

January 11, 2021

Your Worship Mayor Meed Ward, Members of Council, Ms. Heather MacDonald, and Mr. Kevin Arjoon:

RE: City of Burlington Parkland and Housing Strategy

The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Halton Region. The WE HBA represents nearly 300 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. The residential construction industry employed over 27,300 people, paying \$1.7 billion in wages, and contributed over \$3.0 billion in investment value within the Hamilton Census Metropolitan Area (of which Burlington is a key part of) in 2019.

Our industry faces a variety of inter-related challenges that affect our ability to build the necessary supply of new housing to meet growing demand for a variety of housing options for people in Burlington. In an environment where even during a global pandemic housing of all types and tenures is becoming more expensive, and pricing more people out of the market, the WE HBA believes that all levels of government working together with industry have an important opportunity to consider the impacts of planning and fiscal policy decisions on housing supply and ultimately prices. The WE HBA strongly believes that a healthy housing system exists when a city or region has the right mix of housing choices and supply that are able to address all residents' shelter needs through their full life cycle.

Within this context, the West End Home Builders' Association (WE HBA) is writing to you regarding the City of Burlington staff reports that are coming forward to the Environment, Infrastructure and Community Services Committee on January 12, 2021 and Community Planning, Regulation and Mobility Committee on January 14, 2021.

Staff Report ES-01-21: Parks recreation and cultural assets master plan update:

The WE HBA has not yet been engaged regarding this initiative. The staff report indicates that the City's vision includes "building more parks associated with development in new growth areas across the City" and to "increase park and greenspace city wide". The WE HBA is not aware of reports that the City of Burlington has prepared that indicate that any part of the City has been identified as being parkland deficient. Nor is the WE HBA aware of criteria that have been developed by the City of Burlington in conjunction with the public and stakeholders from the building industry to identify any existing or future parkland requirements within the existing built-up area. The WE HBA is also not aware of any public



consultation on this initiative and note that the new Official Plan has yet to receive final approval from either the Minister or the LPAT pending the outcome of a number of appeals. In addition, the Region of Halton is reviewing its own Official Plan and has not yet allocated to the City of Burlington its share of future population growth from Schedule #3 of the Growth Plan to 2051. At this time, any assumptions the City may make in respect of future parkland requirements are hypothetical as the Region has yet to complete its detailed Official Plan and Regional Council has yet to direct 2051 population and employment growth requirements to the local municipalities.

Phase 1 of the proposed work plan suggests staff will undertake a parkland provisioning assessment based on a vision that is not found in any approved planning documents, and does not recognize new Provincial legislation regarding Community Benefits Charges:

- J **Review of our current inventory of parkland, open space** – An inventory of existing facilities is fundamental information that the City must have to operate effectively, and the completion of this work is expected to be an ongoing initiative.
- J **Examine role and function of park types (historical) including new park types (Urban parks) in the city's planned growth areas and recommend service level changes for each park type related to growth areas** - An inventory of the role and function of existing parks is fundamental information that relates to the comments on the bullet above. The requirements for future urban parks are directly related to the City's new Official Plan and future growth requirements to the year 2051. The WE HBA believes that the City of Burlington is not yet in a position to undertake a future parkland needs study as it cannot yet confirm how much growth the City will be required to accommodate within the existing built-up area until such time as the Region of Halton allocates population and employment for the 2051 Growth Plan planning horizon. Until such time as the City has population and employment numbers allocated representing the next 30 years of growth, and has an Official Plan in place to accommodate future growth requirements, WE HBA believe that it is premature to undertake this exercise. The WE HBA recommends that the City of Burlington work collaboratively with both the public and stakeholders in the new housing industry on long term park planning once the Official Plan has been passed and once the full picture of growth requirements to 2051 is better understood.
- J **Provide baseline provisioning standards** - The baseline from which future parkland demand is proposed to be measured from is an arbitrary 5-minute walking distance between parks. This metric may be used in a limited number of other municipalities for vast redevelopment areas (e.g. City of Toronto waterfront), however, this is not a typical standard used for parkland. This measurement fails to recognize the existing urban fabric of the downtown, nor has the City confirmed the existing level of service. Any increases in the level of service within existing communities should recognize a benefit to existing residents (and thus be funded from the



general tax base). The new housing industry is prepared to pay our fair share as a Community Benefit through the standard Parkland Dedication provisions established in the Planning Act. Any increases to the level of service would require the City to purchase and assemble lands for new parks (please see comments on parkland reserve fund below). The WE HBA looks forward to further consultation and discussion when 2051 growth allocations provide a clearer picture regarding future requirements.

