Comments Regarding Urban Structure and Intensification Policy Directions

June 2016

The Burlington Development Committee (SDC) generally supports the proposed Policy Directions and would like to provide comments as they pertain to SDC Principles and Objectives (Appendix A). Our work is based on the "Urban Structure and Intensification Policy Directions" presentation made to the Policy and Development Sub-Committee by Phillip Caldwell and Leah Smith on June 1, 2016; discussion during the presentation; and a review of the Urban Structure and Intensification Policy Directions Report PB-29-16.

Detailed Comments on Policy Directions

Policy Direction A – Update the Guiding Principles and Land Use Vision to reflect the 2015 – 2040 Land Use Vision to reflect the 2015-2040 Strategic Plan and revisions to the Urban Structure.

- SDC thoroughly endorses this Policy Direction and have felt since 2012 that the Official Plan should fully align with the Strategic Plan for the City to operate in an efficient and effective manner and not go off track.
- SDC has developed our own thoughts on what should be included in the Guiding Principles and Land Use Vision. Some guiding principles we would like to see included beyond what proposed in PB-29-16 are: Sustainable Development, Diversity & Adaptability, Community, invigorated Rural Areas, Interconnectivity, Accessibility & Equity, and Health & Vitality. See Appendix B for further details.
- Bear in mind when you are developing the Land Use Vision it needs to consider more than what is incorporated in the Strategic Plan.

Policy Direction B – Establish a new City System and Urban Structure Framework, including associated policies and mapping, within the Official Plan.

- As shown in Figure 1 – Major Components of the Official Plan including a new Urban Structure along with Intensification Framework and Primary Transportation Network should be an opportunity to explain in a simple manner how they link and allow users to better understand what we want to accomplish**.**

- We like the concept of Appendix A - Draft City System and proposed schedule & policies. It allows us to easily visualize the physical make-up of the City and how the parts are connected.
- We like the concept of Appendix B – Draft Urban Structure and proposed associated policies and mapping as it paints a good picture of the overall land use vision.

Policy Direction C – Establish a new Intensification Framework, including associated policies and mapping, within the Official Plan.

- Given the issue of proposed increased densities all over the City a new Intensification Framework is required.
- It will be extremely worthwhile if the purpose of the Intensification Framework (IF) can be achieved by:
    - making it clearer and simpler to evaluate OPA's wanting increased density by filtering out those amendments not directed to priority areas(will save time and confusion)
    - co-ordinating better infrastructure/community infrastructure investment (will save City and Region unnecessary expenditures), and
    - better forecasting of Regional population and employment growth to 2041 (will ensure more accurate numbers are given to the Region)
    - providing greater opportunities to accommodate a variety of housing forms to meet broad demographics needs (particularly if it ensures affordability for lower income needs)
- The four proposed Intensification areas make good sense and will enable us to outline where intensification will be readily acceptable, where it will be thoroughly questioned, and where it will be frowned on.
- In **Employment Intensification Area(s)** making all areas Primary Intensification Lands does not make sense. There should be a Secondary Employment Intensification Area(s). You cannot prioritize all the areas the same. You want to determine areas where infrastructure can be combined more efficiently.
- In the evaluation of **Secondary Intensification Area(s)**, we need to consider the available infrastructure. During the presentation it was described as comprising of elements such as transit availability, site servicing etc. Given that Burlington has a Community Energy Plan that describes installation of district energy in areas of sufficient density, the "infrastructure" conversion should/must also include existing or planned district energy.
- Incorporating publicly-funded schools into the **Secondary Intensification Area(s)** is a dangerous precedence. Developers will use this to their advantage. We are better off leaving these within the **Established Neighbourhood Area(s)** and make changes as an exception.
- Within the **Established Neighbourhood Areas** we like the ideas of introducing policies that prohibit privately initiated Official Plan amendments for increased density beyond that permitted through the underlying land use designation.

- Strong language is needed for **Established Neighbourhood Area(s)** that prevents any Official Plan Amendments beyond existing maximum density. Clearly identify that densities can increase up to ten times under the existing low density allowance, particularly in areas with large lots. Provide potential solutions to avoid excessive change to the appearance of established neighbourhoods by using measures such as Development Permits, accessory buildings, multi-family conversions and increased building height to preserve green space. Another approach is to develop policies that provide a disincentive for reducing permeability through larger lot coverage such as stormwater charges based on permeability.
- Provide detailed definitions of employment uses with examples.

