

**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 STEPHEN SCHAEFER

Prepared for ClubLink Corporation ULC and ClubLink Holdings Limited

May 17, 2021

Qualifications

1. I am a Civil Engineer and a principal of SCS Consulting Group (SCS). SCS is a Civil Engineering Consultant providing services primarily to private sector clients, and also to public sector clients. SCS’s key services include Master Servicing and Stormwater Management studies in support of the Secondary Plan, Draft Plan of Subdivision and Site Plan planning process, detail design of municipal servicing and stormwater management systems, contract administration and on-site services and provision of cost sharing engineering services for landowner groups.
2. I have been practicing as a Civil Engineer since my graduation from Ryerson University with a Bachelor of Engineering in 1989. I have been qualified to give

professional engineering evidence before the Ontario Municipal Board (as it was then known) on numerous occasions.

3. A copy of my curriculum vitae is attached to this Witness Statement, together with a signed Acknowledgement of Expert's Duty form.

Retainer

4. In April of 2015 SCS was retained by ClubLink Corporation in connection with the proposed re-development of the Glen Abbey property. This included the provision of preliminary engineering services in support of the preparation of a proposed development plan, and completion of a Functional Servicing and Stormwater Management Report in support of Official Plan Amendment, Zoning Bylaw Amendment and Draft Plan of Subdivision applications. SCS's role is to provide and coordinate servicing design related to storm, sanitary and water servicing as well as stormwater management (SWM).

Summary of Evidence and Opinions

5. The following issues from the Issues List will be addressed from an Engineering perspective.
6. **Issue #10 – Town of Oakville – *Have sufficient data and analysis been provided to determine the water demands of the proposed development?***
7. A Water System Analysis prepared by TMIG on February 22, 2021 was included in Appendix L of the Functional Servicing Report for the Proposed Redevelopment of the Glen Abbey Golf Club dated February 2021 by SCS Consulting Group (FSSR). The water demands have been calculated based on the proposed development statistics, resulting in a peak hour rate (excluding fire) of 75.7 L/s and an average day flow of 42.6 L/s. The model results indicate that pressure requirements set out by the Region of Halton are satisfied at all junctions and every node can achieve the minimum fire flow identified by the Regional design criterion. In my opinion, sufficient data and analysis have been provided to determine the water demands of the proposed development.
8. **Issue #11 – Town of Oakville – *Is the design of the water infrastructure within the subject lands sufficient to ensure the adequacy and security of the system of water delivery?***
9. As described in Section 5.2 and Appendix L of the FSSR, the water system analysis includes measures to address Halton Region's request to add a third supply main from Golfview Court, in addition to the connection to the existing 750mm diameter watermain on Upper Middle Road and the connection to the existing watermain under Dorval Drive. The FSSR also describes upsizing of the 200mm diameter watermain across Dorval Drive to a 300mm diameter watermain in response to the Region's request. In addition, there is an opportunity to provide a provisional interconnection with the Zone 2 supply system entering the site from

Old Abbey Lane. The connection could be via a redundant connection, controlled by a check valve, which would open if the Zone 3 supply, currently proposed to service the site, were interrupted. This redundant connection, if desired by the Region, could be used to provide emergency fire flows. The water analysis has proven that the Regional standard water pressure and fire flow design criteria can be met at all internal nodes. Therefore, in my opinion, the design of the water infrastructure within the subject lands is sufficient to ensure adequacy and security of the water delivery system.

10. **Issue #12 – Town of Oakville** – *Is there sufficient capacity in the existing water supply infrastructure to accommodate the demand?*
11. As described in Section 5.2 and Appendix L of the FSSR, the water analysis has confirmed that the Region’s design criteria for water pressure and fire supply can be met at all nodes based on connections to the existing water system at Dorval Drive, Golfview Court and Upper Middle Road, along with a provisional emergency fire flow connection to the Zone 2 system on Old Abbey Lane. The hydraulic modelling assessment included in the FSSR was based on adding the full proposed redevelopment to the Region’s existing condition hydraulic model. In my opinion, there is sufficient capacity in the existing water supply infrastructure to accommodate the demand associated with the proposed redevelopment.
12. **Issue #13 – Town of Oakville** – *Has the impact of the sanitary drainage flow from the proposed development been appropriately evaluated to determine whether there is sufficient capacity in the existing infrastructure, including in downstream sewers and the Third Line pumping station?*
13. As described in Section 4.2 and Appendix L of the FSSR, the existing downstream sanitary sewer capacity has been evaluated using the Region’s existing condition InfoSewer model, including a survey of pipe inverts at key areas of capacity concern as requested by the Region. The modelling results, as provided in the FSSR, have demonstrated sufficient residual capacity in the existing downstream sanitary sewer system. The FSSR also identified that the existing Third Line sanitary pumping station has a residual capacity of 150 L/s, based on the anticipated 2031 flow as projected in the South Halton Water and Wastewater Master Plan (June 2008). This residual capacity exceeds the anticipated average day flow rate of 20.21 L/s from the re-developed Glen Abbey lands.
14. **Issue #48 – Regional Municipality of Halton** – *Do the Applications have appropriate regard for the Region's Urban Services Guidelines?*
15. Section 4.2 of the FSSR specifically notes that the sanitary system is to be designed per Region of Halton criteria. Section 5.2 of the FSSR notes the water system is to be designed per the Town of Oakville and MECF criteria, however reference to the Region’s criteria was inadvertently omitted from this section. It is understood that the water system is owned and operated by the Region and therefore the entire system will be designed in accordance with Regional standards

