

PL-21-21: Appendix A – City of Burlington Submission on the Regional Official Plan Review Growth Concepts Discussion Paper Technical Comments

General Comments:

The Growth Concepts Discussion Paper and accompanying appendices are comprehensive documents that present a detailed description of the 5¹ growth concepts and the technical analysis that informs them and their evaluation by experts through the technical reports. While Staff observed that many previous comments were implemented into the Discussion Paper, Staff have identified some additional opportunities for clarity. For additional information please see covering report PL-21-21: *Submission on the Region of Halton’s Concepts Discussion Paper*.

Page Number	Comment or Question
38	<p>A reference to a Statistics Canada analysis to validate the following statement: “Along with this has been a concern about highrise living, with a decline in the demand for units in tall towers. There is some evidence that these conditions, as fleeting as they may be, are leading to an increase in demand for single family housing further out from the GTA employment Centres.” (Footnote 6)</p> <ul style="list-style-type: none"> • However, the language used in the Statistics Canada analysis is far clearer in what is meant by the term single family, i.e. “This has shifted the interest of homebuyers from condos to single-family homes such as singles, semis and townhomes. Furthermore, the increasing prevalence of working from home during the pandemic has made commuting less of a deciding factor when choosing where to purchase a residential property.” • Similar comments related to terminology for multi-family/multi-residential/tall towers/highrises/apartments/condominiums. The language used through the discussion paper seems to favour more general terms such as single family and apartment but to the average member of the public, it is likely not clear that single family also includes semis and townhomes/townhouses etc. It is likely that the difference between townhomes and row houses is unclear. • Suggest defining the term ‘condominium’. This is often referenced as a housing type and closely associated with multi-residential/apartments/tall towers. A simple housing type terminology key could go a long way in conversations with

¹ For the purposes of these comments, the 5th growth concept (Concept 3B) as it is discussed on Halton Region’s website is discussed as part of these comments.

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	<p>Council and the public, especially when there’s such a strong need to zero in on the missing middle and gentle density.</p> <ul style="list-style-type: none"> • An explanation that rental units can exist across both the various housing types and ownership configurations, and that there is a significant difference between purpose-built rental and other rental type and that affordable housing comes with its own unique subset of terminology (i.e. rent supplement, rent-geared to income etc.) could provide additional clarity. • Consistent use of terms could a long way in preventing the conversation from focusing only one single detached vs. tall towers. As well as avoiding terminology overload/misuse.
42	<p>The following statement is made “For Millennials, being able to afford a single family home is increasingly important as they begin to have children. Recent new home sale data gives some indication of this pattern beginning to emerge.”</p> <ul style="list-style-type: none"> • The above statement highlights affordability but does not address the concept of access. That is some millennials may be able to afford family-friendly housing but cannot access it because there is not enough built supply, or because a large portion of the population is ‘over-housed’ in the supply that does exist. Yet, at the same time, it is important to clarify issues of supply/affordability/access to avoid a disproportionate focus on ‘building our way out of’ affordability issues. • ‘Single family home’ seems overly specific and potentially limiting if interpreted to mean single-detached. There is likely an opportunity to lay-out some clear terminology ground rules and ensure that language is used consistently. • The above statement seems more focused on “family-friendly housing”, which should be clarified to mean two bedrooms or more in size, regardless of housing type. Single/detached/single-detached/single-family/ground-oriented dwelling may often overlap but these terms do not always refer to the same thing and care should be taken to avoid confusing the public/decision-makers.

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	<ul style="list-style-type: none"> Section 6.B acknowledges the possibility of family-friendly apartments, which is positive. This is an important concept to continue re-iterating throughout all discussions.
107	<p>Response to bullet # 2</p> <p>When the existing conditions of Halton Region are taken into consideration it is really concepts 2 and 3 that would provide a greater diversity of uses. Currently, in Halton Region, apartment units account for 20% of all residential units. In 2051, the share of apartment units would shift under concept 4 to 32% of all residential units. The more intensive concepts (2 and 3A/B) would result in shares ranging from 35% to 40% of all residential units. While the variety of new unit types under concept 2 and 3 would technically be narrower, when the existing conditions they will be introduced into in is considered, they provide the greatest diversity of units.</p>
107	<p>Summary Findings, Bullet point 3. The assertion that Concepts 1 and 4 better protect existing employment uses as a function of creating less need to convert employment land to accommodate residential development does not take into consideration the changing landscape of employment (intensification of employment areas, Major Office Employment) as well as the realities of employment in a post-Covid era.</p>

