makes it clear that, where a municipality must decide on a planning matter before its official plan has been amended to conform with the Growth Plan, or before other applicable planning instruments have been updated accordingly, it must still consider the impact of the decision as it relates to the policies of this Plan which require comprehensive municipal implementation.
218. Furthermore, it is noted that the Town is no longer seeking approval of proposed Policy 28.1.3 in OPA 15, which would have required a “municipal comprehensive review” for the identification of new “strategic growth areas” and significant changes to the boundaries of existing “strategic growth areas”. I support the removal of that proposed policy from OPA 15.

Issue #9: Should the Applications be refused on the basis that intensification of the nature and scale proposed should be located in the Town’s strategic growth areas (growth areas in the Livable Oakville Plan), based on:

- (a) consistency with the policies of the Provincial Policy Statement regarding nodes and corridors; intensification and redevelopment; transit-supportive development; and coordinating planning and infrastructure; including sections 1.1.1, 1.1.3.2, 1.1.3.3, 1.2.1, 1.2.4, 1.6.1, and 1.6.3;***
- (b) conformity with the policies of the Growth Plan regarding directing growth to strategic growth areas; intensification within the delineated built-up area; integration of planning and infrastructure; aligning growth with transit and transportation corridors; transit-supportive densities and development; and implementation; including sections 1.2.1, 2.1, 2.2.1, 2.2.2, 3.1, 3.2.1, 3.2.2, 3.2.3, 3.2.8, 5.2.3.2, and 5.2.5;***

- (c) *regard for matters of provincial interest relating to the appropriate location of growth and development and the promotion of sustainable development;*
- (d) *conformity with the policies of the Halton Official Plan regarding Intensification Areas; the coordination of infrastructure and planning; and transit-supportive development, including sections 44, 47, 48, 72, 77(5), 78, 80, 81(1), (2), (3), (4), (7), (7.2), (9) and (10), 172, and 173 (2), (20) and (21); and*
- (e) *the policies of the Livable Oakville Plan regarding growth areas and residential intensification outside of growth areas; the use of infrastructure and public service facilities; transit-supportive development; and developing a transit-supportive urban structure, including sections 2.2.1, 3, 4.1, 4.3, 8.1.1, 8.9.1, 8.9.4, 8.9.9, 8.12.1, 8.12.2, 9.1.2, 11 (preamble), and 11.1.8?*

Note: For the purposes of Issues 1(d), 5, 6 and 9(e), it is the Town's position that the references to the Livable Oakville Plan should be considered as including the amendments in OPA 15 and OPA 16, including those portions of OPA 15 and OPA 16 that are currently in effect as well as those portions of OPA 15 and OPA 16 that remain under appeal by ClubLink. The applicability of OPA 15 and OPA 16 to ClubLink's redevelopment applications is a matter to be determined by the Tribunal in the hearing.

219. No. In my opinion, the Applications should not be refused on the basis that intensification of the nature and scale proposed should be located in the Town's strategic growth areas (Growth Areas in the Livable Oakville Plan).
220. For the reasons set out throughout this witness statement, it is my opinion that significant growth and intensification can appropriately be accommodated outside of the Growth Areas designated in the Liveable Oakville Plan.
221. In my opinion, intensification of the nature and scale proposed on the subject site would be consistent with the PPS for the reasons set out in paragraphs 53-58 above. I am likewise of the opinion that intensification of the nature and scale proposed on the subject site would have appropriate regard for matters of provincial interest, including those matters relating to the appropriate location of growth and development and the promotion of sustainable development.

222. In my opinion, intensification of the nature and scale proposed on the subject site would conform with the Growth Plan for the reasons set out in paragraphs 59-74 above.
223. In my opinion, intensification of the nature and scale proposed on the subject site would conform with the Halton Official Plan for the reasons set out in paragraphs 75-93 above.
224. In my opinion, intensification of the nature and scale proposed on the subject site would be appropriate having regard to the Livable Oakville Plan for the reasons set out in paragraphs 106-181 above

Issue #43: Do the Applications introduce a new growth area not identified in the Livable Oakville Plan or a major growth area or Intensification Area not identified in the Regional Official Plan?