and will be subject to review and approval by the Region. It is my opinion that the Applications have appropriate regard for the Region's Urban Services Guidelines and that matters of detailed engineering design for municipal services can be adequately addressed through Draft Plan of Subdivision conditions and subsequent Subdivision or Site Plan Agreements.

16. **Issue #49 – Regional Municipality of Halton** – *Has sufficient information been provided and analysis completed to demonstrate how the proposed development can be appropriately serviced from a water and wastewater perspective?*
17. In my opinion, sufficient information has been provided and analysis has been completed to demonstrate how the proposed redevelopment can be appropriately serviced. Section 4.0 and Appendix L of the FSSR demonstrates how the proposed redevelopment will be serviced with sanitary sewers, including both the internal alignment and the external connection points and associated sufficient capacities. Section 5.0 and Appendix L of the FSSR demonstrates how the proposed redevelopment will be serviced with water infrastructure to adequately meet domestic and fire requirements, including a description of the associated connection points to the existing infrastructure.
18. **Issue #50 – Regional Municipality of Halton** – *Have the downstream water and wastewater impacts been adequately evaluated and addressed, including but not limited to the need for pipe oversizing, replacements and/or upgrades to the Third Line Sanitary Sewer Pump Station?*
19. See the Response to Issues #11, #12 and #13 above.
20. **Issue #52 – Regional Municipality of Halton** – *Have the water pressure zone boundaries been appropriately evaluated and satisfactory solutions provided to address any potential reconfigurations, external works or modifications required to accommodate the proposed development?*
21. The water pressure zone analysis is included in Appendix L of the FSSR. As demonstrated, the subject lands are proposed to be serviced from the existing Zone 3 system and will have adequate pressure and fire flow throughout. A provisional interconnection with the Zone 2 system from Old Abbey Lane has been identified in Section 5.0 and Appendix L of the FSSR for use as an emergency fire supply, subject to the Region's preference.
22. **Issue #53 – Regional Municipality of Halton** – *Have the servicing solutions proposed for the development been designed and funded such that there will be no additional costs to the Region arising from the development?*
23. All servicing infrastructure within the subject lands and associated interconnection with the existing Regional water and sanitary system will be funded and constructed by the developer. The development will contribute to all required Regional development charges with regard to external infrastructure contributions.

List of Documents to be Referred To

24. Functional Servicing and Stormwater Management Report, Proposed Re-Development of the Glen Abbey Golf Club, Town of Oakville, February 2021
25. Glen Abbey Development Water and Sanitary Servicing Analysis, February 22, 2021, The Municipal Infrastructure Group
26. Halton Region, Water and Wastewater Linear Design Manual, Version 2.0, May 2014
27. Urban Services Guidelines, Regional Official Plan Guidelines, Halton Region



Stephen Schaefer, P. Eng.
Principal
SCS Consulting Group

Appendix "A"

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

Applicant and Appellant: Subject:	Clublink Corporation ULC and Clublink Holdings Ltd. 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: Subject:	Clublink Corporation ULC and Clublink Holdings Ltd. 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: Subject:	Clublink Corporation ULC and Clublink Holdings Ltd. 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



Steve Schaefer, P. Eng.
Principal
SCS Consulting Group

Introduction

Steve is a founding partner of SCS Consulting Group. He has over 30 years of experience and has been responsible for management and technical execution of engineering projects from the initial planning stages through to construction. His strong background in municipal design, water resources, and project management allow for a seamless approach to his projects from start to finish.

He has recently led design teams responsible for municipal design of many large residential, industrial, commercial, office and high/low rise condominium developments throughout the GTA. Steve also specializes in providing engineering services (such as cost sharing and project management) to several large development groups. Steve's experience includes provision of expert witness services at the Ontario Municipal Board.