- Identify new parkland needs in relation to growth areas** – In the absence of an approved Official Plan, the WE HBA believes the City is not yet in a position to determine which areas of the City may require additional parkland. The WE HBA looks forward to working with the City of Burlington to identify parkland needs to ensure complete communities for new home purchases and renters in the communities our members are building once the Official Plan is in place with 2051 population and employment allocations.
- Impact of growth on the existing park system** – The City is not yet in position to confidently identify its future growth areas or to determine parkland requirements until growth allocations to 2051 have been established and approved.
- New parkland needs analysis methodology (types, locations, sizes) relative to growth projections (2040?)** – The WE HBA is unclear for the rationale of planning to a 2040 target when provincial policy to which the City of Burlington is required to be in conformity with has established a 2051 planning horizon. Until such time as the policy framework for the 2051 planning has been approved, it is inappropriate for the City to determine how much parkland may or may not be required. The WE HBA looks forward to future engagement and working collaboratively on a 2051 planning horizon as established by the Provincial Government.
- Recommendations for a privately owned publicly accessible (POPS) strategy and framework** – The Province of Ontario has instituted a new Community Benefits Charges (CBC) framework in the *Planning Act* that replaces the previously existing s. 37 framework. Section 37(9) of the *Planning Act* requires the municipality to prepare a CBC strategy. Future POPS should be considered within this new framework. The WE HBA looks forward to consultation and engagement with the City of Burlington on a CBC strategy.
- Recommend design standards for new park types recommended** – Although it may be useful for the City to develop guiding principles, detailed design standards may not be effective as modifications to suit individual circumstances and site characteristics will inevitably be required in each circumstance.



-) **Strategy to secure parkland using the alternative rates based on sound justification for land and cash in lieu of land** – The WE HBA is concerned the City may be considering requirements to take land rather than cash-in-lieu from new medium and high-density developments. This approach is fraught with numerous challenges. For example, within the downtown area, sites are typically small and the amount of parkland that could be reasonably expected to be dedicated would be extremely limited, resulting in numerous small parcels of scattered land. The City's alternative parkland rates are inappropriate in the existing built-up area where replacement densities tend to be significantly higher. Most intensifying municipalities utilize cash-in-lieu of parkland that over time enables the City to purchase functional parcels for parkland in priority areas. The City has been collecting cash-in-lieu of parkland and currently has a parkland reserve fund of over \$4,000,000. This fund has accumulated over many years and provide for an opportunity for the city to pool resources together to purchase new parkland.
-) **Recommendations for updating the Park Dedication By-law and any implication to Development Charges By-law and CBC strategy** - The new Official Plan is not in a position to be amended at this time as not yet in force. The Province has passed new Community Benefits Charges legislation which the new Official Plan does not address. Until such time as a new Official Plan receives final approval and required detailed financial impact studies have been completed prior to the update of a new development charges by-law (which is to be based on a Region-wide planning horizon of 2051), this work is premature.
-) **Public engagement (school boards, HDLC)** – Efforts to consult with the public and interested stakeholders is proposed to be restricted to school boards and a committee (HDLC). When dealing with major community building considerations such as a new Official Plan or parkland policies, the City must be committed to undertaking a detailed review with stakeholders in an effort to develop solutions. The WE HBA welcomes opportunities to discuss and resolve parkland matters cooperatively with City staff prior to recommendations being presented to Committee and Council within the context of approved planning policies that consider the City's long-term growth requirements and responsibilities.

Staff Report PL-02-21: City of Burlington Housing Strategy – proposed Terms of Reference

The new Official Plan for the City of Burlington has not yet been approved nor have population and employment forecasts to the 2051 planning horizon as required by Provincial Policy been allocated by the Region of Halton to the City of Burlington. While the WE HBA appreciates the pro-active approach, we note that the future of growth in the City of Burlington is very uncertain at this time.

