



December 2016

**RE: 5421, 5453, and 5463 Dundas Street and 3232 Tremaine Road
File No. 505-06/15, 520-09/15 and 510-03/15
Evergreen Community (Burlington) Ltd.**

Evergreen Secondary Plan Comments

<hr/> <p><i>Allowing development to proceed in accordance with this Draft Plan of Subdivision would represent an enormous wasted opportunity for both the City and Evergreen</i></p> <hr/>	<p>Introduction and Overview</p> <p>The Burlington Sustainable Development Committee has carefully examined the documents submitted by Evergreen Community (Burlington) Ltd. (“Evergreen”) under File Numbers 505-06/15, 520-09/15 and 510-03/15 (24T-15003/B) pertaining to proposed development at 5421, 5453, 5463 Dundas Street and 3232 Tremaine Road (“the Property”).</p> <p>Through the lens of Burlington’s Strategic Plan 2015-2040 and associated plans such as the Burlington Economic Development Strategic Plan, allowing development to proceed in accordance with this Draft Plan of Subdivision would represent an enormous wasted opportunity for both the City and Evergreen.</p>
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When this Plan is revisited in the current planning context, the Committee believes that development can meet the newly-expressed strategic goals and emerging policies of the City with respect to mixed-use development and neighbourhood design, and at the same time, allow Evergreen to incorporate more residential/commercial units on the property. The City and Evergreen should independently and jointly evaluate what benefits could accrue from adding 1,200 to 1,500 units to the current Plan for the property.

Respecting the earnest work done by both the City and Evergreen on this file, and noting that this application has evolved through a process of discussions, It is the Committee’s opinion that the Draft Plan of Subdivision reflects legacy planning policies as described in Official Plan (OMB - Oct. 24, 2008), the pre-restructuring “Growing in Place” Official Plan review process, and the Burlington, Our Future Strategic Plan 2011-2014 (published November 14, 2011). Policies around commercial planning were described by urbanMetrics Inc. in a [March 2104 report](#) to the City as follows:

“Burlington’s existing commercial hierarchy and land use policies signal a shift towards phasing out post-war commercial development patterns, but retain traditional language (i.e. designation titles) and protections for car-oriented retail uses and built forms. The existing policies also continue to segregate commercial uses from the places where most people live. Rather than comprehensive framework for complete and walkable communities with integrated amenities and services for residents, the existing commercial planning framework takes a more selective approach to introducing new forms of commercial development in mixed use, intensification areas, while maintaining the status quo in ‘stable’ areas.”

General observations of the Committee with respect to the Draft Plan of Subdivision include:

1. Land use within the site is highly segregated, with clusters of residential, naturalized zones, a business corridor, and mixed-use corridors. While these are comparatively near each other, they have been kept separate on the site. This design approach, reminiscent of streetscapes like Alton, produces a homogeneous neighbourhood character, and fails to inspire a sense of “community”.
2. Evergreen has felt it necessary to tiptoe around the boundaries of natural heritage areas and what the City might find acceptable in terms of development density. The result is islands of single family home parcels with pockets of higher density townhomes, and some multi-unit buildings at the streetscape. The City should grant clear permission to Evergreen to develop with higher density provided it is able to achieve the aims expressed in the City’s emerging planning approach.

Context of Burlington’s Strategic Plan 2015-2040

In its latest Strategic Plan, the Municipal Council of the City of Burlington sets out a vision for the development of the city over the next 25 years based on 4 key elements.

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| A City that Grows | The City of Burlington attracts talent, good jobs and economic opportunity while having achieved intensification and balanced, targeted population growth for youth, families, newcomers and seniors. |
| A City that Moves | People and goods move throughout the city more efficiently and safely. A variety of convenient, affordable and green forms of transportation that align with regional patterns are the norm. Walkability within new/transitioning neighbourhoods and the downtown are a reality. |
| A Healthy and Greener City | The City of Burlington is a leader in the stewardship of the environment while encouraging healthy lifestyles. |
| An Engaging City | Community members are engaged, empowered, welcomed and well-served by their city. Culture and community activities thrive, creating a positive sense of place, inclusivity and community. |

Burlington’s approach to achieving targeted growth is expressed in the [Burlington Economic Development Strategic Plan](#) and the Official Plan Review: Proposed Commercial Lands Policy Directions.

