

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

**LOCAL PLANNING APPEAL TRIBUNAL**

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

Applicant and Appellant: Clublink Corporation ULC and Clublink Holdings Ltd.  
Subject: Request to amend the Official Plan - Refusal of request by the Town of Oakville  
Existing Designation: Private Open Space and Natural Area  
Proposed Designation: Site Specific (to be determined) – including Residential, Mixed Use and Community Commercial  
Purpose: To permit the redevelopment of the Subject Lands for a mix of residential, commercial and open space uses  
Property Address/Description: 1333 Dorval Drive  
Municipality: Town of Oakville  
Approval Authority File No.: OPA.1519.09  
LPAT Case No.: PL171084  
LPAT File No.: PL171084  
LPAT Case Name: Clublink Corporation ULC v. Oakville (Town)

**See Appendix “A”**

**WITNESS STATEMENT OF ROBYN BROWN**

**Prepared for ClubLink Corporation ULC and ClubLink Holdings Limited**

**May 17, 2021**

Qualifications

1. I am a land economist and planner and am a Director of IBI Group, which is a multi-disciplinary firm that provides advice to a broad range of clients. I joined IBI Group eight years ago. Up until 2020, I managed the Real Estate, Economics and Planning Team out of the Toronto office. In early 2021, I assumed leadership of the IBI Group Real Estate, Economics and Planning Team.
2. Prior to joining IBI Group, I worked as a sales representative at a nationally represented commercial real estate brokerage. My responsibilities focused on land acquisition and leasing, working predominantly in the Western GTA. Major projects

included assisting private and institutional clients in the disposition of over 500 acres of development land across the GTA, along with portfolio analysis and disposition strategies. Additionally, my work included industrial and office leases, including renewals, proposal calls, and competitive bids.

3. I hold an undergraduate degree in history and political science from the University of Toronto, a graduate degree in history from the University of Toronto and a Masters of Planning (MPI) from Ryerson University. I am a member of the Ontario Professional Planners Institute, a member of the Ontario Association of Land Economists (PLE) and LAI Land Economists Society (LAI). My area of expertise focuses on employment and residential land needs, growth management, market analysis, development feasibility, economic impact and economic development.
4. A copy of my curriculum vitae is attached to this Witness Statement, together with a signed Acknowledgement of Expert's Duty form, as Attachments 1 and 2

#### Retainer

5. IBI Group was originally retained by ClubLink Corporation ULC and ClubLink Holdings Limited. ("ClubLink") in January 2016 to complete a Commercial/Retail Market Review and Impact Study, a Capital Impact Assessment and a Municipal Financial Impact Study in support of ClubLink's Official Plan Amendment, Zoning By-law Amendment and Draft Plan of Subdivision applications (the "Applications"). The Applications were submitted to the Town of Oakville (the "Town") on November 10, 2016. ClubLink appealed the Town's refusal of the Applications to the Local Planning Appeal Tribunal.
6. IBI Group's retainer was extended in August 2020 to provide updates to the Commercial/Retail Market Review and Impact Study ("Retail Market Review"), Capital Impact Assessment and the Municipal Financial Impact Study ("Capital/Municipal Impact Studies"). IBI Group also completed a Community Services and Facilities Study ("CSFS") to address issues raised by the Town and the Regional Municipality of Halton (the "Region") on the Issues List for these appeals. The four studies were produced to the Town and the other parties to these appeals on February 22, 2021. The findings of the Retail Market Review and the CSFS are included in my Summary

of Evidence and Opinion. The summary of findings and opinion for the Capital/Municipal Impact Studies are included in Ms. Audrey Jacob's Witness Statement.

### Summary of Evidence and Opinions

#### **Commercial/Retail Market Review and Impact Study (February 17, 2021)**

7. The Retail Market Review was completed on February 17, 2021. The purpose of the Retail Market Review was to update IBI Group's 2016 report and to provide an overview of the Town's retail policies and hierarchy along with the retail context proximate to the Glen Abbey site.
8. The following summarizes the findings of the updated Retail Market Review:
  1. The proposed retail component is 62,871 square feet (sf) and is located on the ground floor of five mixed-use buildings, incorporating varied unit sizes.
  2. The anticipated types of uses which will occupy the space will range from 2,000 to 4,000 sf and will service the local residents, visitors and other businesses.
  3. A Town-wide commercial analysis done as part of the Town's Municipal Comprehensive Review exercise suggests that there will be a shortfall of 820,000 sf of commercial space based on current supply and demand until 2041.
  4. The same analysis suggests that the flexibility inherent in the North Oakville Secondary Plan policies may lead to a greater shortfall as commercial development may not be built to the extent that is required.
  5. A square foot per capita analysis conducted for the proposed redevelopment of the Glen Abbey Golf Club demonstrates that there is sufficient market support/population for the proposed commercial component of the redevelopment.

6. The retail/service/office space proposed as part of the Glen Abbey Golf Club redevelopment will be sufficient to service the immediate local community and will not impact the viability or planned function of existing or future neighbouring retail.

### **Community Services and Facilities Study (February 17, 2021)**

9. The CSFS was completed on February 17, 2021. The purpose of the CSFS was to provide a review of the existing community services and facilities that are available to future residents of the proposed Glen Abbey redevelopment and surrounding study area, and to determine the community infrastructure needs associated with residential growth based on current/recommended level of service standards. Where potential deficiencies were identified, the study explored opportunities for future accommodation on the Glen Abbey site and in existing community facilities.
10. The Town does not have a Terms of Reference for the completion of a CSFS. On this basis, IBI Group submitted a proposed Terms of Reference to the Town and Region on October 12, 2020 and received comments from the Town on November 17, 2020 and from the Region on October 26, 2020. Comments from the Town and Region have been addressed in Appendix B of IBI Group's CSFS and are further addressed in the issues identified below.
11. The following summarizes the findings of the CSFS:
  1. **Study Area and Forecasted Growth:** IBI Group established a study area based on the estimated extent to which local residents would seek out the various types of community infrastructure. The study area boundaries are defined by Dundas Street West to the north, Trafalgar Road to the east, the Queen Elizabeth Way (QEW) to the south and Third Line to the west. IBI Group estimates that the study area will grow from 61,620 (2016 Census) to 70,731 residents based on current development applications in the study area and the expected population yield from the proposed Glen Abbey redevelopment (5,719 residents).

