

PLANNING JUSTIFICATION REPORT

SEPTEMBER

2022

3515 - 3545 Rebecca Street
Oakville, Regional Municipality of Halton





Date:

September 28, 2022

Prepared for:

Burloak Market Place Inc.

Prepared by:

MacNaughton Hermsen Britton Clarkson Planning Limited

442 Brant Street, Suite 204

Burlington ON L7R 2G4

T: 905 639 8686

F: 905 761 5589

Our file: 17106A

CONTENTS

1.0	INTRODUCTION.....	1
1.1	PURPOSE OF THE APPLICATION.....	2
1.2	SUBJECT LANDS.....	3
1.3	AREA CONTEXT.....	3
2.0	PROPOSAL.....	4
2.1	BACKGROUND CONTEXT.....	3
2.2	DEVELOPMENT PROPOSAL.....	3
3.0	POLICY ANALYSIS.....	5
3.1	PROVINCIAL POLICY STATEMENT, 2020 ('PPS').....	12
3.2	GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE (2019).....	15
3.3	TOWN OF OAKVILLE, CONSOLIDATED 2021.....	19
3.4	TOWN OF OAKVILLE ZONING BY-LAW 2014-014.....	10
4.0	CONCLUSION.....	11
4.1	CONCLUSION.....	10

LIST OF FIGURES

- Figure 1 Location Map
- Figure 2 Site Context & Surrounding Land Uses
- Figure 3 Site Plan
- Figure 4 Rendering – Main Entrance
- Figure 5 Rendering – South Terrace End View

An architectural rendering of a modern, multi-story residential building. The building features a mix of brick, white, and dark grey panels. It has multiple levels of balconies with glass railings and some greenery. The ground floor is a mix of large glass windows and brick walls, suggesting a mix of retail and residential use. There are trees and landscaping in front of the building, and a few cars are visible on the street. The sky is a clear, light blue.

1.0

INTRODUCTION

1.1 PURPOSE OF THE APPLICATION

MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) is retained by Burloak Market Place Inc., the owners of the lands municipality addressed as 3515-3545 Rebecca Street in the Town of Oakville. MHBC was originally retained in 2017 to assist with planning approvals for the first phase of the lands with respect to the commercial and office development, which is now approved. The subject lands are now proposing a retirement home on the next phase, and this justification has been prepared to demonstrate how an employment conversion and the development of the future phase as a retirement home is an appropriate use of the subject lands, and the existing employment designation should not be maintained.

This Planning Justification Report (PJR) has been prepared in support of the employment conversion of the subject lands from an Employment designation, which is still being proposed in the Halton Region Official Plan.

This Planning Justification Report provides the following:

- A general description of the Subject Lands, existing uses, surrounding uses, and existing physical conditions to provide an understanding of the locational context;
- A description of the proposed development and its design elements;
- A review of the existing provincial policy and regulatory framework;

- A summary of key conclusions and recommendations related to the employment conversion request.

1.2 SUBJECT LANDS

The Subject Lands are municipally addressed 3515-3545 Rebecca Street in Oakville, Ontario. The Subject Lands are legally described as Part of Block 1 on Plan 20M-1084, Designated as Parts 1, 2 and 3 on Reference Plan 20R-19074. As shown of **Figure 1**, the Subject Lands are generally located on the east side of Burloak Drive, north of Rebecca Street. The Subject Land has a total site area of approximately 3.16 hectares (7.81 acres) with frontage of approximately 183 metres on Burloak Drive and 163 metres on Rebecca Street.

The Subject Lands are mainly vacant, but there are steel frame structures erected from the previous building permit applications/approvals that were not completed. The structure can be seen in Figure 1 below and being used for agricultural cultivation.

