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City of Burlington
426 Brant Street
P.O. Box 5013
Burlington ON L7R 3Z6

West End Home Builder's Association | Community Planning, Regulation and Mobility Committee Agenda Item 5.6, Report PL-33-20 – Downtown Urban Growth Centre (UGC) and Major Transit Station Areas (MTSA) Designations

Attn: Kevin Arjoon, City Clerk

The West End Home Builders' Association (WE HBA) is a proud member and local association of both the Ontario Home Builders' Association (OHBA) and the Canadian Home Builders' Association (CHBA). We are the voice of the residential construction industry across Hamilton, Burlington, Oakville, Milton, and Halton Hills, and the greater Halton Region, supporting the needs of our members and the home-buying public. Our Association represents and advocates for 305 members as a voice for the land development, home building and renovation industries. Our membership includes builders, developers, suppliers, trade contractors, manufacturers, financial institutions, mortgage insurers, warranty providers, housing agencies, as well as service and professional companies. WE HBA members build and/or develop approximately 3500 housing units a year, ranging from singles and towns to mid- and high-rise, multi-storey developments. In Halton Region, the building and renovation industry provides over \$3 billion in investment value and employs over 26,000 people. Residential construction is a vital economic driver to every community in Canada.

The following submission on behalf of the West End Home Builders' Association is intended to provide comment and feedback on Staff Report PL-33-20, regarding an adjustment to the boundary of the Downtown Burlington Urban Growth Centre and removal of the Major Transit Station Area designation from the downtown. PL-33-20 suggests adjusting the boundary of the Burlington UGC to incorporate the lands of the Burlington GO Station area. It also recommends that the Downtown MTSA be removed, as staff believe that the downtown bus terminal does not constitute an MTSA and is not representative of the transit service level provided.

Thank you for providing the West End Home Builders' Association (WE HBA) with the opportunity to comment on the above-noted staff report. We recognize that Council is working to confirm its long-term planning policies for the Downtown while at the same time trying to finalize its new Official Plan for a planning horizon ending in 2031. Simultaneously, the City is also working with the Region of Halton and the



Ministry of Municipal Affairs and Housing under a separate process to confirm a long-term planning vision for the Region as a whole and the City of Burlington, to 2051. While these initiatives are certainly related, they are two separate exercises that unfortunately appear to be getting blurred together.

At this time, the Urban Growth Centre (“UGC”) and MTSA designations as demonstrated in the Region of Halton Official Plan both apply to the Downtown in the City of Burlington. The Urban Growth Centre designation is confirmed by Provincial policy. The Region of Halton has indicated that it will “consider” modifications as it works through its integrated growth management strategy for 2051. Official Plan Amendment 119 to the City’s existing Official Plan confirms the Urban Growth Centre and MTSA designations for the downtown. City Council speaks by resolution, and OPA 119 is Council’s current position. The City of Burlington cannot minimize or ignore the significance and importance of the UGC and MTSA designations: 1. based on a hypothetical scenario that has yet to be endorsed by City Council and is part of a separate and distinct planning process; 2. in the absence of detailed and comprehensive study and analysis; and, 3. in the absence of approved policies established by the Region of Halton and the Ministry of Municipal Affairs.

It is within this context, that we have a number of questions and comments related to Council’s consideration of Staff Report PL-33-20. We find that the Staff Report is unclear in its language, rationale, and conclusions. Therefore, we are requesting that Council’s consideration of this report be deferred until such time as the building industry and the public is provided with adequate information to fully understand and evaluate any staff recommendations related to this complex matter. Once we have been provided an opportunity to review the additional information requested, we would like to meet with City Planning staff to review these matters in detail. The following provides a general summary of the matters that have been raised by our membership that we request be clarified through formal written responses from the City:

- On several occasions, the report states that an adjustment to the boundary of the Downtown UGC is recommended. The staff report states that the area around the Burlington GO is positioned to accommodate an adjusted UGC boundary to “align” with lands in “the vicinity of the Burlington GO Station”. WE HBA agrees that transit-supportive development around higher-order transit benefits the citizens of a community in accessing transit and reducing the need for private vehicles and its ability to potentially accommodate alternative modes of transportation. We also support the retention of the UGC as determined by the Province and as currently recognized by all levels of government as included in the policy framework established by the Minister of Municipal Affairs in 2006-2008, which remains in effect today. Unfortunately, the report does not expand on or provide any specifics indicating the extent of the adjustment being promoted, nor provide mapping to demonstrate the extent of the adjustment being recommended. WE HBA requests further clarification as to what the extent of this adjustment will include, as well as the provision of a visual representation of the “adjustment(s)” being considered/recommended.
- The Ministry of Municipal Affairs and Housing and the Ministry of Transportation provided a joint letter stating that the City and Region together have the ability to remove the identification of a mobility hub and the MTSA designation of Downtown, however did not speak to the UGC location nor its boundaries, or the changing of them. In fact, the designation of the downtown Urban Growth Centre was confirmed by the Province of Ontario through the update of the Provincial Policy Statement in 2019 and the Growth Plan in 2020. Several policies of *A Place to Grow: Growth Plan for the Greater Golden Horseshoe* speak to the purpose and function of Urban Growth Centres. The 2008 Growth Plan policies – when the Urban Growth Centres designations were established –