225. No. The Applications do not introduce a new growth area not identified in the Livable Oakville Plan or a major growth area or *Intensification Area* not identified in the Regional Official Plan.
226. In my opinion, as set out in paragraph 145, it would not be necessary to amend Schedule A1 of the Livable Oakville Plan to identify the subject site as a Growth Area in order to permit the proposed redevelopment.
227. Similarly, it is my opinion that it would not be necessary to specifically identify the subject site as an *Intensification Area* within the context of Sections 77 to 81 of the Halton Official Plan in order to permit the proposed redevelopment.

Issue #44: Is the site an appropriate location for a new unplanned major growth area or Intensification Area?

228. Yes. In my opinion, the site is an appropriate location for “a new unplanned major growth area or *Intensification Area*”, although qualified by my earlier comments regarding the use of the term “unplanned”. As stated above, it is my opinion that intensification and redevelopment on large sites such as golf courses may be “unplanned” only in the sense that it generally will not have been anticipated in the applicable Official Plan designation.

229. As stated in paragraphs 226 and 227 above, it is my opinion that it would not be necessary to amend Schedule A1 of the Livable Oakville Plan to identify the subject site as a Growth Area or to specifically identify the subject site as an *Intensification Area* within the context of Sections 77 to 81 of the Halton Official Plan in order to permit the proposed redevelopment. In my opinion, the site is an appropriate location for redevelopment of the nature and scale proposed. Ultimately, what it is called or how it is shown in the Livable Oakville Plan is a matter of implementation and does not affect my opinion regarding planning appropriateness.

Issue #45: Do the Applications conform with the growth management policies in the Regional Official Plan, including but not limited to Sections 48, 77(5), 81(2) and 81(3), which direct local municipalities to prepare Area-Specific Plans or policies for major growth areas and Intensification Areas?

230. Yes. In my opinion, the Applications conform with the growth management policies in the Regional Official Plan, including but not limited to Sections 48, 77(5), 81(2) and 81(3).

231. As stated in paragraph 227 above, it is my opinion that it would not be necessary to specifically identify the subject site as an *Intensification Area* within the context of Sections 77 to 81 of the Halton Official Plan in order to permit the proposed redevelopment.

Issue #46: Is the nature and scale of development appropriate given that the site is not a growth area identified in Livable Oakville or a major growth area or Intensification Area identified in the Regional Official Plan, considering:

- (a) consistency with the policies of the Provincial Policy Statement 2020 that direct planning authorities to identify appropriate locations for intensification, including but not limited to Policy 1.1.3.3;***
- (b) consistency with the policies of the Provincial Policy Statement 2020 that direct a coordinated, integrated and comprehensive approach to land use planning and that require municipalities to identify areas where growth and development will be directed, including but not limited to Policies 1.2.1 and 1.2.4;***
- (c) conformity with the policies of the Growth Plan 2019 that require municipalities to establish a hierarchy of areas within settlement areas to manage growth;***
- (d) conformity with the policies of the Growth Plan 2019 that apply to strategic growth areas; and***

(e) conformity with the policies of the Growth Plan 2019 regarding infrastructure to support growth, integrated planning, moving people/transit, transit-supportive densities and development, and public service facilities?

232. Yes. In my opinion, the nature and scale of development is appropriate notwithstanding that the subject site is not a Growth Area identified in Livable Oakville or a major growth area or *Intensification Area* identified in the Regional Official Plan.
233. As stated in paragraphs 226 and 227 above, it would not be necessary to amend Schedule A1 of the Livable Oakville Plan to identify the subject site as a Growth Area or to identify the site as an *Intensification Area* in order to permit the proposed redevelopment.
234. In my opinion, the nature and scale of development would be consistent with the PPS for the reasons set out in paragraphs 53-58 above, including Policies 1.1.3.3, 1.2.1 and 1.2.4.
235. In my opinion, the nature and scale of development would conform with the Growth Plan for the reasons set out in paragraphs 59-74 above, including the policies that require municipalities to “establish a hierarchy of areas within settlement areas to manage growth” and the policies that apply to strategic growth areas.

