



August 24, 2020

Curt Benson, MCIP, RPP
Chief Planner and Director of Planning
Halton Region
Oakville, ON
VIA EMAIL ONLY

Dear Mr. Benson:

RE: HALTON REGION URBAN STRUCTURE REPORT/BURLINGTON UGC/BURLINGTON GO MTSA

Niagara Planning Group (NPG) Inc. (NPG) has been retained by the owners of 789 and 795 Brant Street in the City of Burlington. We are working with the owners of these two properties to provide feedback and input to the City's process entitled "Taking a Closer Look at the Downtown" and the reports released in June 2020 (PL16-20 and associated appendices) as part of the review of Downtown Burlington.

We have also reviewed the staff report regarding the proposed changes to the Urban Growth Centre in the City of Burlington (PL33-20) which was released on July 31, 2020. The report recommends defining the Burlington GO Station as the City's Urban Growth Centre and removal of the Major Transit Station Area designation for downtown Burlington. We note that there is no map provided of the proposed Urban Growth Centre boundary at the Burlington GO Station in report PL33-20.

We are writing to advise that there are unresolved issues related to the City's ongoing work and the Region's discussion paper on Regional Structure that is currently available for public comment. We believe the Burlington GO MTSA boundary needs to be revisited in light of the City's request. The boundary for the Burlington GO MTSA was prepared on the basis of downtown Burlington being the Urban Growth Centre. At the time, the UGC boundary and the Burlington GO MTSA boundary aligned providing a contiguous policy area connecting Brant Street and downtown Burlington to Burlington GO MTSA.

We note that the proposed Burlington GO MTSA boundary was prepared on the basis of the boundary in effect in 2018. The 2018 boundary reflected the City's Urban Structure at the time and was carried forward into the Region's Urban Structure Discussion Paper currently available

for public comment. With the City's decision to request that Burlington's UGC be moved from downtown Burlington to the Burlington GO MTSA, our comments are as follows:

1. The City's MTSA boundary for the Burlington GO Mobility Hub was predicated on the adjoining boundary with the downtown Burlington UGC boundary. Given the City's report PL33-20 and the proposed significant change in the urban structure of Burlington, the Burlington GO MTSA boundary as proposed by Halton Region must be revisited. It cannot be assumed that the MTSA Boundary and the UGC boundary would be one and the same if the UGC is moved to Burlington GO.
2. The proposed MTSA 800 m area of influence includes our client's lands (see page 108 of Regional Discussion Paper) although the MTSA boundary, as proposed, does not.
3. The proposed MTSA 800 m area of influence includes lands that have been identified as a high-density land use designation in the City's "Taking a Closer Look at the Downtown" Report released in June 2020 (Staff Report PL16-20; SGL Consultants Background Report). More specifically, the City is proposing high density residential/commercial development at the intersection of Brant and Prospect and further south to the intersection of Brant and Ghent. This includes our client's lands. We are supportive of the recommended density and height provisions for the Upper Brant Precinct as identified in City Report PL16-20 and the SGL Report associated with the City's report. The Upper Brant Precinct is within 800m of the Burlington GO MTSA making it a key area for higher density development; the width of Brant Street in this location supports higher density and height; and the area is walkable to the Burlington GO MTSA. Whether the lands remain the downtown plan or are part of a revised Burlington GO MTSA boundary, the Upper Brant Precinct height and density approach should be retained and applied. It is our submission that whether our clients' lands are in the downtown or the Burlington GO MTSA (and potential future UGC), the Upper Brant Precinct policies as updated by our letter of submission to the City dated August 24, 2020 should apply.
4. Brant Street is shown as a future priority bus corridor making it appropriate for inclusion in the MTSA to the 800 m radius.
5. Given the transit, planned density, and significant urban structure changes in Burlington as requested by City Council, we are requesting that our client's lands at 789/795 Brant Street be included in the Burlington GO MTSA and Burlington GO UGC if the Region supports the City's request.

We understand a future report is being provided on public consultation on the UGC boundary issue. We believe engagement with stakeholders and property owners is critical given the significance of this change in urban structure in Burlington. We request notice of all decisions related to this report, the Burlington Downtown UGC and MTSA, as well as the Burlington GO MTSA/proposed UGC.

Sincerely,

John Henricks, MCIP, RPP
President
Niagara Planning Group (NPG) Inc.

Copies: Heather MacDonald, MCIP, RPP, City of Burlington
Clerk, City of Burlington (for distribution to Council Members)
Khai Ly/Donna Lee