

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
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February 28, 2019

**Subject: Amendment #1 to the Growth Plan for the Greater Golden Horseshoe, 2017.
EBR Postings: ERO-013-4504; ERO-013-4505; ERO-013-4506; ERO-013-4507**

File: 552-08

This submission represents the City of Burlington comments in response to the posting of 4 notices on the EBR related to Amendment #1 to the Growth Plan for the Greater Golden Horseshoe, 2017. The Ontario Growth Secretariat released the postings for a consultation period that extended from January 15th to February 28th, 2019.

The submission includes:

- a high level discussion of key comments;
- detailed comment tables arranged by themes (Appendix A-1);
- detailed mapping related to the proposed Provincially Significant Employment Zone mapping (Appendix A-2) and specific mapping issues presented in (Appendix A-3) to support the comments provided;
- a listing of the wide range of local study of employment that has been undertaken by the City of Burlington; and,
- Motions approved by Planning and Development Committee on February 27, 2019.

Key Comments on Proposed Modifications to the Growth Plan, 2017

General Observations

- It is difficult to provide complete comments on Amendment 1 as it is clear that many of the directions established will require other guidance material and supporting documents. Consultations like these would be best supported by details about how the various ongoing provincial initiatives work together to meet the provincial objectives. A road map of these initiatives and related issues would support a more complete understanding of the proposed modifications.

- Amendment 1 presents modifications that will have the effect of weakening the core principles of the strong growth management framework developed to reduce urban sprawl as established in Places to Grow, 2006 and continued in Places to Grow, 2017. The lowering of the density and intensity targets on a region-wide basis, and the lowering of the barriers to settlement area boundary expansion, will not lead to appropriate growth around Major Transit Station Areas where investments in key transit infrastructure are being made, but will make urban boundary expansions more prevalent increasing the rate at which the Greater Golden Horseshoe as a region adds new urban lands for greenfield development.
- Many lower-tier municipalities have commissioned or completed significant planning analysis and public and stakeholder consultation to establish Urban Structure Plans, which identify areas for intensification, areas that will be protected and areas that will see limited change. This work is necessary to achieve a balance between the various policy objectives of the Growth Plan. This proposed amendment provides little reference to the lower-tier municipality and its role in implementing the Growth Plan.
- Local Planning Appeals Tribunal (LPAT) appeals rely upon staff reports prepared by lower-tier municipal staff in response to a given development application, even when the approval authority is the upper-tier municipality. Amendment #1 proposes the removal of reference to the role of site design and urban design standards. Site design and urban design standards are a key means of making the connection between a site-specific development application, local context and the broader objectives of the Growth Plan, will pose a challenge to demonstrating conformity with the Growth Plan. Municipal Official Plans are the key means of implementing the Growth Plan and policies in the Growth Plan should be written to support implementation through the development of a local vision in upper-, single- and lower-tier Official Plans.
- Amendment #1 does not clarify the role of the lower-tier municipality in employment land planning, specifically, the role in defining employment areas. The City of Burlington recommends that there is a role for the lower-tier official plan in designating lands for employment purposes and developing official plan policies and zoning regulations to guide development in areas that make up employment areas. Lower-tier municipalities have a role in identifying issues and recommending solutions prior to the municipal comprehensive review, where appropriate. A number of recommendations are provided to support clarifying the role of the lower-tier municipality. Instead of three geographic definitions of employment area the objective of the policies of the Growth Plan should be to establish a unified geography for employment areas and a clear policy framework.

Theme 1:

Employment Planning and the identification of Provincially Significant Employment Zones

Provincially Significant Employment Zones (PSEZ)

Proposed Amendment:

The province has identified provincially significant employment zones that would receive enhanced protection for employment uses. To ensure employment areas that are crucial to the province's economy are not converted without a more comprehensive assessment of employment land need, the ministry is proposing to identify provincially significant employment zones that would not be eligible for conversion during the proposed transitional period.

Staff Analysis:

Employment Area planning and employment planning in general are complex. The proposed mapping presented as part of this consultation was not supported with a detailed purpose or with sufficient discussion of methodology. Without understanding how the mapping was developed it is not possible to respond in a complete way to the mapping as presented.

Staff do not support the PSEZ mapping as presented. A map and an associated table are provided as Appendices 2 and 3 which describe mapping issues and potential solutions. The modifications requested have only been forwarded to ensure that the discussion of the extent of employment areas is not further complicated by the introduction of the PSEZ. However, these recommended solutions, particularly where lands are identified to be added to the PSEZ are provided on the assumption that the City of Burlington asserts that the Region's municipal comprehensive review is the appropriate time to consider conversions. Further, the City expects that the Region's municipal comprehensive review continues to be the appropriate opportunity to bring forward recommendations for conversion. These recommendations are described in City of Burlington Staff Report PB-04-18 "Appendix D: Lands recommended for Employment Conversion that are located within the Region of Halton Employment Area overlay". Should anything in the modifications to the Growth Plan or other subsequent changes to land use planning in Ontario affect the ability to consider employment conversion within the PSEZ through the Regional municipal comprehensive review, staff do not support the addition of these lands.

The City of Burlington has completed extensive research and study related to employment. A list of these studies is provided as Appendix A-4.

Staff Recommendation:

1. Revise the PSEZ mapping to remove or add lands, as recommended in Appendix 3, to reflect, at a minimum existing land use designations and the Region of Halton's Employment Area overlay, in order to recognize existing local approaches to planning for employment.
2. Remove PSEZ mapping from all lands within the City's Mobility Hub boundaries, as depicted on Appendix 2. This is to ensure that the PSEZ mapping does not represent an additional barrier to support greater local autonomy and flexibility for municipalities and to enable municipalities to provide the appropriate supply of housing and jobs near provincial transit investments faster and more effectively.

Upper- and Single-tier municipalities may designate employment areas prior to the next municipal comprehensive review

Proposed Amendment:

Clarification that upper- and single-tier municipalities can designate employment areas at any time before the next municipal comprehensive review, including adding existing lower-tier municipal designations.

Staff Analysis:

This is a helpful clarification. What is the role of the local municipality?

It is critical that the role for the lower-tier municipality is clear. For example, in the case of the City of Burlington, if the Region of Halton were simply to take all employment designated parcels from the in force and effect local Official Plan that are included in the definition of "employment area" it would ignore a series of investigations and analysis related to city designated employment land that have taken place over a number of years. This analysis recommends some redesignations and some employment area additions. This detailed level of analysis is best completed at the local, lower-tier level.

Staff support this policy that would allow the findings of the local exercise that identified lands to be added to the Region of Halton Employment Area overlay in advance of the municipal comprehensive review.

Staff Recommendation:

1. Require upper-tier municipalities to work with lower-tier municipalities to determine the appropriate additions to the upper-tier employment area, if any, in consideration of lower-tier analysis and subject to appropriate criteria.

One-time window

Proposed Amendment:

The proposed policy framework for protecting employment areas would change by allowing employment area conversions to be approved ahead of the next municipal comprehensive review. This proposed amendment would provide flexibility to municipalities who wish to support mixed use development, while maintaining employment area protections where needed.

Staff Analysis:

As written the one-time window allowing employment area conversions does not offer any flexibility or clarity to a lower-tier municipality. Given that work is well underway in most upper-tier municipalities in order to meet the 2022 timeframe for upper and single-tier conformity with the Growth Plan, it is unlikely that resources would be redirected from that work.