Policy Direction D – Amend the Official Plan's definition 'intensification' to conform with the Province and Region of Halton's definition and undertake consequential amendments throughout the Official Plan as required.

- Moving from a change in zoning approach to change from what currently exists makes very good sense. People can only think about intensification from what we can see currently in front of them.

Policy Direction E – Update the Official Plan's current evaluation criteria for intensification proposals to better address a range of uses and built-forms.

- SDC supports expanding the criteria boundaries for accessing intensification.
- The six proposed changes generally make good sense but would expand on how two of them will work:
  - How will Transportation Demand Management (TDM) be brought into consideration under the criteria "the ability to consider TDM measures when evaluating adequacy of parking"?
  - What do you mean by "high quality public realm" under the criteria "ensuring intensification proposals contribute towards a high quality public realm"? This needs to be clearly defined.
- We consider the following additional criteria should be added:
  - Refer to the Official Plan Sustainability and the Environment policies plus the Sustainability Building and Development Guidelines (when it becomes official) that it applies to intensification applications as well as all others.
  - Include a requirement for district energy evaluation and incorporation of readiness.
  - Include a requirement for a carbon analysis for fuel sources that indicates a positive step towards carbon neutrality.
  - Include a requirement for a triple bottom line evaluation in accordance with objectives of the Strategic Plan.

Policy Direction F – Introduce policy that enables the identification of Strategic Investment Areas within Primary Intensification Areas by City Council.

- SDC endorses the idea of Strategic Investment Areas particularly where we strongly believe intensification should take place, where we want intensification to be carried in specific manner, where we want to attract certain types of new industry to Burlington, where we want to redevelop, where we want to overcome environmental issues or where could save infrastructure costs.
- The idea using incentives such as Development Related Fee Incentives, Capital Investments, Community Improvement Plans, etc. to achieve our objectives makes good sense. As we have limited experience in implementing incentives, we should learn from other municipalities who have been successful and replicate their practices.

Policy Direction G – Establish a new Mobility Hubs policy framework, including associated policies and mapping, within the Official Plan.

- SDC supports this objective and recommends promptly establishing visions, interim policies and guidelines to ensure development within the vicinity of Mobility Hubs that is proposed prior to OP adoption proceeds in a manner that will support the character and vision for each area.
- Overall, the SDC suggests that the City of Burlington proceed with Mobility Hub planning keeping in mind the following overarching question: **How will Mobility Hubs sustain themselves economically, environmentally and socially over the short and long term? Our city's competiveness will depend on how well we accommodate these types of developments.**
- **For further details on our thoughts see "Comments Regard Mobility Hubs – April 2015" (Appendix C)**

i Update the overarching Land Use Vision and Guiding Principles of the Official Plan to reflect Mobility Hubs
- We support this as it should be updated at the same time as the overall Land Use Vision and Guiding Principles.

ii Add Mobility Hubs Land Use Policies to guide development in all hubs.

- We support the proposed objectives, policies to guide Area Specific Plans, and policies to guide development in hub areas prior to the completion of an Area Specific Plan.

iii Update Official Plan Schedules to reflect Mobility Hubs

- The concept of the new Appendix D – Intensification Framework Transportation Framework showing how the Mobility Hub Study Areas aligns with Primary, Secondary & Employment Intensification Areas, primary transit area and mobility hub corridors makes good sense. This map should also show external linkages to Oakville, BRT, Hamilton and 403 Bus Routes.
- A separate map showing all non-car/truck linkages to Mobility Hubs should be developed walking, cycling and public transit routes along with links to other municipalities, BRT, 403 buses, etc.

Iv Add and update definitions to reflect Mobility hub terminology

- We definitely need these definitions as it will eliminate a lot of the confusion that currently exists. For example, the development of a Glossary for the Strategic Plan certainly helped.

Policy Direction H – Update the policies and schedules in the Official Plan and Transportation Master Plan to recognize the role of Mobility Hubs and Connectors in the city-wide transportation system.