2. **Schools:** Halton District School Board (HDSB) and Halton Catholic District School Board (HCDSB) have indicated that the proposed redevelopment can be accommodated by existing schools in the study area.
3. **Indoor recreation facilities:** The two community centres (Glen Abbey CC and River Oaks CC) and two additional indoor recreation facilities (White Oaks Pool and Pine Glen Indoor Soccer facility) within the study area will meet the community/recreation centre requirements (1.6 facilities) for the future population of the study area.
4. **Tennis Courts:** The future population of the study area generates a demand for 18 tennis courts, which is approximately 7 tennis courts less than the current inventory in the study area. IBI Group does not anticipate the need for tennis courts on site or within the study area.
5. **Emergency facilities:** Existing Master Plans for police, fire and paramedic services do not identify the need for a facility on site. Any planned upgrades to existing facilities within the study area have been captured by the capital programs in the Town and Regional development charge studies.
6. **Parks:** Based on the proposed number of residential units, the parkland dedication requirement for the proposed redevelopment is 10.7 hectares, 0.3 hectares more than the proposed 10.4 hectares of parkland in the Draft Plan of Subdivision. This small parkland deficiency could be satisfied by a future cash-in-lieu payment.
7. **Libraries:** The future population of the study area generates a library demand of 41,024 sf, 16,868 sf more than the existing inventory of space. When factoring in the limited demand produced by the proposed redevelopment (3,300 sf), the decline in the number of library visits, the increased use of digital platforms, and the opening of the new Sixteen Mile Creek branch just outside the study area, it is not anticipated that a new library facility will be required on the Glen Abbey site.

8. **Soccer Fields:** The future population of the study area generates a demand for 32 fields, 10 more fields than the current inventory of facilities. There may be opportunity to accommodate a portion of the soccer field demand on the Glen Abbey site through the proposed flexible playfields in the Central Park. The remaining deficit is expected to be accommodated elsewhere in the study area or Town.
9. **Ball Diamonds:** The future population of the study area generates a demand for 14 ball diamonds, approximately 1 more diamond than the current inventory of facilities. IBI Group anticipates that the demand can be accommodated through the optimization of existing ball diamonds. It is not expected that a ball diamond will be required on site.
10. **Basketball Courts:** The future population of the study area generates a demand for 7 courts, approximately 3 more courts than the current inventory of facilities. There may be opportunity to accommodate the basketball court demand of the Glen Abbey redevelopment (0.5 basketball courts) on site through the design of the proposed parkland. The remaining deficit is expected to be accommodated elsewhere in the study area or Town.
11. **Human Services:** There are a wide variety of existing human services (e.g. cultural services, housing and employment services, youth service, etc.) in the study area, which would address various needs of residents within the study area. Future demand for human services will be largely driven by the demographics of the study area. Opportunities to accommodate future human services on site exist through the proposed non-residential space
12. **Child Care Services:** There are currently 23 licensed child care locations in the study area which provide 2,285 licensed childcare spaces. IBI Group estimates that the build out of the proposed Glen Abbey redevelopment could yield 225 children requiring child care services. The proposed residential and non-residential uses on site offer opportunities to accommodate the future child care services on site, in whole or in part.

**13. Development Charge Contribution:** It is estimated that the proposed redevelopment will contribute \$63.7 million in development charge revenue to the Town at build out, based on current rates (2020). This will help to fund the growth related capital costs for provision of the required community infrastructure.

### Issues List and Responses

12. In my evidence at the hearing, I will primarily address the following issues on the Issues List: 5, 9(a) and (b), 40, 42, 46(e), 89, and 105(a) and (b).

**13. 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?**

14. Response: Of the policies identified in Issue 5, Section 3 of the Livable Oakville Plan is relevant to IBI Group's Retail Market Review and CSFS. Section 3 discusses the Town's Urban Structure and the nine land use designation categories. Section 3.2 discusses the Mixed-Use designation and states that these designations are to be primarily focused within the Growth Areas and in specified locations which reflect an area's planned function (emphasis added by IBI).

15. Section 3.3 discusses Commercial Use designations and states that "Commercial uses are to be focused in commercial centres whose scale and types of uses will reflect the centre's planned function. The commercial land use designations provide objectives and policies to define the use and function of these centres." As per Section 13.1.1, the Town is to maintain a variety of commercial areas to provide a broad range of retail goods and services. The commercial areas are to be distributed throughout the Town to serve the needs of residents and shoppers.

16. As it relates to the proposed commercial uses, the Glen Abbey redevelopment is proposing 62,871 sf of retail/commercial space on the ground floor of the five mixed-

use buildings. The commercial uses are intended to service the needs of the immediate local community and are expected to generally be comprised of convenience/service related uses, which is supported by the proposed “Main Street 2” and “Community Commercial” designations on site. The Glen Abbey redevelopment is not identified as a commercial centre and, as such, does not propose any major commercial uses (e.g. department store, supermarket, home improvement store, etc.) which would compete with the function of the Town’s planned commercial centres or other mixed-use areas IBI Group’s square foot per capita analysis conducted for the proposed redevelopment demonstrates that there is sufficient market support/population for the proposed commercial component of the redevelopment.

17. It is my opinion that the Applications adequately consider the impact of the proposed redevelopment on the commercial component of the Town’s Urban Structure and do not undermine the planned function of the Town’s commercial structure.

**18. Issue 9(a): 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;**

19. Response: Of the policies identified in Issue 9(a), policies 1.1.1, 1.1.3.2, 1.6.1 and 1.6.3 of the Provincial Policy Statement (“PPS”) are relevant to IBI Group’s Retail Market Review and CSFS.

20. Section 1.1.1 identifies policies for the creation of healthy, liveable and safe communities. Subsection B speaks to the provision of an appropriate range and mix of residential and non-residential uses and parks/open space uses to meet the long term needs of residents. Subsection G speaks to the provision of the necessary infrastructure and public service facilities to meet current and projected needs.