Section 4.0 of the staff report provides a summary of the Housing Strategy Project which is intended to result in the preparation of a city-wide housing strategy that will result in amendments to the new Official Plan. The key outcomes of the City's Housing Strategy include:



-) Understanding the key players and their respective roles in housing** – The staff report identifies a number of key stakeholders that are involved in the production of affordable housing. These include the Federal government, the Provincial government, the Region of Halton, the City of Burlington, non-profit organizations, the private sector, and individuals. Members of the HDLC committee and WE HBA include the majority of the active builders in the City and should be consulted. While the report indicates that the City of Burlington “does not have any direct responsibility for housing”, the City does have an important role as it has established a reserve fund for affordable housing. As such, the City of Burlington is also actively involved in the provision and accommodation of affordable housing. Meaningful consultation based on approved planning policies will be required to facilitate the development of solutions. The production of affordable housing within the City of Burlington has been very challenging and has been exacerbated in the absence of contemporary Official Plan policies that promote and incentivize higher density and affordable housing. The WE HBA looks forward to positive engagement with the City of Burlington towards stronger partnerships between the city and private sector towards the incentivization and encouragement of more affordable housing with significant government participation.
-) Understanding the current state of housing in Burlington and identifying current and future housing needs** – The WE HBA looks forward to consultations with the City of Burlington regarding the current state of housing in Burlington. The WE HBA looks forward to additional discussion and consultation regarding future housing needs in the context of the Official Plan being approved by the province and the Region of Halton allocating future growth for the City of Burlington to 2051 (in accordance with existing Provincial planning policy). Once the Official Plan is approved and there is a clearer picture regarding growth in the coming decades to 2051, there will be a much stronger foundation for the identification of future housing needs.
-) Establishing a toolbox of best practices in housing, focusing on innovative practices and new, pioneering ideas** – the WE HBA believes that best practices are a great place to start. This is an approach that the City has traditionally taken. However, on several other initiatives (e.g., tall building guidelines, shadow study guidelines and wind impact study guidelines) the WE HBA is concerned that the City has implemented restrictive standards that are contributing to challenges in delivering new housing supply. Made in Burlington solutions are required to respond appropriately to local circumstances, Provincial and Regional policy requirements.
-) Developing of a set of action-oriented housing objectives and an associated implementation plan** - The WE HBA looks forward to working in collaboration with the City of Burlington to develop an “action-oriented housing objectives and an associated implementation plan”. The WE HBA cautions that until such time as the City fully understands the magnitude of future growth that the City must plan to accommodate that it may be premature to advance a housing



strategy. This will be best accomplished and informed by an approved Official Plan that is consistent with Provincial policy.

-) **Establishing where the City wants to focus or prioritize efforts to address housing issues in the City** – As noted in previous comments, while the WE HBA is generally supportive of a plan to address housing issues in the City, until such time as its future long-term growth requirements to 2051 have been established through an approved Official Plan, the City is not yet in a position to determine its housing priorities.

Summary:

The WE HBA appreciates the opportunity for engagement and looks forward to future discussions and consultation on both parkland and housing strategies. The WE HBA looks forward to working with the City of Burlington to improve the public policy framework to deliver new housing supply in complete communities. While the WE HBA appreciates the proactive approach by the City of Burlington, in the absence of an understanding of the City's future growth requirements (2051) and an approved Official Plan, the recommendations of staff reports ES-01-21 and PL-02-21 are premature.

The WE HBA encourages the City to work with Region of Halton, the building industry and other interested stakeholders within the framework established by the *Planning Act*, the Provincial Policy Statement, the Growth Plan and the new provincial Community Benefit Charges framework to support new housing supply and to accommodate the City's 2051 growth requirements. The City of Burlington will be in a better position to establish parkland requirements and housing requirements when the 2051 population and employment numbers are allocated and when the Official Plan has been finalized and approved by the provincial government. **Therefore, the WE HBA respectfully requests that reports ES-01-21 and PL-02-21 be deferred.**

We are pleased to discuss our concerns with City staff and Council at any time. Please advise us of any further actions regarding these matters.

Regards,



Bianca Bruzzese
WE HBA President