- We fully agree that the Official Plan and Transportation Plan policies need to be developed concurrently in order to ensure coordination and policies predominately focused road networks needs to modified to give more priority to walking, cycling and public transit.

- Mobility Hubs need to be connected to one another and key destinations in the city. Outlining the Primary, Secondary and Tertiary Connectors, mapping them to show how they link Mobility Hubs & other key destinations, and developing policies to support them is absolutely vital.

- An absence of Mobility Hubs in North Burlington may lead to increased traffic congestion and a lack of vibrancy. To address these issues, consider developing policies that support:

  - Potential future Mobility Hub or transit nodes servicing connections to Milton, the Dundas Bus Rapid Transit, and commuter buses running along the 407.

  - Connections to possible future Fairview and Appleby LRT.

- Are there more Secondary Connectors such as Queensway/Harvester Road linkage between Appleby and Burlington Go Stations? Do we need to think more broadly? What connectors to the Growth areas above the QEW?

- Efficiency of intra- and inter-city transit service should be assessed on an ongoing basis to ensure access is provided for all community members and to ensure a multi-modal approach to transportation is functioning effectively (i.e. local residents can walk to transit and get around Burlington and to neighbouring cities with ease – our goal should be that not only **can** citizens do this, but they **choose** to do so)

- Effectively coordinate land use, transportation in a multi-modal approach that prioritizes walking, cycling and transit use major means of transportation

- Incorporate a higher level of accessibility than the existing minimum requirements, and ensure that technology enhances the experience for customers with disabilities.

- Policies to support the reduction of greenhouse gases through decreased CO_2 production from vehicles should be established by applying Zoning Bylaws and/or design guidelines that provide secure storage for bicycles, dedicated parking for hybrid/electric personal vehicles and facilities to equip hybrid/electric buses.

- Consider creating zoning bylaws that require an appropriate number of electric vehicle (EV) charging stations in areas where vehicles to accommodate vehicles parked both for the duration

of a workday or overnight (Level 1), as well as short term opportunity charging (Level 2 and/or 3). Provide for future expansion by building in additional electrical capacity, to allow for growth of EV adoption.

Sincerely,

Members of the Burlington Sustainable Development Committee

Appendix A

The following represent a subset of SDC Principles and Objectives most relevant to the proposed Urban Structure and Intensification Policy Directions.

Sustainable Development Committee Principles:

Support Responsible Development that promotes efficiency and enhances the quality of life.

Promote Sustainable Resource Use and conservation practices

Have Regard for Environmental, Economic and Social Costs and Benefits in the development and use of resources, products and services.

Promote Responsible Stewardship to ensure equitable use of natural and environmental resources in order to meet essential needs and both present and future generations.

Sustainable Development Committee - Objectives:

Full Public Participation in Development Decisions. The public should be part of all planning decisions. Economic, environmental and social impacts of proposed developments should be considered.
Best Use of Land. Promote the best use of land based upon an ecosystem approach to ensure environment integrity and diversity. To include but not limited to promoting environmentally sensitive lands and fertile soil for agriculture throughout the municipality.
Balanced Development. Provide a community plan and an economic strategy aimed at creating sustainable and appropriate forms of development that reflect human scale and a sense of community as well as representing a balance between urban development and natural surroundings.
Efficient Urban Design. To increase the efficiency of land use in the urban community in terms of energy and time, promote intensification and diversification policies that generate urban sprawl.
Accessible Community Development. A new form of community development should be promoted whereby local community components such as commerce, shopping, employment, education, and recreation are readily available, preferably within walking distance of all residents.
Integration of Natural Features and Green Space. Integrate natural features and green spaces in all new developments and intensification projects.
Energy Conservation. Promote energy conservation through efficient land use planning and building design.
Balanced Transportation System. Develop a balanced transportation system including transit, pedestrian, and cycling amenities and the best use of the road and people, with the existing facilities used to their fullest capacity.
Evaluation of Development. Continuous monitoring and evaluation of development should take place to ensure that it does not have adverse impacts on the City's finances and the environment.

1.0 VISION STATEMENT

Vision

Neighbourhoods are at the heart of what makes a great city. They are where we live, where children play, where we return after a long day, and where we connect most closely with other citizens.