21. Section 1.1.3.2 subsection B speaks to the provision of land use patterns which appropriately and efficiently use planned or existing infrastructure and public service facilities to avoid unjustified and uneconomical expansions.
22. Section 1.6.1 outlines policies for the provision of infrastructure and public service facilities in a coordinated and efficient manner which are financially viable over their lifecycle and are available to meet current and projected needs.
23. Section 1.6.3 speaks to the optimization and adaptive re-use of existing infrastructure and public service facilities prior to the development of new facilities.
24. As per the findings of the CSFS, it is expected that the Town's current inventory of schools, indoor recreation facilities, tennis courts and emergency services will sufficiently service the anticipated population growth associated with the Glen Abbey redevelopment. Potential shortfalls in soccer fields, ball diamonds and basketball courts and libraries are expected to be overcome through the optimization of existing facilities outside of the Glen Abbey redevelopment or through further site design of the proposed park space in the Glen Abbey redevelopment.
25. As it relates to parks, IBI Group has calculated the estimated parkland dedication requirement based on the Planning Act alternative rate of 1 hectare per 300 units. Based on this rate, and assuming the proposed redevelopment is approved for 3,222 residential units, a parkland deficiency of 0.3 ha has been identified. If there is a shortfall of parkland based on the approved units, ClubLink will address the deficiency through necessary revisions to the draft plan of subdivision to the satisfaction of the Town or through a cash-in-lieu payment.
26. Though these lands do not count towards parkland requirements, ClubLink is proposing to convey approximately 34.4 hectares of natural heritage lands to the Town and/or Conservation Halton as a condition of approval of the proposed redevelopment. These lands could contribute to future community recreation as they could be used for passive recreational purposes, as will the Trailway Open Space Blocks 177 and 178.

27. Based on the proposed redevelopment plan and current development charge rates, the Glen Abbey site redevelopment is estimated to contribute \$63.7 million in development charge revenue to the Town by build out. The revenue generated from the development charges will help to fund growth-related capital investments, which will help to service current and future residents.

28. It is my opinion that the Glen Abbey redevelopment is consistent with the identified policies of the PPS. The findings of the CSFS demonstrate that there will be sufficient public service facilities to accommodate the needs of current and future residents. Where possible, existing facilities can be optimized and efficiently used to avoid unjustified and uneconomical expansion of services and facilities. Where potential deficiencies have been identified, it is expected that the development charge revenue generated from the Glen Abbey redevelopment would contribute to funding growth related capital investments, such as public service facilities, to meet the needs of future residents.

29. **Issue 9(b): 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: ... (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;**

30. Response: Of the policies identified in Issue 9(b), policies 1.2.1, 2.1, 3.1, 3.2.1 and 3.2.8 of the Growth Plan are relevant to IBI Group's Retail Market Review and CSFS.

31. Section 1.2.1 outlines the overarching principles of the Growth Plan for the planning and development of land, the management and use of resources and the creation of complete communities to support the needs of current and future residents. As it relates to public services facilities, the policies direct the integration of land use

planning and investment in infrastructure and public service facilities to support complete communities.

32. Sections 2.1 and 3.1 similarly promote the creation of complete communities through the better use and optimization of land, infrastructure and public service facilities to maximize current and future investments to create strong, healthy and prosperous communities. Where appropriate, the policies promote the co-locating of services in community hubs and prioritizing strategic growth areas as appropriate.
33. Section 2.2.2 identifies the objectives of a municipal strategy for the accommodation of intensification in the delineated built-up area. Subsection E states that this strategy will “prioritize planning and investment in infrastructure and public service facilities that will support intensification”.
34. Section 3.2.1 identifies the need for the coordination of infrastructure and land use planning across various governments and agencies. Subsection 5 identifies the need for the Province to work with public sector partners to identify strategic infrastructure needs to support multi-year planning for transportation and public service facilities.
35. Section 3.2.8 specifically focuses on the needs for public service facilities. The policy states:
  1. Planning for public service facilities, land use planning and investment in public service facilities will be co-ordinated to implement this Plan.
  2. Public service facilities and public services should be co-located in community hubs and integrated to promote cost-effectiveness.
  3. Priority should be given to maintaining and adapting existing public service facilities and spaces as community hubs to meet the needs of the community and optimize the long-term viability of public investments.
  4. Existing public service facilities that are located in or near strategic growth areas and are easily accessible by active transportation and transit, where that service is available, should be the preferred location for community hubs.

5. Municipalities will collaborate and consult with service planning, funding, and delivery sectors to facilitate the co-ordination and planning of community hubs and other public service facilities.
  6. New public service facilities, including hospitals and schools, should be located in settlement areas and preference should be given to sites that are easily accessible by active transportation and transit, where that service is available.
36. As per the findings of the CSFS, it is expected that Oakville's current inventory of schools, indoor recreation facilities, tennis courts and emergency services will sufficiently service the anticipated population growth associated with the Glen Abbey redevelopment. Potential shortfalls in soccer fields, ball diamonds, basketball courts and libraries are expected to be overcome through the optimization of existing facilities outside of the Glen Abbey redevelopment or through further site design of the proposed park space in the Glen Abbey redevelopment.
37. The findings of the CSFS illustrate that sufficient public service facilities will be provided to support the proposed intensification of the Glen Abbey redevelopment. Where potential deficiencies have been identified, proposed solutions have been outlined in the CSFS.
38. The Glen Abbey redevelopment is estimated to contribute \$63.7 million in development charge revenue to the Town by build out. The revenue generated from the development charges will help to fund growth related capital investments, such as public service facilities, which will help to service current and future residents.
39. ClubLink is willing to retain all or part of the existing clubhouse, and transfer ownership to the Town or other public agency, as part of a neighbourhood hub, as a condition of approval. Options for the adaptive reuse of the clubhouse are described in the Cultural Heritage Landscape Assessment and Heritage Impact Assessment of ERA Architects Inc. dated November 9 2016.
40. It is my opinion that the Glen Abbey redevelopment conforms with the identified policies of the Growth Plan. The findings of the CSFS illustrate that there will be

sufficient public service facilities to accommodate the needs of current and future residents and will contribute to the creation of complete communities. Where possible, existing facilities will be optimized and efficiently used. Where deficiencies have been identified, it is expected that the development charge revenue generated from the Glen Abbey redevelopment would contribute to funding growth related capital investments, such as public service facilities, to meet the needs of future residents.

**41. Issue 40: Are the location, size and configuration of the proposed parks appropriate?**

42. Response: IBI Group has analyzed the quantum of parkland required to be conveyed to the Town (or the payment of cash in lieu thereof) under section 51.1 of the Planning Act, if the redevelopment proceeds with the specific mix of unit types currently contemplated. The location and configuration of the proposed parks are addressed in the Witness Statement of Mr. Brendan Stewart.

43. IBI Group has calculated the estimated parkland dedication requirement based the maximum Planning Act alternative rate of 1 hectare per 300 dwelling units. Based on this rate, and assuming 3,222 dwelling units, the parkland dedication requirement for the proposed redevelopment is 10.7 hectares, 0.3 hectares more than the proposed 10.4 hectares of parkland in the Draft Plan of Subdivision.