Steve maintains a strong industry presence through participation in numerous BILD committees as well as being on the board of the Lake Simcoe Conservation Foundation.

Steve brings a very practical approach to all of his projects, which result in a feasible, cost efficient and easily implementable design and construction program.

Education

Ryerson University, Toronto, Ontario, B.Eng., Civil Engineering, 1989

Professional Affiliations

Professional Engineer, Association of Professional Engineers of Ontario, 1992

Consulting Engineer, Association of Professional Engineers of Ontario, 1999

Member, Ontario Society of Professional Engineers

Board Member, BILD

Member, Whitchurch-Stouffville Chamber of Commerce

Member, International Erosion Control Association

Past Project Experience

Friday Harbour – 2000 Unit Marina and Golf Course Resort, Town of Innisfil

- ➔ Steve provided engineering input to the creation of the Resort Concept Plan and managed the engineering studies through the planning process.
- ➔ The stormwater system was designed to include an extensive treatment train of Low Impact Development practices to minimize the phosphorous impacts on Lake Simcoe.
- ➔ The storm servicing solution required to service the 4km of new shoreline, which was essentially at a constant elevation, included an innovative series of gravity and pumped systems with on-line storage to minimize the pumping costs.
- ➔ The project included a comprehensive and multi-disciplinary approach to satisfy the extremely onerous conditions imposed by the agencies through the OMB to ensure no environmental impacts to the lake or surrounding areas occur.

Times Group – Markham Centre – Master Servicing Plan and Detailed Design, City of Markham

- ➔ Steve coordinated a multi-disciplinary team to complete a Master Environmental Servicing Plan to support this 4500 unit high rise residential and mixed use (office, commercial, parks) project, proposed to meet LEED Gold standards.
- ➔ Provision of expert witness services at the Ontario Municipal Board.
- ➔ Managed the engineering design of the site services, including use of “green” technologies including green roofs, infiltration galleries, rainwater cisterns for irrigation, and oil-grit separators.
- ➔ Managed the implementation of a \$7M external sanitary trunk sewer and input to the Class EA for two bridge crossings of the Rouge River.

Midhurst Secondary Plan and Plans of Subdivision – 400ha, 5000 lots, Town of Springwater

- ➔ Managed the engineering studies through the planning process including preparation of the Master Servicing and Stormwater Management Plan studies for the Secondary Plan.
- ➔ Provision of expert witness services during the Ontario Municipal Board process
- ➔ Provided Group Engineering services for the developer’s group.
- ➔ Managed the detailed design for the subdivisions and external infrastructure.

Ballantrae Golf and Country Club – 900 Lot Lifestyle Community, Town of Whitchurch-Stouffville

- ➔ Responsible for coordinating the engineering support for this lifestyle community and golf course from the initial planning stages to detailed design and construction. The site is located on the Oak Ridges Moraine. To mitigate the environmental impact in this sensitive area, the stormwater management design incorporated a “zero” run-off solution, with the water either being used for golf course irrigation or infiltrated to the ground. The subdivision design included alternate development standards for all roads and services.



Aurora 2C Secondary Plan and Subdivisions – Master Servicing and SWM Plan, and Design of Three Subdivisions, Town of Aurora

- Managed the engineering studies through the planning process for this 566 acre, 3000 lot residential subdivision area.
- Provided group engineering services including provision of cost sharing assistance.
- Managed the design of three residential subdivisions, including creek crossings and SWM facilities.

Industry Involvement

- MOECC Low Impact Development Stormwater Management Guidance Document and updated ECA process
 - BILD representative on the Stakeholder Review Committee.
 - Coordinated BILD comments on the document, leading to successful improvements to the LID implementation requirements.
 - BILD representative at MECP working group meetings to facilitate the transition of the ECA process for sewers and SWM systems to a Municipal ECA process.
- York Region DC Review
 - Member of the BILD sub-committee established to coordinate with York Region to provide input to the proposed DC update.
- City of Vaughan DC Review
 - Member of the Vaughan developers group established to coordinate with the City of Vaughan staff to provide input to the proposed DC update.
- TRCA Sustainable Technologies Evaluation Program Steering Committee
 - Member of the Steering Committee, working with GTA area conservation authorities, municipalities, regions and provincial agencies to review and input on upcoming policies, technologies, training and guidelines.
- BILD Board of Directors
 - Acting Board member in 2019/2020



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..... Stephen Schaefer.....(name)
I live at the ...City of Pickering.....(municipality)
in the..... Regional Municipality of Durham.....(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 12, 2021.....

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Signature