



January 14, 2025

Delia McPhail – Planner  
Town of Halton Oakville  
1225 Trafalgar Road  
Oakville, ON L6H 0H3

Dear Ms. McPhail:

**RE: PLANNING JUSTIFICATION ADDENDUM:  
OFFICIAL PLAN AMENDMENT: RESUBMISSION  
1295 SIXTH LINE, CREDITMILLS DEVELOPMENT GROUP  
TOWN FILE: OPA 1515.23  
OUR FILE 20326C**

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The purpose of this Addendum Planning Justification Report is in response to the Town of Oakville's June 21, 2024 Development Application Comment Report regarding the Creditmills Development Group's Official Plan Amendment application of May 1, 2024. This addendum provides the background context, a list of revisions to the development concept, an overview of the application's conformity with the recently approved Provincial Planning Statement and an assessment in relation to the Town's Housing Strategy and Action Plan, as well as a response as to how the proposed amendment has addressed the Town Council's questions regarding various planning matters.

Many of the Town's comments have also been addressed in the attached Comment Matrix submitted with the resubmission package. Several reports and studies from the original submission have also been revised and include:

- Revised Concept Site Plan with revised entrance, amenity areas identified and waste plan details;
- Revised Traffic Impact Study (TIS) with revised plans noting the provision of required parking spaces based on unit sizes;
- Revised Functional Servicing Report (FSR) outlining the Halton Region Wastewater Servicing allowable I&I rates, as well as including the fire flow testing demonstrating that the existing water system can support the development;
- Revised Stormwater Management Report (SWM) identifying storage sizing and groundwater discharge; and,
- Revised ESSQ form utilizing the most recent Halton Region form.

Revised pages of the Planning Justification Report (PJR): Section 2.5 Transportation Context, are attached to this Addendum as Appendix 1. These revisions provide the corrected Oakville Transit route numbers that were incorrectly referenced in the submitted PJR in May, 2024.

New materials are also included with the resubmission package and include:

- Arborist Report prepared by Maple Hill Tree Services Inc., dated December 12, 2024;
- Tree Protection Plan prepared by Maple Hill Tree Services Inc., dated December 12, 2024;
- Preliminary Site Servicing Plan prepared by EXP, dated January, 2024 showing topographic contours;
- Preliminary Grading Plan prepared by EXP, dated January, 2024 showing topographic contours; and,
- ESA Phase 1 Letter of Reliance, prepared by EXP and dated December 16, 2024.

It should be noted that several of the additional materials provided were not required as part of a complete application and are provided to generally respond to issues raised. Given the nature of the planning application, which is an Official Plan Amendment, more detailed reports and plans will be provided with the future zoning and site plan applications.

### ***1.0 BACKGROUND CONTEXT***

On May 1, 2024, an application for an Official Plan Amendment was submitted to the Town of Oakville to facilitate the proposed development of a 70-unit, six storey residential building on the Subject Lands. The unit types would include 42 one bedroom, 24 two bedroom and four 3-bedroom units with 74 parking spaces provided below grade and 6 at grade spaces. This application was deemed complete on May 6, 2024 by the Planning Services Department.

Town staff, in their June 25, 2024 report to the Planning and Development Council, noted that as part of a future Zoning By-law Amendment application for the Subject Lands, they would, at that time, consider the following additional matters for development of the Subject Lands:

- Transportation implications (including travel demand management strategies, and parking utilization)
- Pedestrian connections and walkability
- Stormwater Management
- Tree Preservation
- Functional Servicing
- Urban Design
- Shadow/sun impacts.

The majority of these matters have been addressed within the submitted comment matrix and in the revised reports and plans submitted with this resubmission. It should be noted that a Tree Preservation Plan and Arborist Report have been prepared for this Official Plan Amendment resubmission and are included in the resubmission package.

Staff also noted in the June report that they anticipated the submission of the corresponding Zoning By-law Amendment application prior to a final recommendation on the Official Plan Amendment. The Zoning By-law Amendment application will be considered for submission once the resubmitted OPA has been further evaluated.

On July 8, 2024, a Public Meeting was held that provided opportunities for the public to provide input on the Official Plan Amendment application. The public comments have been compiled within the attached comment matrix which includes responses to address the concerns. Town Council also identified several matters for which they sought further clarification. These included:

- Complete Community
- Intensification
- Unit Mix
- Requirement of Affordable Housing units
- Conceptual Building: Entrance Location & Rooftop Lighting
- Site Plan Design (waste management; construction management; tree removal, etc.)
- Parking Ratios (vehicular/bicycle)
- Zoning By-law Amendment and final Site Plan submissions

## ***2.0 REVISED DRAFT CONCEPT PLAN***

During the past half year, the project team have undertaken revisions to the draft concept plan in response to both the Statutory Public Meeting comments and the City planning staff inputs. The following provides an overview of the main revisions that have been undertaken between the first draft concept plan submission and this revised concept included within this resubmission.

The main revisions undertaken in this resubmission include:

- Yard Setbacks
  - Revised front entrance from side to front façade along Sixth Line
  - Increased front yard setback to 7.57 m
  - Rear yard setback dimension of 27.32 m
- Landscape Buffer
  - Increased landscape buffer width to 3.0 m by front entrance driveway.
- Waste Management
  - Revised Refuse Pickup to “private”.
- Amenity Space
  - Added Amenity Space in a number of locations in rear yard.
  - Added rooftop greenspace in Amenity Areas.
- Area Calculations
  - Minor revisions to area calculations
- Building Design
  - Revised building façade at front elevation, facing Sixth Line
- Parking
  - Removed one parking space to bring quantity in line with regulatory requirement of 80 parking spaces by reducing size of one sixth floor 2-bedroom unit from 79.2 m<sup>2</sup> to 74.5 m<sup>2</sup>

Zoning By-law 2014-014 Vehicle Parking Standards: 1295 Sixth Line Proposed Parking Provision (OPA)					
Land Use		No. of Units	Minimum Requirements		Proposed Parking Supply
			Parking Rate	Parking Spaces	
Apartment Dwelling	Units less than 75 m <sup>2</sup> NFA	52	0.75 per dwelling unit	39	80
Visitor			0.25 spaces per unit	13	
Apartment Dwelling	Units greater than 75 m <sup>2</sup> NFA	18	1.25 per dwelling unit	23	
Visitor			0.25 spaces per unit	5	
<b>Total:</b>				80	80

- P-01: The Underground Parking has been changed to a 3% sloped slab, to drop the slab along the south property line to provide over 2 m of planting depth for trees.
- P-06: The cross Section has been revised to show the sloped basement slab and dropped basement roof
- Revised access to enclose Basement Bike Storage
- Miscellaneous
  - Added paving notes on adjacent property.