44. If there is a shortfall of parkland based on the approved units, ClubLink will address the deficiency through necessary revisions to the draft plan of subdivision to the satisfaction of the Town or through a cash-in-lieu payment.

**45. Issue 42: Has there been sufficient analysis of the capacity of the existing community facilities to accommodate the proposed development? Has a community infrastructure plan, based on Regional guidelines, been provided describing where, how and when public services for health, education, recreation, socio-cultural activities, safety and security and affordable housing will be provided to serve the proposed community?**

46. Response: IBI Group's CSFS was developed based on the Region's "Community Infrastructure Guidelines" and Terms of Reference for community services and facilities studies in other jurisdictions. The Town does not have a Terms of Reference for a community services and facilities study. On this basis, IBI Group prepared and submitted a Terms of Reference to the Town and Region for review in October 2020. Responses and comments were received from Town and Regional staff in October and November 2020. IBI Group's responses to the Town and Region's comments are provided in Appendix B of the CSFS.
47. The findings of the CSFS illustrate that it is expected that there will be sufficient public service facilities to accommodate the needs of current and future residents as it relates to public services for health, education, recreation and safety and security.
48. Opportunities for socio-cultural activities will be driven by the demographic profile of the future residents of the Glen Abbey redevelopment, which cannot be forecasted. To address this, IBI Group has identified human and child care services within the defined Study Area to illustrate the potential opportunities to service the future needs of residents. In addition, the non-residential component of the mixed-use developments will offer opportunities for human and child care services within the proposed commercial space.
49. It is my opinion that the CSFS has addressed the Region's "Community Infrastructure Guidelines" and includes sufficient analysis of the capacity of existing community facilities, and the potential for new facilities, to accommodate the proposed redevelopment.
50. **Issue 46(e): 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: ... (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?**

51. Response: Please see Paragraphs 31 to 40 of my witness statement for details on conformity with the applicable Growth Plan policies. It is my opinion that that the proposed Glen Abbey redevelopment conforms with the identified policies of the Growth Plan.
52. **Issue 89: Does the proposed development maintain, protect and enhance the existing neighbourhood character to conform to the Town's Official Plan, including the criteria in Section 11.1.9?**
53. Response: Section 11.1.9.j states that "development should maintain access to amenities including neighbourhood commercial facilities, community facilities including schools, parks and community centres, and existing and/or future public transit services."
54. The findings of the CSFS illustrate that it is expected that there will be sufficient public service facilities to accommodate the needs of current and future residents. Where possible, existing facilities can be optimized and efficiently used to avoid unjustified and uneconomical expansion of services and facilities. Where potential deficiencies have been identified, it is expected that the development charge revenue generated from the Glen Abbey redevelopment would contribute to funding growth related capital investments, such as public service facilities, to meet the needs of future residents. The proposed redevelopment will also maintain access to existing amenities through the proposed road, active transportation and transit systems.
55. It is my opinion that the evaluation criteria of 11.1.9.j as they relate to community facilities, parks, schools and community centres has been satisfied by the proposed redevelopment, as set out in the CSFS.
56. **Issue 105(a): 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?**

57. Response: Of the policies identified in Issue 105(a), policies 1.1.1 and 1.7 of the PPS are relevant to the Retail Market Review and CSFS. Please see my response to Issue 9(a), at paragraphs 20 to 28, for my assessment of PPS policy 1.1.1.
58. Section 1.7 identifies a list of criteria which is meant to promote long term economic prosperity. Subsection C references optimizing the long-term availability of land, infrastructure and public service facilities.
59. To address long term availability of public service facilities, IBI Group examined a Study Area beyond the Glen Abbey site to identify the potential facility needs of the greater influencing area.
60. It is my opinion that the proposed Glen Abbey redevelopment is consistent with the identified policies of the PPS as they relate to parks and public service facilities.
61. **Issue 105(b): 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: ... (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”?**
62. Response: Of the policies identified in Issue 105(b), policies 2.1 and 2.2.1.4 of the Growth Plan are relevant to the Retail Market Review and CSFS. Please see my response to Issue 9(b), paragraphs 31 to 40, for my assessment of Growth Plan policy 2.1.
63. Section 2.2.1.4 identifies the goals and objectives of complete communities in the context of the Growth Plan. Subsection d)ii) speaks to the expansion of convenient

access to public service facilities which are co-located and integrated in community hubs.

64. The findings of the CSFS illustrate that sufficient and convenient services and facilities are available to current and future residents. Where potential deficiencies have been identified, proposed solutions have been offered to mitigate any potential impacts.

65. It is my opinion that the proposed Glen Abbey redevelopment conforms with the identified policies of the Growth Plan as they relate to parks and public service facilities.

#### Summary of Opinion

66. It is my opinion that the Applications are consistent with the identified policies of the PPS and conform to the identified policies of the Growth Plan and the Livable Oakville Plan.

67. The findings of the CSFS illustrate that the community facilities/services needs of the proposed Glen Abbey redevelopment can be accommodated through a mixture of existing facilities and the further detailed planning for some uses on site.

68. The findings of the Retail Market Review illustrate that the proposed retail/commercial space on the Glen Abbey redevelopment will not impact the planned function of the Town's commercial centres.

69. It is my opinion that from a commercial and community services perspective, the proposed Glen Abbey redevelopment will contribute to the creation of a complete community which optimizes existing facilities and meets the needs of current and future residents.