In particular, the Commercial Lands Policy Directions suggest an emphasis towards the creation of complete communities using a placemaking approach to design.

The term “complete communities” refers to communities that are vibrant, mixed use, pedestrian-oriented, transit supportive and human-scale. The approach suggests a tight integration of a wide range of land uses, including community infrastructure such as facilities, programs and social networks that improve quality of life.

Placemaking is a multi-faceted approach to the planning, design and management of public spaces, the public realm and communities that involves including people in the discussion of designing public spaces that reflect shared value and support healthy communities.

The City seeks to have its mixed use areas follow patterns of urban (rather than suburban) design, and Council should insist on application of high-quality urban design guidelines as part of the Evergreen development process. These design guidelines will ensure that the principles of sustainability, compatibility, placemaking, pedestrian and transit-oriented development and efficient and attractive urban form are achieved.

By contrast, the current Draft Plan of Subdivision follows a distinctly suburban development pattern.

Brent Toderian Recommendations

First and foremost, Toderian recommends that the City of Burlington understand its planning context as “urban”, and for planning not to follow the suburban context of the past with all of its policy baggage.

Walking, cycling and transit modes must be prioritized, so that single-occupancy motor vehicles are not the default choice for trips. With respect to the Draft Plan of Subdivision, this means a) that the City of Burlington must integrate well-serviced transit routes with the new development, and b) that safe walking and cycling routes be created across Bronte Creek, to points in Oakville and across Dundas St. to the Bronte Creek Trail System.

Densifying a suburban plan will only create gridlock and traffic congestion. Accordingly, if the property is to accommodate a plan with higher density, streets must be designed to support the efficient movement of people and goods, including some that follow a “complete street” format.

Density is not about building height, it is about the quality of the built form with respect to visual interest, variety of building massing, and landing properly on the street front to achieve human scale, community connectedness, control of wind and solar shading, and animation of streetscape from the activity within and around the building.

The Committee’s observations on the Draft Plan of Subdivision with respect to these statements:

1. The homogeneity of building types and the clustering of these by function as shown on the Draft Plan of Subdivision do not support a dense development pattern, and largely miss the concept that building design is paramount to creating community character. The Committee would expect to see

a lot more detail about how the developer will accomplish placemaking with landmark design buildings and homes.

2. An urbanized street plan will accommodate many different functions within a parcel, most notably public-oriented retail (e.g. restaurants, pubs, grocery stores, pharmacy, health clinics, hardware and clothing stores) with residential and other community services in a way that creates vibrancy. These are elements that will attract all age groups to the development, particularly younger adults who do not wish to own cars and are seeking affordable properties within convenient walking distance to services and transit.
3. Transit should be integrated with the development and must be available at the outset and without fail. The City will need to invest heavily up front with expectation that investment will be recovered over a longer timeframe, and must understand that it is making this investment in alignment with its long-range strategic goals. It is not sufficient for the City to presume that routes can be established once population density is achieved. High-frequency transit links to regional transit and key community areas must be operational when the parcels are marketed or the community will absolutely fail to attract non-driving clientele.

Principles and Objectives of Sustainable Development Committee

The Sustainable Development Committee bases much of its commenting on the following Principles and Objectives of Sustainable Development, as developed by the committee, endorsed by Council and found in Appendix E of the City’s Official Plan:

PRINCIPLES	COMMENTS
Support responsible development that promotes efficiency and enhances the quality of life.	This development has potential to support quality of life, based on its proximity to an extensive natural heritage system that can be easily accessed. Focus is required on establishing walkability to community services and maintaining accessibility to all areas of the development.
Protect the environment in both a proactive and remedial manner, with emphasis on anticipation and prevention.	The approach to handling protection of the natural heritage system through buffer zones, connections to other natural heritage areas, and links under roadways for small mammals and amphibians is certainly proactive. However, the committee notes that the integration of natural heritage only goes as far as needed.
Make decisions that recognize the interdependence of humans and nature in a common ecosystem.	Decisions made in the Plan are certainly heading in the right direction, but the residential area is a homogenous desert. Green space should be near or surrounding the residential areas and these can be improved by tying them together with the natural heritage system.
Promote responsible resource use	The plan to train each house owner about the area is good. More trees and green space are required. Integration of