### 3.0 PROVINCIAL PLANNING STATEMENT 2024

The Provincial Planning Statement 2024 ('PPS 2024') was issued under Section 3 of the Planning Act and came into effect on October 20, 2024. This PPS replaces the previous Provincial Policy Statement that had come into effect on May 1, 2020. The PPS 2024 represents the harmonization of the previous PPS 2020 with the Growth Plan 2019. The Province describes the PPS 2024 as a planning tool that municipalities need in order to build more homes while also enabling the municipality to support development and increase housing supply. The vision for Ontario is to:

- *increase the supply and mix of housing options; and to*
- *provide a sufficient supply with the necessary mix of housing options to support a diverse and growing population and workforce, now and for many years to come.*

The role of the PPS 2024 is to set the policy foundation for regulating the development and use of land province wide. The PPS 2024 also notes that, "Municipal official plans are the most important vehicle for implementation of the Provincial Planning Statement." Under the legislative authority section, the PPS 2024 also states:

*In respect of the exercise of any authority that affects a planning matter, section 3 of the Planning Act requires that decisions affecting planning matters shall be consistent with policy statements issued under the Act.*

Within the General Policies for Implementation and interpretation, section 6.1.7 indicates that in situations where a municipal Official Plan has not been updated to be consistent with the PPS 2024, the planning authority must still make a decision that is consistent with the PPS 2024.

In assessing the revised development proposal for the Subject Lands, this Addendum further identifies how the proposed Official Plan Amendment ('OPA'), and the revised concept plan, continues to be consistent with the new PPS 2024 policies.

Section 2 of the new PPS sets out a number of policies with respect to Building Homes, Sustaining Strong and Competitive Communities as follows:

2.1 *Planning for People and Homes*

2.1.4 *To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall:*

a) *maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development.*

2.1.6 *Planning authorities should support the achievement of complete communities by:*

a) *accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses ..., recreation, parks and open space, and other uses to meet long-term needs;*

**The proposed OPA supports the Province's policy of providing housing options, with a proposed density that will meet projected growth requirements. The proposed amendment adds a housing option to diversify housing and meet the needs of future residents in an existing neighbourhood that is well serviced by employment, schools, parks and facilities.**

Section 2 of the PPS sets out additional policies related to housing as follows:

2.2 *Housing*

2.2.1 *Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:*

b) *permitting and facilitating:*

1. *all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*

- c) *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
- d) *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.*

**The proposed amendment to the Official Plan introduces a housing type and building that is contextually appropriate and compatible within an existing residential area. The proposed development efficiently uses an existing residential lot serviced by existing infrastructure, public service facilities and active transportation.**

The Subject Lands are located within the Town’s Settlement Area and the built up area.

2.3.1 *General Policies for Settlement Areas*

2.3.1.2 *Land use patterns within settlement areas should be based on densities and a mix of land uses which:*

- a) *efficiently use land and resources;*
- b) *optimize existing and planned infrastructure and public service facilities;*
- c) *support active transportation;*
- d) *are transit-supportive, as appropriate.*

2.3.1.3 *Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.*

2.3.1.4 *Planning authorities shall establish and implement minimum targets for intensification and redevelopment within built-up areas, based on local conditions.*

**The proposed OPA provides for intensification within the residential neighbourhood area of the Town which is located within the Settlement Area. While not located in a Strategic Growth Area, the Subject Lands reflect a site with an opportunity to provide for modest and compatible intensification within an existing area which maintains the existing lot patterns within the established neighbourhood and introduces a density that more efficiently utilizes settlement area lands. By intensifying an existing lot, the amendment will support the development of a residential housing option that optimizes existing infrastructure and public service facilities and supports transit. The amendment supports redevelopment that achieves the intent of complete communities to provide a mix of housing options in areas served by existing infrastructure and facilities. .**

2.9 *Energy Conservation, Air Quality and Climate Change*

2.9.1 *Planning authorities shall plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:*

- a) *support the achievement of compact, transit-supportive, and complete communities.*

**As noted above, while the amendment is not proposing lot pattern changes, it represents the achievement of a compact apartment form within an existing community.**

6.1 General Policies for Implementation and Interpretation

6.1.12 *Density targets represent minimum standards and planning authorities are encouraged to go beyond these minimum targets, where appropriate, except where doing so would conflict with any policy of the Provincial Planning Statement or any other provincial plan.*

**The proposed amendment increases the density of an existing lot within an existing residential area. This density increase supports the PPS 2024 policies and vision to increase the supply and mix of housing options in support of a growing population and workforce, through a compatible and appropriate design.**

8. *Definitions*

***Compact built form:** means a land use pattern that encourages the efficient use of land, walkable neighbourhoods, mixed land uses (residential, retail, workplace, and institutional) all within one neighbourhood, proximity to transit and reduced need for infrastructure. Compact built form can include detached and semi-detached houses on small lots as well as townhouses, duplexes, triplexes and walk-up apartments, multi-storey commercial developments, and apartments or offices above retail. Walkable neighbourhoods can be characterized by roads laid out in a well-connected network, destinations that are easily accessible by transit and active transportation, sidewalks with minimal interruptions for vehicle access, and a pedestrian-friendly environment along roads.*

***Complete communities:** means places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.*

**The proposed Official Plan Amendment efficiently utilizes land through future development within an established grid patterned, walkable neighbourhood. The proposed amendment supports development on a lot that is adjacent to transit and serviced by existing water and wastewater infrastructure. The proposed lot is accessible by transit and public sidewalks, as well as informal pathways through the abutting school site with minimal interruptions for vehicle access.**