#### List of Documents to be Referred To

1. Provincial Policy Statement (2020)
2. A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2019)

3. Greater Golden Horseshoe: Growth Forecasts to 2051, Hemson Consulting, August 26, 2020
4. Region of Halton Official Plan, Interim Office Consolidation (September 28, 2015)
5. Halton Region Best Planning Estimates (June 2011)
6. Livable Oakville, Town of Oakville Official Plan (2009), Office Consolidation (February 23, 2015)
7. Halton Region Development Charges Background Study (2017)
8. Town of Oakville Development Charges Background Study, Watson and Associates (2018)

#### IBI Group Reports

9. Glen Abbey Golf Club Redevelopment Municipal Financial Impact Study (February 22, 2021)
10. Glen Abbey Golf Club Redevelopment Capital Impact Study (February 22, 2021)
11. Glen Abbey Golf Club Redevelopment Commercial/Retail Market Review and Impact Study (February 17, 2021)
12. Glen Abbey Golf Club Redevelopment Community Services and Facilities Study (February 17, 2021)

#### Commercial/Retail Market Review and Impact Study

13. Retail and Service Commercial Policy Review, urbanMetrics for the Town of Oakville (2006)
14. Policy Discussion Paper – Commercial Uses - Livable Oakville, Town of Oakville (2010)
15. Employment & Commercial Review, Dillon Consulting for the Town of Oakville (2016)

#### Community Services and Facilities Study

16. Community Infrastructure Guidelines, Halton Region (2014)
17. 2019-2020 Long Term Accommodation Plan, Halton District School Board (2019)
18. 2019 Long Term Capital Plan, Halton Catholic District School Board (2019)

19. 5-Year Review of the 2012 Parks, Library and Recreation Master Plan, Montieth Brown Planning Consultants for the Town of Oakville (2017)
20. 2019 Performance and Measures Report, Oakville Public Library
21. Fire Master Plan and Implementation Plan, Dillon Consulting (2016)
22. Halton Regional Police Facilities Plan (2014)
23. Halton Regional Police 2020-2023 Strategic Plan
24. 10 – Year Master Plan Halton Paramedic Services (2015)
25. Halton Early Learning and Child Care Plan, 2016-2020
26. Glen Abbey Community Services and Facilities Study (CSFS) Terms of Reference – Prepared by IBI Group, dated October 7, 2020



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Robyn Brown

**Dated:** May 17, 2021

### Appendix "A"

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

Applicant and Appellant:	Clublink Corporation ULC and Clublink Holdings Ltd.
Subject:	Application to amend Zoning By-law No. 2014-014 - Refusal of Application by the Town of Oakville
Existing Zoning:	Private Open Space (O2), Private Open Space-Special (O2- Sp. 114), and Natural Area (N)
Proposed Zoning:	Site Specific (to be determined)
Purpose:	To permit the redevelopment of the Subject Lands for a mix of residential, commercial and open space uses
Property Address/Description:	1333 Dorval Drive
Municipality:	Town of Oakville
Municipality File No.:	Z.1519.09
LPAT Case No.:	PL171084
LPAT File No.:	PL171085

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

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

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

Applicant and Appellant:	Clublink Corporation ULC and Clublink Holdings Ltd.
Subject:	Proposed Plan of Subdivision - Failure of the Town of Oakville to make a decision
Purpose:	To permit the redevelopment of the Subject Lands for a mix of residential, commercial and open space uses
Property Address/Description:	1333 Dorval Drive
Municipality:	Town of Oakville

Municipality File No.: 24T-17003/1519  
 LPAT Case No.: PL171084  
 LPAT File No.: PL171167

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

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

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

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

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

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

**PROCEEDING COMMENCED UNDER** subsection 17(36) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Appellant: ClubLink Corporation ULC & ClubLink Holdings Ltd.  
 Subject: Proposed Official Plan Amendment No. 15  
 Municipality: Town of Oakville  
 LPAT Case No.: PL180580  
 LPAT File No.: PL180580

**PROCEEDING COMMENCED UNDER** subsection 17(36) of the *Planning Act*, R.S.O. 1990, c. P.13, as amended

Appellant: ClubLink Corporation ULC & ClubLink Holdings Ltd.  
Subject: Proposed Official Plan Amendment No. 16  
Municipality: Town of Oakville  
L.P.A.T. Case No.: PL180580  
L.P.A.T. File No.: PL180581

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

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

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

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

# Attachment 1 - CV of Robyn Brown

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## Robyn Brown MA, MPL

### Director – Sr. Practice Lead, Planning

Ms. Robyn Brown, MA, MPI, is a senior land use planner/land economist in the Real Estate, Economics and Planning division at IBI Group. Robyn brings her experience in commercial real estate, including an extensive understand of the GTA ICI and land market. At IBI Group, she leads a team of planners, economists and GIS specialists on growth management exercises, highest and best use studies, economic and market impact assessments across Canada. Robyn helps her clients make strategic decisions about their real estate assets.

Previously, Ms. Brown worked as a sales representative at DTZ Barnicke , a nationally represented commercial real estate brokerage. Focused on land acquisition and leasing, Ms. Brown helped in the disposition of over 500 acres of development land across the GTA, along with portfolio analysis and disposition strategies.

Specialties: Growth Management, Economic Development, Transit Oriented Communities, Financial and Economic Feasibility Studies, Market Analysis, Site Selection, Employment Land Conversions and Land Needs Analysis

She is the former co-chair of ULI's Women's Leadership Initiative (2018 - 2020), is currently on the Board of Directors for Toronto CREW (Commercial Real Estate Woman) and a member of the Ontario Professional Planning Institute and Lambda Alpha International (Land Economics Society).

## Representative Experience

### Market, Financial and Economic Studies

**Plains Road, Retail Needs Assessment – Burlington, ON** – IBI Group was retained to assist a developer who was intended to redevelop an older strip-mall along Plains Road to a mixed-use building with residential and ground floor retail. The study was intended to help the client assess the amount of new retail which could be supported by the development, along with address neighbourhood concerns regarding the loss of the existing retail space in the community. This study looked at the Burlington retail hierarchy, reviewed the policy environment, conducted a high-level inventory of the Plain Road retail corridor, looked at residential and non-residential growth projections, and suggested potential tenants and unit sizes to maximize market supported retail opportunities.

**Airport Road, Retail Needs Assessment – Caledon ON** – IBI Group was retained to complete a retail needs assessment to support an Official Plan Amendment to convert a historic house to retail, adding an additional 14,000 sf along Airport Road in Caledon East. The study reviewed the current retail hierarchy, pending developments (residential and non-residential) in the community, the policy environment, growth projections, and completed a high level retail space per capita assessment to support the development. Ms. Brown acted as the project manager on this file.

