



January 20, 2020

*\* via email & regular mail\**

City of Burlington  
c/o Jo-Anne Rudy, Committee Clerk  
Community Planning, Regulation  
& Mobility Committee  
426 Brant Street, P.O. Box 5013  
Burlington, ON  
L7R 3Z6

Attention: Committee Chair and Members

**Re: City of Burlington Interim Control By-Law Land Use Study &  
Proposed Official Plan & Zoning By-law Amendments (Staff Report PL-01-20)**

Dear Chair Stolte & Committee Members:

Please find set out below Metrolinx's comments on the materials presented on January 14, 2020 for the Interim Control By-Law (ICBL) Land Use Study and the related proposed Official Plan (OP) and Zoning By-law (ZB) Amendments being considered by Council on January 30, 2020.

Metrolinx's interest is related to the proposed OPA and ZBA on the lands at and surrounding Burlington GO Station within 800m of the station and within 30m of the rail corridor. Burlington GO Station is served with regional rail service, which will be increased to headways of 15-minutes or better under the GO Expansion program by 2027. To capitalize on provincial investment in regional transit and to realize the intended benefits, Metrolinx is undertaking transit oriented development at and adjacent its stations to increase ridership, improve the customer experience and to offer more choices in modes of travel. Transit oriented development is, at its essence, mixed-used high density development well integrated with transit and all other modes. These objectives are consistent with the policies of the Growth Plan (2019), and 2041 Regional Transportation Plan.

With regard to the proposed Burlington Official Plan and Zoning By-Law Amendments arising from the ICBL Land Use Study, Metrolinx requests the City:

- retain existing land use permissions and not approve the Official Plan and Zoning By-law Amendments for the study area at this time;
- undertake additional analysis to demonstrate that the proposed land use and height permissions, at a minimum, support the Growth Plan density target of 150 people and jobs per hectare for the Burlington GO Major Transit Station Area (MTSA);
- consider greater densities within the MTSA, in order to incentivize transit oriented development and support the massive investment in regional transit currently underway as part of the GO Expansion program; and

- further engage affected stakeholders and landowners, including Metrolinx, in determining the proposed land use framework for the ICBL study area, prior to presenting a revised proposal for City Council's consideration.

More detailed comments on the ICBL Land Use Study and proposed OPA and ZBA are below.

### Scope

Metrolinx's comments on the ICBL Land Use Study and proposed OPA and ZBA are focused on our lands located at 2101 Fairview Street and 2120-2144 Queensway Drive, and those lands adjacent to and/or within 30 m of the active rail corridor where Metrolinx has an interest to ensure safety, operational, and policy compliance. Comments have also been provided on proposed policies that may impact how future and current GO customers access and use Burlington GO Station.

### Comments

#### Land Use

- Metrolinx supports the conclusion in the ICBL Study that the highest and densest buildings be located closest to the GO station. The study however, effectively down-zones lands in the MTSA at a time when the Province is promoting transit oriented development that can leverage the benefits of the significant capital and operating investment in regional transit. This is of great concern to Metrolinx.
- Analysis should be provided by the City to demonstrate that the proposed height and land use permissions, at a minimum, allow for achieving the Growth Plan minimum density target of 150 people and jobs per hectare within 500 to 800 metres the Burlington GO station, which is a designated MTSA. Metrolinx understands that the exact boundary of the MTSA will be determined through Halton Region's Municipal Comprehensive Review (MCR) and that an interim boundary may be required for the City's analysis. The boundary used previously in the Burlington GO Mobility Hub Study should be considered until the limits of the MTSA are confirmed by the Region.
- Metrolinx encourages the City to consider permitting densities above the minimum established in the Growth Plan, taking into consideration:
  - the surrounding community context, including the existing land uses and block structure which provide any opportunity to transition between tall buildings on underutilized sites at the core of the MTSA, to lower density residential neighbourhoods;
  - the frequent rail service being provided to Burlington GO Station; and
  - the Provincial interest in incentivizing transit oriented development to support the massive investment in regional transit currently underway as part of the GO Expansion program.
- In addition, and with regard to the specific permissions proposed in the OPAs, we note the following:
  - Recommendations in Section 14.2 of the Dillon Land Use Study and in Part III, Section 7.2.3 of the proposed OPAs in Special Planning Area "A" significantly constrain feasible development on Metrolinx lands. When combining proposed public space allocations, maximum building floor plates, mid-block public right-of-way, and

associated setbacks with existing rail corridor safety standards and setbacks, it becomes difficult to implement transit supportive development. A more fulsome investigation and analysis of the net result of these recommendations, coupled with rail safety standards needs to be undertaken.

- We note that the draft outputs of the on-hold Mobility Hub Study did not restrict development to 24 storeys and that the Mobility Hub Study conclusion was reached through extensive consultation with Metrolinx staff, other landowners, agencies, and the public. Until further consultation and analysis is completed, the existing height permissions should be retained.

### **Connectivity and Circulation**

- Metrolinx supports conclusions in Section 6.2.1 of the Dillon Land Use Study relating to improved mobility and connectivity to Burlington GO Station and between the station and Downtown. Through the 2016 GO Rail Station Access Plan Metrolinx has identified several complementary recommendations that would integrate well with the ones proposed in the Study. It is encouraging to see that sustainable and active travel modes are being prioritized to move people within Burlington and to the station.
- Metrolinx also supports recommendations in Section 6.2.2 of the Dillon Land Use Study that support improvements to the local transit network and its operations; particularly the implementation of bus priority along Brant Street as this is also identified in the *2041 Regional Transportation Plan*.
- Map 4 (Schedule M-1 MTSA Special Planning Area) from the proposed OPAs and Diagram 5A from the proposed ZBAs note a new mid-block, public right-of-way running east-west between Fairview Street and the rail corridor. Metrolinx does not support this road bisecting the existing bus loop at the Burlington GO Station. If this proposed road were to be implemented, significant impacts to bus operations could be expected and bays, which are already at a premium, would be reduced. This concern was previously shared with City staff from the Integrated Mobility Team so it is concerning to see the road included in the proposed amendments.

### **Process**

- In Appendix A, the overview and timeline details activities between 2006 and 2022. The anticipated future schedule of the Burlington GO Mobility Hub Study is requested to be included as it is understood the forthcoming Secondary Plan for the Burlington GO Station area would replace the ICBL recommendations.
- Metrolinx requests to be included in the Technical Advisory Committee and Landowners' Group when the Burlington GO Mobility Hub Study (as well as Aldershot and Appleby GO) resumes.
- Metrolinx also requests further consultation on the delineation of the Burlington GO MTSA boundary and identification of height permissions and density targets through City of Burlington secondary planning and Region of Halton Municipal Comprehensive Review process.

Thank you for this opportunity to comment on the Interim Control By-Law Land Use Study and the related proposed Official Plan and Zoning By-Law Amendments. We look forward to working closely with the City to revisit the findings of the ICBL Land Use Study and the related proposed land use permissions for the study area.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mathieu Goetzke', written over a vertical line.

Mathieu Goetzke  
Chief Planning Officer (A)  
Metrolinx