



**PENTA**  
PROPERTIES

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March 4, 2021

Mark Steffler  
Manager, Innovation & Partnerships  
Burlington Economic Development  
414 Locust Street, Suite 203  
Burlington, Ontario  
L7S 1T7

Dear Mr. Steffler:

**Re: Burlington's Proposed New Brownfield Community Improvement Plan**

We are writing with respect to the proposed new Burlington Brownfield Community Improvement Plan, and request that this written delegation be received and considered by Council.

Brownfield Community Improvement Plans have been around for a long time in other municipalities. Take for example the Hamilton ERASE Community Improvement Plan. Much can be learned from our neighbouring municipalities to advance this initiative in a manner that has already been proven to work.

Of greater importance though is the Brownfield Community Improvement Project Area map that was posted with the public notice. According to this map, the entire urban area of Burlington is shown as brownfield. This is simply incorrect.

According to the aforementioned Hamilton ERASE Community Improvement Plan, a brownfield is defined generally as undeveloped or previously developed properties that may be contaminated. They are usually, but not exclusively, former industrial or commercial properties that may be underutilized, derelict or vacant. That hardly describes the entire urban area of Burlington.

As an example of your mischaracterization of brownfields, you have shown our lands west of Burloak Drive, south of Upper Middle Road (known as Bronte Creek Meadows) as Brownfield Priority Area 1. Bronte Creek Meadows is not a brownfield. Similarly, you have shown all existing residential neighbourhoods as Brownfield Priority Area 4. Residential neighbourhoods are not brownfields either. The foundation of this Community Improvement Plan appears to be fundamentally flawed.

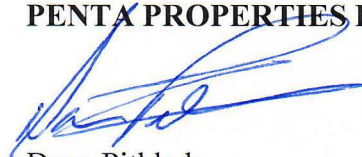
Furthermore it is stated that the intended purpose of this Brownfield Community Improvement Plan is to achieve municipal economic development goals. Please expand on how this is to be achieved. We are concerned that by putting out maps like this, it effectively down zones and puts a negative connotation in the industry for those lands unnecessarily, the false implication being that these lands may be contaminated and require costly remediation when that isn't

necessarily the case. If economic development is the goal, there are other better opportunities available to Council that would have more significant impacts than a CIP. In particular, Burlington needs to embrace mixed use land permissions that would deliver jobs, housing and other community benefits. The private sector will deliver economic and community development if the current land use barriers are removed. Significant economic development will not occur if they are not removed.

We would strongly suggest further review and analysis of your plan to ensure there are no unintended consequences or negative timing impacts that would be counterproductive to your goals.

We appreciate your consideration of these comments, and request notification of any applicable Council decisions.

Yours truly,  
**PENTA PROPERTIES INC.**



Dave Pitblado  
Director, Real Estate Development

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