



Millcroft Greens Development Brief

January 2021

This document has been prepared after the review of the Planning Justification Report submitted with the complete application from Millcroft Greens. Comments in this brief are limited to the key principles/strategic objectives of each of the various levels of government policies.

Background

Millcroft is a master-planned community that was launched in 1986 with the creation of a golf course envisioned to be the core of the community. The homes at Millcroft were then thoughtfully designed to take full advantage of the 18-hole, figure 8 golf course that winds its way through the community.

Today, Millcroft is a substantially completed development consisting of approximately 3,500 homes, 700 of which back onto the golf course. Just as envisioned 35 years ago, the golf course has become an integral part of the community, fostering social interaction and community connectivity by providing people with the use and enjoyment of green space, natural storm water ponds and the attraction of abundant wildlife. Millcroft is a unique neighbourhood that adds positively to the diversification of choices available in Burlington.

Proposed Development

Millcroft Greens is proposing to remove current holes 6 and 7 as well as truncating holes 1 and 16 to infill with 98 homes and four new roads. There are existing homes surrounding each of these holes. When we review other recent developments on golf courses in the Region of Halton, we are not aware of any other development where a few golf course holes are infilled with paving and homes. Locally, both Richview and Saw Whet golf courses were entirely developed and by contrast, there were very few homes affected and they were only on the perimeter. The proposed development of Glen Abbey is similar in that there are about 40 homes on the perimeter of the proposed golf course development.

Millcroft Greens is also proposing to replace the current maintenance shed with a 6 storey apartment building on Dundas Street.

Our Position

The City of Burlington is in a time of transition facing the challenges of build-out and population growth requirements imposed by the Province. Challenges of intensification, infill practices, habitat destruction, infrastructure development and effective transportation make sustainable planning more important than ever. We believe that the Burlington City Council has thoughtfully determined the future of Burlington in developing and approving Burlington's Strategic Plan 2015-2040, the 2008 Burlington Official Plan and the new 2020 Burlington Official Plan.

We are opposed to the portion of the proposed development involving the infill of golf holes because it **does not align with** the sustainable policy direction in the **2020 Provincial Policy Statement (PPS), the 2019 Golden Horseshoe Growth Plan, Burlington's Strategic Plan 2015-2040, the 2008 Burlington Official Plan, nor the 2020 Burlington Official Plan.**

The portion of the Development proposal that deals with the infill of the four golf holes is classified in the 2008 Burlington Official Plan as Major Parks and Open space and in the 2020 Burlington Official Plan as Natural Heritage System, Major Parks and Open space. We do not believe that changing this zoning aligns with the City's 2015-2040 Strategic Plan nor its 2008 or 2020 Official Plans. Accordingly, it is not in the best interests of the City of Burlington, its current or future residents. A growing population and in particular the residents of Uptown, will require recreational facilities such as the golf course and all the Major Parks and Open space that are in the neighbourhood.

Our position is not that there should be no further development in the Millcroft Community but rather it should be completed within the areas in the Millcroft Community that are zoned for residential development in the Burlington Official Plan. Cramming 98 homes on four golf holes, which will only fit with smaller lot sizes, variances to setbacks, and a private road into what is zoned as Major Parks and Open Space is not appropriate.

1. Provincial Policy Statement

The 2020 Provincial Policy Statement is a key part of Ontario's policy-led planning system which sets the policy foundation for regulating the development and use of land. It also supports the provincial goal to **enhance the quality of life** for all Ontarians.

It is recognized in the Provincial Policy Statement that "Municipal official plans are the most important vehicle for implementation of this Provincial Policy Statement and for achieving comprehensive, integrated and long-term planning." Within the Region of Halton, there are local official plans which set out a vision, goals and objectives and includes policy to guide land use decisions in cities and towns. The 2008 and 2020 City of Burlington Official Plans were both approved by both the overarching Halton Region and the Province as being compliant with the Provincial Policy Statement and the Halton Region Official Plan.