The Province could provide clarity to municipalities by stating that redesignation of lands designated only by the lower-tier municipality as employment area are not considered employment conversions.

Detailed comments on the proposed policy modifications are attached as Appendix 1.

Staff Recommendation:

1. The Growth Plan should be modified to clarify that employment lands designated within a lower-tier Official Plan that are not identified in the Upper-tier Official Plan employment areas, are not considered employment conversions.

Theme 2: **Major Transit Station Areas**

Proposed Amendment:

A series of changes are proposed to enable the determination of a major transit station area faster so that zoning and development can occur sooner. The proposed modifications, among other things, would allow an upper-, or single-tier municipality to delineate and set density targets for major transit station areas in advance of the municipal comprehensive review.

Staff Analysis:

One of the proposed outcomes of Amendment 1 is the development of more housing and jobs near transit.

The concern raised in the Provincial consultation sessions was that all municipalities (single-, upper- and lower-tier) wanted a clear message from the Province about balancing the Plan's policy direction on Major Transit Station Areas (MTSAs) with the Plan's policy direction on Employment Lands. The proposed modifications, including the intent and the extent of the PSEZ in the area of MTSAs, will need to be significantly revised in order to meet the stated objective of unlocking potential at MTSAs. Additional complications will lead to more uncertainty and delays in moving forward with planning around MTSAs.

The amendment also proposes to simplify requirements related to establishing alternative density targets at multiple stations along a single priority transit corridor. This requirement established in the Growth Plan, 2017, required multiple stations along a priority transit corridor within an upper-, or single-tier municipality to be considered together to establish an alternative target. The removal of this requirement relieves the Region from considering every MTSA along a given priority transit corridor at the same time and this should in turn mean that upper-, single or lower-tier municipalities should be able to delineate the station areas and establish targets independently, per the direction of the Growth Plan and relevant supporting guidance material (with appropriate modifications).

If this, and the modifications suggested in relation to the PSEZ are not incorporated, it is likely that while development may occur around MTSAs before the municipal comprehensive review, the ability to guide that development in a coordinated and well thought out manner could be at risk. It is unlikely that upper- and single-tier municipalities would consider delineating MTSAs in advance of the municipal comprehensive review as this work has already been established in work plans underway. On the ground this could mean that in a two-tier municipality MTSAs will not be delineated and approved until 2022. Beyond that lower-tier conformity exercises would be required, which are not universally sheltered from appeal, as well as local secondary plan development and approval.

Staff Recommendation:

1. Modify policy to empower a lower tier municipality to delineate its own MT SA boundaries through study that responds to the provincial direction in policy and guidance documents. This would support unlocking MTSAs and link the work directly to the local planning exercise that will be the means of meeting the various objectives of the MTSA policies.

Theme 3:

Agricultural and Natural Heritage Systems

Proposed Amendment:

The proposed changes relate to how the Agricultural and Natural Heritage System mapping are implemented. Changes include:

- the Natural Heritage System for the Growth Plan does not apply until it has been implemented in upper- and single-tier official plans;
- prior to Provincial mapping coming into effect the Growth Plan policies for protecting prime agricultural areas and natural heritage systems and features will apply to municipal mapping;
- allowing upper- and single-tier municipalities to refine the provincial mapping in advance of the municipal comprehensive review;
- once implemented in official plans, further refinements may only occur through a municipal comprehensive review.

Staff Analysis:

The proposed changes to policy respond to a series of concerns highlighted in previous Halton Area Planning Partnership (HAPP) submissions to the Province on the Coordinated Plan Review (2017) and through feedback provided to the province in relation to the City of Burlington's Official Plan project. Through these submissions Burlington conveyed that the provincial Natural Heritage System and Agriculture System mapping should not take effect until it has been incorporated into the Upper Tier Official Plan through the Municipal Comprehensive Review Process, as supported by local planning study, analysis and public consultation. Staff supports the proposed changes to the Growth Plan that support this direction. We understand however that the policy modifications to the Growth Plan do not apply to the Greenbelt Plan and Niagara Escarpment Plan areas. As a result Burlington would still need to include the unrefined provincial Agriculture and Natural Heritage System maps in our new Official Plan if it is approved prior to the Region's Municipal Comprehensive Review. This would result in the inclusion of both the provincial mapping and the Region's mapping in the Rural and North Aldershot Planning Areas, leading to confusion for landowners in these areas. Staff recommends that this is addressed along with some other minor modifications to improve clarity and define implementation processes related to the provincial mapping.

Staff Recommendation:

1. The policy changes made to the Growth Plan (summarized in the 3 bullet points above) should also apply to the provincial Natural Heritage System and Agriculture System mapping in the Greenbelt Plan and Niagara Escarpment Plan Areas.
2. Once the provincial mapping has been incorporated into the upper tier plan through a municipal comprehensive review, permit refinements through other Planning Act Applications in order to reflect site specific studies, such as Environmental Impact Assessments (EIAs).
3. Clarify that once the provincial mapping has been incorporated into the upper tier plan through a municipal comprehensive review, that there is no need for the municipality to submit a request that the Provincial mapping be updated. Provincial approval of the mapping through the municipal comprehensive review acknowledges the local modifications appropriate.

Theme 4:

Intensification and Density Targets

Proposed Amendment:

Proposed reductions related to residential intensification targets and designated greenfield density targets, measured across the upper- or single-tier municipality.

Staff Analysis:

The City of Burlington supported the targets established in the Growth Plan, 2017.

The City of Burlington context is unaffected by this change. Both targets are measured over the entire upper tier municipality. There is little remaining Designated Greenfield Area within the City to which this target density would apply. These lands have been or will soon be planned. Since there is little remaining Designated Greenfield Area the majority of growth in the municipality occurs within the Built Up Area. This means that almost all residential growth within the City of Burlington constitutes intensification.

While the minimum intensification target and the targets for Designated Greenfield Areas are no longer proposed to increase over time the forecast of people and jobs within Growth Plan, 2017 remain the same. This will impact the rate at which new land is required to be designated for urban purposes, which will mean more urban sprawl.

Staff Recommendation:

The City of Burlington supports the targets established in the Growth Plan, 2017.

Theme 5:

Small Rural Settlements

Proposed Amendment:

The proposed changes create a new category of settlement area. This modification clarifies that there is a sub-category of settlement area that is specifically excluded from the definition of Designated Greenfield Area. The policy also identifies the possibility to consider minor rounding out of small rural settlements.

Staff Analysis:

This modification responds to issues highlighted in the HAPP submission on the Land Needs Methodology which highlighted the need to recognize that small scale, privately serviced areas of rural character should not be considered part of the Designated Greenfield Area. This issue was previously addressed by modifying O.Reg 311/06, which is proposed to be further modified to acknowledge this issue has been addressed now through changes to the Growth Plan policy language. This issue has no impact within the City of Burlington. Staff support the Region of Halton suggestion that the policy should indicate that consideration of minor rounding out should be assigned to the upper-tier municipality.

Staff Recommendation:

The City of Burlington supports the addition of a rural settlement definition and modifications to the definition of Designated Greenfield Area.

Theme 6:

Settlement Area Boundary Expansions

Proposed Amendment:

A variety of proposed modifications are proposed to enable local municipal decisions on reasonable changes to settlement area boundaries in a timely manner so as to unlock land faster for residential and commercial development.