Issue #93: Do OPA 24 and/or Zoning By-law 2018-016 require the Town’s identified heritage attributes of the Glen Abbey Property to be “retained” and, if so, does this requirement render OPA 24 and/or Zoning By-law 2018-016:

- (a) Inconsistent with the Provincial Policy Statement, 2020 (“PPS”), and in particular, policy 2.6.1 and the definitions of “Conserved” and “Heritage attributes”, as well as the following policies: 1.1.1, 1.1.3.1, 1.1.3.2, 1.1.3.3, 1.4.3, 1.5, 1.6.3, 1.6.6, 1.6.7, 1.7 and 1.8?**
- (b) Not in conformity with the Growth Plan for the Greater Golden Horseshoe, 2019 (“Growth Plan”), and in particular, policy 4.2.7.1 and the definition of “Conserved”, as well as the following policies: 2.2.1.2(a), (c) and (d), 2.2.1.3(c), 2.2.1.4, 2.2.2.3, 2.2.6.1(a) and 2.2.6.2(b)-(d)?**
- (d) Contrary to principles of good planning?**

236. Yes. In my opinion, OPA 24 and Zoning By-law 2018-016 require the Town’s identified heritage attributes of the Glen Abbey Property to be “retained” and,

accordingly, are inconsistent with the PPS, do not conform with the Growth Plan and are contrary to principles of good planning.

237. The proposed policies applicable to the Glen Abbey Special Policy Area state that the policies are intended to ensure that “its cultural heritage value or interest and heritage attributes are retained” (my emphasis). In contrast, both the PPS and the Growth Plan direct that cultural heritage resources (and their attributes) are to be “conserved”.
238. “Conserved” does not necessarily mean that “heritage attributes” will be retained, as distinct from cultural heritage value or interest. Rather, “conserved” means “the identification, protection, management and use of built heritage resources, cultural heritage landscapes and archaeological resources in a manner that ensures their cultural heritage value or interest is retained”.
239. The definition further provides that “this may be achieved by the implementation of recommendations set out in a conservation plan, archaeological assessment, and/or heritage impact assessment that has been approved, accepted or adopted by the relevant planning authority and/or decision-maker. Mitigative measures and/or alternative development approaches can be included in these plans and assessments.”
240. Based on the principle of “retention” rather than “conservation”, the proposed policy seeks to restrict permitted uses in a manner that is not consistent with the intensification policies of the PPS and does not conform with the intensification policies of the Growth Plan, nor does it appropriately balance various planning objectives.

Issue #94: Are the proposed restrictions on permitted land uses and new buildings and structures imposed by OPA 24 and Zoning By-law 2018-016:

- (a) ***Inconsistent with the PPS, and in particular, policies 1.1.1, 1.1.3.1, 1.1.3.2, 1.1.3.3, 1.4.3, 1.5, 1.6.3, 1.6.6, 1.6.7, 1.7 and 1.8?***
- (b) ***Not in conformity with the Growth Plan, and in particular, policies 2.2.1.2(a), (c) and (d), 2.2.1.3(c), 2.2.1.4, 2.2.2.3, 2.2.6.1(a) and 2.2.6.2(b)-(d)?***
- (c) ***Not in conformity with the Halton Region Official Plan, and in particular, policies 72(1) - (4) and (9), 168, 169(1.1), 169(1.2), 169(1.3), 169(11), 170(14) and 170(16)?***