**The Subject Lands are located within an existing neighbourhood that offers equitable access to many necessities for daily living, including jobs, transportation options, public service facilities, local stores and services. The proposed amendment will add to the**

**range of housing options that currently exist offering more housing options for a wider range of demographics and needs. Adding a compact apartment form will support a more inclusive complete community by supplying housing that supports the needs of a diverse population.**

#### **4.0 HOUSING STRATEGY AND ACTION PLAN**

On December 9, 2024, the Town of Oakville Planning & Development Committee approved the Housing Strategy and Action Plan. The strategy is founded on the Livable Oakville Plan (2009, Consolidated August 31, 2021) ('OP') Mission Statement:

*To enhance the Town's natural, cultural, social and economic environments by ensuring that environmental sustainability, cultural vibrancy, economic prosperity and social well-being are incorporated into growth and development decisions.*

It is also guided by the guiding principle of OP, s.2.2.2:

##### *2.2.2 Providing choice throughout the Town in order to:*

- a) enable the availability and accessibility of a wide range of housing, jobs and community resources to meet the diverse needs of the community through all stages of life;*
- b) provide choices for mobility by linking people and places with a sustainable transportation network consisting of roads, transit, walking and cycling trails; and,*
- c) foster the Town's sense of place through excellence in building and community design*

The Housing Strategy acknowledges the Town's Housing Pledge to deliver 33,000 residential units by 2031/32 (e.g. next 6 to 7 years). While it emphasizes developments in areas that may experience insufficient infrastructure capacity, the Subject Lands are currently serviced and contain the capacity to service the future development of the lands as proposed through the Official Plan Amendment. The Strategy also notes that to meet the Town's housing pledge within the next 6 to 7 years, the Town needs to produce approximately 3,300 residential units annually. The Town acknowledges that housing completions will "trend toward the supply of higher density housing forms as part of the overall housing mix and assist to achieve housing mix."

The Housing Strategy also notes that the higher density housing forms are the least represented housing form in Oakville, with apartment buildings that are five or more storeys making up only 12% of Oakville's housing mix, while 60% of the Town is made up of low-density, low-rise development. The Housing Mix Target in the Regional Official Plan calls for at least 65 percent of new housing units produced annually in Halton to be in the form of townhouses or multi-storey buildings (higher density housing) to 2031.



The Housing Strategy identifies several goals, and in part include the following:

- Goal 1* Support Growth Management and Increase the Housing Supply  
*Objective: Identify, encourage, and enable housing opportunities within the town's urban structure, which functions as the foundation for growth management in Oakville.*
- Goal 2* Improve Housing Affordability, Housing Options and Housing Choice  
*Objective: Enable a greater diversity of housing types in more places throughout the town, where appropriate, focusing on housing types, sizes and tenures that are in short supply and housing that improves affordability.*
- Goal 5* Engage, Raise Awareness, Build Capacity  
*Objective: Engage town staff, agency partners and the public to raise awareness and build the community capacity necessary to support the construction of a wide range of housing types that are needed throughout Oakville.*
- Goal 6* Collaborate  
*Objective: Work with agency partners and other levels of government to achieve the goal of creating more housing, while ensuring growth is contextually appropriate, including assessing capacity based on the developable land area and density range, and is environmentally and fiscally responsible.*

The Town expects the housing development outcomes to include:

- Increased Housing Supply (more homes built)
- Improved Affordability (more homes people can afford)
- Enhanced Housing Choice (more types of homes people need)
- Accelerated Housing Delivery (more homes faster)
- Development of Livable, Complete Communities (a place to call home with the services people need)

In regard to 'actions', the majority of the required actions either have not been started or are ongoing. Examples include, in part:

- Starting an Official Plan Review (OPR) to bring the Livable Oakville Plan into consistency with the Provincial Planning Statement 2024;
- Starting an exploration of opportunities for growing the housing supply within the town's established residential areas while upholding the overall urban structure and growth management framework that directs the majority of growth to an identified system of nodes and corridors. This exploration involves initiating a Complete Residential Areas Review, gentle density and/or missing middle strategy, and/or subcomponents thereto, and have any resulting OPAs approved, as applicable.
- Starting a review to develop a policy section specific to housing in the general policies in the Livable Oakville Plan, including any goals and objectives for housing town-wide,

and to start a Housing Needs Assessment Report and have resulting OPA approved, as applicable.

- Completion of a Capital Forecast Review which is currently ongoing and to be completed in 2026.

**In context of the Housing Strategy & Action Plan's actions not having been initiated, the proposed OPA will result in the delivery of residential units, in the interim, that assist in achieving the Town's 6-7 year target of having 33,000 unit completions by 2031/32. The proposed amendment and resulting development will support the Town's achievement of Goals 1, 2 and 6, and in context of the Town delivering on Goal 5.**

## ***5.0 COUNCIL QUESTIONS: PLANNING MATTERS***

During the July, 2024 Public Meeting, the Council posed questions regarding several matters that relate to Provincial legislation, Provincial policies, as well as to Town Official Plan policies. The following are responses to several questions of Council requiring further clarification and descriptions.

### **5.1 Complete Community**

The Provincial Planning Statement 2024 (PPS) defines Complete Communities as:

*means places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for equitable access to many necessities for daily living for people of all ages and abilities, including an appropriate mix of jobs, a full range of housing, transportation options, public service facilities, local stores and services. Complete communities are inclusive and may take different shapes and forms appropriate to their contexts to meet the diverse needs of their populations.*

In the context of the proposed application, the proposed development provides for an inclusive development within the existing neighbourhood to meet the diverse needs of the population and future growth for the Town within an existing serviced area. Providing for modest, compatible multi-unit development on the Subject Lands is an example of intensification outside of the defined Strategic Growth Areas that adds to housing supply while respecting the surrounding area context and is provided without adverse impacts.

### **5.2 Intensification**

Under the current Provincial Planning Statement 2024, section 2: Housing states that planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by permitting and facilitating:

- all types of residential intensification, including development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3 wherein planning authorities shall support general intensification and redevelopment to support the

achievement of complete communities, including by planning for a range and mix of housing options;

- promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and
- requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.