Staff Analysis:

These policies enable some municipal flexibility to change settlement area boundaries outside of a municipal comprehensive review, provided specific criteria are met. These proposed policies would provide greater flexibility to address issues related to settlement boundary issues. Staff generally support the additional flexibility but suggest that the policy should clarify that this policy applies only to an upper- or single-tier municipality.

Staff Recommendation:

1. Policies should be modified to make it clear that any proposed expansion must be initiated by an upper- or single-tier municipality given the importance of ensuring an integrated approach to managing growth, including the efficient, orderly, and cost effective provision of infrastructure.

Theme 7:
Other Issues

Language

- The term market demand is being introduced into the discussion of housing which is troubling. The market is not typically a land use planning matter and the meaning of market demand is not clear. While the market might be demanding single family homes it is not the best way to accommodate the population forecasts or to achieve other policy objectives such as development at transit supportive densities. As a new theme emerging in the Growth Plan, it is unclear how this is meant to inform other parts of the amendment. A definition of market demand and other supportive guidance would be needed to support the addition of this concept. As a new theme in the Growth Plan, added background, tools, and guidance to assist Planning authorities to determine market demand should be developed. To date, an integral analysis of the various factors defining and affecting market demand, housing supply and community needs is missing.
- The return of language “encouraging intensification generally throughout the delineated built up area”. It is unclear what kind of impact this will have on the implementation of local urban structure plans. This modification could undermine the ability of a municipality to direct intensification to MTSA’s and other areas supported by appropriate investments in infrastructure and public service facilities.
- Instances where phrasing such as “where/as appropriate” and “or equivalent” should either be removed or modified to explicitly state as determined by whom/ through what process/ based on which criteria. For example, 3.2.6(c) “a comprehensive water or wastewater master plan or equivalent, informed by watershed planning or equivalent has been prepared to:”, will the provincial watershed planning guidelines be amended to provide direction as to what is considered equivalent?
- “Urban sprawl” is a recognizable, common term that helps the public visualize the type of development that the Growth Plan seeks to avoid. “Unmanaged growth” softens the perception and creates a wider window for what may be considered acceptable development.

- Replacing language such as “a clean and healthy environment, and social equity” with “an approach that puts people first” implies that the two concepts are mutually exclusive. While the term “cleaner environment” is included in newly added content, there is a clear distinction between the terms “clean” and “cleaner”. With the removal of the term “healthy”, this statement is considerably weakened, placing less emphasis on the importance of ecological integrity and resilience.

Implementation and Transition Policies

There are a number of opportunities to clarify roles and support the implementation of the Growth Plan, 2017. A series of specific suggestions are provided in the attached comment table under the theme: Other Issues in Appendix 1.

Key Comments on Proposed Modifications to Regulations

Proposed Modification to O.Reg 311/06 (Transitional Matters – Growth Plans)

Proposed Amendment:

Changes to the transition regulation are proposed to ensure alignment with Amendment 1 to the Growth Plan, if approved. The proposed changes include updating references to the Growth Plan as well as deleting provisions that had been recently added to the regulation supporting the implementation of the phased-in designated greenfield area density target and land needs assessment methodology.

In addition to the proposed regulation changes, feedback is also being sought on whether there are specific planning matters, currently in process, that should be addressed through this transition regulation.

Staff Analysis:

While it is recognized that deleting the provision addressing the phased-in designated greenfield area density target is required to reflect changes proposed in Amendment 1, the City reiterates its position that it is supportive of the targets established in the Growth Plan, 2017.

The City of Burlington is also supportive of proposed changes to the Growth Plan with respect to small rural settlements, which if approved, negates the need for the existing provision in the regulation supporting the land needs assessment methodology.

With respect to Growth Plan transition matters, please refer to comments from the City of Burlington in Appendix 1.

Staff Recommendation:

Please refer to the detailed tables reflecting the City's comments on specific policy changes, as it relates to proposed changes to the regulation.

Proposed Modification to O.Reg 525/97(Exemption for Approval – Official Plan Amendments)

Proposed Amendment:

The proposed change to the regulation is to facilitate the proposed amendments to the Growth Plan which would allow municipalities to make changes to their official plan to implement the Agricultural Sysytem for the Greater Golden Horseshoe mapping or the Natural Heritage System for the Growth Plan mapping in advance of their next Municipal Comprehensive Review. The change to the regulation would require the Minister's approval for any official plan amendments seeking to implement the mapping.

Staff Analysis:

This regulation under the *Planning Act* exempts certain municipalites from the need to obtain the Minister's approval for official plan amendments. The list of municipalities to which this exemption applies is included in the regulation.

This regulation does not apply to the City of Burlington, as Halton Region is the approval authority for amendments to the City's official plan.

Staff Recommendation:

The City of Burlington has no comments on the proposed change.

Conclusion

The City of Burlington is supportive of the initiative taken to identify challenges to implementing the Growth Plan. Many of the topic areas identified have posed challenges in planning at the local level in a two-tier system. There are a number of opportunities to identify a key role for lower-tier municipalities to support the implementation of the policies of the Growth Plan.

Please accept the detailed cover letter, tables and mapping as the City of Burlington's comments with a focus on providing clarity, and with attention to the Province's stated desired outcomes related to Amendment 1 to the Growth Plan, 2017. Given the tight timelines for consultation the City of Burlington may submit additional comments after the February 28th

deadline, pending Council approval of the staff report and attached submission on March 25, 2019.

Thank you for providing the City of Burlington the opportunity to comment on these policy and regulation modifications.

Respectfully submitted,

A handwritten signature in blue ink that reads "Heather MacDonald". The signature is written in a cursive, flowing style.

Heather MacDonald MCIP, RPP, CHRL

Director of City Building &
Chief Planning Official
City of Burlington

Attached:

- Appendix A-1: Detailed Comments Table by Theme
- Appendix A-2: Map: Comparison of Halton Region Employment Area overlay with Draft Provincially Significant Employment Zones mapping
- Appendix A-3: Provincially Significant Employment Zones mapping issues table
- Appendix A-4: List of Recent Studies related to Employment
- Appendix A-5: Motions approved by Planning and Development Committee on February 27, 2019

Employment Planning

Policy	Description	Comments	Proposed Alternative, if any
2.2.5.5	Municipalities should designate lands within settlement areas located adjacent to major good movement facilities	The intent behind removing the requirement for an employment strategy while at the same time establishing the requirement for establishing multiple density targets for employment areas is not clear.	
2.2.5.6	Clarification that upper- and single-tier municipalities can designate employment areas at any time before the next municipal comprehensive review, including adding existing lower-tier municipal designations.	<p>What is the role of the local municipality?</p> <p>For example, in the case of the City of Burlington, if the Region of Halton were simply to take all employment designated parcels from the in force and effect local Official Plan that are included in the definition of “employment area” it would ignore a series of investigations and analysis related to city designated employment land that have taken place at the local level recommending some redesignations and some employment area additions.</p> <p>This policy would allow the findings of the local exercise that identified lands to be added to the Region of Halton Employment Area overlay. Practically, it is unclear if the Region would consider these requests.</p>	<p>Require Upper-tier municipalities to add lands to the Employment Area identified in the Upper-tier Official Plan in advance of a municipal comprehensive review where:</p> <ul style="list-style-type: none"> a) the lower-tier municipality considered all employment lands and employment area within the municipality; b) the lands are contiguous with any employment area designated within the Upper-tier Official Plan; c) the designations limit permitted uses in accordance with 2.2.5.7.