and conservation practices.	residential horticulture, perhaps a community garden, is seen as essential elements.
Have regard for environmental, economic and social costs and benefits in the development and use of resources, products and services.	The Fiscal impact Study shows a surplus of \$66,300 per year when development is fully operational. The developer could increase this surplus while providing additional sustainable features by following a higher-density, sustainable Plan per LEED Neighborhood Design principles.
Promote responsible stewardship to ensure equitable use of natural and environmental resources in order to meet essential needs of both present and future generations.	The developer appears to have done a reasonably good job in this area, but the Plan could and should go much further. See comment above regarding LEED Neighborhood Design.

OBJECTIVES	COMMENTS
Protection of Natural Resources: Preserve and extend accessible green spaces, shorelines, natural water courses and the Niagara Escarpment for future generations.	The developer has done a good job of preserving the natural heritage system. SDC has some concerns with the isolated natural heritage system in Block 428 on south side of property.
Reforestation of the City: Promote the replanting and management of vegetation on private and public property within the city.	The developer is preserving two large areas of woodlands (NHS Blocks 429 and 431). Regarding replanting, the developer needs to consider tree planting, particularly in the residential areas. Plantings should also be considered along the 407 corridor to reduce impact of CO ₂ emissions. SDC would like to see more details around a Tree Conservation Plan.
Full Public Participation in Development Decisions: Allow the public to be part of all planning decisions. Economic, environmental and social impacts of proposed developments should be considered.	There should be a neighbourhood meeting to review this Secondary Plan, and recommendations should be incorporated into an amended Plan.
Actively Promote Sustainable Development: Advocate changes at the senior levels of government, as	The City is missing an opportunity to implement its goals for the Strategic Plan with respect to sustainable development, urban

<p>well as in the city, in order to evolve towards sustainability.</p>	<p>built form, economic prosperity, and intensification.</p>
<p>Make the Best Use of Land: Land-use decisions based upon an ecosystem approach to ensure environmental integrity and diversity. To include, but not be limited to, promoting environmentally sensitive lands and using fertile soil for agriculture throughout the municipality.</p>	<p>Though the Secondary Plan has conformed to rules around allowable density and protection of the natural heritage system, and has tried to maintain the integrity and diversity of the parcels, it fails to reach full potential.</p> <p>Space has not been used to maximum potential, and the result is a Plan that achieves conformance, but misses the goals of the new Strategic Plan.</p>
<p>Protection and Enhancement of Natural Features: Protect and enhance Burlington's natural features by ensuring that the physical features of shorelines, agriculture lands, flood plains, forestry tracts and notable landmarks such as the Niagara Escarpment are preserved for future generations.</p>	<p>See comments from previous section.</p>
<p>Natural Storm Water Management: Protect water courses in their natural state and for those water courses that have been significantly altered, restoration to a more natural state will be encouraged as opportunities arise.</p>	<p>The use of LID techniques like rainwater harvesting, rain gardens, stormwater capture, bioswales and bioretention cells, permeable pavement surfaces and other innovative stormwater management techniques is commendable.</p>
<p>Balanced Development: Provide a community plan and an economic strategy aimed at creating sustainable and appropriate forms of development that reflect human scale and a sense of community as well as representing a balance between urban development and natural surroundings.</p>	<p>The overall concept of the development started off fairly well with split among Business Corridor, mixed corridor-employment, mixed use corridor general and residential medium density. This provides a balance of between employment uses and three difference housing types. The developer indicates this will provide 1300 jobs and 900 residential units with a combined people and jobs of 73.3/ha which exceeds the 50/ha mandated under the Ontario Growth Plan.</p> <p>Although the Employment Land Use was addressed in a balanced manner – the proposed Business Corridor does not include any light industry.</p>