Livable Oakville Plan, Section 4 states:

*In managing growth and change, the use of existing infrastructure and public service facilities should be optimized wherever feasible before consideration is given to the development of new infrastructure. Infrastructure investment shall be cost-effective and co-ordinated to support and facilitate intensification. The Town will consider planning approval, financial and other incentives to support the development of intensification areas.*

Section 4.3 states:

#### *Residential Intensification Outside of the Growth Areas*

*It is the policy of the Plan that the key focus for development and redevelopment to accommodate intensification will be the locations identified as Growth Areas. Lands outside of Growth Areas are predominantly stable residential communities which consist of established neighbourhoods. While the Plan encourages intensification generally throughout the built up area, it also recognizes that some growth and change may occur in these areas provided the character of the areas is preserved and the overall urban structure of the Town is upheld. Intensification outside of the Growth Areas including additional intensification opportunities such as infill, redevelopment and greyfield and brownfield sites, will be considered in the context of this Plan.*

This section of the Livable Oakville Plan specifically reference infill and redevelopment outside of Growth Areas as an important opportunity for intensification to be considered in the context of the Plan.

Section 11: Residential states that, *"a variety of residential uses are to be accommodated through the three Residential land use designations: Low Density Residential, Medium Density Residential and High Density Residential. These designations provide for a full range of housing types, forms and densities. While the majority of intensification and development within the Town is to occur within the Growth areas."* The section also indicates that intensification outside of the Growth Areas within the stable residential communities will be subject to policies that are intended to maintain and protect the existing character of those communities.

This section also states an objective of the Town is to: *"encourage an appropriate mix of housing types, densities, design and tenure throughout the Town, promote housing initiatives to facilitate revitalization, compact urban form and an increased variety of housing alternatives,"* and, *"promote*

*innovative housing types and forms to ensure accessible, affordable, adequate and appropriate housing for all socio-economic groups."*

Policy 11.1.8, states that Intensification within the stable residential communities shall be provided as follows:

- b) Within the stable residential communities, on lands designated Low Density Residential, there may also be sites at the intersection of arterial and/or collector roads, or sites with existing non-residential uses, that have sufficient frontage and depth to accommodate appropriate intensification through development approvals. Intensification of these sites may occur with Low Density Residential uses in accordance with section 11.1.9 and all other applicable policies of this Plan.*
- c) Within the stable residential communities, on lands designated Medium Density Residential and High Density Residential, there may be underutilized lands on which additional development may be appropriate. Intensification of these lands may occur within the existing density permissions for the lands and may be considered subject to the requirements of section 11.1.9 and all other applicable policies of this Plan.*

While the Subject Lands have an existing single detached home that is vacant, they are designated Low Density Residential but adjacent to High Density Development. It is appropriate to consider the proposed Official Plan Amendment in the context of 11.1.8 and through 11.1.9 as a unique opportunity for modest intensification within the existing residential area.

The evaluation of the proposed development in accordance with the policies of 11.1.9 are still applicable and the proposed amendment will facilitate the proposed revised development which continues to maintain and protect the existing neighbourhood character\* which is reflected in the high, medium and low density surrounding context.

*11.1.9 Development within all stable residential communities shall be evaluated using the following criteria to maintain and protect the existing neighbourhood character:*

- a) The built form of development, including scale, height, massing, architectural character and materials, is to be compatible with the surrounding neighbourhood.*
- The proposed development seeks to incorporate a six-storey apartment building along Sixth Line, adjacent to an existing seven storey apartment building to the immediate south of the Subject Lands (already designated as High Density Residential). The proposed height in this regard is compatible and provides a logical extension of the existing High Density designation and will provide a consistent built form and density in terms of height and density along Sixth Line.**
- In terms of scale and massing, the proposed development has been strategically sited on the Subject Lands to ensure that much of the built form and massing is located in close proximity to Sixth Line to provide an appropriate separation from the building to the existing semi-detached houses to the southeast fronting Redbank Crescent.**

- Due to the unique narrow shape of the Subject Lands, the proposal has been designed to be massed in an east-west direction in order to maximize the building area while also ensuring an appropriate design with adequate setbacks and stepbacks to the surrounding lots. A significant setback of 27.3 metres has been incorporated at the rear of the property to ensure that the majority of the built form is appropriately sited to ensure no shadow impacts to the semi-detached houses to the southeast fronting Redbank Crescent.
- In terms of the architectural character and materials, the proposed development seeks to implement a high-quality built form with a variety of materials. The adjacent building to the south is constructed fully of brick veneer while the one storey semi-detached houses located to the southeast mainly utilize brick in their facades. The proposal seeks to incorporate a combination of cut stone veneer for the first two storeys and brick veneer for the third to fifth storeys. The sixth storey is proposed to be glass windows with tint glazing in bronze and aluminum frames. The architectural character of the building carefully selects façade materials that both complement and elevate the character of the local neighbourhood. It employs contemporary cut stone veneer for the initial two storeys, transitioning to a traditional brick veneer for the third to fifth storeys. The sixth storey is envisioned as a glass structure with bronze-tinted glazing and aluminum frames. The mix of materials proposed is in accordance with the Town of Oakville's Urban Design Guidelines and is compatible with the surrounding neighbourhood.

*b) Development should be compatible with the setbacks, orientation and separation distances within the surrounding neighbourhood.*

- The proposed development seeks to intensify a large narrow and deep lot currently occupied by a vacant, single-detached house fronting Sixth Line. The Subject Lands are situated within an area that contains an apartment building to the south, school lands to the north, and low density residential to the southeast, indicating that the immediate context is inconsistent in terms of setbacks, orientation and separation distances.
- The neighbouring apartment building to the south is located on a large parcel with a total area of 1.09 hectares. The apartment building to the south has setbacks from all property lines to allow for significant at-grade parking including drive aisles and a drop-off area. The building is setback approximately 11.6 metres from Sixth Line, 10.6 metres to the south, 45.6 metres to the north and 33.9 metres to the east/rear. The majority of the parking on the site is located in the side yard to the north of the building (adjacent to the semi-detached dwellings fronting Redbank Crescent) and at the rear of the building which also fronts onto Redbank Crescent. The commercial convenience store and houses to the north of the Subject Lands are setback 7.5 metres from Sixth Line. On the west side of Sixth Line, homes are oriented towards Sixth Line and setback 10 metres on average. The proposed

development is setback 7.57 metres from Sixth Line. The front yard and side yard setbacks and orientation of the proposed building provides for adequate setbacks and transition to the surrounding area while addressing the Sixth Line frontage as the front entrance for the building.

