

January 13, 2026

**Ministry of Infrastructure - Transit Oriented Communities
and Agency Oversight Division**

777 Bay Street
Suite 425
Toronto, ON
M5G 2E5

**Re: Provincial Priority Request for Four (4) Minister’s Zoning Orders for the Transit-
Oriented Community in the Town of Oakville**
ERO Number: 025-1368

On behalf of 1539059 Ontario Inc. (‘Client’), Corbett Land Strategies Inc. (‘CLS’) is pleased to submit this letter to the Ministry of Infrastructure containing our response to the ERO Posting 025-1368 for the “Provincial Priority Request for Four (4) Minister’s Zoning Orders for the Transit-Oriented Community in the Town of Oakville”. We respectfully request that the Province consider the proposed 56 storey mixed-use development at 349 Davis Road (‘Subject Lands’) within the Transit-Oriented Community of Oakville for the reasons set out below:

TOCs as a Solution to Accommodate Growth

We are supportive of the Province’s continued commitment to advancing Transit-Oriented Communities (TOCs) as a key land use planning tool to address Ontario’s housing supply, economic competitiveness, and complete-community objectives, and to support the Province’s substantial investment in Metrolinx and Major Transit Station Area infrastructure in the Greater Toronto and Hamilton Area (GTHA).

The TOC framework appropriately recognizes that the greatest return on public investment in transit infrastructure is achieved when higher-density, mixed-use development is directed to locations that are well-served by existing or planned rapid transit.

The Province’s leadership in removing barriers to intensification in strategic transit locations is both necessary and timely, particularly in municipalities facing significant growth pressures and constrained greenfield opportunities. Furthermore, it is highly important in circumstances where local development approval processes are complex and too lengthy to effectively respond to prevailing provincial objectives.

Alignment with Provincial Objectives

The TOC framework is well-aligned with broader provincial policy direction, including:

- The Provincial Planning Statement, 2024 (PPS 2024) objective to direct growth to Strategic Growth Areas and Major Transit Station Areas;
- The goal of achieving compact, transit-supportive built form that makes efficient use of land and infrastructure;
- Provincial housing targets that require municipalities to accommodate significant residential growth within existing settlement areas; and
- The recognition that zoning and development standards in proximity to transit must evolve to reflect changing mobility patterns and demographic needs.

We support the Province's emphasis on flexibility, certainty, and speed in approvals for TOC projects, particularly where proposals demonstrate clear conformity with transit-supportive design principles and municipal intensification objectives.

Consideration of the Subject Lands within the TOC

The Subject Lands are designated as part of the 'Urban Core' of the 'Trafalgar Precinct' within Midtown Oakville's Official Plan Amendment 70 (OPA 70). The Subject Lands are a mere 335 metres from the outer periphery of the proposed TOC (see Appendix A). This area is envisioned to be a mix of various land uses, creating a highly walkable community in Midtown Oakville. It will include a variety of office, civic, cultural, residential, and recreational spaces, along with public areas. Midtown Oakville is considered the Town's primary Strategic Growth Area and Protected Major Transit Station Area (PMTSA), located along the Lakeshore West GO provincial priority transit corridor.

On November 8, 2022, the Client submitted an Official Plan Amendment and Zoning By-law Amendment Application for the proposed development of a 58-storey mixed-use building comprised of one level of retail use, three levels of above-ground parking, one level of office use and 53 levels of residential use, with a density of 9.75. The initial drafts of OPA 70 were used to design the proposed development and ultimately informed the first submission of the proposed applications.

The Midtown Oakville Draft OPAs released in May 2022 and May 2023 facilitated growth through density ranges between 4.0 and 10.0 Floor Space Index (FSI). Within Appendix A of the January 2024 Committee Meeting report, it was noted that Midtown Oakville is expected to include a range of tall and mid-rise built forms, with 57% of the total developable area for tall buildings expected to have height ranges of 8 to 48 storeys. These provisions were later eliminated in subsequent iterations and the final version of OPA 70.

On February 18, 2025, Town Council adopted the Midtown Oakville OPA, which sought to further restrict development within the Trafalgar Precinct to a minimum of 3 and maximum of 5 FSI, and building height thresholds of 5 to 20 storeys.

Prior to the approval of OPA 70 (which is still with the Province for final approval), the Client appealed the proposed development due to lack of decision to the Ontario Land Tribunal. Presently, the Client is attempting to mediate the raised issues with the Town through a formal mediation process. Through this effort to mediate, the Client has modified the development concept to address the concerns raised by Town and Regional Staff, and other commenting agencies, received before and after the adoption of OPA 70. In light of the advancement of the TOC in Oakville, the revised concept has also taken into consideration the development program set out within the proposed MZO, with the anticipation that the Subject Lands can be part of this provincial endeavour to support Oakville's Strategic Growth Area.

The updated development proposal is seeking the construction of a 56-storey mixed-use development with a density of 9.49 and 280 residential units (see Appendix B). The building has a non-residential gross floor area of 12%, with intended commercial uses on the ground floor and office uses on floors 1-3. Although not a requirement, the proposed development includes one level of above ground parking and six (6) levels of below-grade parking, while ensuring adequate bicycle storage to accommodate diverse modes of transportation.