Policy	Description	Comments	Proposed Alternative, if any
2.2.5.7	Modified language that requires municipalities to provide for an appropriate interface to maintain land use compatibility between employment areas and adjacent non-employment areas.	Land use compatibility is a key consideration in all land use planning. The terms “appropriate” and “maintain” are vague. If this policy is truly about land use compatibility the term “adverse effects” should be included. An appropriate interface or edge condition between employment areas and non-employment areas could include <i>major office uses</i> and <i>major retail uses</i> on non-employment areas.	See comment on 2.2.5.8.
2.2.5.8	Modified language that requires municipalities to provide for an appropriate interface to maintain land use compatibility between employment areas and adjacent non-employment areas.	The inclusion of <i>major office uses</i> and <i>major retail uses</i> alongside sensitive uses appears to limit the potential to use these other “non-sensitive uses” as one means of minimizing or mitigating impacts on existing industrial uses.	The development of <i>sensitive land uses</i> will avoid industrial, manufacturing or other uses within the <i>employment area</i> that are particularly vulnerable to encroachment.
2.2.5.10	One-time window to allow municipalities to undertake some conversions between the effective date of the proposed amendments and their next municipal comprehensive review, where appropriate and subject to criteria. Includes requirement to maintain a significant number of jobs on those lands	<p>This policy allows an upper or single-tier municipality to convert lands within existing employment areas.</p> <p>To be effective, this policy should be modified. From a lower-tier municipal perspective it should be noted that, as written, this one-time window for conversions would have no effect.</p> <p>An additional policy should be added to provide clarification to upper-tier municipalities that employment lands that are designated in a lower-tier official plan that are outside of the Upper-tier official plan employment</p>	<p>Notwithstanding policy 2.2.5.9, until the next municipal comprehensive review, lands within existing <i>employment areas</i> may be converted to a designation that permits non-employment uses provided the conversion would:</p> <ul style="list-style-type: none"> a) satisfy the requirements of policy 2.2.5.9 a),d), and e); and b) maintain a significant number of jobs on those lands. <p>For clarity, employment lands designated within a lower-tier Official Plan that are not identified in the Upper-tier Official</p>

Policy	Description	Comments	Proposed Alternative, if any
		<p>area are not considered employment conversions.</p> <p>Further, local municipalities will require additional tools to “maintain a significant number of jobs on those lands” such as conditional zoning.</p>	<p>Plan employment areas, are not considered employment conversions.</p> <p>OR</p> <p>In the case of a two -tier municipality, the Upper Tier municipality must consider conversions outside of the extent of the <i>employment area</i> designated within its Official Plan in advance of a municipal comprehensive review where the conversions would:</p> <ul style="list-style-type: none"> a) satisfy the requirements of policy 2.2.5.9 a), d), and e); and b) ensure a significant number of jobs on those lands.
2.2.5.11	Expanded opportunities for major retail in employment areas	<p>This policy would mean that the criteria to permit new or expanded opportunities in employment areas could be developed prior to the municipal comprehensive review.</p> <p>This policy should clarify, if it is the intent, that only an upper- or single-tier Official Plan is permitted to detail these criteria. See note on Transition in the “Other Issues” table.</p>	See notes on Transition in the Other Issues Table.
2.2.5.12	Introduction of Provincially Significant employment zones that must be protected and cannot be converted outside of the municipal comprehensive review.	The Provincially Significant Employment Zones (PSEZ) were developed without local consultation.	Please find attached a detailed map and table which has been prepared to highlight the challenges of the extent of the proposed PSEZ and identify proposed solutions.

Policy	Description	Comments	Proposed Alternative, if any
		<p>Additional data, detailed rationale and methodology for the development of the mapping was not provided as part of the consultation.</p> <p>If the intent of the PSEZ is to be a stop gap for municipalities that have not designated employment areas in their upper or single-tier Official Plans the proposal might be an appropriate approach. In that case the PSEZ should not apply if an employment area is designated in an upper-tier Official Plan.</p> <p>Adding another layer of complexity to an already complex area of land use planning will not have the effect of reducing red tape. In fact, if the PSEZ mapping were to proceed as proposed there are several sites that are not currently designated employment lands within the <i>employment area</i> of the City or the Regional Official Plan. These sites would have to go through the Region's municipal comprehensive review in order only to maintain the land use permissions they enjoy today.</p> <p>Without local consultation and confirmation of data the PSEZ will have serious consequences to land owners</p>	<p>Recommendation: Do not implement the PSEZ as proposed.</p>

Policy	Description	Comments	Proposed Alternative, if any
		<p>and should not be implemented as proposed.</p> <p>In lieu of imposing the PSEZ as proposed consideration should be given to taking the same approach as proposed through this amendment for the NHS and Agricultural mapping. In that scenario the mapping would not apply until implemented and mapped in the Upper-tier Official Plan.</p> <p>A more detailed discussion about the intent of the mapping is required.</p> <p>An alternative framework could also be considered, like the Gateway Economic Zone which allowed the Upper Tier municipality to work within Provincial expression of expectations (and approval) to meet the same objective.</p>	
2.2.5.13	Establishing multiple employment density targets	Please review 2.2.5.5. The intent of removing the requirement for a strategy and replacing it with the elements of a strategy is unclear.	
2.2.5.14	A new policy that requires municipalities to retain space for a similar number of jobs when redeveloping employment lands.	<p>This policy should be re-worded as it is unclear.</p> <p>Where a site, that is recommended for conversion, currently has 0 jobs or 5 jobs, that existing condition could be used as a means to limit the amount of</p>	<p>Where lands are converted to a designation that permits non-employment uses outside of employment areas, the redevelopment of any employment lands should retain space for a similar number of jobs to remain to be accommodated on site</p>

Policy	Description	Comments	Proposed Alternative, if any
		<p>jobs that a municipality could require on a given site. The proposed language adds some clarity and a more objective approach to determining the appropriate amount of space for jobs.</p> <p>In addition, in order to be implementable local municipalities will also require a tool to support the requirement for a certain number of jobs. Conditional zoning is one such tool. Until that tool is available it is not possible to implement this policy.</p>	in proportion to the size and scale of the development proposal.
2.2.5.16	Clarification that within existing office parks, non-employment uses should be limited.	<p>It is unclear if this policy and the associated definition is suggesting that existing <i>office parks</i> are no longer considered employment areas.</p> <p>At a minimum the policy should clarify that non-employment uses do not include residential uses in any case.</p> <p>The policy has not provided sufficient direction.</p>	Please clarify the intent of this policy.
5.2.2.3	Supplementary Direction: This policy states that the province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.	The mapping established in the Upper-tier plan should be interpreted (through Provincial approval) as the approved Provincial mapping without requiring an additional step of “a municipal request”.	The Province shall consider mapping in an Upper-, or Single-tier Official Plan, approved by the Province, as depicting the refined provincially significant employment zones, the agricultural land base mapping or the <i>Natural Heritage System for the Growth Plan</i>

Major Transit Station Areas

Policy	Description	Comments	Proposed Alternative, if any
2.2.4.4	Revised policies that simplify the process and criteria for alternative targets that reflect on-the-ground realities.	This modification is positive and simplifies the approach for considering alternative targets.	None
2.2.4.5	A new policy that allows municipalities to delineate and set density targets for major transit station areas in advance of the municipal comprehensive review, provided the Protected Major Transit Station Area (MTSA) tool under the Planning Act is used.	<p>This modification is positive. The removal of the requirement to balance targets across the same priority transit corridor removes a barrier to moving forward with MTSA delineation. It also relieves the Upper or Single-tier municipality from the exercise of balancing density targets and alternatives along a given priority transit corridor.</p> <p>However, this policy should go further to empower a lower tier municipality to delineate its own MTSA boundaries as a result of a study that responds to the Provincial direction in policy and in guidance documents. This would support unlocking MTSAs and linking the work directly to the local planning exercise that will be the means of meeting the various objectives of the MTSA policies.</p>	Notwithstanding policies 5.2.3.2 b) and 5.2.3.3 c), upper-, and single-, and lower- tier municipalities may delineate the boundaries of major transit stations areas...