241. Yes. In my opinion, the proposed restrictions on permitted land uses and new buildings and structures imposed by OPA 24, and Zoning By-law 2018-016 are inconsistent with the PPS, do not conform with the Growth Plan and do not conform with the Halton Region Official Plan.
242. OPA 24 would restrict permitted land uses and new buildings and structures by limiting uses related to the golf course to existing buildings and limiting hotels/conference centres to a specific portion of the site, and then only subject to meeting the applicable requirements of Section 33 of the *Ontario Heritage Act*. As well, OPA 24 would restrict the expansion of existing buildings, by requiring them to meet the applicable requirements of Section 33 of the *Ontario Heritage Act*. Zoning By-law 2018-016 would permit only the buildings and structures existing on the date of the passage of the by-law, as well as temporary buildings and structures related to golf tournaments; a hotel or public hall would only be permitted on Block 2 subject to the removal of the “H” symbol.
243. Proposed OPA 24 and Zoning By-law 2018-016 would remove existing land use permissions and impose significant restrictions on land uses and new development that are not necessary or justifiable in my opinion and would preclude the subject site from being able to redevelop in a manner that would otherwise implement numerous provincial and municipal planning policies.

Issue #98: Do OPA 24 and Zoning By-law 2018-016 fail to properly balance policy objectives in a way that is:

- (a) ***Inconsistent with the PPS, and in particular, Part I and Part III and policy 4.2?***
- (b) ***Not in conformity with the Growth Plan, and in particular, policies 1.2.3 and 5.2.1.1?***
244. Yes. In my opinion, OPA 24 and Zoning By-law 2018-016 fail to properly balance policy objectives in a way that is inconsistent with the PPS and does not conform with the Growth Plan.
245. In my opinion, the restrictions on land uses and new buildings and structures do not properly balance policy objectives related to heritage conservation and policy objectives regarding the efficient use of land and infrastructure and increasing the supply of housing and housing options, among others.

Issue #105 (re OPA 15): Is proposed section 3.6, together with the proposed new Schedule A1, intended to restrict growth through mixed use development and intensification to the areas identified as “Nodes and Corridors” on Schedule A1 and, if so, does this restriction render OPA 15:

- (a) Inconsistent with the Provincial Policy Statement, 2020 (“PPS”), and in particular, policies 1.1.1, 1.1.3.1, 1.1.3.2, 1.1.3.3, 1.4.3, 1.6.3, 1.6.6, 1.6.7, 1.7 and 1.8?***
- (b) Not in conformity with the Growth Plan for the Greater Golden Horseshoe, 2019 (“Growth Plan”), and in particular, section 2.1, policies 2.2.1.2(a), (c) and (d), 2.2.1.3(c), 2.2.1.4, 2.2.2.3, 2.2.6.1 and 2.2.6.2, and the definition of “strategic growth areas”?***
- (c) Contrary to principles of good planning?***

246. Yes. In my opinion, proposed section 3.6, together with the proposed new Schedule A1, is intended to restrict growth through mixed use development and intensification to the areas identified as “Nodes and Corridors” on Schedule A1. The applicable policy provides that Nodes and Corridors are key areas of the Town identified as the focus for mixed use development and intensification and states that the Nodes and Corridors comprise the Town’s strategic growth areas as that term is defined in the Growth Plan, 2017.

247. It is my opinion that this restriction is inconsistent with the PPS, does not conform with the Growth Plan and is contrary to principles of good planning for the reasons set out in paragraphs 166 to 169 above.

Issue #106: If the Glen Abbey property is to be approved for mixed use development and intensification, should the proposed new Schedule A1 be amended and, if so, in what manner?

248. In my opinion, if the Glen Abbey property is to be approved for mixed use development and intensification, it would not be necessary to amend the proposed new Schedule A1. However, if the LPAT determined that the identification of the Glen Abbey lands as “Nodes and Corridors” or in some other fashion were desirable so as to distinguish it from other lands within the Residential Areas structural element in order to permit the proposed redevelopment, I would not be opposed to such a modification. See paragraph 170 above.