The applicable designations for the Subject Lands, in accordance with the Provincial, Regional, and Local planning and regulatory framework are set out below:

- **Provincial Policy Statement (2020):** Settlement Area;
- **Growth Plan (2020):** Built-Up Area;
- **Region of Halton Official Plan:** Urban Area; Employment Area;
- **Region of Halton Official Plan Amendment 49 (ROPA 49):** Urban Area; Employment Area;
- **Town of Oakville Official Plan:** Employment Area; Business Commercial with a Site Specific Exception;
- **Town of Oakville Zoning By-law 2014-014:** Business Commercial (E4) with site specific permission E15



Figure 1: Location Map

1.3 AREA CONTEXT

The Subject Lands are shown on **Figure 2** which illustrates the land uses surrounding the site. The site photos provide further contextual description of the Subject Lands and surrounding area. The surrounding uses are also described as follows:

- NORTH:** Immediately north of the Subject Lands is a place of worship (Harvest Bible Chapel), storm water management pond;
- EAST:** Commercial condominiums for sale, woodlot, and an automobile service station.

- SOUTH:** Low density residential is located immediately south on Rebecca Street .
- WEST:** Nursing home (Burloak Long Term Care); Low density residential; Public open space (Forthergill Woods Park); Burloak Drive



Figure 2: Site Context



2.0

PROPOSAL

2.1 BACKGROUND CONTEXT

On November 6, 2017, a request to convert the lands from employment to a mixed use employment use was submitted to the Town of Oakville. The request was to re-designate the lands from Employment Commercial to Community Commercial to recognize the site's context in a low density residential area. Town staff realigned the existing designation boundaries to reflect the actual lot lines of the property, but did not remove the lands from the Employment Overlay as stipulated by Halton Region (the approval authority of any Town amendment to the Official Plan).

On February 28, 2019, legal counsel for the landowners of the subject land requested that the lands be removed from the Provincially Significant Employment Zone (PSEZ) designation. The Province created these zones to protect employment area properties that provide large enough parcels of land for large-scale manufacturing, warehousing, distribution and similar uses from adjacent, incompatible uses – such as low density residential housing. In December, 2019, the Province recognized that the subject property would be unable to accommodate large-scale industrial employment uses within context of the fact that the lands were immediately abutting low density residential uses. The Province subsequently removed the PSEZ from the subject lands.

On October 7, 2020, a request was submitted to Halton Region's policy planning manager, to remove the lands from the Region's employment overlay. The rationale was to have the Region recognize the Province's removal of the lands from the PSEZ as well as to recognize the previous Ontario Land Tribunal decision to permit retail uses on the subject lands, both decisions in context of the property's location in a residential community.

2.2 DEVELOPMENT PROPOSAL

This application proposes the development of a 6 to 8 storey retirement development situated at the northeast corner of Burloak Drive and Rebecca Street on a 3.14 hectare (7.77 acres) parcel of land. The phase 2 development (highlighted below) proposes a GFA of approximately 13,890 m² and a total of 141 units, and is anticipated to generate approximately 65 jobs, which equates to approximately 180 jobs/ha for the phase 2 lands. The units will be distributed between various levels of care including memory care, assisted living households, and independent living suites. See **Figure 3** for the Site Plan of the proposed development. **Figure 4 and 5** illustrates rendering of the proposed retirement home.

The Official Plan Amendment and Zoning By-law Amendment subject to this pre-consultation request will seek to modify the existing site specific designation and zoning to allow for the requested Retirement Home use.