In addition, the Provincial Policy Statement recognizes that:

1.5.1 Healthy, active communities should be promoted by: a) planning public streets, spaces and facilities to be safe, meet the needs of pedestrians, foster social interaction and facilitate active transportation and community connectivity; b) planning and providing for a full range and equitable distribution of publicly accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources; c) providing opportunities for public access to shorelines; and d) recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.

This comprehensive directive perfectly describes the existing Millcroft Community with its integrated golf course/Major Parks and Open Space being the defining feature. We believe that the Major Parks and Open Space designation is the appropriate classification and is consistent with the Provincial Policy Plan and the Burlington Strategic Plan 2015-2040.

2. Golden Horseshoe Growth Plan

Within the Golden Horseshoe Growth Plan, the first two Principles in Section 1.2.1 are:

- Support the achievement of complete communities that are designed to support healthy and active living and meet people's needs for daily living throughout an entire lifetime.
- Prioritize intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability.

Defined by its golf course/Major Parks and open space and envied for its community spirit, Millcroft is the very essence of an established neighbourhood. It provides recreation for Burlington's residents both as a golf course in the summer and a walking trail when the course is closed. It also provides many residents backing onto the golf course privacy and a more open view (many with a view to the Niagara escarpment). It is not surprising to us that Millcroft is categorized as an "established neighborhood" in the Burlington Official Plan 2020.

Millcroft is not identified as a strategic growth area in either the 2008 or 2020 Burlington Official Plans. The proposed development is not located on a transit corridor and the style of housing would most likely result in two additional cars per household intensifying an established community. There are a number of other strategic growth areas in Burlington identified by the Official Plan which should be prioritized over infilling golf holes for a **limited number** of new homes.

We do not believe that the Millcroft Greens development proposal meets the two key principles of the Growth Plan for the Greater Golden Horseshoe, 2019 ("Growth Plan").

3. Burlington's Strategic Plan 2015-2040

The Burlington Official Plan 2020 as well the 2018 Burlington Official plan build upon four key strategic directions within Burlington's Strategic Plan 2015-2040 which was approved in 2016. They are: (a) A City that Grows; (b) A City that Moves; (c) A Healthy and Greener City; (d) An Engaging City. Millcroft Greens development proposal where they plan to infill golf holes with houses and paving does not meet any of the four strategic directions:

(a) A City that Grows

Specifically stated within the Burlington Official Plan in section 1.4.2 (d) under A City That Grows is, "Provides for the long-term protection of the City's established neighbourhoods, and natural and *cultural heritage resources*". Clearly the approved Strategic Plan and the accompanying 2008(amended) and 2020 Official Plans recognize that growing the City is not intended to destroy established unique neighborhoods. The proposed infill development on golf holes would require a change in zoning to lands currently classified as Major Parks and Open Space in an established neighborhood.

Within the Planning Justification Report, Millcroft Greens references Section 1.2 which states "A City that Grows demonstrates density (intensification) done well.". Additionally, reference is

made to Section 1.2 (e) which states “Older neighbourhoods are important to the character and heritage of Burlington and intensification will be carefully managed to respect these neighbourhoods.” Subsequently they assert that their proposal complies with this objective as “the additional residential lots represent intensification that is sensitive to the surrounding community context ...”.

We disagree with these comments. This strategic direction does recognize the importance of continuing to grow the City **however**, it also recognizes that this growth/intensification needs to be balanced with maintaining Major Parks and Open Space as well protecting established neighbourhoods. The 2018 proposed Burlington Official Plan and the Burlington Official Plan 2020 only allow the reclassification of Major Parks and Open space when done in conjunction with a statutory Official Plan review (Section 8.4.2(2)). Clearly this section was included in these Official Plans to ensure that the City was able to prioritize where future residential development should take place, then determine the appropriate balance with Major Parks and Greenspace at the most appropriate time (ie. only when the next Official Plan is being completed with a clear understanding of future development for the next five to ten years). Also, we would argue that Millcroft Greens application is not consistent with the surrounding community since the lot sizes are smaller, have different setbacks and will only fit on a private road which doesn't exist in single residential homes elsewhere in Millcroft.