Issue #107: Does proposed section 3.3 lack clarity and/or fail to conform with the Greenbelt Plan, and in particular, policy 6.2.1 as it relates to the applicability of the Urban River Valley designation for privately owned lands?

249. Yes. In my opinion, proposed section 3.3 lacks clarity and fails to conform with the Greenbelt Plan, and in particular, policy 6.2.1 as it relates to the applicability of the Urban River Valley designation for privately owned lands.
250. Policy 6.2.1 of the Greenbelt Plan states that only publicly owned lands are subject to the policies of the Urban River Valley designation, and that privately owned lands within the boundary of the Urban River Valley area are not subject to the policies of this designation.

Issue #110: Does the proposed text in the new section 3 referencing the “long-term protection of ... cultural heritage resources” lack clarity and/or fail to properly balance policy objectives in a way that is: ...

(d) Contrary to principles of good planning?

251. Yes. In my opinion, the proposed text in the new section 3 referencing the “long-term protection of ... cultural heritage resources” lacks clarity and fails to properly balance policy objectives in a way that is contrary to principles of good planning.
252. “Long-term protection” suggests a considerably more restrictive approach to cultural heritage resources than does “conservation”. In my opinion, the approach of “conservation”, as defined in the PPS and the Growth Plan, represents good planning.

Issue #111: Are the proposed requirements for a municipal comprehensive review or a required comprehensive Official Plan review for certain future amendments to the Livable Oakville Plan, as identified in the proposed policy 28.1, inconsistent with the PPS, not in conformity with the Growth Plan and/or contrary to the Planning Act, where such a process is not required?

253. Yes. In my opinion, the proposed requirements for a municipal comprehensive review or a “required comprehensive Official Plan review” for certain future amendments to the Livable Oakville Plan, as identified in the proposed policy 28.1, are inconsistent with the PPS, not in conformity with the Growth Plan and/or contrary to the Planning Act, where such a process is not required. However, I understand

that the Town is no longer seeking approval of Policy 28.1.3. See paragraph 163 above.

254. While not applicable to the Applications, it is my opinion that Policies 28.1.2, 28.1.4 and 28.1.8 are similarly inconsistent with the PPS and not in conformity with the Growth Plan. Policy 28.1.2 would require a municipal comprehensive review for any redesignation of an employment area to a designation that permits non-employment uses, whereas Policy 2.2.5(10) of the Growth Plan permits employment land conversions outside of a municipal comprehensive review in specified circumstances. Furthermore, Policies 28.1.4 and 28.1.8 would limit consideration of modifications to the Major Commercial Area element or of an Official Plan Amendment that would result in a significant reduction in the number of residents and jobs that could be accommodated on a site to a “required comprehensive Official Plan review”, neither of which is required by the PPS or the Growth Plan.

Issue #113: Is the proposed identification of “Cultural Heritage Landscapes” on proposed new Schedule A1, which are described in policy 5.3.4 as being “protected or registered under the Ontario Heritage Act”, and when considered in conjunction with the proposed policies in OPA 15:

- (a) Lacking in clarity?***
- (b) Inconsistent with the PPS, and in particular, Part I, policy 2.6.1 and the definition of “conserved”?***
- (c) Not in conformity with the Growth Plan, and in particular, policy 4.2.7.1 and the definition of “conserved”?***
- (d) Contrary to principles of good planning?***

255. Yes. In my opinion, the proposed identification of “Cultural Heritage Landscapes” on proposed new Schedule A1, which are described in policy 5.3.4 as being “protected or registered under the Ontario Heritage Act” and, when considered in conjunction with the proposed policies in OPA 15, is lacking in clarity, is inconsistent with the PPS, does not conform with the Growth Plan and is contrary to principles of good planning.

256. The PPS and Growth Plan policies apply to significant cultural heritage landscapes, and not to cultural heritage landscapes generally. Furthermore, in my experience, identifying (significant) cultural heritage landscapes on an urban structure schedule in an Official Plan is highly unusual, if not unique. In my experience, Part IV designations under the Ontario Heritage Act are typically done through by-law and do not form part of an Official Plan. In my opinion, this typical approach is sensible.