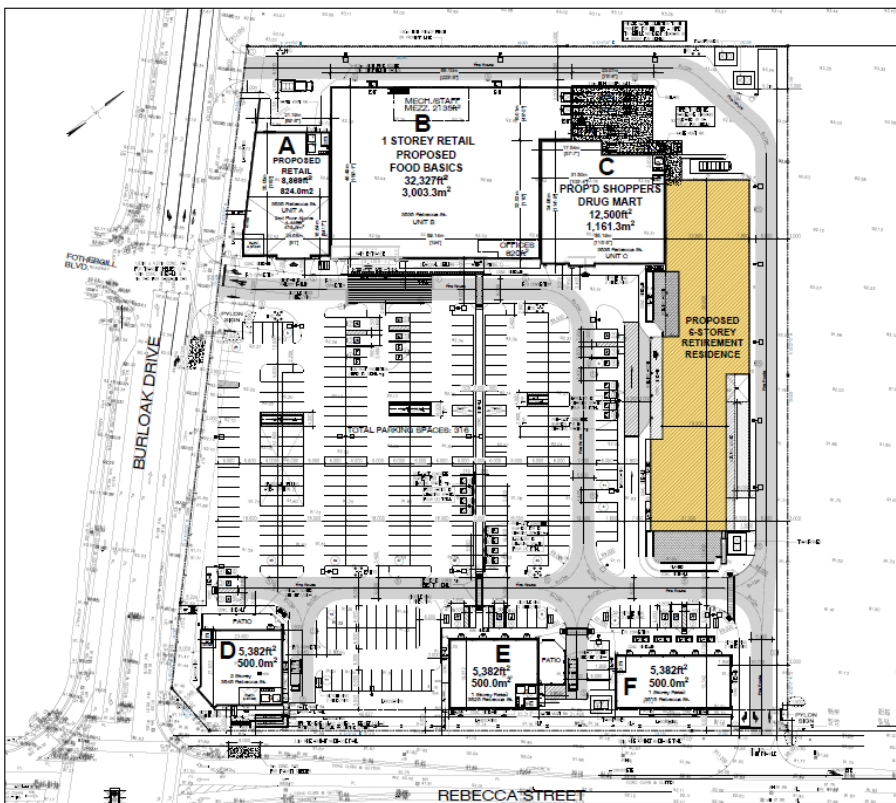


Figure 3: Site Plan



Figure 4: Rendering – Front Entrance



Figure 5: Rendering – South Terrace End View

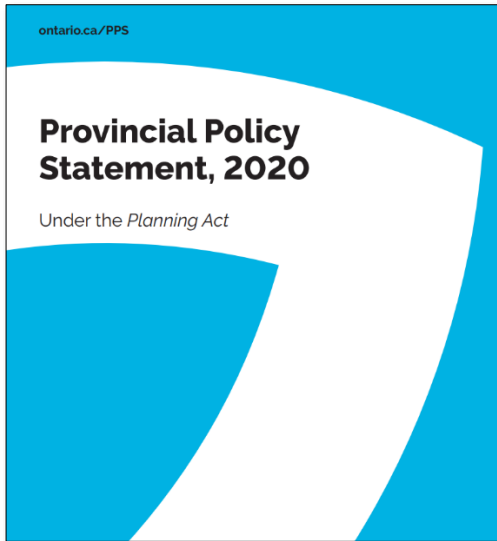


3.0

POLICY ANALYSIS

The following is an overview of the status of the Provincial, Regional, and City planning documents that affect the Subject Lands, namely, the Halton Regional Official Plan, the Town of Oakville Official Plan and the Town of Oakville Zoning By-law. The Provincial Policies along with the Region and City Official Plan policies will be used to demonstrate how the subject lands should not be maintained as Employment lands.

Halton Region is the 'cross-jurisdictional' approval authority of lower-tier municipal Official Plans. In this context, the lower-tier policies of both the Town of Oakville's Livable Oakville Plan and the City of Burlington's new Official Plan (under appeal, but recently approved by Halton Region) are applicable to the Subject lands, as the lands are situated on the boundary line of these two lower-tier municipalities.



3.1 PROVINCIAL POLICY STATEMENT, 2020 ('PPS')

The Provincial Policy Statement ("PPS"), 2020 provides policy direction on matters of provincial interest related to land use planning and development with the goal of enhancing the quality of life for all Ontarians. The Planning Act requires that decisions affecting a planning matter "be consistent with" the policies of the PPS. The PPS provides policies related to Building Strong Healthy Communities (Section 1.0) and the Wise Use and Management of Resources (Section 2.0).