Policy	Description	Comments	Proposed Alternative, if any
		The modifications allow for a flexible approach in the case where alternative targets may be proposed.	
Definition: Major Transit Station Area	Clarification that major transit station areas can range from an approximate 500 to 800 metres radius of a transit station.	<p>This is a positive modification that introduces some flexibility into the work of delineating an MTSA. This modification acknowledges that 500 to 800 metres is the approximate distance that a person can walk in 10 minutes. This corresponds to the MTO transit supportive guidelines.</p> <p>It appears that the definition however establishes a maximum of 800 metres. The definition should be revised to clarify that both figures are approximate.</p>	The area including and around any existing or planned higher order station or stop within a <i>settlement area</i> ; or the area including and around a major bus depot in an urban core. Major transit station areas are generally defined as the area radius extending approximately within an approximate 500 to 800 metres radius from of a transit station, representing about a 10-minute walk.

Natural Heritage and Agricultural Systems

Policy	Description	Comments	Proposed Alternative, if any
4.2.1.2	The proposed policy reads: “ <i>Water resource systems</i> will be identified to provide for the long-term protection of <i>key hydrologic features, key hydrologic areas</i> , and their functions.”	Similar to the Natural Heritage System and Agriculture System, broad landscape systems are best implemented through the Municipal Comprehensive Review process, as supported by local planning analysis and public consultation. This should be identified in the policy to provide implementation clarity.	“Water Resource Systems will be identified through a Municipal Comprehensive Review to provide...”

Policy	Description	Comments	Proposed Alternative, if any
4.2.2.4	Specification that the provincial mapping of the agricultural land base and the Natural Heritage System for the Growth Plan does not apply until it has been implemented in upper-and single-tier official plans.	This change responds to concerns raised with the Province related to Natural Heritage System and Agricultural System mapping. This allows municipalities to refine the mapping based on more specific local information, analysis and consultation prior to incorporating the mapping into an Official Plan.	This policy direction should also be extended to apply to the Natural Heritage System and Agriculture System mapping within the Greenbelt Plan and Niagara Escarpment Plan Areas.
4.2.2.4	During the period before provincial mapping is implemented in upper-and single-tier official plans, the Growth Plan policies for protecting prime agricultural areas and natural heritage systems and features will apply to municipal mapping.	Support, see above.	This policy direction should also be extended to apply to the Natural Heritage System and Agriculture System mapping within the Greenbelt Plan and Niagara Escarpment Plan Areas.
4.2.2.5	<p>Specification that municipalities can refine and implement provincial mapping in advance of the municipal comprehensive review.</p> <p>New policy that states: "Upper- and single-tier municipalities may refine provincial mapping of the <i>Natural Heritage System for the Growth Plan</i> at the time of initial implementation in their official plans. For upper-tier municipalities, the initial implementation of provincial mapping may be done separately for each lower-tier municipality. After the <i>Natural Heritage System for the Growth</i></p>	Municipalities routinely receive Environmental Impact Assessments (or equivalent) that are used to refine the boundaries of a natural heritage system, based on a detailed site-specific study and analysis. Provided these studies are submitted in support of a Planning Act application (or similar) and approved by the municipality, refinements should be permitted outside of the municipal comprehensive review.	Delete reference to the municipal comprehensive review. Consider instead: "...further refinements may only occur through an approval process under the <i>Planning Act</i> , the <i>Niagara Escarpment Planning and Development Act</i> or the <i>Environmental Assessment Act</i> ."

Policy	Description	Comments	Proposed Alternative, if any
	<i>Plan</i> has been implemented in official plans, further refinements may only occur through a <i>municipal comprehensive review</i> .”		
5.2.2.3	Supplementary Direction: This policy states that the province may review and update provincially significant employment zones, the agricultural land base mapping or the Natural Heritage System for the Growth Plan in response to a municipal request.	The mapping established in the Upper-tier plan should be interpreted (through Provincial approval of a municipal comprehensive review) as the approved Provincial mapping without requiring an additional step of “a municipal request”.	The Province shall consider mapping in an Upper-, or Single-tier Official Plan, approved by the Province, as depicting the refined provincially significant employment zones, the agricultural land base mapping or the <i>Natural Heritage System for the Growth Plan</i>
Definitions	<p>New definition introduced:</p> <p>Natural Heritage System for the Growth Plan: The natural heritage system mapped and issued by the Province in accordance with this Plan.</p> <p>The original definitions for “Agricultural System” and “Natural Heritage System” have been almost fully retained, yet the first part of the explanation for the Natural Heritage System (The natural heritage system mapped and issued by the Province in accordance with this Plan.) has been pulled out to create a new definition.</p>	The introduction of the unique term “Natural Heritage System for the Growth Plan” is confusing. What is the rationale for this and why was it done for the Natural Heritage System, but not the Agricultural System?	<p>Ensure consistent structure/style changes throughout the document. Retain original definition to Natural Heritage System.</p> <p>Utilize other means of clarifying Provincial vs. Regional vs. Local Natural Heritage System, if this was the rationale for the change. For example, explanatory text included in Official Plans.</p>

Intensification and Density Targets

Policy	Description	Comments	Proposed Alternative, if any
2.2.2.1	<p>Revised policy that establishes different minimum intensification targets for municipalities.</p> <p>Specifically:</p> <ul style="list-style-type: none"> The Cities of Barrie, Brantford, Guelph, Orillia and Peterborough and the Regions of Durham, Halton and Niagara will have a minimum intensification target of 50%. 	<p>The City of Burlington supported the targets established in the Growth Plan, 2017.</p> <p>The City of Burlington context is unaffected by this change. The target is measured over the entire upper tier municipality. Given that there is little remaining Designated Greenfield land the majority of growth occurs within the built up area and contributes to this target. The City of Burlington is a significant contributor to achieving the intensification target for the Region of Halton.</p> <p>While the minimum intensification target is no longer proposed to increase over time the forecast for people and jobs remain the same. This will impact the rate at which new land is required to be designated for urban purposes.</p>	Retain the targets established in Growth Plan, 2017.
2.2.2.3	Clarification that intensification should be prioritized around strategic growth areas while also being encouraged generally throughout the delineated built up area.	The chief method of developing a strategy to accommodate growth through intensification at an Official Plan level is through the development of an Urban Structure. A reference to Urban Structure should be maintained here.	c) encourage intensification generally to achieve the urban structure as identified by an Upper-, Single- or Lower-tier municipal official plan.