Issue #114: Does the proposed identification of “Cultural Heritage Landscapes” on proposed new Schedule A1, when considered in conjunction with the proposed policies in OPA 15, lack clarity and/or fail to properly balance policy objectives in a way that is:

- (a) Inconsistent with the PPS, and in particular, Part I, Part III and policy 4.2?**
- (b) Not in conformity with the Growth Plan, and in particular, policies 1.2.3 and 5.2.1.1?**
- (c) Contrary to principles of good planning?**

257. Yes. In my opinion, the proposed identification of “Cultural Heritage Landscapes” on proposed new Schedule A1, when considered in conjunction with the proposed policies in OPA 15, lacks clarity and fails to properly balance policy objectives in a way that is inconsistent with the PPS, does not conform with the Growth Plan and is contrary to principles of good planning.

258. See my responses to Issues #110 and #113 above.

Conclusions

259. For all of the foregoing reasons, I recommend approval of the Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision to permit the proposed redevelopment of the Glen Abbey Golf Club from a high-level planning policy perspective. David Capper will be addressing the details of the instruments as well as more detailed land use planning considerations.

All of which is respectfully submitted,



Peter F. Smith, M.C.I.P., R.P.P.

May 17, 2021

List of Documents to be Referred To:

1. *Planning Act*, R.S.O. 1990, c. P. 13
2. Provincial Policy Statement (2014)
3. Provincial Policy Statement (2020)
4. Growth Plan for the Greater Golden Horseshoe (2006), as amended
5. Growth Plan for the Greater Golden Horseshoe (2019), as amended by Growth Plan Amendment No. 1
6. Ministry of Public Infrastructure Renewal, Built Boundary for the Greater Golden Horseshoe, 2006 (April 2, 2008)
7. Greater Golden Horseshoe: Growth Forecasts to 2051 (Hemson Consulting Ltd. August 26, 2020)
8. Greenbelt Plan (2017)
9. Region of Halton Official Plan (1995), as amended
10. Integrated Growth Management Strategy, Growth Scenarios, Halton Region to 2041, Hemson Consulting Ltd. et al, June 2019
11. Town of Oakville Planning Services Department, Halton Integrated Growth Management Strategy (IGMS): an Oakville planning staff discussion paper, July 15, 2019 (including Appendix A)
12. Regional Official Plan Review, Regional Urban Structure Discussion Paper, June 2020
13. Draft ROPA 48 (February 17, 2021)
14. Region of Halton staff report No. LPS17-21 re Draft ROPA 48, February 17, 2021
15. Livable Oakville Official Plan (2009), as amended
16. Official Plan Amendment No. 15 (adopted September 27, 2017)
17. Town of Oakville Residential Intensification Study, Background Analysis and Directions Report, Macaulay Shiomi Howson Ltd. et al, February 2009
18. Town of Oakville Planning Services Department, Urban Structure Review - Policy Directions Report, May 4, 2017 (including Appendix A - Urban Structure Review Policy Directions Report (Draft), Macaulay Shiomi Howson Ltd. et al, May 2017)
19. Town of Oakville Planning Services Department, Public Meeting and Recommendation Report - Town-Initiated Official Plan Amendments - Urban Structure Review, September 12, 2017
20. Town of Oakville Planning Services Department, Public Meeting Report – Town-initiated Official Plan Amendment – Hospital District, November 11, 2020
21. Town of Oakville Planning Services Department, Public Meeting Report – Town-initiated Official Plan Amendment – Bronte GO Major Transit Station Area, April 27, 2021

