

**Piper Morley**  
T: 416-367-6591  
pmorley@blg.com

**Lee English**  
T: 416-367-6169  
lenglish@blg.com

Borden Ladner Gervais LLP  
Bay Adelaide Centre, East Tower  
22 Adelaide Street West  
Toronto ON M5H 4E3  
Canada  
T 416-367-6000  
F 416-367-6749  
blg.com



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**DELIVERED BY EMAIL AND ONLINE SUBMISSION**  
**transitorientedcommunities@ontario.ca**

Transit Oriented Communities and Agency Oversight Division  
Ministry of Infrastructure  
777 Bay Street, Suite 425  
Toronto, ON M5G 2E5

To Whom it May Concern:

**Re: Oak-Lane Park Investments Inc.**  
**Written Submission regarding Four (4) Minister's Zoning Orders for the Transit-Oriented Community in the Town of Oakville**  
**ERO# 025-1368**

We are legal counsel to Oak-Lane Park Investments Inc. ("**Oak-Lane**"). Oak-Lane is the owner of lands municipally known as 570 Trafalgar Road, Oakville ("**Oak-Lane Lands**"). The Oak-Lane Lands are recognized as a gateway redevelopment site for the Midtown Oakville area.

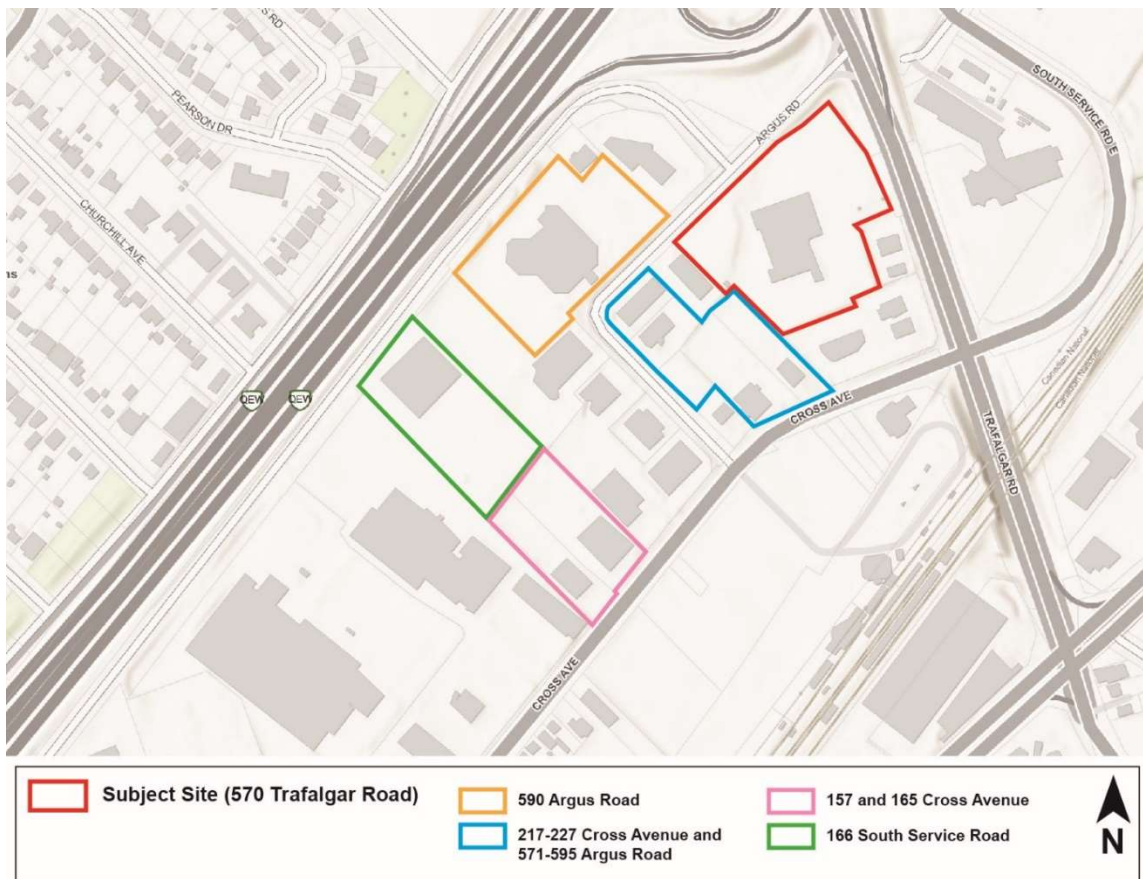
The purpose of this letter is to provide written submissions in advance of the Minister of Infrastructure's ("**Minister**") consideration of, and decision regarding, four (4) Minister's Zoning Orders for a Transit-Oriented Community in the Town of Oakville ("**TOC**"), comprised of the following lands.