	<p>The site plan suggested for residential does not inspire us. The developer needs to incorporate more green in the design through more connections to the natural heritage areas, more park area within the community and public amenity areas. The built-forms proposed do not totally reflect the human scale or provide a sense of neighbourhood. We need the proper balance between urban development and natural surroundings. The natural heritage has to blend more into the neighbourhood.</p> <p>To accomplish this and make better use of land, we feel more density is required.</p>
<p>Efficient Urban Design: Increase the efficiency of land use in the urban community in terms of energy and time; promote intensification and diversification policies rather than policies that generate urban sprawl.</p>	<p>Development reflects typical suburban planning, as opposed to urban planning. This approach lends itself to sprawl patterns as opposed to intensified, integrated, community-oriented planning.</p>
<p>Minimal Discharge of Toxic Pesticides and Other Toxic Chemicals: Promote the elimination of private and public use of toxic pesticides and other chemicals that have negative effects on the environment, particularly those known to be persistent.</p>	<p>N/A</p>
<p>Accessible Community Development: Form a new type of community development which includes readily available local community components such as commerce, shopping, employment, education and recreation within walking distance of all residences.</p>	<p>This community is laid out with trails and sidewalks. Links to natural heritage system and employment lands are good, but streetscape can use more work in achieving a walkable urban form.</p>
<p>Responsible Use of Natural Resources: Encourage conservation of natural resources; the city should work towards ensuring that users are charged for the full local costs of their individual use of water, electricity and sanitary sewers. There should also be</p>	<p>This does not appear to be addressed.</p>

<p>educational programs to encourage conservation of natural resources.</p>	
<p>Integration of Natural Features and Green Space: Integrate natural features and green space in all new developments and intensification projects.</p>	<p>The site has plenty of green space surrounding in the form of the natural heritage system, but SDC has concern with amenity areas. Parkland within the site is about two acres, and does not appear to incorporate spaces for community-based activities such as sports.</p>
<p>Energy Conservation: Promote energy conservation through efficient land use planning and building design.</p>	<p>The developer needs to consider district energy, renewable energy, and efficient building envelope. SDC asks that the developer carefully examine and address the Sustainable Building Guidelines when putting forward its built form.</p>
<p>Ecosystem Auditing: City of Burlington should prepare an objective ecosystem audit of the entire municipality at regular intervals.</p>	<p>N/A</p>
<p>Balanced Transportation System: Develop a balanced transportation system including transit, pedestrian, and cycling amenities and best use of the road system for movement of goods and people, with the existing facilities used to their fullest capacity.</p>	<p>The Transportation Study primarily addresses cars, and contains little about transit. The Plan and supporting documents address trail systems for walking and cycling; however, it is still incomplete and should be much more clear about how walking, cycling, transit are prioritized and how movement of goods is accommodated within the plan. SDC would also like to see cross sections of connecting streets to see how walking, cycling, and car uses are integrated. Developer should address ways that transit will be routed through and around the property to serve residents and businesses.</p>
<p>Evaluation of Development: Continuous monitoring and evaluation of development should take place to ensure that it does not have adverse impacts on the city's finances and the environment.</p>	<p>Planners should evaluate the development on an ongoing basis to ensure that developers and builders are following the established Plan and report recommendations.</p>

Principles of LEED Neighborhood Design

The Principles of LEED for Neighborhood Design should be incorporated into a new Plan of Subdivision, to ensure that the resulting design and land use meet the aspirational goals expressed in Burlington's Strategic Plan. The location and features of this property offer opportunity to meet these objectives, while providing excellent financial return for developers, builders and companies involved with realizing a new mixed-use, employment lands vision.

Smart Location and Linkages

Good neighborhood design requires connections to adjacent development and transit. The property is bounded on the south by a busy regional road with potential linkages to Burlington Transit, Oakville Transit and regional transit services. Despite the proximity of these, the development team will need to put significant effort into overcoming potential obstacles to connectivity arising from Bronte Creek immediately bordering the property on the west, Highway 407 to the north, and the lack of pedestrian and cycling infrastructure on the property boundaries.

Good neighborhood design requires very careful consideration of how natural heritage is enhanced and preserved on site. The presence of creeks, ponds and forested lots will require all stakeholders to collaborate on creative ways to integrate built form with this natural heritage so that it is preserved, enhanced and made accessible to the public for recreation and enjoyment.