22. Town of Oakville Planning Services Department, Public Meeting and Recommendation Report – ClubLink Corporation ULC and ClubLink Holdings Limited, September 12, 2017
23. All reports submitted in support of the application.
24. Regional Municipality of York, Report of the Commissioner of Corporate Services and Chief Planner, Committee of the Whole, Planning and Economic Development – Residential Unit Supply Inventory, March 5, 2015
25. Materials associated with OMB/LPAT Case Nos:
 - a. PL180196
 - b. PL171369
 - c. PL070673
 - d. PL170580
 - e. PL151160
 - f. PL160394
 - g. PL130413 and PL100685
 - h. PL171222
 - i. PL141318
 - j. PL200232 (3171 Lakeshore Road West)

ATTACHMENT "A"



BOUSFIELDS INC.

Peter F. Smith MCIP, RPP

Director

CURRICULUM VITAE

Peter joined Bousfields in 1987, becoming a partner in 1990. Managing complex and demanding projects for both the public and private sector, he possesses a particular talent for integrating sound public policy based planning with both greenfield development and urban intensification. He has over 35 years experience in the land use planning field, having worked previously for a law firm, a market consultant and the City of North York.

PROFESSIONAL HISTORY

Director, Bousfields Inc.	1990-Present
Senior Planner, John Bousfield Associates Limited	1987-90
Planner III, City of North York	1987
Planner, Weir & Foulds, Barristers & Solicitors	1982-87
Planner, Paterson Planning & Research Limited	1979-82

EDUCATION, PROFESSIONAL AFFILIATIONS & MEMBERSHIPS

- B.E.S. (Hon. Urban & Regional Planning), University of Waterloo, 1979
- Member, Canadian Institute of Planners

Peter F. Smith continued

RELEVANT PROJECT EXPERIENCE

Official Plans, Secondary Plans And Reviews

- Churchville Heritage Conservation District Plan (for City of Brampton)
- Prince Edward County Growth & Settlement/Service Strategy
- Nobleton Community Plan (for Township of King)
- South Urban Community Secondary Plan (for former City of Gloucester)
- East Terrace Neighbourhood Plan, Grimsby
- York Mills Office Centre Secondary Plan Review, North York
- Highway 7/Highway 400 Land Use and Density Study (for City of Vaughan)

Community Design Plans

- Riverside South Community, Ottawa, 55,000 population and business park (for City of Ottawa)
- Georgetown South, Halton Hills, 2,500 residential units (for Halton Hills Village Homes Inc.)
- Port of Newcastle, Clarington, 1,000 residential units (for Kaitlin Group)

Residential/Mixed-Use Developments

- 90 Harbour Street, Toronto (for Menkes)
- Ordnance Triangle, Toronto (for DiamondCorp & Build Toronto)
- 1 Yonge Street (for Pinnacle International)
- Bridlewood Mall Redevelopment, Scarborough (for Malibu)
- 5 St. Joseph Street, Toronto (for MOD/Graywood)
- Pier 27, Toronto Waterfront (for Cityzen/Fernbrook)
- Theatre Park, Toronto (for Lamb Developments)
- Cinema Tower, Toronto (for Daniels Corp.)

- New Four Seasons Hotel, Toronto (for Menkes)
- Gooderham and Clear Spirit Towers Distillery District, Toronto (for Cityscape)
- West Queen West Triangle, Toronto (for Verdiroc)
- London on the Esplanade, Toronto (for Cityzen)
- Uptown Residences, Yonge/Bloor, Toronto (for Pemberton)
- 18 Yonge Street, Toronto (for H & R)
- Herons Hill, North York (for Monarch)
- Atria IV Redevelopment, North York (for Tridel/Dorsay)
- N. Y. Towers, North York (for Daniels Corp.)
- World Trade Centre (now Pinnacle Centre), Toronto (for Camrost)
- McGuinness Redevelopment, Etobicoke (for Camrost)
- Hilton Hotel Expansion, Niagara Falls
- Sharkey's Site, Oakville (for Daniels Corp.)
- Bridgehome 2000, North York
- Lakeshore Village, Etobicoke (for Daniels Corp.)
- Inn-on-the-Park, North York, 420 residential units (for Eisen Corp.)
- Village-by-the-Grange Expansion, Toronto (for Tridel)
- Esplanade/Scott Street, Toronto
- 520 Kingston Road, Toronto (for Cityhome)
- 186 Redpath, Toronto (for Plazacorp)
- Front/Jarvis, Toronto (for Camrost)