## Education

Master of Planning (MPI Urban Development, Planning), Ryerson University, 2012

Master of Arts (MA, History), University of Toronto, 2002

Bachelor of Arts (Honours, History & Political Science), University of Toronto, 2001

## Experience

### 2012–Present

IBI Group, Toronto, ON

Director – Senior Practice Lead, Planning

Land Use Planner/Land Economist

### 2011

City of Toronto, Policy and Planning Department, Intern

### 2005–2011

DTZ Barnicke Limited, Real Estate Sales Person, Industrial Coordinator

## Awards and Publications

Paper: "Barriers to Midrise Development in Toronto", Ryerson University (2012)

Thesis: "Them: the Role of the Scientist in Fifties Science Fiction Films". An analysis of the changing nature of authority and science as reflected in science fiction films of the fifties. University of Toronto (2002)

2015 WLI Championship Team

2019 ULI Prologis Award Winner

## Organizations

Urban Land Institute (Toronto)

WLI – Women's Leadership Initiative (ULI)

Toronto CREW (Commercial Real Estate Women) – Board of Directors

BILD

OPPI (Ontario Professional Planners Institute)

Lambda Alpha International



**Canada Lands Corporation (CLC) – Due Diligence/Highest and Best Use Studies** – IBI Group, along with EY and Golder has been retained to complete businesses cases for redundant federal properties to inform CLC whether they should retain these sites for redevelopment. Ms. Brown is the project manager on the Real Estate and Highest and Best Use component of these studies reviewing policy and market information to determine the potential on the site for added value. (ongoing)

**Economic Impact & Economic Development Study - St. Paul's Hospital, Vancouver, ON** – Robyn was the project manager on this economic impact study, looking at the relocation of the St. Paul's hospital in downtown Vancouver. As part of this three-phased project, was an analysis of the localized impact on businesses and real estate, for the existing and new site. In addition, this study included an economic development strategy for a health innovation district. Using case study work in Canada and the United States, policies, tools and cluster analysis informed the planning and marketing of the 1 million sf of ancillary medical office, retail and research

**Retail Impact and Fiscal Impact Assessment - Glen Abbey Golf Course** -- IBI Group is part of a larger consultant group retained in relation to the proposed redevelopment of the historic Glen Abbey Golf course to a mixed-use community. IBI Group was retained to prepare a fiscal and retail impact study for the proposed development in 2016, along with updates to the reports and additional Community Services and Facilities Study in 2021. Ms. Brown is the project manager on this file and was the main liaison with the consultant group and the client.

**Uptown Belgrade – Economic and Market Peer Review** – IBI Group was retained to peer review the AECOM/McKinsey background work for the Master Plan for Uptown Belgrade, a 2,400-hectare greenfield site adjacent to New Belgrade, Serbia. The site was being master planned as a mixed-use community anchored by five themes; education, IT; Health and Wellness Tourism, Sports and Tourism. IBI Group was retained to review the urban design, master planning, market and economic assumptions to determine the feasibility of the scale and scope of development. Ms. Brown leads the market and economic component. (ongoing)

**Milton Mobility Hub -Market Peer Review** – IBI Group represents a majority landowner in the proposed Milton Mobility Hub. Planned for densities in excess of 150 people and jobs per hectare and supported by the implementation of high-order rail, the Town of Milton and Metrolinx the Regional transit provider are seeking to create a master plan which will transform a suburban community to transit supportive densities. IBI Group has been retained to review and comment on the plans. Specifically, Ms. Brown has been retained to assess the market fundamentals, financial assumptions and feasibility of the planned development.

**Burnaby Mixed Use Development Feasibility Study** – IBI Group was retained to complete a three part study to i) test the Burnaby residential, office and retail market ii) design a mixed use building for an infill site and iii) test the financial feasibility of the project. Ms. Brown was the project manager on the market and financial feasibility of this project. Ms. Brown reviewed the current supply and demand for residential and office space in Burnaby, with a focus on the Edmonds Town Centre to inform the future design. After a draft of the building was circulated, Ms. Brown tested the financial feasibility of the opportunity to inform the clients on whether to move forward with the development.

**County of Leduc – Economic Impact Assessment** – IBI group was retained by the County of Leduc (Alberta) to assess the potential impact of highway extension for the County. IBI Group considered the short-and-long term economic benefits of the development, including quantifying the potential development land which would be opened by the creation of the new roadway. (ongoing)

**Economic Development Strategy – Duke Heights BIA** --IBI Group was retained by the BIA to assist this employment area with their economic development strategy and re-branding. The existing employment area was looking to capitalize on recent transportation infrastructure investments, including a new subway stop and future LRT investments. IBI Group completed an employment SWOT which looked at existing typologies, transit infrastructure, employment clusters and local institutions. In concert with local business stakeholders, IBI Group helped create a vision for the



future of the BIA, along with recommendations for fiscal and planning policies to allow the area to capitalize on new infrastructure and growing employment sectors.

**Champagne Centre – Toronto, ON** - IBI Group was retained to complete a market and economic impact assessment of the Champagne Centre, a 270,000 sf former Ginger Ale bottling plant. The building had recently been purchased by a medical company looking to develop a health facility which was proposed to include extended supportive uses such as restaurants, retail, a long-term stay hotel and other wellness activities. IBI Group was retained to assist in demonstrating the positive economic impact of the proposed uses to the local and regional economy. As part of this study IBI Group completed a high-level market study which reviewed trends in medical office, hotel and recreational industries in order to inform the optimal mix of tenancies and create a synergistic environment which would support the local economy.

**Winnipeg Eastern Corridor Route Selection – Winnipeg, MB** – IBI Group was retained a sub-consultant by the City of Winnipeg to aid in undertaking a transit study to establish a plan for Rapid Transit within the eastern area of Winnipeg. The transit route has the potential to provide access to important destinations within the city, and strengthen connections between residents, employment, institutions, and cultural nodes. IBI Group lead the City Building stream of the study, encouraging the route selection and concept design to be used as a means for creating more vibrant mixed-use neighbourhoods with active pedestrian realms. Ms. Brown was responsible for the cost-benefit analysis component of this study.

**Hotel/Residential Development Assessment – Trivat, Montenegro** – IBI Group was retained to design a potential residential long-term stay/hotel seaside development in Trivat. Ms. Brown was the project manager on the market and financial feasibility component, which determined the opportunities for the two types of development. Analysis included construction costs, operational costs, property tax implications, occupancy and overall annual revenues.

## Land Needs and Growth Management

**City of Winnipeg Residential Growth Study** – IBI Group was retained to complete a residential growth strategy to accommodate approximately 200,000 new residents to 2040. Ms. Brown is the project manager on this file and dealt with day to day communications, stakeholder outreach and sub-consultants. A three phased approach which with a. develop a weighted criterion to measure growth opportunities b. using the weighted criteria to examine identified areas for growth and c. allocating the growth to various areas based on results of the evaluation.

**Vaughan Employment Lands Review** – IBI Group was retained by a landowner group in the City of Vaughan to complete an employment land inventory in support of a land use conversion. Ms. Brown was the project manager in charge of creating an employment land inventory and assessment, along with a review of the City of Vaughan's employment forecasts and an assessment of the ability to accommodate future growth.

