

December 19, 2019

Mr. Paul Lowes, MES, MCIP, RPP
Principal
SGL Planning & Design Inc.
1547 Bloor Street West
Toronto, ON
M6P 1A5

Dear Mr. Lowes:

**Re: Taking a Closer Look at the Downtown: Themes, Principles
and Land Use Concepts
Mattamy James Street Limited Partnership
2082, 2086 and 2090 James Street
City of Burlington
Our File: 2017/04
City File Nos.: 505-07/17 & 520-16/17**

We are Planning Consultants for Mattamy James Street Limited Partnership ("Mattamy"). We are writing to you in your role as Planning Consultant to the City of Burlington.

The purpose of this letter is to provide you with additional information with respect to the pending Mattamy applications and to comment on the recently released "Land Use Concepts" from the document: Taking a Closer Look at the Downtown: Themes, Principles and Land Use Concepts prepared by SGL Planning and Design Inc. dated October 2019.

Mattamy Applications

In December 2017, Mattamy filed applications with the City to amend the current approved Official Plan and Zoning By-law 2020 to provide for the redevelopment of the subject lands located at 2082, 2086 and 2090 James Street. The subject lands are situated at the southwest corner of James and Martha Streets at a gateway entry to the Downtown.

I have attached my January 2019 Planning Justification Report (PJR) that was filed for the revised proposal consisting of a 17 storey building with 164 residential apartment units and ground floor office/commercial. We strongly urge that you review the PJR along with the rationale/justification provided for a tall building at this location in the context of the Land Use Concepts under review. In addition to conforming to and being consistent with various Provincial policies and conforming to Regional Plan policies, the proposal fulfills a number of strategic and planning goals and objectives of the City. Further, the building design complies with the Council adopted Tall Building Guidelines. The prominence of the site at a key gateway location to the Downtown and the compatibility of the proposed building with adjacent uses in my opinion makes a tall building at this location a desirable and attractive redevelopment opportunity for the Downtown Area.

Land Use Concepts

I attended your presentation before Planning Committee on Thursday December 5, 2019 and listened to the delegations. Based on my review of the Land Use Concepts (i.e. Concepts 1 and 2), I provide the following comments/observations.

Both Land Use Concepts identify the Mattamy lands as part of a new “Downtown East Mixed-Use Precinct” which is envisioned to “...serve as a pre-eminent designation for major office, post-secondary education institutions and residential uses.” Within this Precinct, tall buildings 12+ are recommended. The approach is consistent with the various principles identified and the desire to shift building height away from the Lakeshore and Brant Street, protect Village Square and move taller buildings north of the Elgin Street Promenade.

Although the Mattamy applications were filed under the current approved Official Plan, and predate the adopted Official Plan and ongoing planning review of the Downtown, we believe that the independent work undertaken by SGL strongly aligns with the Mattamy applications and reinforces the support for a tall building at this location. We believe the Land Use Concepts should identify prominent gateway locations, such as the subject lands, at key entry points to the Downtown.

In listening to the various public delegations, there continues to be this inherent fear of tall buildings in the Downtown. Like many Urban Growth Centres, building height and density are crucial to its success. It is difficult to appreciate the public’s perception of tall buildings given that many tall buildings have existed in the Downtown for several decades and new tall buildings have more recently been constructed. Collectively, these existing and new buildings form part of the Downtown landscape/fabric and have not resulted in an adverse impact or incompatibility in the Downtown Area nor have they negatively affected the more mature residential neighbourhoods within the Downtown (e.g. St. Luke’s/ Emerald Neighbourhood Precinct). In order to achieve the densities necessary for the designated Downtown Urban Growth Centre, and achieve the Tall Building Guidelines imposed by the City, it is my opinion that taller buildings must be considered.

In response to the public delegations, as you are aware, Planning Committee adopted the following resolution:

“Direct the Director of Community Planning, Regulation and Mobility that, in planning the recommended concept for the downtown based on good planning principles and practices, consideration be given to reducing the heights in the Brant Street Corridor, downtown east side, Locust Street and the foot of Lakeshore Road/Burlington Avenue; and that the overall densities more closely align with the minimum target of 200 people or jobs per hectare; and that the calculations of people/jobs per hectare (total and density) for the preferred concept be included in the final report, including estimations of Old Lakeshore Road and Waterfront Hotel (based on current Official Plan permissions).”

The direction to consider reduced heights appears to be in response to public comments and the aforementioned fear of tall buildings, and has not had the benefit at this time of any planning input and analysis. It is important that you and City Planning staff address the broader public interest, as opposed to self interests, to achieve the long-term sustainability of the Downtown for future generations.

Downtown Urban Growth Centre Targets

I have reviewed the City's analysis of the population and jobs per hectare contained in Appendix C of Report PB-19-19 dated September 12, 2019. This was discussed at Planning Committee.

Based on my review, it is evident that the City is not achieving the minimum target of 200 persons/jobs per hectare for the Urban Growth Centre even with the removal of Spencer Smith Park. As an aside, I do not understand how Spencer Smith Park can be arbitrarily removed from the Urban Growth Centre which obviously inflates the persons/jobs per hectare figures. The numbers provided in Appendix C (Report PB-19-19) to achieve 200 persons/jobs per hectare relies on projects that have not been built as well as specific projects such as Mattamy that are under consideration and currently impacted by the Interim Control By-law.

Technical Reports

I echo the concerns by some delegates regarding the release of reports relied upon for the work presently being conducted for the Downtown. I have requested the draft EIS prepared by Dillon on multiple occasions and have yet to receive. The draft EIS was referenced by Conservation Halton circulation comments on the Mattamy applications and has been further referenced in Section 5 (page 45) of the Land Use Concepts report. To produce public documents that rely on reports that have not been publicly released is inappropriate.

If you have any questions or wish to discuss my comments further, please advise. Please ensure that we are consulted moving forward.

Yours truly,

WELLINGS PLANNING CONSULTANTS INC.

A handwritten signature in black ink, appearing to read 'Glenn Wellings', written in a cursive style.

Glenn Wellings, MCIP, RPP

Copy: Angela Morgan, City Clerk
Leah Smith/Alison Enns – City Community Planning
Curt Benson – Region of Halton
Nadine Di Nardo/Chris Strzemieczny – Mattamy James Street Limited Partnership
Scott Snider, Turkstra Mazza Associates