Policy	Description	Comments	Proposed Alternative, if any
		<p>The return of language regarding the encouragement of intensification generally throughout the delineated built-up area could also undermine a municipality's urban structure objectives. This should be qualified to require that such intensification is contemplated by the Official Plan of the municipality.</p> <p>The 2017 Growth Plan was more specific about strategic growth tied to urban structures. This modification could be challenging to municipalities who have identified areas where significant changes are not necessary.</p> <p>This language could be detrimental in terms of LPAT appeals that would now have specific language spelling out that development anywhere in the built-up area would be in conformity with the Growth Plan. This could undermine local attempts to reaffirm urban structure and identify established neighbourhood areas that are not expected to change significantly and are not areas which align with local and provincial investments in infrastructure.</p>	

Policy	Description	Comments	Proposed Alternative, if any
2.2.2.4	New policies that permit all municipalities to apply for alternative intensification targets	Does not impact the Burlington context.	
2.2.7.2	<p>Revised policy that establishes different minimum designated greenfield area density targets for municipalities. The following targets would take effect at the next municipal comprehensive review and apply to the entire designated greenfield area (with the exception of net outs).</p> <p>Specifically: The Cities of Barrie, Brantford, Guelph, Orillia and Peterborough and the Regions of Durham, Halton and Niagara will have a minimum designated greenfield area density target of 50 residents and jobs per hectare.</p>	<p>The City of Burlington supported the targets established in the Growth Plan, 2017.</p> <p>The City of Burlington context is unaffected by this change given that there is little remaining Designated Greenfield land.</p> <p>This will impact the rate at which new land is required to be designated for new designated greenfield areas.</p>	
2.2.7.4;2.2.7.5	New policies that permit upper and single tier municipalities to apply for alternative designated greenfield area density targets, with simplified criteria.	<p>The City of Burlington supported the density targets established in the Growth Plan, 2017.</p> <p>The City of Burlington context is unaffected by this change given that there is little remaining Designated Greenfield land.</p> <p>This will impact the rate at which new land is required to be designated for new designated greenfield areas.</p>	

Settlement Area Boundary & Small Rural Settlements

Policy	Description	Comments	Proposed Alternative, if any
2.2.8.4	Amended to allow for the adjustment of settlement area boundaries outside of a municipal comprehensive review.	The policy should clarify that this may only be initiated by an upper- or single tier municipality.	
2.2.8.3 d)	Amended such that 2.2.8.3 c) and d) are deleted and replaced with “the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and <i>stormwater master plans</i> or equivalent, as appropriate;”. Also amended by deleting “watershed planning or equivalent has demonstrated that”, adding “water, wastewater and stormwater” and deleting “not negatively impact” and replacing it with “be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and”.	The proposed policy deletes references to policies 3.2.6 and 3.2.7, which provide important direction on the type of studies and information needed to support boundary expansions. Watershed and/or subwatershed planning includes water, wastewater and stormwater servicing considerations as identified by the modified policy, however is not limited to these items. Watershed and subwatershed planning is also a critical tool for identifying and refining natural heritage features, areas and systems. These are key considerations when considering a settlement area boundary expansion.	Include reference to Sections 3.2.6 and 3.2.7. Include reference to “watershed planning or equivalent”.
2.2.8.3(f)	Removal of “An agricultural impact assessment will be used to determine the location of the expansion”	What is the rationale for removing this? What is the status of the Draft Agricultural Impact Assessment (AIA) Guidance Document that the Province released in March of 2018?	prime agricultural areas should be avoided where possible. To support protect the Agricultural System, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing

Policy	Description	Comments	Proposed Alternative, if any
	Replaced with “prime agricultural areas should be avoided where possible. To support the Agricultural System, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the Agricultural System and in accordance with the following....”	<p>Provincial AIA guidelines are a key component of supporting implementation of the provincial agricultural system as they provide a consistent minimum framework for agricultural impact evaluation throughout the GGH.</p> <p>The removal of this requirement weakens protection for the agricultural system and introduces risk and subjectivity into the evaluation process.</p>	and mitigating the impact on the Agricultural System, as informed by an agricultural impact assessment and in accordance with the following:

Other Issues

Policy	Description	Comments	Proposed Alternative, if any
1.2.2	Legislative Authority: ...a planning matter will conform with this Plan,...	To be consistent with the <i>Planning Act</i> the Growth Plan should be modified to acknowledge that a planning matter will conform or will not conflict with this Plan.	a planning matter will conform, or will not conflict with this Plan...
2.2.1.4 Design	Language changes related to design.	<p>Weakening language around design and urban design guidelines erode a key means of connecting site specific development to the policies of the Growth Plan.</p> <p>The Planning Act identifies matters of Provincial interest that decision makers shall have regard to in Part 1, section 2. Included among them is: the</p>	Retain references to: “Ensure development of high quality” “site design and urban design standards”

Policy	Description	Comments	Proposed Alternative, if any
		promotion of built form that (i) is well designed, (ii) encourages a sense of place, and (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant.	
3.2.1.2	Amended by adding "environmental planning", and by deleting "infrastructure master plans, asset management plans, community energy plans, watershed planning, environmental assessments, and other" and by deleting "where appropriate."	The city supports environmental planning, however the revised policy provides less clarity to implement the policy, and specifically the expected plans and studies that implement and demonstrate environmental planning approaches.	Include reference to the types of studies and plans that may be used to demonstrate compliance with the policy.
Transition	A matter to consider related to transition	Until an Upper-tier municipality has completed its municipal comprehensive review a lower tier Official Plan should be sheltered from conformity to the Growth Plan.	