The PPS advances policies in *Section 1.1* on Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns. The PPS states that healthy, livable and safe communities should be sustained by (*Policy 1.1.1*):

- "a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term;*
- b) accommodating an appropriate range and mix of residential (including second units, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open space, and other uses to meet long-term needs;*
- e) promoting cost-effective development patterns and standards to minimize land consumption and servicing costs;*
- h) promoting development and land use patterns that conserve biodiversity and consider the impacts of a changing climate"*

The policies of Section 1.3, Employment states that planning authorities shall promote economic development and competitiveness by (*Policy 1.3.1*):

“d) encouraging compact, mixed use development that incorporates compatible employment uses to support livable and resilient communities”

Policy 1.3.2.5 states lands within existing employment areas may be converted to a designation that permits non-employment uses provided the area has not been identified as provincially significant through a provincial plan exercise or as regionally significant by a regional economic development corporation working together with affected upper and single-tier municipalities and subject to the following:

- a) there is an identified need for the conversion and the land is not required for employment purposes over the long term;*
- b) the proposed uses would not adversely affect the overall viability of the employment area; and*
- c) existing or planned infrastructure and public service facilities are available to accommodate the proposed uses.*

In response to the conversion criteria of the PPS, we offer the following:

The proposal can provide for a more complete and integrated mix of land uses achieving better efficiencies and more appropriately achieving the objectives for a complete community. The addition of residential uses also results in an efficient land use pattern in which many necessities and services are in close proximity to one another, forming a more connected, complete community.

While the proposal seeks to add residential uses to the Subject Lands, the ability to integrate residential and commercial uses will allow the proposal to contribute to a mixed-use, complete community while ensuring a significant amount of jobs are maintained in compatibility with the surrounding Employment Areas.

The Subject Lands are located within a Business Commercial employment area that permits commercial, retail and office uses, therefore, the introduction of residential uses will allow for a more complete community with an appropriate separation from the Provincially Significant Employment area on the east side of Great Lakes Boulevard.

The property is within an area where future services and infrastructure will be available to accommodate the conversion.

The Subject Lands are also in close proximity to high order transit and existing commercial uses to serve the proposed development.

Policy 1.4.3 on Housing states that planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area by:

“b) permitting and facilitating:

- 1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including special needs requirements; and*
 - 2. all forms of residential intensification, including second units, and redevelopment in accordance with policy 1.1.3.3;*
- c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;*
 - d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed; and*

The proposal can provide for a more complete and integrated mix of land uses achieving better efficiencies and more appropriately achieving the objectives for a complete community. The subject lands were removed from the Provincially Significant Employment Zone, and similarly should be removed from the Employment designation in the Region of Halton Official Plan. The addition of a retirement residence on the phase 2 lands results in an efficient land use pattern in which many necessities and services are in close proximity to one-another, forming a more connected, complete community. The ability to integrate a retirement home and commercial uses will allow the proposal to contribute to a mixed-use, complete community while ensuring a significant amount of jobs are maintained and compatibility with the surrounding Employment Areas.

services via active transportation (i.e. walking) for the residents of the future retirement home.

The proposal for a retirement home use will provide increased housing options in the area for residents at different stages in their life cycle.

The Subject Lands are located in an area with existing municipal water and wastewater services and public transit.

As discussed above, the Subject Lands are in close proximity to high order transit and existing commercial uses to serve the proposed development.

The Subject Lands are located within a Business Commercial employment area that permits commercial, retail and office uses, therefore, the introduction of a retirement home will allow for a more complete community with an appropriate separation from the Provincially Significant Employment area on the east side of Great Lakes Boulevard. The proposal also creates an opportunity to easily access necessities and



3.2 GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE (2019)

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (hereafter 'A Place to Grow' or the 'Growth Plan') was prepared and approved under the Places to Grow Act, 2005 and updated on May 16, 2019. A Place to Grow establishes a long-term framework for growth and development in the Greater Golden Horseshoe ("GGH") region which encourages the efficient use of land through the development of complete communities that are compact, transit supportive, and provide a range of housing and employment opportunities. A Place to Grow utilizes a land use planning horizon to 2041.