**Appendices Technical Report Comments
Appendix A: Climate Change Lens**

Page Number	Comment or Question
General	In the absence of a Regional strategy quantifying base greenhouse gas emissions and establishing a reduction target, it will be challenging to assess which scenario most effectively contributes to climate change mitigation and adaptation. Staff look forward to reviewing the Green House Gas Emissions Assessment Report from the Region in the coming weeks.
General	Since climate change is a theme that applies across the board. It seems out of place to group it with environment and agriculture.
7	'Of note, the effects of climate change have been considered in establishing the measures for all four themes in the Evaluation

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	<p>Framework. Measures specific to climate change adaptation and mitigation of greenhouse gas emissions are included in Theme 3.'</p> <p>No specific evaluation metrics or measurable outcomes - we made this comment last time but there have been no amendments to the technical appendix that reflect this. This relates to the overarching comment that although a climate change is ostensibly embedded throughout each of the growth concepts, it seems that there are few measurable metrics that have been applied and is more of a motherhood statement.</p>
9	<p>'To what extent can climate change be mitigated through compact built form, developing a sustainable transportation system, protection of agricultural lands and soils, and protection of natural heritage and supporting healthy watersheds?'</p> <p>Climate change addressed through land use and protection of landscapes / natural heritage system. Doesn't cover other climate change mitigation impacts for example extreme weather.</p>
9	<p>'How can future communities in Halton be adaptable to climate change through compact built form, developing a sustainable transportation system, protection of agricultural lands and soils, and protection of natural heritage and supporting healthy watersheds?'</p> <p>How is this being measured? Is there an ecosystem services calculator? How do we evaluate the value of these natural assets and their services to weigh them against the impact of the growth concepts?</p>
20	<p>'At the local level, detailed community design and building design must be achieved, where green standards implemented by local municipalities are becoming common, and Provincial support for the provision of services, like transit, to support the planned urban structure.'</p> <p>At the local level to implement. Except for renewable energy. do we need further clarity from Region? Links to comment above about local implementation mechanisms.</p>

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105	<p>'To adapt to a changing climate, the Region will need to continue to support natural heritage system planning, in particular flood management, to minimize negative impacts and increase resilience. For mitigation of greenhouse gases, the policy focus will be to reduce energy demand from transportation and buildings and protect greenspaces.'</p> <p>Same as comment above. Natural heritage system planning focuses on specific climate change mitigation measures i.e. flood management but what about extreme weather events etc.</p> <p>Bring out link to protecting greenspaces and reducing GHGs. Transportation and buildings are more obvious but the protecting green spaces is more intrinsic and might need to be clarified further for members of the public.</p> <p>End of this sentence doesn't read right - think it should be 'transportation, buildings and protecting greenspace'.</p>
106	<p>'More detailed climate change objectives will be established through local municipal official plans, secondary and neighbourhood plans, infrastructure and master servicing plans (particularly transit plans), as well as conditions of approval for individual development applications.'</p> <p>This provides further clarity on local implementation but not what the Region's role will be.</p>
112	<p>'complete communities'</p> <p>Does this include sustainable buildings?</p>
112	<p>'...the Region is directed to mitigate and adapt to climate change impacts...'</p> <p>Who / what is the focus of this mitigation? Mitigation seems to be focused on protecting natural heritage systems.</p>
Appendix A page 2	<p>'Through the update to the ROP, the Region has the opportunity to set goals</p>

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	<p>related to climate action to encourage or imagine (i.e. re-envision the kind of community it wants to be) more systemic change in terms of reducing GHG emissions and improving resiliency to extreme weather.’</p> <p>Does the IGMS actually do this? Climate change seems to be a motherhood statement with few tangible outcomes.</p>
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Appendix B: Land Needs Assessment Methodology