We believe that Burlington Council has properly classified the golf course Major Parks and Open Space within an Established neighbourhood and there is no justification for changing this for the proposed development. The Burlington Official Plan 2020 has already detailed more suitable alternatives to grow the City. Shrinking the golf course to an executive course will make it far less attractive to the Burlington and Halton residents, reducing its use and potentially making it financially unable to continue. Consequently, this will certainly detract from the goal of having an attractive and liveable community and change the unique golf course neighbourhood.

Having 98 homes crammed onto 4 existing golf holes does very little for intensification of the City, eliminates part of the finite open space, will destroy the existing natural environment perspective, cause additional traffic concerns and detract from the natural balance that helps to manage storm water issues of the City. In addition, it significantly impacts the privacy of the homes that are backing on these holes.

(b) A City that Moves

This strategic objective is brought to life through the development of the City's new integrated mobility plan which is now underway. The City recognizes that building more roadways is no longer sustainable and that transportation choices will have a great impact on communities and climate change for current and future generations. Two of the key pillars in the mobility plan are the alignment of land use with transportation and sustainability. The alignment of land use with transportation seeks to focus growth in areas that align with transportation infrastructure and the pillar of sustainability seeks to reduce transportation environmental impacts in Burlington.

In stark contrast to this strategic objective and the pillars of the mobility plan, the proposed development is not located on a transit corridor. As a result, everyone in the neighbourhood has at least one car, and usually more, to drive to amenities, the Go station and to work. Additional

homes will add traffic to existing local streets that have already been studied and equipped with traffic calming measures. Four of the proposed parcels are not located on transportation corridors that provide routine Burlington transit service and two parcels in particular will add 75 homes adjacent to one of the busiest intersections within our Millcroft neighbourhood.

(c) A Healthy and Greener City

Clearly the proposed development of paving, placing 98 homes and the removal of around 400 mature, 35+ year old trees on 4 golf holes as well encroaching on the City's Natural Heritage System goes against this strategic objective. The 400 trees being removed are mature trees that not only enhance the beauty of the space but just as importantly act to reduce the noise of the train line and traffic. While trees are proposed to be placed in the 6 metre buffer zone, they will not be the same size/maturity of the ones removed.

In their Planning Justification Report, Millcroft Greens indicates that there are several other parks and recreational centers within a 15 to 20 minute walk. While this is true, it fails to take into account the substantial growth that the City has experienced since these facilities were built. The most significant park in Millcroft serves inter-City baseball, softball and soccer teams which have only increased in number. Additionally, significant residential development has also occurred north of Dundas and to the east in the Orchard. Add to this, the City's plan for future residential development on Taywood (Branthaven), vacant land on Millcroft Park Drive and the Uptown area. Consequently, we believe it is absolutely vital to maintain all of the existing Major Parks and Open Space for the existing and future residents especially taking into account the future development expected by the Burlington Official Plan.

Finally, there are a limited number of properties in the Burlington urban area that back onto a golf course – namely those in Millcroft, Tyandaga and Burlington Golf and Country Club. Many of the current residents in these homes specifically moved to Burlington because of this feature. We believe in a Healthy and Greener City, it is critical to maintain a reasonable number of these types of homes. Millcroft Greens application would eliminate 110 of the homes backing on the golf course in this phase.

As we will discuss later, we believe that reducing the course to an executive course will significantly impact its economic viability resulting in additional future development in Millcroft which potentially will leave the City/residents with the remaining open land to maintain. It is important for the City and its residents to know what the end plan would be when considering this application.

(d) An Engaging City

An Engaging City supports and encourages the building of active and creative communities. Successful infill development can and should return cultural, social, recreational and entertainment opportunities, gathering places and vitality to older centers. The loss of green space from the proposed development far outweighs the benefits of a few walking trails, which is not consistent with an Engaging City. In fact, this infill could result in the demise of the entire

golf course which is the primary recreational and social gathering place and identity in the Millcroft Community as well used by the residents of Burlington and Halton.

Based on the foregoing, we do not believe that the Millcroft Greens development proposal is in accordance with Burlington's Strategic Plan 2015-2040.