A Place to Grow builds upon the policy foundations of the PPS, 2014 and previous Plans as well as responds to key challenges in the GGH region by providing enhanced policy directions designed to achieve complete communities that are compact, transit-supportive, and make efficient uses of investments in infrastructure and public service facilities while ensuring the protection of agricultural and natural areas and supporting climate change mitigation and adaptation. Guiding principles of the Growth Plan are established to support the achievement of complete communities: prioritize intensification and higher densities to make efficient use of land and infrastructure; provide flexibility to capitalize on economic and employment opportunities; support a mix of housing options; improve the integration of land use planning with planning and investment in infrastructure; protect and enhance the natural environment; conserve and promote cultural heritage; and, integrate climate change considerations into planning and growth management.

The Growth Plan provides policies for where and how to grow, stating that population and employment

growth be directed to urban areas and rural settlement areas. Within these areas, the Growth Plan designates between two different areas of growth: the built up area, where growth is to be directed and accommodated through intensification; and, designated greenfield areas, which are generally undeveloped, vacant land, where growth and development should achieve a compact urban form. The Subject Lands are located within the built up area in the Town of Oakville.

Policy 2.2.5.7.c states that municipalities will plan for employment areas within settlement areas by:

- a) *prohibiting residential uses and prohibiting or limiting other sensitive land uses that are not ancillary to the primary employment use; and,*
- b) *providing an appropriate interface between employment areas and adjacent non-employment areas to maintain land use compatibility.*

Under the amendment released in May 2019, the Growth Plan allows lands within existing designated employment areas to be converted to non-employment designations provided (*Policy 2.2.5.9 and Policy 2.2.5.10*):

- *there is a need for the conversion (Policy 2.2.5.9.a);*
- *the lands are not required over the horizon of this Plan for the employment purposes for which they are designated (Policy 2.2.5.9.b);*
- *the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan (Policy 2.2.5.9.c);*
- *the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan (Policy 2.2.5.9.d);*
- *there are existing or planned infrastructure and public service facilities to accommodate the proposed uses (Policy 2.2.5.9.e);*

- *maintain a significant number of jobs on those lands through the establishment of development criteria (Policy 2.2.5.10.b); and,*
- *not include any part of an employment area identified as a provincially significant employment zone (Policy 2.2.5.10.c).*

Further, the Growth Plan states (*Section 1.1*) that people over the age of 60 are expected to comprise over 25% of the population by 2041, which will result in the need for more age-friendly development that can address their unique needs and circumstances. This will include a more appropriate range and mix of housing options, easier access to health care and other amenities, walkable built environments, and an age-friendly approach to community design that will meet the needs of people of all ages.

Complete communities are defined by the Growth Plan as “places such as mixed-use neighbourhoods or other areas within cities, towns, and settlement areas that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. Complete communities are age-friendly and may take different shapes and forms appropriate to their contexts.”

With people over the age of 60 expected to comprise over 25% of the population by 2041, there is a need for increased opportunities for seniors’ accommodations in the Town of Oakville. The proposed location of the retirement home is within a block of land that was previously identified as a Provincially Significant Employment Zone but has since been removed from this zone as of December 2019. The block of land bound by Great Lakes Boulevard, Burloak Drive, Rebecca Street represents an independent parcel where very limited employment uses exist. This block has

residential uses abutting it to the immediate west and south, as well as institutional uses to the north. Therefore, allowing for the retirement use on the Subject Lands would provide a transition from the Employment Zone to the east of Great Lakes Boulevard and the existing low density residential community to the west and south, providing an appropriate interface between employment areas and adjacent non-employment areas to maintain land use compatibility. The proposed land use is also compatible with the existing long-term care facility to the immediate west of the Subject Lands, and would provide for integration of seniors living accommodations with a mix of retail and service commercial uses to better utilize existing services and infrastructure and to complete a more complete community.