COMPARISON OF HALTON REGION EMPLOYMENT AREA OVERLAY WITH DRAFT PROVINCIAALLY SIGNIFICANT EMPLOYMENT ZONES

Legend

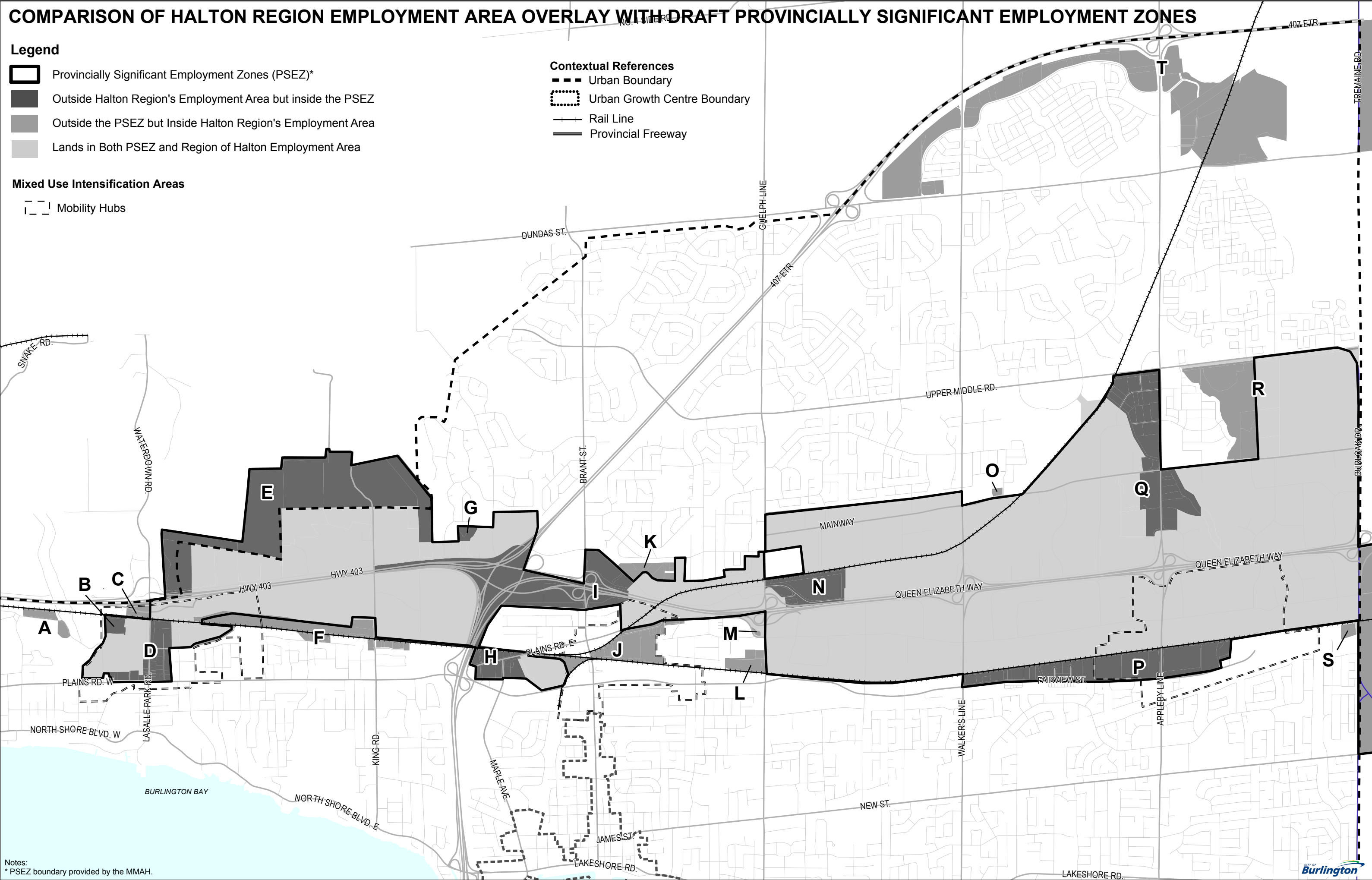
- Provincially Significant Employment Zones (PSEZ)*
- Outside Halton Region's Employment Area but inside the PSEZ
- Outside the PSEZ but Inside Halton Region's Employment Area
- Lands in Both PSEZ and Region of Halton Employment Area

Mixed Use Intensification Areas

- Mobility Hubs

Contextual References

- Urban Boundary
- Urban Growth Centre Boundary
- Rail Line
- Provincial Freeway



Note: For the purposes of this discussion, the Employment Area overlay established in the Region of Halton Official Plan is being considered a means of identifying serious errors in the PSEZ mapping. This analysis supports the continued role of the Region of Halton in defining the extent of the employment areas and to assess those lands through the municipal comprehensive review. The City of Burlington however, through the work in support of the recently Adopted Official Plan, has identified issues of a technical nature related to the Region's Employment Area and has also identified recommendations for conversions to be considered through the Region's municipal comprehensive review. The Adopted Official Plan is not approved and through the approval process the Region has identified non-conformity issues related to employment policies. Nothing in these comments limits those recommendations and positions presented as part of the Adoption of the Official Plan and its appendices including the Urban Structure Vision. Should anything in the modifications to the Growth Plan or other subsequent changes to land use planning in Ontario affect the ability to consider employment conversion within the PSEZ through the Regional municipal comprehensive review, staff do not support the addition of these lands.

Legend key	Map ID	Address or Addresses	Region of Halton Employment Area	COB Employment Area (existing OP)	PSEZ	Solution
	A	238 Sumach Lane; 279 Sumach Lane	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	B	Howard Road (Hidden Valley Park)	No	No	Yes	Remove from PSEZ; or Modify Policy to acknowledge that despite being within the PSEZ, lands not designated for employment use are not impacted.
	C	1199 Waterdown Road	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	D	Plains Road W; Plains Road E; Cooke Blvd; Masonry Court	In part	Yes	Yes	Remove the portion of lands found outside the Regional Official Plan employment area extent; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area. <u>Unlocking MTSA's</u> This is a key area of City designated employment area recommended for redesignation to a non-employment land use

						designation to support the objectives of the Major Transit Station Area that does not impact Regional interests.
	E	151 North Service Road; 291 North Service Road; 1775 King Road; 1570 Yorkton Court; 1800 King Road	In part	In part	Yes	In part, remove the portion of these lands outside the Urban Area boundary from the PSEZ. In part, remove the portion of these lands outside the Region of Halton Employment Area from the PSEZ.
	F	Enfield Road; King Road; CN Rail Shunting Yard	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	G	Heather Hills / Kerns Road	No	No	Yes	Remove the portion of these lands outside the Region of Halton Employment Area from the PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	H	1167 to 1254 Plains Road E; 955 Maple Ave	No	Yes	Yes	Remove the portion of lands found outside the Regional Official Plan employment area extent from the PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	I	1510 North Service Road; 1225	No	No	Yes	Remove the portion of lands found outside the Regional Official Plan employment area extent from the PSEZ; or,

		Brant Street; Infrastructure Lands; Interchange Lands.				Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	J	North of Metrolinx Rail Line, South of CN Rail Line - Queensway Drive various	Yes	Yes	No	<p>Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.</p> <p><u>Unlocking MTSA's</u> This is a key area of Regionally designated employment area with potential for conversion to support the objectives of the Major Transit Station Area. The City holds that any decision regarding the potential for conversion of these lands will await the completion of the Region's municipal comprehensive review.</p>
	K	Various North Service Rd; Industrial Street	Yes	In part	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	L	860 Guelph Line; 888 Guelph Line	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	M	2477 and 2489 Queensway Drive	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	N	Various North Service Road including	No	No	Yes	Remove from PSEZ; or Modify Policy to acknowledge that despite being within the PSEZ, lands not designated for employment use are not impacted.

		3167 North Service Road				
	O	4025 Mainway	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	P	Properties on the north side of Fairview Street from Walkers Line to Oval Court	No	Yes	Yes	Remove the portion of lands found outside the Regional Official Plan employment area extent from the PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area. <u>Unlocking MTSA's</u> This is a key area of City designated employment area recommended for redesignation to a non-employment land use designation to support the objectives of the Major Transit Station Area that does not impact Regional interests.
	Q	Uptown west side of Appleby Line, Appleby Corridor.	No	Yes	Yes	Remove the portion of lands found outside the Regional Official Plan employment area extent from the PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	R	5201 Mainway; 5150 and 5164 Upper Middle Road.	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
	S	800 Burloak Dr	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.