Retail Developments

- Laird Drive Commercial Development, Toronto (for First Capital Realty)
- Chartwell Commercial Development, Scarborough (for First Capital Realty)
- New Format Commercial Development Major Mackenzie/Weston Rd., Vaughan (for SmartCentres)

Peter F. Smith continued

- New Format Commercial Development, Hurontario/Steeles (for City of Brampton)
- Harmony/Taunton Centre, Oshawa, 750,000 sq. ft. (for First Pro)
- Metro East Trade Centre Commercial Expansion, Pickering, 430,000 sq. ft. (for Genra Inc.)
- New Format Retail Developments, Airport/Highway 7, Brampton, 650,000 sq. ft. (for First Pro)
- Commercial/Industrial Development, Airport/Bovaird, Brampton, 480,000 sq. ft. (for First Pro)
- Crossroads Centre, Weston Road/Highway 401, North York, 350,000 sq. ft. (for First Pro)

Infill Residential

- WorkLofts/Flatiron Lofts (for Lamb Development)
- Burnhamthorpe Road Townhouse Development, Mississauga (for Dunpar)
- Waterstone Court, Oakville
- St. Jude Community Homes, Toronto
- St. Paul's Dovercourt, Toronto
- Little Brothers of the Good Shepherd, Toronto
Avenue Homes, Unionville
- 117 Eglinton Avenue East, Toronto
- St. Clair/Walmer Road Townhouses, Toronto

Institutional

- Ryerson Student Residence, Jarvis Street
- West Park Healthcare Centre Expansion, Toronto
- Regent Park Community Health Centre, Toronto
- Learning Centre for Children with Autism, North York
- St. Stephen's Community House, Toronto

Residential Subdivisions

- Royal Park, Woodbridge Highlands, Vaughan
- Kipling South, Woodbridge, Vaughan
- Halton Hills Village Homes, Georgetown South, Halton Hills
- Kaitlin, Lake Wilcox, Richmond Hill
- City View, Barrie
- Jofian, Kleinburg

Recreational/Residential developments

- Angus Glen Golf Club, Markham
- King Valley Residences (60 units) and ClubLink Corporate Offices, King Township
- Emerald Hills Golf Course Expansion and Residences (80 units), Whitchurch-Stouffville (for ClubLink)
- Maple Downs Golf Course Expansion

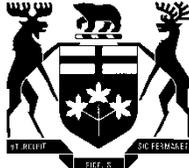
Waterfront Planning

- Orillia Central Waterfront (for City of Orillia)
- Oshawa Harbour Plan (for Oshawa Harbour Commission)
- Oakville Waterfront Plan, OPA 10 (for Baillie/Dorion)

Reports/Policy Review

- Development Permit Demonstration Project, March 2000 (for Ministry of Municipal Affairs and Housing)
- Provincial Policy Statement Five Year Review Stakeholder Consultation, December 2001 (for Ministry of Municipal Affairs and Housing)
- Submission on 1989 Housing Policy Statement (for Urban Development Institute)
- Submission on 1996 Provincial Policy Statement (for Urban Development Institute)

ATTACHMENT "B"



Ontario

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

ACKNOWLEDGMENT OF EXPERT'S DUTY

Case Number	Municipality
PL171084, PL180158, PL180580, MM180022, MM170004	Town of Oakville

1. My name is.....(*name*)
I live at the(*municipality*)
in the.....(*county or region*)
in the(*province*)
2. I have been engaged by or on behalf of **ClubLink Corporation ULC and ClubLink Holdings Limited** (*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.

Date.....

Signature