4. 2008 Burlington Official Plan

The relevant guiding principles in the 2008 Burlington Official Plan (Part 1 Policy Framework Section 3) are:

- a) Provide a community plan and growth strategy aimed at creating an attractive, liveable community that offers a wide range of housing, employment, transportation, and leisure opportunities for all its citizens.
- b) Support a healthy, clean and sustainable community based on an *ecosystem* approach and the implementation of the principles of *Sustainable Development*, by ensuring that environmental integrity and diversity, social and economic factors, and *compatibility* are considered in land use decisions.
- d) Foster a unique, vibrant and strong community identity.
- h) Promote the efficient use of land through *intensification* within appropriate areas of the City, in accordance with Provincial growth management objectives, while recognizing the need for balancing this objective with other planning considerations.

The land on which Millcroft Greens is proposing to develop, is classified in the 2008 Burlington Official Plan as Major Parks and Open Space.

In Part III Land Use Policies Section 6.3.2 d) it states

Uses permitted within the Major Parks and Open Space designation *may* include: municipal parks and related *community facilities*, *golf courses* and related facilities, and outdoor *recreation uses*.

In Part III Land Use Policies Section 6.3.1 it talks about the objectives of having adequate Major Parks and Open Space Designation as being:

- a) To recognize parks and open space lands as valuable resources to the community that play an important role in defining the character and lifestyle of the City's residents.
- b) To ensure an adequate and equitable supply of parks and open space, and the full range of leisure opportunities are available throughout the City.

Both the 2008 and 2020 Burlington Official Plans include an urban Uptown area beside the Millcroft neighborhood. The urban Uptown area is a priority mixed use growth area where there is expected to be 4,000 to 4,500 residents when fully developed. In addition, there has been significant intensification in both the Orchard and Alton areas which are also close to the Millcroft neighborhood. Within Millcroft, two parcels of land remain which are designated for future residential development. Branthaven has already begun the process of developing one of these properties with a proposed 67 units on the Appleby Line transit corridor.

As outlined in the Planning Justification Report (Page 8), there are limited parks/centers available to the existing residents without even factoring in the proposed development in the 2020 Burlington Official Plans. Consequently, eliminating parks and open space that play an important role in defining the character and lifestyle in Millcroft/Burlington would seem counter-intuitive to ensuring an adequate and equitable supply of parks and open space especially when there are far better alternatives for residential development already identified in the 2008 and 2020 Burlington Official Plans and a limited number of houses (98) proposed.

We also believe, if this plan is successful, then it will be the first phase of further development of the golf course encroaching on more of the limited Major parks and Open space. This is evidenced by the appeal that Millcroft Greens has made to the Official Plan of 2020. If it is truly the intent of Millcroft Greens to redevelop the golf course and maintain the revised course into the future, why would they appeal the 2020 Official Plan.

5. 2018 / 2020 Burlington Official Plan

The 2020 Burlington Official Plan aligns local community interests with the Regional and Provincial policy direction and articulates the City of Burlington's vision beyond 2031. This Plan was approved by both Burlington Council and the Halton Region. Appeals were filed by the deadline and their outcome will be determined in the future. The precursor to this plan was the 2018 adopted plan which was supported by the current Burlington Council with the exception of a review of the development principles for the downtown core area. While the Millcroft Greens Application falls under the 2008 Burlington official plan, it is clear that the approved Burlington Strategic Plan as well the 2018 and 2020 Burlington official plans reflect where the City wishes to go in respect of planning and development

The sections of both the 2018 and 2020 versions of the Burlington Official Plan that potentially impact the Millcroft Greens application the most have remained substantially unchanged from 2018. It is important to note that the 50% sale of the land associated with this application and the forming of Millcroft Greens did not happen until early 2020 consequently the parties were fully aware of the current zoning as well the direction that the Burlington City Council were moving in regards to future planning/development.