By 2040, Burlington has fulfilled its promise as a city that actively connects people and places, with new and transitioning neighbourhoods where easy access to amenities, services, recreation and employment merge with opportunities for walking, cycling and using public transit. Respecting the tremendous wealth of natural, historical and cultural heritage embodied in the unique identity of existing neighbourhoods and its rural north, Burlington carefully manages growth and development throughout these areas.

By 2040, Burlington's investments in collaborative enterprise among the city, region, province, educational institutions and industry enable us to attract and retain high-growth, knowledge-based companies and the intellectual capital that make Burlington a stable, resilient and sustainable city.

While Burlington boasts an attractive and diverse economy, we also demonstrate that prosperity is more than the absence of poverty. Burlington is a caring community where members are engaged, empowered, welcomed and well-served by their city. Neighbour supports neighbour in an environment where culture and community activities thrive, creating a positive sense of place and inclusion. Through balanced, targeted population growth, Burlington has attracted families, youth, newcomers, and seniors with good jobs and economic opportunity.

Principles

2.0 PRINCIPLES AND BASIS OF THE PLAN

2.1 Principles of the Plan

The City will strive to achieve its Vision by adopting the following principles that enable us to maintain the proper balance of social, cultural, environmental and economic interests. The principles reflect the long range direction for the City, are broad in nature and are the foundation for the objectives and policies found in subsequent sections of this Plan.

1. **Sustainable Development** – North American cities face declining ecosystems, and the human economy is a subsystem of these ecosystems. Burlington addresses this decline by supporting a built form and systems that support the kinds of communities and connections that provide social, economic and environmental well-being now and in the future. This involves making decisions

   - that recognize the interdependence of humans and the rest of nature in a common ecosystem

   - that seek to prevent and reverse degradation of the earth, air, water, plants and

animals by human activity

- that recognize the urgency of climate change by taking measures to reduce greenhouse gas emissions and to adapt

- that promote conservation and responsible use of resources.

- that discourage processes and practices that result in natural resources being consumed at a rate faster than they can be replenished

- that discourage production and use of persistent and harmful substances

- that affirm and promote practices that respect human rights, provide a safe and healthy environment, and help our community not only meet the economic and social needs of citizens but enhance quality of life

2. **Diversity and Adaptability** – Natural, social and economic systems are strongest when they incorporate diversity. This plan emphasizes diversity within the physical form of the City, the natural, social and cultural systems, population demographics and the local economy. A more diverse system is more adaptable to future changes.

3. **Community** – Neighbourhoods thrive and prosper when people can communicate, interact, exchange ideas, and share in community decision making. Neighbours support neighbours to achieve a common set of goals. This Official Plan will be used as a tool to engage, support and encourage communities in identifying opportunities to build active, creative neighbourhoods.

4. **Invigorated Rural Areas** – Burlington embraces Halton Region's rural strategy, including support for locally-sourced agricultural products. A healthy, protected, well-connected, and enhanced natural-heritage system forms a fundamental component of the City's rural character. Planning and investments ensure usability, safety and access to the Bruce Trail for recreation, tourism and health.

5. **Interconnectivity** – Refers to the linking of both built and natural spaces. Connectivity to places outside the City is also important. Connectivity should not favour efficiency over effectiveness and equity. Connectivity builds community.

6. **Accessibility and Equity** – All members of our community will have access to the goods and services they require in their daily lives. This does not necessarily mean that all neighbourhoods must be the same or include the same numbers of amenities. Rather, it means that the overall organization of the City and the transportation system allows all people equitable access to goods and services.

7. **Health and Vitality** – Burlington sustains the health of its citizens through access to preventive healthcare services, along with infrastructure that supports active lifestyles such as parks and green spaces, access to linked trail systems, community gardens, and pedestrian-friendly streets. The City actively safeguards the basic elements of physical security and healthy air, water and land. The principle of vitality means a city that is socially and culturally vibrant and diversity is desired and supported.