**Bolton Residential Expansion Areas** – IBI Group was retained by one of the landowners in the potential Bolton Residential Expansion Areas to represent their lands as part of the assessment of the expansion areas. IBI Group was responsible for the land needs assessment, monitoring the Peel 2041+ growth forecasts and the fiscal impact assessment of the different options. Ms. Brown was the project manager on this file, and coordinated with the different consultants, and managed day to day activity on the file.

**Ottawa Land Needs Assessment –Mattamy/ Minto Communities** – IBI Group was retained by two major developers in the City of Ottawa to review and complete an analysis of the City of Ottawa's land needs assessment to 2041. IBI Group reviewed the impact of employment land conversions, servicing, available land and intensification to determine if the City had sufficient land to accommodate the forecasted residential growth to the planning horizon.



**Clarington Official Plan Update – Tribute Communities** – IBI Group was retained to assist a developer with lands in the Courtice area, to understand and advise on the impact of the draft Official Plan policies on their land holdings. Ms. Brown as project manager reviewed the proposed policies, attended public meetings and assessed the future residential lands proposed by the by-law. This study included a residential land needs assessment.

**Brantford/Brant County Employment Accommodation – Walton Development and Management LP** – IBI Group was retained by Walton Development to examine the current inventory of employment and residential lands in the City of Brantford and Brant County to assess the need for additional lands to accommodate forecasted growth. Ms. Brown conducted a high-level overview of employment lands across the Greater Golden Horseshoe, including availability, competitiveness and local employment lands market.

**Welland Employment Lands Re-designation – Empire Communities** – IBI Group was retained by Empire Communities to work with the City of Welland and the Region of Niagara to review the re-designation of two parcels of former industrial land, one the former John Deere plant to mixed use. This study looks at the potential number of jobs and space which will need to be retained on the site, and how the re-designation of the sites will impact the City of Welland’s ability to accommodate future employment growth. (ongoing)

**Burlington Employment Lands Review – Paletta Developments** – IBI Group was retained by the developer to review the Phase 1 and Phase 2 Employment Lands Study including the key assumptions in the land budget and employment forecasts. Ms. Brown assisted in the analysis of the vacant Burlington Employment Lands, including development potential, servicing constraints, market appeal and timing of market absorption.

**Kitchener/Waterloo Land Needs Assessment – Schlegel Villages** – IBI Group to monitor and participate in the Region of Waterloo’s Municipal Comprehensive Review process in order to assist Schlegel in understanding the potential inclusion of their lands in the urban settlement area. This work included reviewing land supply and demand assumptions. (Ongoing)

#### **Development Charges and Municipal Finance Work**

**Peel Region – Non- Residential Development Charges – Orlando Corporation** – IBI Group was retained by Orlando Corporation, one of the largest non-residential developers in North America to assist them in assessing the validity of the proposed development charges in Peel Region along with their respective municipalities. IBI Group’s work considered the anticipated non-residential development, trends in development and floor space per worker assumptions which underpinned the charge.

**Community Benefit Charge Impacts – Homestead Homes** – IBI Group was retained by Homestead to understand the potential magnitude of the proposed new charge on “soft” services, replacing Development Charges, Parkland contributions and Section 37. IBI Group compared the current charges in multiple municipalities on a proposed development with the proposed charges to understand the magnitude of the charge. This work was used to draft a letter to the province.

**Devonleigh Homes – Community Benefit Charges/Development Charge Monitoring** – Devonshire Homes has nearly 2,000 units in six different municipalities, and has retained IBI Group to monitor and review proposed changes to the charges, along with Community Benefit Charge Strategy Studies and Parkland studies across the various municipalities to keep Devonleigh Homes appraised of any changes, their impacts and to represent Devonleigh Homes in discussions/negotiations with the municipalities and their consultants. (ongoing)

**McMaster University – Development Charges – Student Housing** – IBI Group has been retained by McMaster University to represent them in a hearing regarding the City of Hamilton’s decision to no longer allow exemptions for the University space and student housing. (ongoing)



**South East Courtice Secondary Plan – Fiscal Impact Assessment** – IBI Group represents the SE Courtice Landowners Group (LOG) in the Secondary Plan process. IBI Group, in submission to the Town of Clarington and its consultants has assessed the operating impacts on the City's finances of various land use concepts proposed throughout the process to assist in assessing one of the criteria used in assessing the concepts.

**28 Bathurst Street -- Build Toronto** -- IBI Group was retained to conduct a residual land value analysis to illustrate how the remediation costs influence the financial viability of residential, office and industrial redevelopment options. The analysis was informed by the market for these three asset classes, the job potential by asset class, and the impact of the development on the success of the area. The review helped Build Toronto select a financially viable development option aligned with stakeholder interests.

**Tourist Train Extension Feasibility Study – Albany, NY** – IBI Group was part of a multi-disciplinary team looking at the feasibility of extending an existing tourist train route through Warren County to Albany and New York City. Ms. Brown was the project manager on the economic and demographic component of this study. She looked at current tourism spending in the area, conducted case study research of other tourist trains and ridership across North America, and looked at trends in North American Tourism to inform the market and ridership feasibility component of this study.

**Hotel/Office Feasibility Study – Vaughan, ON** – IBI Group was retained by a developer who had a parcel of land, planned to develop with office and hotel facilities to undertake a feasibility study to support changes to the permitted size and design. Ms. Brown, as project manager on this file, directed the research into the Vaughan and York Region office market, including supply and demand assessments. Hotels and banquet facilities, along with neighbouring tourist attractions were mapped, in order to develop an understanding of the competitive environment. Finally, a review of trends in GTA hotels and hospitality informed the opportunities for increased hotel space.

#### Other Studies

**City of Toronto Employment Land Conversion** – IBI Group was retained to assess the feasibility of submitting three privately owned employment sites for conversion during the recent City of Toronto's Official Plan Review. Ms. Brown was responsible for review of the current planning status of the site and employment projections across the City using the City of Toronto Employment Survey and information on the construction and availability of current industrial product across the Greater Toronto Area. These studies were used to augment the conversion applications.