- There are four semi-detached dwelling units that share a property line with the Subject Lands and are located to the southeast of the site with frontage along Redbank Crescent. These dwellings are all 1 to 1.5 storeys and have been designed with standard setbacks for detached dwellings, with front and rear yards ranging in length from 8.27 m to 10.8 m and 14.22 m to 18.10 m, respectively.
- The proposed development is set back 27.3 metres from the rear yard, locating the majority of the building footprint within the front two thirds of the property in order to provide appropriate separation distances to the existing dwellings fronting Redbank Crescent to minimize shadow impacts as shown in detail in the supporting Sun and Shadow Study. The parking area at the rear will also be appropriately buffered through the preservation of the existing trees, additional plantings and a fence, all to be finalized in detail as part of a future Landscape Plan with the Zoning By-law Amendment application.

*c) Where a development represents a transition between different land use designations or housing forms, a gradation in building height shall be used to achieve a transition in height from adjacent development.*

- The proposed development has incorporated appropriate setbacks and stepbacks in order to achieve an appropriate transition in height from the adjacent 7-storey apartment building and to the neighbouring low density residential dwellings. A large 27.3 metre setback has been incorporated from the rear lot line to the 1 storey vestibule on the eastern façade and a larger 37 metre setback has been incorporated from the rear lot line to the residential portion of the building.
- In terms of stepbacks, the residential portion of the building is stepped back from the vestibule 6.8 metres above the first storey to the east. The eastern façade is also further stepped back from the enclosed stairway 3.2 metres. These significant setbacks and stepbacks incorporated into the design provide an appropriate transition to the adjacent low density residential to the southeast.
- The proposal has also been designed to incorporate setbacks and stepbacks to the western façade fronting Sixth Line, where low density residential fronts the west side of the street. A 7.57 metre setback is incorporated from the front lot line to the first and second storey. The third to fifth storeys are stepped back an additional 5.4 metres and the sixth storey is stepped back an additional 6.4 metres. The setbacks and stepbacks to the front lot line provide an appropriate transition in height to the low density residential on the west side of Sixth Line.

*d) Where applicable, the proposed lotting pattern of development shall be compatible with the predominant lotting pattern of the surrounding neighbourhood.*

- **The surrounding lot pattern is varied and includes the large school lot and the existing apartment lot to the south. No new lots are proposed as part of the amendment as the intent is to develop the existing 0.38 ha lot with the proposed 6 storey apartment building.**
  - e) Roads and/or municipal infrastructure shall be adequate to provide water and wastewater service, waste management services and fire protection.*
- **The supporting TIS and FSR demonstrate that the existing road network and municipal servicing infrastructure is adequate to service the proposal. The Waste Management Plan for the site indicates that all of the access driveways to be used by the private waste collection vehicles have grades less than 8% and have a minimum vertical clearance of 4.4 metres, a minimum width of 4.5 metres and be 6 metres wide at the point of ingress and egress. The FSR and revised FSR prepared by EXP, conclude that water servicing can be provided with new fire and domestic service connections to the existing 300 mm diameter watermain located on Sixth Line. Sanitary servicing can be provided with a new sanitary service connection to the existing 300 mm diameter sanitary sewer on Sixth Line.**
  - f) Surface parking shall be minimized on the site.*
- **The majority of the parking for the development will be underground, with 6 surface parking spaces located at the rear of the building to be appropriately screened from the public street. The parking area at the rear will also be appropriately buffered through the existing vegetation, additional plantings and a fence, all to be finalized in detail as part of a future Landscape Plan with a future Zoning By-law Amendment and Site Plan application.**
  - g) A proposal to extend the public street network should ensure appropriate connectivity, traffic circulation and extension of the street grid network designed for pedestrian and cyclist access.*
- **Private vehicular access will be provided from the public street into the site providing access to the underground parking area as well as to a drop off and pick up location and to surface visitor parking spaces.**
  - h) Impacts on the adjacent properties shall be minimized in relation to grading, drainage, location of service areas, access and circulation, privacy, and microclimatic conditions such as shadowing.*
- **The revised SWM Report, attached to this resubmission, continues to indicate that the proposed grading will maintain the existing drainage patterns for the site, while meeting Town of Oakville criteria and ensuring emergency major overland flow is directed west towards Sixth Line and not to the neighbouring property to the north or south.**

- **Overall, the grading design for the site is to be completed in concert with the proposed SWM strategy for the site which includes a network of high and low points, and underground SWM cistern, and inlets designed to capture the attenuate all storm events up to and including the 100–year storm event and control to the 5-year pre-development levels.**
- **The location of loading, site access and circulation have been designed along the southern limit of the site and are proposed to be properly screened from the existing residential to the southeast.**
- **In terms of microclimatic conditions such as shadowing, the previously submitted shadow impact study demonstrates that there are minimal impacts to the surrounding area and the requirements of the Town’s sun shadow requirements are met.**

*j) 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.*

- **The proposed development’s location is serviced through existing public facilities, transit services and commercial uses.**

*k) The transportation system should adequately accommodate anticipated traffic volumes.*

- **The proposed development is not anticipated to have a significant impact on the surrounding network. Refer to the attached updated TIS Brief.**

*l) Utilities shall be adequate to provide an appropriate level of service for new and existing residents.*

- **The FSR and revised FSR indicate that required utilities are located within the Sixth Line right-of-way adjacent to the site. Utility staff have not indicated any issues with providing the necessary utility service for the development to date.**

*\* Definition: Character means the collective qualities and characteristics that distinguish a particular area or neighbourhood.*

**The proposed development is of an appropriate scale, height massing and architectural character and designed to appropriately transition to and integrate with the surrounding areas, lots and built forms. The development incorporates appropriate setbacks and transitions to height to the surrounding area. the proposed development is supported by existing infrastructure and has minimal surface parking and has adequately addressed**



**access and traffic impacts. Impacts to adjacent properties have also been fully addressed through supporting reports.**

### **5.3 Unit Mix**

The Province does not legislate nor provide PPS 2024 policies that require a mix of units (e.g. 1-, 2-, or 3-bedroom units). Similarly, Halton Region Official Plan (ROP) only provides bedroom counts related to bed and breakfast establishments rather than requirements within general residential buildings (ROP s.100(15) and s.138(16)). The Town of Oakville Livable Oakville Plan also does not contain policies specifically requiring or stipulating unit mix.