Challenges may exist on the site with respect to providing resilience against climate-change-induced weather events and integrating stormwater control with natural features on the site. The Sustainable Development Committee expects the development team to engage with Conservation Halton and City engineering staff to develop effective strategies and plans to mitigate potential risks.

Neighbourhood Pattern and Design

It is crucial that site development respect the fact that humans interact with the built form. Compact development forms with a variety of massing and human-scale structure at street level will be far more appealing to people than monolithic, separated, single-story, single-use structures cropping up between roads and parking lots.

Sustainable Development Committee expects to see complete streets (see Official Plan definitions); compact mixed-use form, particularly along the service road corridor; traffic calming and other measures to significantly reduce the speed of automobile traffic through the property; and significant integration of landscaped natural features (e.g. trees, natively-planted medians) within pedestrian, parking and roadway areas.

The integration of public commons with building clusters is a hallmark of well-designed communities. Amenities such as community gardens, playgrounds and covered bicycle storage must be included within these commons spaces.

Deliberate, planned connectivity among the various parcel groupings must be established from the outset. Sustainable Development Committee does not yet see a vision from these developers for how

the Evergreen property might achieve connectivity to services at Appleby Line and Dundas Street, the 12-Mile Creek Trails, cycling routes to the north, or services in Oakville.

Developers and planners will need to devise extremely creative strategies to ensure that two primary objectives are met:

1. Goods travel easily to and from destinations within the property (e.g. manufactured products, raw materials, retail stock).
2. Street infrastructure supports walking, cycling, transit and automobile traffic in that priority order.

These two objectives should be met with separate infrastructure, not a blended system. 55' trucks moving at high speed or with heavy loads are not compatible with pedestrian traffic.

Green Infrastructure and Buildings

This design branch comprises two distinct, yet integrated aspects – green infrastructure AND green buildings. Sustainable Development Committee is adamant that the development, design and construction teams carefully plan, design and construct the elements of these two strategies throughout the property. It is at this precise stage of development that decisions be made about how energy and transportation systems will be organized to achieve future carbon neutrality. While the development may be initially low-carbon, and not officially carbon neutral, flexible thermal and electrical infrastructure with high-quality buildings provide a solid foundation upon which to build to carbon neutrality.

Green infrastructure includes a comprehensive district energy system supplying thermal energy to each parcel, a low-impact stormwater system to effectively manage the quality and quantity of stormwater from site, an integrated major stormwater conveyance system to handle what have historically been 100-year storm events (though increasing in frequency due to climate change), methods to manage the quality and quantity of material leaving the property through the sanitary sewer system, a system for collecting, sorting and otherwise managing waste and recyclables so that resources are conserved and reused.

Green building includes all aspects of efficient and renewable construction as specified in City of Burlington's Sustainable Building Guidelines. All construction on site should adhere to these guidelines, particularly where they are integrated to the district energy system.

Because of the required subsurface infrastructure and space allocation, Evergreen should already be considering the life-cycle benefits and costs of various air- and water-based zone cooling and heating infrastructure such as district-energy-connected fan coil units, inverter-driven heat pumps, geo-exchange, etc. with respect to such elements as fuel price escalation, fuel source security, equipment maintenance, equipment lifetime, capital cost, overall energy consumption/efficiency, efficiency of source fuel use, carbon emissions, carbon cost, and energy recovery.

The same consideration must be given to infrastructure for electric/hybrid vehicles, including car sharing programs, shuttles and similar services.

Conclusions

Given the limitations of the proposed Draft Secondary Plan as outlined in this letter, Sustainable Development Committee recommends and expects that the City of Burlington and Evergreen Community (Burlington) Ltd. will re-engage in discussion about how the Plan can be re-envisioned in the context of Burlington's Strategic Plan 2015-2040, LEED Neighborhood Design, and principles of sustainable development. A significant opportunity will be missed if an urgent course correction is not immediately taken on this file.

Respectfully submitted by,

Guy Sheppard, Chair
on behalf of the Policy & Development Subcommittee
Burlington Sustainable Development Committee

Attachments

Attachment A - Conceptual Photographs for Evergreen Secondary Plan – Attached are some photographs to provide you with a better idea of some concepts we feel should be included in the Evergreen Secondary Plan.

Attachment B – Evergreen LEED Neighbourhood Checklist