- 217-227 Cross Avenue and 571-595 Argus Road (i.e. the "**Adjacent Development**");
- 157 and 165 Cross Avenue;
- 166 South Service Road East; and
- 590 Argus Road (collectively, "**TOC Lands**").

Oak-Lane supports the establishment of a transit-oriented community on the TOC Lands. However, it is essential that the plans and studies prepared in support for the TOC account for the redevelopment of Midtown Oakville, including the Oak-Lane Lands, at a level of intensification comparable to that proposed on the TOC Lands. If not, there is a risk that the transportation network and servicing infrastructure will be inadequate to accommodate future growth.

**The Oak-Lane Lands are the Preeminent, Gateway Location in Midtown Oakville**

The TOC Lands are in the immediate vicinity of the Oak-Lane Lands. The Adjacent Development abuts the Oak-Lane Lands to the southwest. The following is a context map, showing the Oak-Lane Lands (outlined in red) and the TOC Lands:



As this map clearly demonstrates, there are five significant development sites in this area. The TOC Lands comprise four of these sites, while our client’s site, which enjoys the preeminent locational characteristics of the five, is planned to be subject to the significantly more restrictive policies of Town of Oakville Official Plan Amendment No. 70 (“**OPA 70**”), which is currently with the Minister of Municipal Affairs and Housing for review and approval. Such an outcome would be completely unfair and contrary to the public interest as it would lead to an underutilization of the Oak-Lane Lands’ significant redevelopment potential.

Oak-Lane intends to redevelop the Oak Lane Lands with high density, mixed-use redevelopment, maintaining the option of relocating the dealership to a podium in one of four or more high-rise towers on its site.

A decision to approve the TOC that does not anticipate comparable height, density and built form on the Oak-Lane Lands would be contrary to the public interest as it will impair the ability for this area to redevelop in an efficient and coordinated manner.

### **Ministerial Coordination Regarding the TOC and OPA 70 is Required**

There is a compelling public interest in ensuring the decisions regarding OPA 70 and the TOC are coordinated and reflect the future development of the entire area, not just the TOC Lands.

In order to ensure that the planning for this important area of Oakville is done in a comprehensive manner, it is critical that the Minister coordinates with the Minister of Municipal Affairs and Housing to ensure that OPA 70 permits the same, or greater, heights and densities on the Oak-Lane Lands as may be permitted on the Adjacent Development.

Specifically, OPA 70 should be amended to permit buildings up to 56 storeys in height on the Oak-Lane Lands, with corresponding minimum density permissions.

Coordinating these processes in a manner that plans for the future redevelopment of the Oak-Lane Lands will result in a plan that protects for full build out and recognizes the Oak-Lane Lands' gateway location in Midtown Oakville.

### **Tower Separation and Fire Access Concerns Regarding the Adjacent Development**

The revised site plan for the Adjacent Development prepared by BDP Quadrangle dated August 2025 shows Tower 'C' is set back 15.3 metres from the existing eastern property line of the Adjacent Development, which is offset from the centreline of the proposed 20-metre right-of-way that will traverse a portion of the Oak-Lane Lands. As proposed, Tower 'C' does not provide a 35-metre tower separation from any future tower on the Oak-Lane Lands (which is required by OPA 70). Unless the plans for the Adjacent Development are revised or the excessive, 35-metre tower separation requirement in OPA 70 is removed, the TOC will adversely impact tower placement on the Oak-Lane Lands.

In addition, it appears that the fire access route shown on the August 2025 site plan for the Adjacent Development is not centred along the existing property line and is offset towards the Oak-Lane Lands. It is unclear how the fire access route will function in the interim condition prior to the acquisition of the portion of the Oak-Lane Lands necessary to establish this right-of-way. Oak-Lane should be involved in any such discussions.

### **Conclusion**


Oak-Lane acknowledges the Midtown Oakville area is underutilized and, given its proximity to higher order transit, is suitable for redevelopment as a mixed-use, transit oriented community. Oak-Lane does not, in principle, oppose the development contemplated by the TOC.

As an abutting landowner, Oak-Lane has a direct interest in the immediate and long-term impacts of the Adjacent Development and, more generally, the redevelopment of Midtown Oakville as a mixed-use, transit-oriented community. This is especially so given the size of the Oak-Lane Lands and their status as a gateway location to Midtown Oakville.

We are available to meet with the Minister and Distrikt to ensure a co-ordinated approach to the interim and final conditions as this area redevelops.

Yours truly,

**BORDEN LADNER GERVAIS LLP**

  
Piper Morley

PM/LE

Cc Client  
SGL Planning & Design Inc.