Within the recently approved 2020 Burlington Official Plan, the area being proposed for development by Millcroft Greens is neither a primary nor secondary growth area. It is designated as an "Established neighbourhood area" (see Schedule B of the Burlington Official Plan). Further Millcroft Greens is proposing development on areas designated as "Natural Heritage System and Major Parks and Open Space" with key natural features (Appleby Creek) which form part of the natural heritage system. As an *established neighbourhood*, new development in Millcroft is not included in achieving the Region's or Provincial growth targets.

Additional relevant references in the 2020 Burlington Official Plan are as follows:

2.4.1 (c) To identify the Established Neighbourhood Area as an area where intensification is generally discouraged

2.4.2.(3) ESTABLISHED NEIGHBOURHOOD AREAS

(a) Established Neighbourhood Areas:

(ii) shall be recognized as a distinct area with the city's urban area where intensification is generally discouraged

(iii) shall not be regarded as essential to achieve the population growth distributions, as stated by Places to Grow, and as distributed by the Region of Halton; and

3.3 PARKS, RECREATION AND OPEN SPACE Parks and open space are an essential component of a healthy and sustainable city. Parks, open space and recreational opportunities contribute to a healthier environment and healthier residents, improving quality of life, providing positive public health outcomes and creating a sense of belonging. The policies in this section provide direction on parks and open space in all areas of the city.

3.3.1 Objectives

a) To recognize parks and open space lands as valuable resources to the community that play an important role in defining the character of the city and lifestyle of the city's residents.

b) To ensure an adequate and equitable supply of parks, open space and that a full range of leisure opportunities, are available throughout the city

8.4.2(2) b) New *golf courses* and golf driving ranges, and expansions to existing *golf courses* and driving ranges requiring additional land, *shall* not be permitted.

8.4.2(2) d) A proposal to re-designate lands within the Major Parks and Open Space designation to another land use designation *shall* only be considered by the *City* in conjunction with a statutory Official Plan Review.

Section 2.4.1 (c) says that any intensification should be discouraged within an Established Neighbourhood area such as Millcroft. Section 8.4.2 (2) d) then provides clarity as to the timing of when the City would consider infill projects on land designated as Major Parks and Open Space. It would appear that the intent of this section is to say that the only time that zoning should be permitted to change from Major Parks and Open Space is when a statutory Official plan review is being completed. We believe the reason for this is so that Council is able to properly assess the balance between future intensification and the associated Major Parks and Open Space (future development being best understood at the time of a statutory Official Plan Review).

As noted above, these Sections have not been changed from the 2018 Burlington Official Plan so Millcroft Greens would have been fully cognizant of it prior to it being formed in early 2020 and their preparation of the current application.

6. Further detail in respect to prior points made

There are a number of other supporting points to be made as to why the zoning should remain as Major Parks and Open Space.

- A. Not necessary to meet growth targets
- B. Detrimental impact on environment
- C. Just the first phase of development encroaching on limited greenspace in this area

A. Not necessary to meet growth targets

The Burlington Official Plan, through zoning, identifies sufficient and more appropriate areas for growth to reach and significantly exceed the growth targets set out by the Province. Should the growth target be raised, as is being contemplated by the Province, there are a number of other urban areas that could be developed which are better aligned with both the growth framework and the strategic goals of the City resulting in a better Burlington.

These areas would include:

- **Urban Uptown area** - There are underdeveloped and undeveloped areas surrounding the Millcroft neighborhood that are slated for residential development in the 2020 Official Plan.
- **Go stations** - There are three Go stations in the City of Burlington. Both the province and the City are encouraging intensification of development around these major transit corridors as well making them into complete communities eliminating the need for many of the residents to have cars but rather be able to walk or use public transit in their daily lives.
- **Employment lands** - Recently, the provincial government has been considering allowing developers to convert over land designated as employment land to mixed use. We understand there is over 400 acres of vacant employment land in Burlington. Converting a portion of the vacant employment land to mixed use or residential is a far more appropriate way to meet growth guidelines than infilling 4 golf holes.
- **Existing Malls** - There is a trend developing in respect of adding condominiums by or within existing shopping malls as “brick and mortar” retail declines. Burlington has both Mapleview mall and the Burlington Center where this type of development would potentially take place in the future. There also are several strip malls in Burlington where this may occur.