**450 Dufferin Employment Land Conversion – Hullmark Developments**– IBI Group was retained by Hullmark Developments, a predominantly non-residential developer, to assist in supporting their conversion of an employment land site near Liberty Village, in the City of Toronto, through the City's Municipal Comprehensive Review. IBI Group worked with designers and planners to assess the potential employment yields for the non-residential component of a proposed mixed-use development. IBI Group assessed the City of Toronto's employment forecasts, the existing employment area, information from the City of Toronto's Employment Survey to address local changes in employment and considered the provincial and city-specific employment land conversion criteria. Ms Brown is the Project Manager and Director on this file. (ongoing)

**Durham-Scarborough Bus Rapid Socio-Economic and Land Use Study** \_ Metrolinx– IBI Group was awarded a contract by Metrolinx to develop a preliminary design and conduct an environmental assessment for the Durham-Scarborough BRT corridor. The Real Estate, Economics and Planning team will complete a socio-economic and land use review to determine the potential impact that the project would have on these environments, and will put forward a collection of mitigation and monitoring measures to address potential adverse impacts. Robyn is the project manager on this task, and this work will support the overall corridor assessment and will inform the mitigation and monitoring measures. (Ongoing)



**Peel Housing Corporation Feasibility Assessment** – IBI Group was retained by Peel Housing Corporation to analyze nine affordable housing sites and identify which sites are most appropriate for infill and redevelopment opportunities. The Real Estate, Economics and Planning team completed a Market Demand Assessment to understand the current market conditions and determine rental demand looking forward. Robyn was the project manager of the demographic and market demand assessment to give an insight into the local rental market in Brampton and Mississauga.

**CN Intermodal Federal Hearing, Milton ON** - IBI Group was retained as part of the larger consulting group to represent CN in a federal Environmental Assessment Hearing regarding their proposed intermodal located on approximately 1,000 acres in south-west Milton, Ontario. The hearing sought to understand the impacts of the potential intermodal on the environment, finances, economy, real estate and traffic operations for the Town of Milton and the Region of Halton. IBI Group was retained specifically to understand the municipal financial impact, and impact on the Region to achieve employment growth targets to 2031. Ms. Brown was responsible for the growth management component and establishing the primary assumptions contemplated within the modeling relate to absorption, assessment value, capital costs, operating costs, user fees and development charges.

**Community Services and Facilities Studies** – Ms. Brown has worked on a number of community services and facilities (CS&F) studies in the City of Toronto and beyond to assess the impact of new development on existing community facilities and services. This work includes an assessment of area demographics, a development pipeline assessment including the forecasting of future residents and employment densities, CS&F inventories and gaps, 10-year service standard assessments and implementation strategies. Service delivery models include the review of the feasibility of community hubs.

Studies include:

- King Spadina Community Services and Facilities Update for the City of Toronto
- 87 Ethel, Toronto
- East Liberty Street
- 2799-1683 Kingston Road
- 1683 Bloor Street West
- 180 Finch Avenue West
- Glen Abbey Redevelopment

**Urban School Accommodation – City of Toronto** – IBI Group was retained by Tribute Communities to review school capacity and accommodation opportunities at an important transit hub. Ms. Brown was the project manager on this file, and considered current school capacities, redevelopment opportunities, reviewing case studies and demographics to inform the future school needs.

**Office Accommodation Study – Region of Peel** – IBI Group was retained by the Region of Peel to conduct a review of their existing offices, renovation and retrofitting costs, and market alternatives. As member of the IBI Team, Ms. Brown, assisted in the review of existing office accommodation, office alternatives and redevelopment options for surplus properties for the Region of Peel. Included in her work was a review of the current Peel Region and GTA West Office and land market, an inventory of potential lease, purchase and design build options to meet various timing and space needs for expansion and/or relocation.

**Toll Plaza Facilities Reuse Study – Los Angeles** – Ms. Brown was part of a study to explore the adaptive reuse and potential repurposing of 10 toll facilities and adjacent acreage. As part of this analysis, an inventory and assessment model was developed to evaluate the feasibility of the reuse



proposals. Criteria included cost-benefit analysis, environmental sustainability, market desirability and site configuration for adaptive uses.

**Railside Drive, Brampton Ontario** – IBI Group was retained to assess the opportunity for a joint venture development of a site adjacent to the Brampton Go Station. Ms. Brown assisted in conducting the market analysis and residual land value analysis.

**Glendale District Plan – Region of Niagara** – IBI Group has retained by the Region of Niagara to complete the Second Phase of their Glendale District Plan. Ms. Brown was responsible for the commercial needs assessment component of this study, looking at future commercial demand in light of population growth, in order to ensure the community had sufficient local retail services. (ongoing)

**O'Connor Drive Streetscape Masterplan – Toronto, ON** – IBI Group was retained to establish a vision, layout and detailed specifications for the implementation of a co-ordinated and high quality public/private streetscape. As part of this project, Ms. Brown completed a high level retail and development inventory, along with looking at trends and opportunities in street front retail. Demographic analysis complimented this assessment.

## Parking Studies

**Shared Parking Feasibility Study – Regional Municipality of Wood Buffalo** – In concert with IBI Group's Transportation Group, Ms. Brown assisted in a study on the feasibility of constructing civic shared parking in the downtown core in order to encourage new civic amenities and residential development in the downtown. Ms. Brown looked at case studies of parking authority models across North America and conducted a high level financial assessment.

**St. Catharines – Downtown Parking Strategy** – IBI Group was retained by the City of St. Catharines to develop a set of parking policies and strategies that would support the Garden City Plan and builds upon the existing parking system. As part of this study, Ms. Brown participated in the residential and employment growth forecasts, along with the financial model. Ms. Brown reviewed other municipalities to understand operating and financing systems, and did an analysis of the operating fund, rate structure, cash-in-lieu and the parking management model

**Town of Whitby – Downtown Parking Accommodation Site Evaluation** – Ms. Brown, as part of a larger parking strategy, assessed the potential for accommodating additional stalls within locations in the downtown. Phasing and redevelopment options were considered as part of this high level assessment.

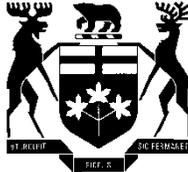
Other Parking Studies:

- City of Oshawa
- City of Barrie
- City of Hamilton (ongoing)



## Attachment 2 - Acknowledgement of Expert's Duty

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

**ACKNOWLEDGMENT OF EXPERT'S DUTY**

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

1. My name is .....Robyn Brown.....(name)  
I live at the .....Municipality of Toronto.....(municipality)  
in the.....Municipality of Toronto.....(county or region)  
in the .....Province of Ontario.....(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 May 17, 2021.....

Signature