The Town of Oakville Housing Strategy and Action Plan mentions one action item under Goal 2: Improve Housing Affordability, Housing Options and Housing Choice to enable a greater diversity of housing types in more places throughout the town, where appropriate:

- 2.5 *Establish official plan policy that requires multi-unit residential developments and high-density housing development incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes, including a minimum number of family sized units, as applicable.*

**This Action Item has not been started and any Town amendment to the Livable Oakville Plan is dependent upon the completion of a Housing Needs Assessment completed by the Town. Regardless, the proposed development does provide for a mix of units including 42 one bedroom, 24 two bedroom and four 3-bedroom units.**

### **5.4 Requirement of Affordable Housing Units**

The *Planning Act* provides policies regarding Inclusionary Zoning which directs the provision/requirement of affordable housing units in two areas of a municipal: 1) Major Transit Station Area; and/or 2) Development Permit area.

- 16 (5) *An official plan of a municipality that is not prescribed for the purpose of subsection (4) may contain the policies described in subsection (4) in respect of,*
- (a) *a protected major transit station area identified in accordance with subsection (15) or (16), as the case may be; or*
  - (b) *an area in respect of which a development permit system is adopted or established in response to an order under subsection 70.2.2 (1). 2019, c. 9, Sched. 12, s. 2 (2).*
- 35.2(1) *By-laws to give effect to inclusionary zoning policies*  
*If the official plan in effect in a local municipality contains policies described in subsection 16 (4), (b) the council of the municipality may pass one or more by-laws under section 34 to give effect to the policies, if the municipality is not prescribed for the purpose of subsection 16 (4). 2016, c. 25, Sched. 4, s. 4.*

**The Subject Lands are not within a major transit station area nor within a development permit system area, therefore the statutory requirement for affordable housing units is not applicable. Regardless, the intention of the proposed development is to provide for units of a form and size that are accessible to more households within the market and for the site to offer a supply of relatively more affordable units within the existing area through the nature of the type of units being proposed.**

## **5.5 Conceptual Building: Entrance Location & Rooftop Lighting**

The Concept Site Plan has been revised and relocates the building entrance from the side façade to the front façade of the building that faces Sixth Line.

Rooftop lighting will meet the requirements of the Ontario Building Code and it is noted that the Town's Property Standards By-law 2023-074 defers to the Ontario Building Code and the Livable Oakville Plan. Section 18 of By-law 2023-074 states:

- 18(2) *Outdoor lighting shall be placed and maintained, or have a barrier placed and maintained, so as to prevent or block direct illumination of the interior of a dwelling or dwelling unit on adjoining property regardless of whether such dwelling or dwelling unit has or may have shades, drapes or other interior window coverings.*
- 18(2.1) *All residential outdoor lighting shall be placed, directed, and maintained or shielded to prevent direct illumination of light onto an adjoining residential property in an area where an outdoor living space is located. (By-law 2024-164)*
- 18(4) *Lighting as required by the Building Code shall be provided and maintained to allow for an adequate level of lighting so that the use normally carried out in such areas can be undertaken safely. (By-law 2024-164)*

## **5.6 Site Plan Design**

Questions were raised by Council regarding waste management, tree removal, and construction management. Waste management and tree removal are addressed in the Arborist Report and Tree Preservation Plan attached to this resubmission. Construction Management Plans may be provided during the Site Plan application stage rather than through the OPA stage and will address all required construction staging and timing issues.

## **5.7 Parking Ratios**

A general question was posed regarding the ratio of vehicular to bicycle parking provisions. Parking ratios are established through the Town's Zoning By-law 2014-014 regulations. Until such time as the Town undertakes a Zoning By-law Review to alter the ratio, the current regulations require the provision of a greater number of vehicular parking spaces than bicycle. The proposed development meets the current zoning regulations for vehicle and bicycle parking.

## **5.8 Zoning By-law Amendment and final Site Plan submissions**

Applications for a site-specific Zoning By-law Amendment (ZBA) and Site Plan will follow the approval of the OPA for the Subject Lands.

### ***6.0 CONCLUSION***

Based on a review of the Provincial Planning Statement 2004, the Town of Oakville Housing Strategy and Action Plan and Council's comments, we conclude that the proposed Official Plan Amendment will support a development that:

- a. Provides for an appropriate housing option on the Subject Lands that is appropriate within the existing and planned character of the surrounding area;
- b. Is consistent with the *Planning Act* and Provincial Planning Statement 2024;
- c. Conforms to the Region of Halton Official Plan (now part of the Town's Local Plan);
- d. Conforms to the Livable Oakville Plan;
- e. Promotes the efficient use of land and will optimize available and planned infrastructure;
- f. Adds housing that contributes to a complete community and much needed housing supply; and
- g. Will not create any adverse impacts to the existing or planned surrounding community.

The Official Plan Amendment will support a development that represents good planning and is in the public interest.