Appendix C

Comments Regarding Mobility Hubs - April 2015

Based on a review of the Mobility Hubs *Briefing Note: Council Workshop on Mobility Hubs (June 2014)* and other associated documents, the Burlington Sustainable Development Committee (SDC) is generally in support of all of the Potential Policy Directions. The Executive Summary outlines our primary suggestions, and is followed by recommendations related to each Potential Policy Direction. We would like to highlight our interest in continuing to provide input towards all levels of Mobility Hub planning, including visioning exercises and the establishment of Policy Directions, Master Plans and Zoning Bylaws.

<u>Executive Summary</u>

SDC supports the incorporation of Mobility Hubs into the Official Plan and offers the following comments and recommendations to assist with finalizing the Policy Directions.

- Incorporate Placemaking into Mobility Hub planning, and involve stakeholders, commenting agencies and the public in visioning processes.

- To address potential pressure for development within Mobility Hub areas prior to the adoption of a revised OP, establish interim policies and guidelines to ensure development proceeds in such a way that will support the vision for Mobility Hubs.

- Act as a leader in Mobility Hub planning and commence a Pilot project as soon as possible. To avoid duplication of issues across our city's Mobility Hubs, evaluate development as it proceeds, based on criteria such as walkability, usable open space/green space, residential and commercial market value, etc.

- Undertake a risk analysis and establish mitigation plans in order to address the potential for a lack of market demand. (See PMBOK Guide 2000 pages 127-144) Undertake research and studies to effectively incorporate our lessons learned from previous experience with mixed use.

- Develop a comprehensive map or graphic that clearly depicts the relationship between each of the major objectives within Official Plan planning (i.e. Mobility Hubs, Transportation Master Plan, Commercial Lands, Employment Lands, and Uptown).

- Ensure Mobility Hub designs prioritize active transportation and are pedestrian-oriented.

- Think locally and Regionally with respect to long-term intensification across the city and corridors in order to establish what the future transportation network will look like and move towards it.

- Consider the social aspects of Mobility Hubs. Provision of community social services, such as child care, community centers, marketplace and providing opportunities for neighbourhood interaction contribute to quality of life and are important in establishing vibrancy.

Policy Directions Comments

Please consider the following comments and recommendations for finalizing Policy Directions as well as for more detailed suggestions that may assist with developing Master Plans and Zoning Bylaws.

A. Incorporate Mobility Hubs into the Official Plan

- SDC supports this objective and recommends promptly establishing visions, interim policies and guidelines to ensure development within the vicinity of Mobility Hubs that is proposed prior to OP adoption proceeds in a manner that will support the character and vision for the area

B. Revise Guiding Principles in the Official Plan for Placemaking

- Define Placemaking and how placemaking looks different in Mobility Hubs than other areas

- Establish a vision for each Mobility Hub by considering the entire area comprehensively and how individual land parcels will "interact" to tell a story, enhance and build upon existing character, maintain & enhance vibrancy, connect the community, maintain safety, etc. Placemaking, Sustainable Design and Complete Streets should be incorporated within the Principles. For example,

  o Explore ways in which green space can help create unique designs and contribute to the Urban Forest. SDC recommends incorporating a minimum amount of vegetation (e.g. a certain percentage of each parcel must contain green space; a certain number of trees must be planted within the Mobility Hub zone; all vegetation must be native and non-invasive)

  o Incorporate a requirement for Mobility Hub buildings to achieve best in class Sustainability and building performance Standards, such as LEED Platinum.

- Consider developing guidelines for appropriate building height limits based on best practices used for cities of comparable size. Consider whether intensity goals can be reached without increased height.

C. Update the transportation policies and schedules in the Official Plan in concert with the Transportation Master Plan to recognize the role of Mobility Hubs and connectors as an integral part of the city-wide transportation system.

- Policies to support the reduction of greenhouse gases through decreased CO_2 production from vehicles should be established by applying Zoning Bylaws and/or design guidelines that provide secure storage for bicycles, dedicated parking for hybrid/electric personal vehicles and facilities to equip hybrid/electric buses.

- Consider creating zoning bylaws that require an appropriate number of electric vehicle (EV) charging stations in areas where vehicles to accommodate vehicles parked both for the duration of a workday or overnight (Level 1), as well as short term opportunity charging (Level 2 and/or 3). Provide for future expansion by building in additional electrical capacity, to allow for growth of EV adoption.