With respect to the specific conversion criteria of *Section 2.2.5.9*, we offer the following:

Section 2.2.5.9.a – there is a need for a conversion. The proposal can provide for a more complete and integrated mix of land uses achieving better efficiencies and more appropriately achieving the objectives for a complete community. The addition of residential uses also results in an efficient land use pattern in which many necessities and services are in close proximity to one another, forming a more connected, complete community. There is a need for seniors housing given that 25% of the population is anticipated to be over the age of 60 by 2041. Given the sensitive uses surrounding the subject lands to the south and west and given the need for additional housing, the subject lands provides an opportunity to satisfy the need for seniors' housing.

Section 2.2.5.9.b – the lands are not required over the horizon of this Plan for the employment purposes for which they are designated.

The proposed location of the retirement home is within a block of land that was previously identified as a Provincially Significant Employment Zone but has since been removed from this zone as of December 2019. The block of land bound by Great Lakes Boulevard, Burloak Drive, Rebecca Street represents an independent parcel where very limited employment uses exist.

While the proposal seeks to add residential uses to the Subject Lands, the ability to integrate residential and commercial uses will allow the proposal to contribute to a mixed-use, complete community while ensuring a significant amount of jobs are maintained in compatibility with the surrounding Employment Areas.

The Subject Lands are located within a Business Commercial employment area that permits commercial, retail and office uses, therefore, the introduction of residential uses will allow for a more complete community with an appropriate separation from the Provincially Significant Employment area on the east side of Great Lakes Boulevard. The Subject Lands are not located in a strategic location to support pure employment uses and are not required for the employment purposes for which they are designated.

Section 2.2.5.9.c – The municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan.

The Subject Lands represent a small portion of the Region's and Town's employment lands and their re-designation will not compromise the Region's or the Town's ability to meet the employment forecasts. Higher employment densities can be supported on the Subject Lands through the commercial uses proposed as part of the approved commercial development. Further to this, Halton

Council, in their recent decision indicated that they would not be adding any new employment lands through the current municipal comprehensive review. Through this decision, Halton Council has indicated that their view is that there are sufficient employment lands designated to maintain an adequate supply.

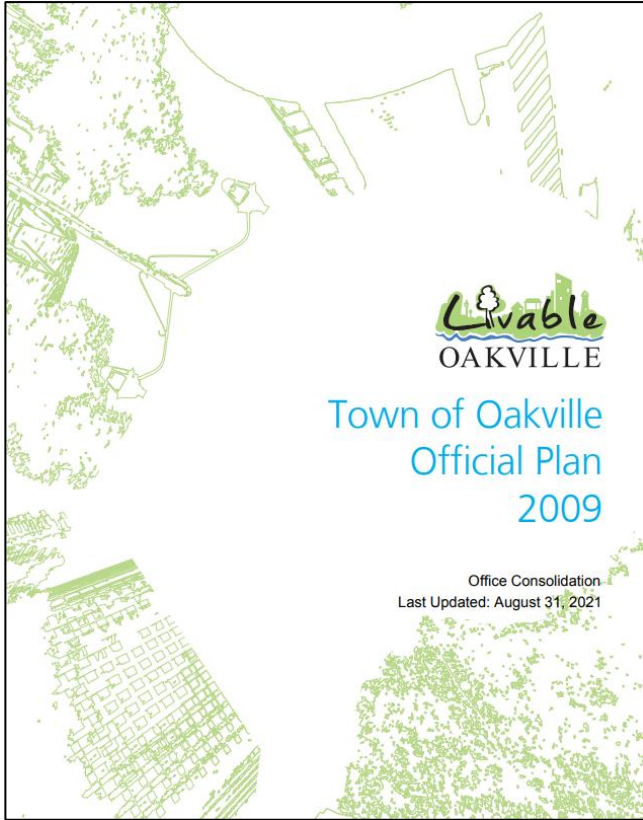
Section 2.2.5.9.d - The proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.