Yours truly,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner



Tamara Tannis, MCP, MCIP, RPP  
Associate

cc. *Creditmills Development Group*

**APPENDIX 1:  
PLANNING JUSTIFICATION REPORT (2024),  
REVISED SECTION 2.5 – TRANSPORTATION CONTEXT**

11. Oakville Golf Club	1.1 km	14	3	2
12. Ridgeview Park	1.1 km	15	3	3
13. White Oaks Pool	1.0 km	14	3	3
14. Monclair Public School	1.1 km	15	4	2
15. Sunningdale Public School	1.1 km	15	4	2
16. Oakville Jaguars Soccer Academy	1.2 km	16	4	4
17. McCraney Valley Park	1.4 km	20	5	3
18. St. John (Oakville) Elementary Office Site	1.6 km	22	5	4
19. Leighland Avenue Park	1.9 km	24	5	3
20. Oakville Town Hall	2.0 km	25	6	5

## 2.5 Transportation Context

Transportation and access are important considerations for the planning and development of new residential development. A high-level analysis of the transportation context is provided in the Transportation Impact Study Brief, and Update, prepared by LEA Consulting. The Subject Lands are located on the east side of Sixth Line. The Subject lands have an existing driveway access from Sixth Line.

The Region of Halton Official Plan identifies Sixth Line as a Minor Arterial Road on Map 3 – Functional Plan of Major Transportation Facilities (**Figure 4**). In the Livable Oakville Plan, Sixth Line is identified as a Minor Arterial Road on Schedule C – Transportation Plan (**Figure 5**). The following is the functional classification of roads from the Livable Oakville Plan for Minor Arterial Roads.

Facility Type	Function	Criteria
Minor Arterials/Transit Corridors	<ul style="list-style-type: none"> <li>Accommodate intermediate volumes of inter-community and inter-neighbourhood traffic</li> <li>Distribute traffic to or from all other classes of roads, except Provincial Highways</li> <li>May act as local transit corridors</li> <li>2 or 4 lanes</li> <li>20,000 or 40,000 vehicles per day<sup>2</sup></li> </ul>	<ul style="list-style-type: none"> <li>Direct access from abutting residential properties will generally be discouraged in the <i>development</i> of new communities and districts unless suitable provisions are incorporated into subdivision plans</li> <li><i>Transit-supportive</i> land uses to be encouraged along right-of-way</li> <li>26 metres</li> </ul>

<sup>2</sup>: This is the typical maximum volume



Figure 4- ROPA 49 (Map 3 - Functional Plan of Major Transportation Facilities)

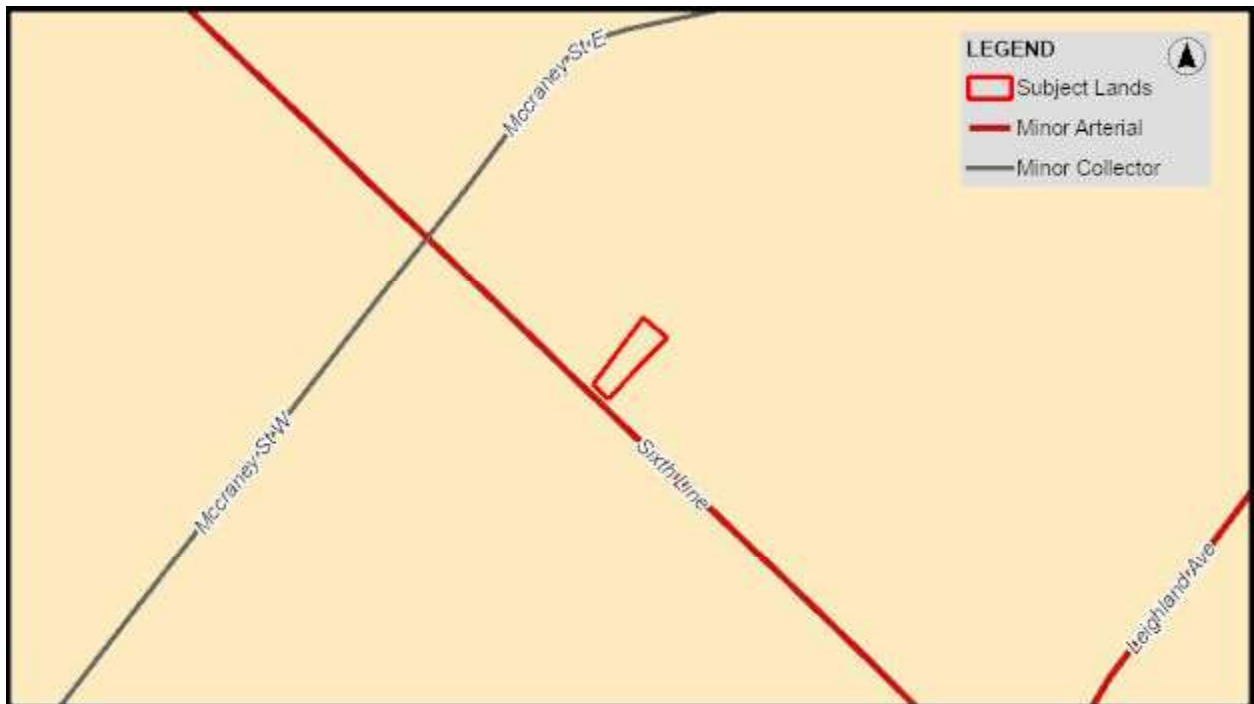


Figure 5- Livable Oakville Plan (Schedule C - Transportation Plan)

## Transit

The Subject Lands are currently served by Oakville Transit, Route 13, 71 and 19. One bus stop is located on the east side of Sixth Line, adjacent to the Subject Lands. A second bus stop is located on the corner of Culham Street and Sixth Line – approximately 300 metres north of the Subject Lands. The current Route 13 provides access to Oakville GO all the way to Bronte GO. Route 19 operates in the east-west direction. Route 19 operates between Oakville GO and Bronte GO. Route 71 White Oaks S.S. (West) transit stop is located adjacent to the Subject Lands and provides access from McCraney and Montclair to Uptown Core (**Figure 7**).

## School Specials

Route 19 operates in the north-south direction between the Uptown Core terminal and Oakville GO station (**Figure 6**). School special routes provide service for the morning and afternoon bell times only and do not operate on statutory holidays, school holidays, March Break or during the summer months.