- Efficiency of intra- and inter-city transit service should be assessed on an ongoing basis to ensure access is provided for all community members and to ensure a multi-modal approach to transportation is functioning effectively (i.e. local residents can walk to transit and get around Burlington and to neighbouring cities with ease – our goal should be that not only **can** citizens do this, but they **choose** to do so)

- Effectively coordinate land use, transportation in a multi-modal approach that prioritizes walking, cycling and transit use major means of transportation

- Incorporate a higher level of accessibility than the existing minimum requirements, and ensure that technology enhances the experience for customers with disabilities.

D. Build a strategy to promote office development in the Mobility Hubs.

- Intensification should include a significant portion of office space, the proportion of which should be established as part of the development of policy

- Ensure that requirements / provision of parking space in Mobility Hubs is not a barrier to office development. Model after downtown exemption area.

- Discourage homogenous uses resulting in oversupply of commercial / service based employment; have diversity of employment opportunities

E. Consider transit-oriented mixed use places including Mobility Hubs in city-wide system

- An absence of Mobility Hubs in North Burlington may lead to increased traffic congestion and a lack of vibrancy. To address these issues, consider developing policies that support:

  o Potential future Mobility Hub or transit nodes servicing connections to Milton, the Dundas Bus Rapid Transit, and commuter buses running along the 407

  o Connections to possible future Fairview and Appleby LRT

F. Consider preparation of Community Improvement Plans that specifically apply to Mobility Hubs.

- We support the using the strategies identified

G. Strengthen Implementation Policies in the Official Plan to address Mobility Hubs. Develop an Implementation Strategy for Mobility Hubs.

- The City should act as a leader in Mobility Hub development and take opportunity to "learn by doing" (see City of Pickering on Placemaking). To do so, a Pilot project should commence as soon as possible, and the City should consider becoming the Developer. SDC recommends developing performance metrics and incorporating basic changes into the existing Official Plan to facilitate the process.

- Undertake research and studies to effectively incorporate our lessons learned from previous experience with mixed use

1) **Undertake detailed Mobility Hub studies including Master Plans. Include enabling policies in the Official Plan to support mobility hub development.**

- Given potential pressure to develop within Mobility Hub areas, SDC recommends that Master Plans are prioritized such that areas with greatest development pressure are designed first to ensure development progresses in accordance with draft Mobility Hub Policy Directions.

- Consider implementing the strategies behind the Development Permit System when creating Master Plans

2) **Develop a phasing strategy for intensification areas including Mobility Hubs. Continue dialog with local utilities.**

- The phasing strategy should be designed to ensure mixed-use designs come to fruition. Therefore, the strategies must outline how to address a greater interest in one use over another Assess if and how infrastructure can support intensification in a timely and affordable manner in any location we intend to intensify

3) **Develop an implementation strategy and timeline that prioritizes and resources future Mobility Hubs work.**

- To ensure development in Mobility Hub areas will progress in accordance with draft policy directions, standards and guidelines prior to the adoption of an updated Official Plan, SDC recommends the following occur by the end of 2015:

  o Develop Terms of Reference

  o Establish a Steering Committee

  o Establish a vision and define basic guidelines to assess development applications. SDC believes that it is better to have a process and some guidelines established so that the City has grounds on which to reject applications or require modifications while Official Plan review is ongoing.

- SDC suggests providing multiple avenues for ongoing input into Mobility Hub planning. Specifically,

  o Provide various opportunities for public and stakeholder input, including public meetings, design charrettes and surveys

- Include representatives from all relevant agencies (e.g. Metrolinx, City of Burlington, Region of Halton, Conservation Halton, MNRF, MOECC) to ensure efficient and effective development review processes by:
  - Providing collective input into the design of Mobility Hub Master Plans and Urban Design Guidelines
  - Providing collective pre-consultation for development applications
  - Ensuring that site plans that meet the requirements of Master Plans are able to obtain permits from relevant agencies without delay or significant revisions

Concluding Statement

Overall, the SDC suggests that the City of Burlington proceed with Mobility Hub planning keeping in mind the following overarching question: **How will Mobility Hubs sustain themselves economically, environmentally and socially over the short and long term? Our city's competitiveness will depend on how well we accommodate these types of developments.**

Sincerely,

Members of the Burlington Sustainable Development Committee