Given its location and proximity to sensitive land uses, including residential to the west and south, the proposed uses on the Subject Lands would not adversely affect the overall employment area. In addition, there are no nearby industries with which compatibility issues are anticipate to arise under the Ministry of Environment's Land Use Compatibility Guidelines. Commercial and residential uses on the Subject Lands will provide adequate buffering between the broader employment area to the north and east. The Subject Lands can retain employment functions through a mix of commercial uses. The proposed retirement home would all also generate employment figures that will support the achievement of the Growth Plan's minimum density targets.

Section 2.2.5.9.e - There are existing or planned infrastructure and public service facilities to accommodate the proposed uses.

The property is within an area where future services and infrastructure will be available to accommodate the conversion. The Subject Lands are also in close proximity to high order transit and existing commercial uses to serve the proposed development. Given the immediate proximity of retail uses, there will be availability of retail and

service uses including a supermarket right outside the door of the seniors building, and elsewhere close by. Overall, the site is well-served by infrastructure, and by public services required by residents.



3.3 TOWN OF OAKVILLE OFFICIAL PLAN, CONSOLIDATED 2021

Town of Oakville:

The lands are bounded to the north, east and south by Livable Oakville land use designations (and existing developments) as follows:

North: Business Employment Exception: Place of Worship and Associated Educational Facility (on site greater than 2 ha)
Existing Development: Institutional Use: Place of worship (Harvest Bible Chapel).

East: Business Employment
Existing Development: Multi-use Commercial Retail Plaza (3545 Rebecca St; Date of Application: Feb 17, 2021; Site Plan Application No. 1635.025/01; Approved).

South: Low and Medium Density Residential
Existing Developments: Single Detached and Townhouse Dwelling Units

City of Burlington

The Subject Lands are bounded to the west by Halton Region’s recently approved City of Burlington’s new Official Plan (under appeal) land use designations (and existing developments) as follows:

West: Residential High Density (west) and Residential Medium Density (southwest)

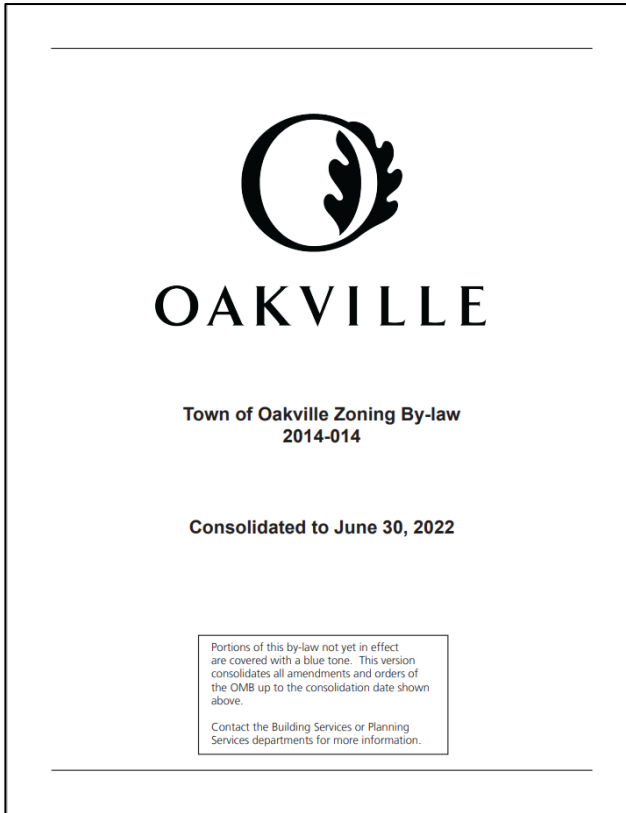
Existing Developments: Nursing home (Burloak Long Term Care) and single dwelling units.

The City of Burlington's new Official Plan policies, approved by Halton Region in November, 2021 (while currently under appeal), allow for intensification on lands designated Residential High Density with a density ranging between seventy-six (76) and one hundred and eighty-five (185) units per net hectare (s.8.3.5(1)). As well, the 'objective' for medium- and high-density lands includes the goal to:

'provide opportunities for limited small-scale commercial uses within medium and high density residential neighbourhood areas, where compatible, which serve the day-to-day needs of residents without the need for a private automobile.'