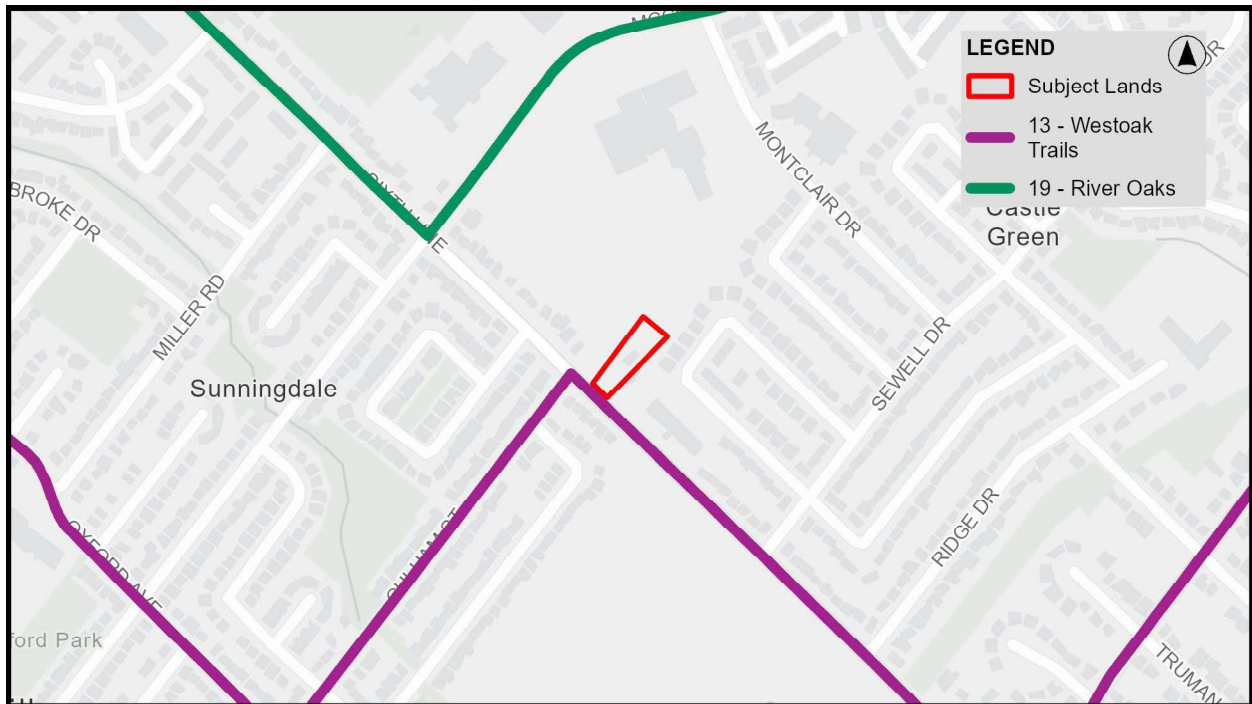


Figure 6- Regularly Scheduled Routes (Oakville Transit)



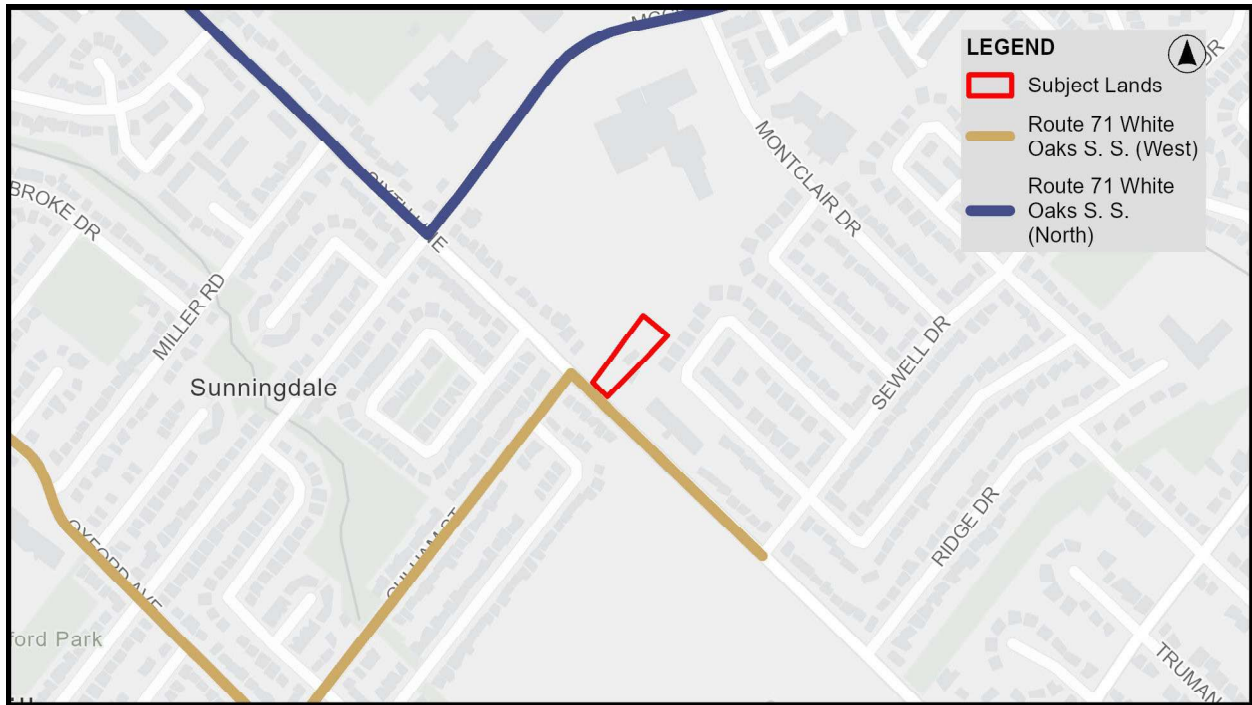


Figure 7- School Routes (Oakville Transit)

Active Transportation and Cycling

According to the Livable Oakville Plan, Schedule D – Active Transportation Plan (**Figure 8**), Sixth Line is identified as having an existing bike lane. Cycling facilities located near the Subject Lands consist of bicycle lanes along Sixth Line and McCraney Street East, and a signed bike route along McCraney Street West. These bicycle planes provide north-south and east-west connectivity to and from the Subject Lands.