	T	407 Corridor Lands	Yes	Yes	No	Add to PSEZ; or, Modify Policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area.
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Land Use Planning Study List and Hyperlinks:		
Committee Agenda Date	Report Title and Report Appendices	Council Resolution Date
<u>20-Jun-11</u>	<u>PB-37-11: Employment Lands Study.</u> <u>Burlington Employment Lands Study, Draft Final Report, June 2011.</u>	<u>14-Jul-11</u>
<u>3-Dec-12</u>	<u>PB-101-12: Draft Employment Lands Study, Part 2.</u> <u>Appendix A: Vacant Employment Lands.</u> <u>Employment Lands Study Phase 2 Draft Report - Part 1.</u> <u>Employment Lands Study Phase 2 Draft Report - Part 2.</u>	<u>10-Dec-12</u>
<u>14-Jan-13</u>	<u>PB-17-13: Official Plan Review: Directions Report on the Draft Employment Land Conversion Policies; and, Proposed Strategic Assessment of Vacant Employment Land Inventory.</u> <u>Appendix A: Employment Lands Policies.</u> <u>Appendix B: Draft Official Plan Employment Lands Conversion Policies.</u> <u>Appendix C: Draft Official Plan Employment Land Conversion Policies showing modifications.</u> <u>Appendix D: Comparison between existing and draft employment land conversion policies.</u> <u>Employment Lands Study Vacant Employment Lands: Site Visit Notes.</u>	<u>28-Jan-13</u>
<u>24-Mar-14</u>	<u>PB-17-14: Report providing information on the Official Plan Review: Transmittal of Final Phase 2 Employment Lands Study.</u> <u>Appendix A: Employment Lands Study Phase 2 Final Report.</u> <u>Appendix B: Comparison of Assumptions: Final Phase 1 ELS; Draft Phase 2 ELS; and, Final Phase 2 ELS.</u> <u>Appendix C: Burlington Employment Lands Study Phase 2, Stakeholders Workshop.</u> <u>Appendix D: ELS stakeholder and agency submissions.</u>	<u>7-Apr-14</u>

<u>26-May-14</u>	<u>PB-18-14: Official Plan Review: Proposed Employment Land Conversion Request Assessment Process and Strategic Vacant Land Assessment.</u> <u>Appendix A: Draft Official Plan Employment Land Conversion Policies showing Modifications.</u>	<u>9-Jun-14</u>
<u>19-Jan-15</u>	<u>PB-02-15: Report recommending endorsement of Official Plan Review: Proposed Employment Lands Policy Directions.</u> <u>Appendix A: Employment Lands Work Chronology.</u> <u>Appendix B: Employment Land Conversion Requests and findings of the Strategic Vacant Land Assessment.</u> <u>Appendix C: Map of Conversion Requests including the findings of the Strategic Vacant Land Assessment.</u> <u>Appendix D: List of Designations and Areas to be considered through the municipal comprehensive review.</u> <u>Appendix E: Briefing Note: Council Workshop on Employment Lands;</u> <u>Appendix F: Draft Official Plan Employment Land Conversion Policies showing modifications.</u> <u>Appendix G: Feedback on Proposed Employment Land Conversion Policies.</u>	<u>26-Jan-15</u>
<u>06-Oct-16</u>	<u>PB-30-16: Official Plan Project: Employment Land Conversion Preliminary Recommendations and Policy Directions.</u> <u>Appendix B: Burlington Employment Lands Policy Recommendations and Conversion Analysis Report.</u> <u>Appendix C: Employment Land Conversion Recommendations.</u>	<u>31-Oct-16</u>
<u>24-Apr-18</u>	PB-04-18: Revised proposed new official plan recommended for adoption Included a link to: <u>Update to Phase2 Employment Lands Analysis</u>	<u>27-Apr-18</u>

Economic Development Studies			
Name and Hyperlink (please copy and paste links below into browser)	Year	Consultant	Notes
Burlington Base Analysis http://bedc.ca/wp-content/uploads/2018/10/Base-Analysis.pdf	2015	MDB	Components of the Economic Vision
Burlington Key Sector Analysis http://bedc.ca/wp-content/uploads/2015/09/Key-Sector-Analysis-.pdf	2015	MDB	
Burlington Infrastructure & Employment Lands Analysis http://bedc.ca/wp-content/uploads/2015/09/Infrastructure-Employment-Lands-Analysis.pdf	2015	MDB	
Burlington Competitive Analysis http://bedc.ca/wp-content/uploads/2015/09/Competitive-Analysis.pdf	2015	MDB	
Burlington SWOT Analysis http://bedc.ca/wp-content/uploads/2015/09/SWOT-Analysis-Findings.pdf	2015	MDB	
Online Survey Summary Report http://bedc.ca/wp-content/uploads/2015/09/Online-Survey-Results.pdf	2015	MDB	
Stakeholder Interview Summary Report http://bedc.ca/wp-content/uploads/2015/09/Stakeholder-Interview-Analysis-.pdf	2015	MDB	
Draft Economic Vision Directions Report http://bedc.ca/wp-content/uploads/2015/09/DRAFT-Economic-Vision-Directions-Report-June-2015.pdf	2015	MDB	
Burlington Rural Strategy Background Document http://bedc.ca/wp-content/uploads/2015/10/Economic-Vision-Burlington-Rural-Strategy-Background-Document.pdf	2015	MDB	
Draft Economic Vision Update October 2015 http://bedc.ca/wp-content/uploads/2015/10/Draft-Economic-Vision-Sep-24-2015.pdf	2015	MDB	
Burlington and GTA suburban office market analysis http://bedc.ca/wp-content/uploads/2016/11/BEDC-Office-Analysis-June-17.pdf	2016	Deloitte	
Halton Employment Survey, Burlington Analysis http://bedc.ca/wp-content/uploads/2018/11/HaltonEmploymentSurvey2017Report-1.pdf	2017	BEDC (internal)	
Economic Base Analysis	2018	BEDC (internal)	

http://bedc.ca/wp-content/uploads/2018/10/Base-Analysis.pdf			
Transportation Tomorrow Survey, Burlington Analysis http://bedc.ca/wp-content/uploads/2018/11/TransportationTomorrowSurvey2018Report-1.pdf	2018	BEDC (internal)	
Burlington Economic Development Corporation (BEDC) Mobility HUBs – Office and Retail Market Analysis Summary Report http://bedc.ca/wp-content/uploads/2019/02/Final-City-of-Burlington-Office-and-Retail-Study-Summary-Report-Jan-15-2019.pdf	2019	Deloitte	

Resolutions approved by Planning and Development Committee on February 27, 2019

5.1 Submission related to the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 (PB-18-19)

Moved by Councillor Kearns

Receive and file department of city building report PB-18-19 and its appendices regarding the City of Burlington Submission on the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017; and

Direct the Director of City Building to submit the appendices, **as amended**, to department of city building report PB-18-19 as the City of Burlington Submission on the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 by the comment submission deadline of February 28, 2019; and

Direct the Director of City Building to provide any additional comments to the Province, if any, upon Council approval on March 25, 2019; **and**

Direct the Director of City Building to include the following in the City's submission to the Province related to the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017:

City of Burlington Council endorses and reinforces that Regional growth targets are calculated across the Region, which allows for individual municipality variations; and

Intensification and density targets applications will continue to be fully examined through the Region's municipal comprehensive review to ensure its implementation fully reflects local contexts and conditions; and

Notwithstanding that the growth forecasts and density targets are minimums and municipalities are encouraged to go beyond them, the forecasts and targets are relevant to planning and must guide planning decisions given their relationship to infrastructure planning and development charge calculations among other community planning considerations; and

Municipalities should be considered compliant with provincial legislation when meeting the forecasts and targets, and any

Resolutions approved by Planning and Development Committee on February 27,2019

decisions to go beyond minimums should be a municipal decision based on local circumstances; and

Once a municipality has met their forecasts and targets in a defined area, or across the municipality, or both, they can only be altered through a five year Official Plan Review; and

In addition to Best Planning Estimates, local municipal planning estimates outside of designated greenfield areas must be incorporated into infrastructure, population and employment service planning.