identified that the Province of Ontario is responsible for determining the approximate size and location of the urban growth centres (Policy 2.2.4.2, *Places to Grow*, 2008). As the staff report identifies, policy 5.2.2.1.b) **only** the Minister has the authority to update the size and locations of the UGCs. The Provincial planning requirements to maintain and enhance Urban Growth Centres and their ability to implement its housing action plan are clear. Municipalities are required to adhere to the size and location of the UGC as identified by the Minister in their Official Plans. WE HBA requests that staff and Council look further into the Provincial policy requirements for altering the boundaries of an Urban Growth Centre and provide any background information, research or correspondence available as to how any changes can occur. This information is required and must be considered by all stakeholders prior to any action being taken in respect of this matter. WE HBA requests to also be provided with these studies and background information in the interest of transparency and fairness. All stakeholders and the community must be able to fully understand how the recommended “adjustment” for the Downtown UGC has been determined and what the term “align”, which is used frequently but undefined, in this report means.


- WE HBA remains concerned that the City may not be on track to meet the target density of the Urban Growth Centre outlined by *A Place to Grow*, both to 2031 as well as to the proposed amended planning horizon of 2051. The background information required to substantiate assumptions made has not been provided to the building industry, including ongoing HDLC meetings. We request to be provided with a copy of the technical analyses that have been used to confirm the City's ability to satisfy minimum growth requirements to 2031, as well as for 2051. Based on the information available, there is little confidence that the required intensification and minimum growth that is required is achievable or will satisfy the requirements of the Growth Plan, or the needs of the community outside of the existing Urban Growth Centre – especially in the absence of any supporting documentation and mapping.
- We would also like to reiterate that the UGC density target of 200 people and jobs per hectare by 2031 is a minimum density requirement. Proposed Amendment 1 to *A Place to Grow*, which provides updated forecasts to Schedule 3 – Population and Employment Distribution for the GGH, as well as an extended planning horizon to 2051, recognizes that unprecedented growth will continue to occur in the GGH over the next 30 years, and municipalities must accommodate their fair-share of this growth. It must also be recognized that the updated forecasts for the 2051 planning horizon are also to be treated as minimums. In our submission to the consultation on *A Place to Grow*, WE HBA and OHBA have both requested that stronger language be incorporated into the amendments to ensure that municipalities continue to treat these forecasts as minimums when planning for future growth. The City's ongoing efforts to “adjust” and “align” the UGC are intended to be considered through the Region's Integrated Growth Management Strategy.
- Please provide WE HBA and the community with the public and stakeholder engagement schedule for this initiative and copy us on any future Council decisions pertaining to these matters.



The WE HBA respectfully submits the above feedback on Staff Report PL-33-20. To reiterate our earlier sentiments, without further clarification on the meaning of “adjustment”, the WE HBA understanding of the recommendations is that the existing UGC is to remain as is, with the suggestion to expand the UGC to incorporate the lands surrounding the GO Station area. WE HBA would like to reconfirm its support for the retention of the existing UGC ***as currently identified in Provincial policy***, but may be supportive of an expansion to include additional lands in order to provide for an effective plan for future growth and intensification, and to ensure that the minimum targets of the Growth Plan can be achieved both to 2031, and beyond to 2051. However, as supporting documentation and analysis from the City of Burlington has not been provided, we are challenged to support modifications at this time. Please provide us with the requested information and with an opportunity to review these matters with City staff prior to acting on this matter. We request that the above comments and recommendations by WE HBA be reviewed, and we look forward to written correspondence in return.

We would be happy to speak further to this topic should Council or Staff wish.

Sincerely,



Kirstin Jensen, MPI, MA
 Manager of Planning & Government Relations
 West End Home Builders' Association

c.c. Mayor Marianne Meed Ward
 Members of Council
 Robert Molinaro, President, West End Home Builders' Association
 Heather MacDonald, Director & Chief Planner, Department of City Building
 Brynn Nheiley, Manager of Development Planning
 Jamie Tellier, Manager of Urban Design