The proposed development represents a highly efficient use of a constrained urban site, delivering significant residential density and mixed-use activity without the need for greenfield expansion. The scale and form of development are appropriate for a TOC context and help address housing demand in areas where growth can be accommodated responsibly. This supports the creation of complete communities and aligns with both provincial and municipal urban design objectives. The proposed development directly implements the intent of the TOC framework by demonstrating how higher densities, mixed uses, and transit integration can be successfully achieved on an appropriate site. Furthermore, the Midtown Oakville PMTSA has significant and costly servicing constraints that will require expansive development approvals on a timely basis in order to fund the solutions. Expanding the TOC to include other lands that are significantly advanced in the approvals process will be essential to provide this funding base.

Conclusion

The Province's Transit-Oriented Communities initiative represents a critical step in modernizing Ontario's land use planning framework to meet current and future growth challenges. We support the direction set out in ERO 025-1368 and encourage the Province to continue enabling well-designed, transit-supportive development in strategic locations, such as our proposed development at 349 Davis Road.

The subject application exemplifies the objectives of the TOC framework and should be considered favorably as part of the Province's broader effort to accelerate housing delivery, optimize transit investments, and build complete, resilient communities. **Given the advanced status of the proposed development, it is therefore requested that the Province consider the expansion of the proposed MZO to include the Subject Lands or the consideration of a new TOC for the Subject Lands.**

Should you have any questions or require additional information, please do not hesitate to contact the undersigned.

John Corbett

John B. Corbett, M.C.I.P., R.P.P.

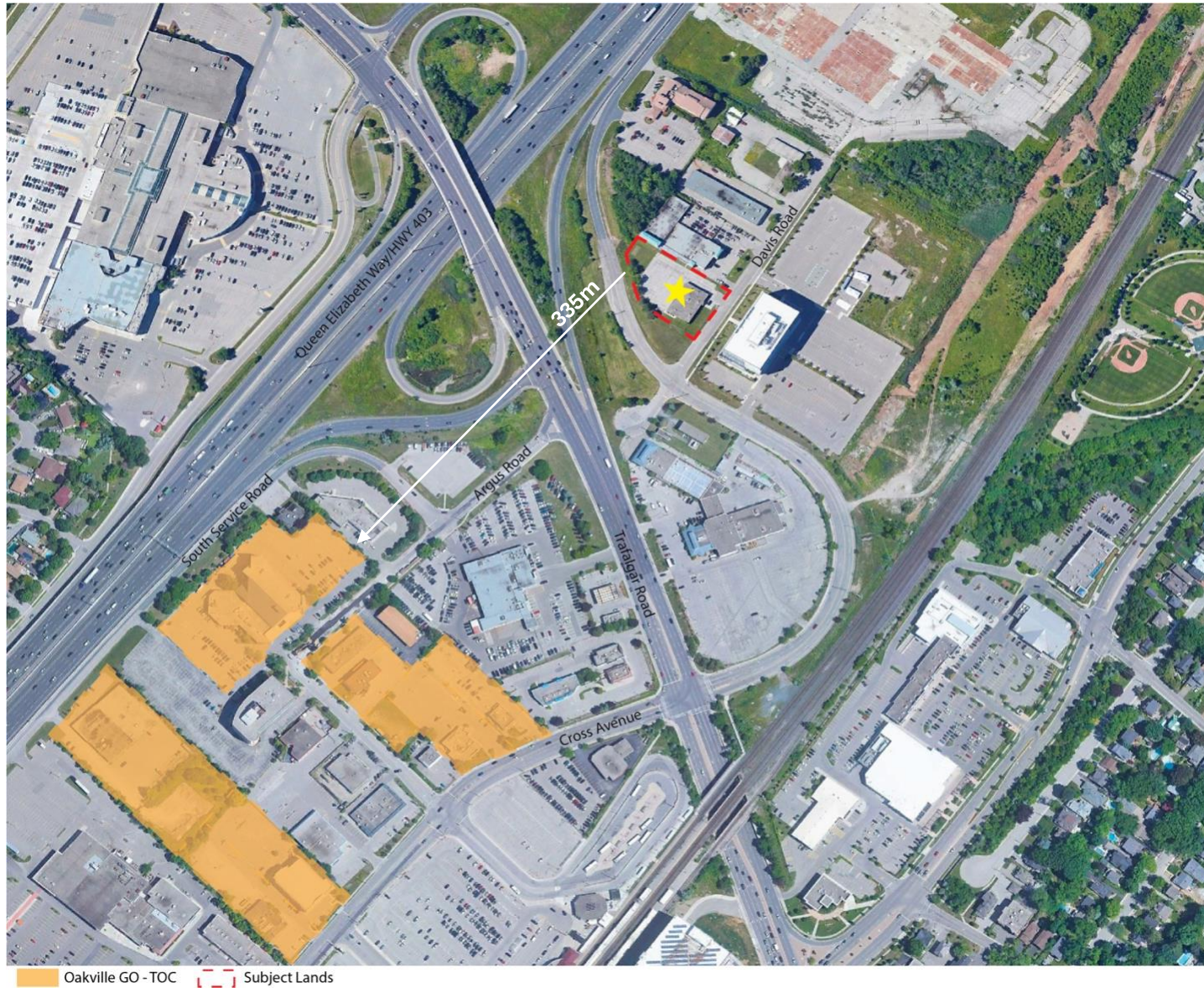
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Appendix A – Context Map



Appendix B – Rendering of Proposed Development

