



Community Builders...Building Communities

November 19, 2019

City of Burlington
426 Brant Street
PO Box 5013
Burlington, Ontario L7R 3Z6

Attn: Mayor Meed Ward & Members of Burlington Council

Re: Taking a Closer Look at the Downtown – Feedback on 2 Concepts

Hamilton-Halton Home Builders' Association has been closely following the proposed updates to the April 2018 adopted Official Plan, and particularly the re-examination of the policies related to the Downtown and Urban Growth Centre. Thank you for providing us an opportunity to comment on the work being conducted by the City and its consultants in relation to the proposed modifications. We would like to take this opportunity to provide our feedback on both the concepts as well as the engagement process overall.

As you are aware, the Hamilton-Halton Home Builders' Association (HHHBA) has been actively involved in the process leading up to the adopted Official Plan to ensure that the goals of the City, its residents and members of the development industry were all sufficiently incorporated. We have made every effort to provide comments, written submissions and feedback via delegations, in order to have input and a role in the process to develop a new Official Plan and corresponding policies for the downtown intensification area.

To date, the submissions and comments we have provided have not been addressed, recognized or responded to. This is further evidenced in the two concepts for the Downtown that are currently up for discussion. Throughout the process, we have made our desire to participate apparent on multiple occasions. It is our opinion that the building and development industry have not been sufficiently engaged. At the outset of the 're-examination of the adopted Official Plan' process, City staff and consultants were directed to work with stakeholders and the public to formulate updates to the Official Plan policies, with the goal of conforming to the Region of Halton OP as well as Provincial policies and growth targets for the Urban Growth Centre. Regrettably, there has been minimal effort on the part of the City to contact or engage with us or our members in any capacity on the issue. We are confident that a favourable working relationship could be established to help inform the options available for the Urban Growth Centre and ensure that consequent policy documents will be in conformity and consistent with the Region of Halton OP as well as Ontario planning policy documents. However, without the engagement of the building and development industry, the work completed thus far is premature and insufficient.



The purpose of this submission is to once again outline concerns similar to those that we have identified in the past. Throughout the course of the process leading up to the adopted OP, the HHHBA was engaged and committed to the review; we attended various meetings, made several requests for information, background research and supplementary studies, and submitted written comments plus oral delegations. In addition, in the Summer of 2017, HHHBA provided a map to the City based on our own Association-initiated research and findings, entitled *Viable vs. Non-Viable Development Activity in the Downtown Mobility Hub*, which identified several developable properties throughout the downtown. The mapping demonstrated where and when redevelopment could be anticipated within the Urban Growth Centre. The HHHBA worked diligently with the development industry and identified “immediately developable” lands within the next 0-5 years. Unfortunately, no response or recognition of this work was ever received.

Over the past number of years, HHHBA and our membership has repeatedly requested copies of the background studies and technical work that has been done which contributed to the adopted Official Plan. At no time have City staff or Council provided any response to the requests, nor our written submissions, and to date we have yet to receive any of the requested information. Our Association is continuously questioning how a design concept can be supported through incorporation into the Official Plan that has no basis in transparent and available research and rationale. We have consistently asked for additional substantiation in the form of background studies, which while alluded to that they would be forthcoming on numerous occasions, were never provided.

The August 2019 “Background Report” was intended to provide interested parties with a guide to the background to the OP Policies for the Downtown and the process the City is currently undertaking to re-examine the Downtown OP Policies. While we were hopeful that this would be a step forward in obtaining the requested background information that we have requested time and time again, this document was merely an overview of the process that goes into re-examining City policies and how a new OP can be achieved, a “Planning 101” overview of sorts. At various points throughout the document, the term “background studies” and “background information” are referenced, however at no point are the details of this information identified nor are these studies provided as appendices to the background report. The background report does not contain any substantial information, statistics, research or analysis – background material – that informs how the adopted OP was arrived at.

In October 2019, an additional report was released which presented an updated vision for the Downtown, with revised precincts, and the introduction of two different concepts to achieve the downtown vision with different development approaches. Unfortunately, this report again fails to provide the substantiated background information that could inform the industry as to how these concepts were arrived at. At various points throughout the report, technical studies and background studies are referenced as being crucial to informing the 2 concepts that were put forward (for instance, Figure 3, page 5). Page 44 identifies that “several background studies are being completed to help guide the development and evaluation of the proposed Land Use Plan and the proposed policy changes to the 2018 Adopted Official Plan”. It is also noted that some studies have been completed and some are currently underway. Unfortunately, at no time in the remainder of the report are those technical and background studies identified, and again are not provided as an appendix to the document.

Our ask, once again, is to be provided with any and all background studies that have been completed to date that have informed not only the creation of the adopted Official Plan, but also those studies that have led to the creation of the 2 concepts presented now. We will also take this opportunity to request to be provided with copies of all background studies that are being used to inform any revised planning policies for the interim control by-law area as well.

This information is crucial to ensure that the OP has substance and is in conformity with higher order Provincial policy documents. We remain concerned that what is being proposed does not meet these requirements nor provides the required information needed for all parties, not just our industry, to ensure that the OP satisfies this test of consistency with the higher-level provincial planning policy documents. At this point, our industry is faced with 2 design concepts for the future of the Downtown of the City of Burlington albeit with no substance or teeth to support those concepts, nor any indication of the statistical impact on growth and intensification that these concepts may provide for the future. Without this critical information, the proposed options are not only premature but ultimately unrealistic, and do not provide a true and informed vision for the future of the City's Downtown.

Thank you for taking the time to consider our request. The HHHBA feels strongly that the City of Burlington should not go forth with the review or recommendations until the requested information is provided to us, and until such time that the industry is genuinely engaged and involved in the discussions. The building industry is a significant contributor to the regional economy and must be accounted for. We are unable to support the planning and growth options for the OP and Urban Growth Centre until such time that the building industry is consulted, and the requested background information is provided for our review and consideration. We look forward to receiving this information and are hopeful that an improved engagement process can be achieved.

Sincerely,



Suzanne Mammel, MBA CET
CEO, Hamilton-Halton Home Builders' Association