B. Detrimental impact on environment

The building of infrastructure on and around open space lands with creeks and wildlife will have a significant detrimental effect on the environment. This open space land is a natural habitat to many species of wildlife which reside and nest on and around the proposed development lands. Whether it is Blue Herons nesting and hunting around the streams and ponds or turtles nesting in the golf course sand traps, protecting natural habitats is fundamental to achieving sustainable development. It is also important to note that a portion of the proposed development is in an area that is a flooding hazard. The golf course lands with the mature trees and turf act as a sponge within our watershed which extends down Appleby Creek to the Lake. This will impact higher peak storm water flows further calling into question whether this is an appropriate site for development.

Additionally, the development proposal calls for the removal of over 400 mature trees which will have a significant impact on the city's tree canopy and nesting grounds notwithstanding that some trees may be replaced with small saplings. Additionally, the mature tree canopy provides a buffer to the noise pollution in this area, particularly that which is generated by trains on the CN rail line. The train noise in this area is significant due to the grade separation on Upper Middle Drive and the curve in the tracks which generates wheel squeal. The tree canopy is a vital barrier to noise in this area.

Finally, because the proposed development of these 98 homes is not on a transit line, assuming 2 autos per household, it will mean the introduction of around 200 additional automobiles and associated emissions on already busy streets with limited exit points.

C. Just the first phase of development encroaching on limited greenspace in this area

We contend that approval of the Millcroft Greens development application and the suggestion of a redeveloped shorter Millcroft Golf Course will lead to further development of the green/open space in this neighbourhood. Shortening the current golf course will likely drive away more existing golfers than appeal to additional new golfers. The reason being that golfers (quite often seniors and beginners) who prefer an executive golf course will play the existing course from the forward red tees. Golfers who prefer a full-length course but play Millcroft, perhaps in part because of its convenient location, will likely choose a different course resulting in lost revenue. Consequently, the probable loss of revenue and resulting economic unviability will be a convenient situation. The current ownership structure of Argo development remaining as a 50/50 partner in the entire property, will result in applications for further phases of development encroaching on more of the green space in this area.

This point is further supported by Millcroft Greens submitting an Appeal indicating they want to be exempt from or have Sections 8.4.2(2) b) and 8.4.2(2) d) deleted from the recently approved Burlington Official Plan. Given that their current application is under the 2008 Burlington Official Plan, what would the point be of doing this unless they wanted to do subsequent phases of development after the one that is being proposed.

Millcroft Golf Course should Live On

We would like to share the following comments received by Tom McBroom who is a renowned golf course architect and the original golf course architect for Millcroft golf course. Twelve of Tom's courses are rated in the top 100 of Canada's golf courses by Score Magazine.

"Looking back over time it occurs to me that Millcroft has been an extraordinarily successful development both from the golf and residential perspectives. The community was well planned and executed by Monarch, the original developer.

The golf course was envisioned as the primary recreational amenity within the community, and thus would form the recreational hub of the overall development. It was the heart of the community recreationally, socially and environmentally.

Interesting to note as well that the golf course was also cleverly designed to aid in the overall storm water detention from the entire community. There were a number of high-quality engineering and design professionals involved at the time. It was state of the art.

Millcroft is not a long championship, destination type of golf course but rather a short regulation length layout of some 5700 yards and a par of 71. It was well designed for the needs of the community, kids, family seniors et al. From what I understand of the development application, the design intent is to shorten the course and reduce its overall par value. In my mind this devalues the golf course and reduces its stature as a full-length course. Its appeal could lessen and thus its viability as a Club could be threatened.

It would be an utter shame to begin to dismember a fine and cherished community asset in an era where green and recreational space is quickly disappearing.”

Today Millcroft is defined - and it's residents united - by a full-length golf course that winds its way through our community with its open spaces, ponds, abundant mature trees and wildlife. The preservation a well-established neighbourhood and its integrated open spaces could not be more aligned with the objectives and principals outlined in all policy levels.