The Town of Oakville, in its Livable Oakville Plan, as approved by Halton Region, designates the subject lands as Business Commercial (Exceptions), Schedule F, South West Land Use, Part E: Growth Areas, Special Policy Areas and Exceptions, 27. Exceptions, Section 27.1.7 policy states the following:

On the lands designated Business Commercial at the northeast corner of Burloak Drive and Rebecca Street a maximum of 7,600 square metres of convenience retail and service commercial uses may be permitted. Of the 7,600 square metres of convenience retail and service commercial uses, a maximum of 3,252 square metres may be permitted for a food store. A minimum of 1,393 square metres shall be provided for office uses. All uses will be subject to further limitations defined within the implementing zoning.



3.4 TOWN OF OAKVILLE ZONING BY-LAW 2014-014

In the Town of Oakville Zoning By-law 2014-014 (and previous parent zone 2011-005, old map 848), the subject lands are identified in Part 10 Employment Zones, as Business Commercial (E4) with special provisions (E-15). Permitted uses are extensive and include, but are not limited to: art gallery, business office commercial schools/self-storage, day care, drive-through facility, financial institution, funeral home, hotel, medical office, motor vehicle uses, pet care, place of entertainment, restaurant, retail store, and veterinary clinic.

The site-specific exemptions in place for the Subject Lands permit a maximum of 7,600 square metres for retail stores and service commercial uses, and of that total amount, only a maximum of 3,252 square metres may be permitted for any individual retail store premises. A minimum of 1,393 square metres shall be provided for office uses.

Based on the existing permissions on the subject lands, traditional employment uses are no longer permitted. The permitted uses on this site are primarily retail, service commercial and office uses. The site specific zoning allows for up to 7,600 square metres of retail, subject to a minimum of 1,393 square metres of office uses being developed. The existing permissions not permitting employment uses but rather primarily retail and service commercial indicates that the subject lands have already been converted from traditional employment.



4.0

CONCLUSION

4.1 CONCLUSION

Based on the provincial criteria for employment conversions, we conclude that the subject land is appropriate for conversion for the following reasons:

- Has no existing employment uses, being a vacant property recently approved for retail and service commercial uses as well as office uses;
- The Province made a decision to remove the subject lands from the Provincially Significant Employment Zone Mapping, and as such the subject lands are no longer part of the provincially significant employment designation;
- Is within an entire block of land that currently provides very little employment uses, bound by Great Lake Boulevard to the north and east, Burloak Drive to the north and west and Rebecca Street to the south;
- Will not have an economic impact through removal as it does not play an economic or strategic role within the Town or Region;
- Can still maintain a high ratio of jobs through maintaining the commercial and retail uses as well as the proposed retirement home use on the subject lands. The proposed retirement homes is anticipated to create approximately 65 jobs which equates to approximately 180 jobs/ha for the phase 2 lands;
- Is fully serviced and underutilized;
- Is within close proximity to the Appleby GO Station which is identified as a Major Transit Station Area providing higher order transit;
- Will provide for a comprehensive new mixed use, gateway development that provides residential, commercial and employment uses;
- Offers an immediate opportunity to provide housing and services for seniors which is in urgent need in the Town; and,
- Can provide a development that is compatible with the existing neighbourhood, especially with

the existing long-term care facility to the immediate west of the Subject Lands. The proposal would therefore provide for integration of seniors living accommodations with a mix of commercial uses to better utilize existing services and infrastructure and to create a more complete community.

- Has already been defacto converted by the current zoning in place as the overall intent of the employment area designation is intended to protected the lands for manufacturing and warehousing uses which are not permitted on the site, and nor would they be appropriate.

Respectfully submitted,

MHBC



Oz Kemal, BES, MCIP, RPP
Partner