

City of Burlington
Development and Infrastructure Committee
c/o City Clerk
City Hall
426 Brant Street
Burlington, Ontario L7R 3Z6

September 12, 2016

Attn: Amber LaPointe, Committee Clerk

Re: Proposed Tall Buildings Guidelines

Dear Committee and Ms. LaPointe:

We are in receipt of the proposed Tall Buildings Guidelines prepared by Planning Staff that is proposed for acceptance and approval at tomorrow's Development and Infrastructure Committee.

Please consider the following comments when reviewing the file:

- HHHBA appreciates and applauds the City for initiating work on a document such as this. Given the City's growth is wholly through intensification in the future, a guideline of this nature is critical to ensure that all parties understand the rules and guiding principles with which tall buildings are to be incorporated into the City.
- There has been zero consultation on the document itself: Planning staff notified our Association that this is coming "fairly quickly", arranged a meeting with two business days' notice with a long weekend in between, attached a document to a meeting notice, and has now brought the guideline forward to Committee one week after said meeting. This does not constitute proper consultation, it is not indicative of how the City of Burlington normally proceeds with business, has not allowed us fulsome review of the document, nor has it allowed the greater industry or public any opportunity to review, be aware, or provide comment on the document. By contrast, Hamilton is in the tail end of a process on their Tall Building Guidelines which has spanned over a minimum of 16 months to date. While the documents are not of the same scope, it is evident that this process has been inappropriately rushed.



- The document as currently presented is poorly constructed. The principles of the document are sound, but there are concerns:
 - There is little flexibility in some of the set figures, which in our opinion are better as ranges or targets. Staff have agreed that the intent is to maintain flexibility, however the document doesn't accurately portray this.
 - It initially appeared that the words shall and should were inappropriately mixed. Through discussion with staff it is now understood that this was done purposefully and we require time to understand the ramifications.
 - Some of the set distances, ratios, etc. seem arbitrary. There has been insufficient time to study what is being proposed and understand if it is comparable to other municipalities, reasonable, etc.
 - Wordsmithing is required. There are items that can and should be better explained so that there is no ambiguity for current and future users of the document. Additionally, small corrections need to be made throughout the document.
- There is no transition policy attached to this, which is usually proposed with a change such as this.

Based on the above, ***we believe it entirely appropriate that the matter be deferred to a future D&I meeting***, to allow our Association and the greater industry time to properly review, and give staff the chance to submit and Committee to approve a good document that all can stand behind and be proud of.

Thank you for your consideration in this matter. If you have any questions or require additional information, please do not hesitate to contact me.

Yours very truly,

Suzanne Mammel, MBA, CET
Executive Officer and Policy Director, HHHBA

Copy - City of Burlington staff: Mary Lou Tanner
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