Page Number	Comment or Question
General	It would be helpful to provide clarity about when ‘population’ is census populations and when an undercount has been used in these calculations.
General	There are a number of calculation errors within the employment tables.
General	Clarity around the definition of the terms “employment lands” and “employment areas” and how they relate to the LNAM calculations would provide additional clarity.
15, Table 4	<p>The LNA’s assessment of market demand is based on past performance. City staff believe that this approach may not fully acknowledge the substantial shift in apartment unit construction over the last 10 years (30.9% of new units), a shift which is more pronounced in Burlington.</p> <p>Burlington’s Development Charges Background Study (2019) states that the share of apartment units in Burlington is already 24%, 4% greater than the regional average and is projected to increase its share of apartment units to 30% by 2031 (20 years before the 2051 planning horizon). This more pronounced shift in apartment unit construction in Burlington indicates that a shift in market demand for higher density residential units is already underway in Burlington and that the market is accommodating this increase in higher density apartment units.</p>
36	Regarding Bullet 2: It’s unclear how the 3% Long-term Vacancy within the Existing Base for the City of Burlington resulted in 69.7 ha. According to the Existing Employment Area Potential section of the

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	memo, a factor for long-term vacancy is applied as 3% of the total occupied and vacant lands. According to the tables, the 2021 Total Employment Land Base (occupied plus vacant) for the City is 1,411.7 ha. To assist with our understanding, can the Region please confirm what numbers were used in the 3% long-term vacancy calculation.
52, Table 36	Municipal Allocation of Four Growth Concepts: The table identifies a total population growth for the City of Burlington of 21,110 between 2021-2031. The region has confirmed that the number should be 19,400 and that this figure does include the census under count. Staff request that the appropriate update be made to table 36.
52, Table 36	Table 36 shows that population growth to 2031 will require an addition of 9,890 new housing units to the City of Burlington or approximately an addition of 989 units per year. This is a significant increase from Burlington’s current rolling average of over the last 10 years (2010-2020) of 692 units per year.
56, Figure 1	There appears to be an error in both the pie chart (concept 1) and in the Table (new DGA) that identifies housing growth in Burlington within new Designated Greenfield Area.
75, Table 50	The LNAM work indicates that Burlington’s 2031 forecasted census population is 208,100 people. When compared to the Region’s 2031 BPE (2009) this is an increase of 15,100 people. Although this results in a significant increase in population to 2031, Staff are of the opinion that this forecast is appropriate. These findings are supported by the Growth Analysis Study Report (2019) which indicated that Burlington’s population could range from between 192,300 to 254,400 people to 2031. This ten year horizon is critical for Development Charges Studies, 10 year capital budgets and consideration should be given in the near term to flexibility of approaches to these studies in the context of the City of Burlington.
79, Table 55	The 2031 employment forecast in Burlington’s Growth Analysis Study Report (2019), under the Reference Scenario is significantly higher than the Region’s.

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Appendix C: Employment Area Conversion Request Inventory

General	There are several errors and inconsistencies among the appendix, the table in the body of the report and the conversions included in proposed ROPA 48.
Further Analysis	See staff report for comments on conversions requiring further analysis.

Appendix D: Transportation Analysis

Page Number	Comment or Question
General	For additional context in evaluating the impacts of various growth concepts, it would have been helpful to acknowledge the relationship between mode share, travel patterns, infrastructure requirements and demand for aggregate resources. Particularly that growth concepts which reinforce the dominance and prioritization of travel by single-occupancy vehicle decrease the life cycle of transportation infrastructure and also strain capacity, resulting in increased demand for renewal and expansion, ultimately exacerbating the trend of induced demand.
General	<p>The negative impacts of car-oriented development regarding mode share targets for sustainable means of transportation could have been discussed, as well as the negative impacts associated with increased demand for parking facilities. Air quality and impacts to public health considerations are also absent from the analysis, and only mentioned at a very high level in the climate change memo.</p> <ul style="list-style-type: none"> • The evaluation does identify that Concepts 3 and 4 do exhibit potential for marginally higher transportation capital costs depending on the transportation solution. • From a transportation perspective, the analysis did not adequately acknowledge the relationship between mode share, travel patterns, infrastructure requirements and demand for aggregate resources. Particularly, growth concepts which reinforce the dominance and prioritization of travel by single-occupancy vehicle which may result in more trips and impact the life cycle assumptions for transportation infrastructure which may also strain capacity of that same

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	<p>infrastructure, resulting in a decrease of the life cycle of transportation infrastructure and also strain capacity.</p> <ul style="list-style-type: none"> • The negative impacts of car-oriented development regarding proposed mode share targets for sustainable means of transportation were not adequately discussed. Despite a climate lens being used throughout the development of the Growth Concepts, air quality and impacts to public health considerations are also absent from the analysis, and only mentioned at a very high level in the climate change memo.
<p>Page 2 Section 1.2</p>	<p>In section 1.2 on pg.2, the following explanation is provided for the DMTR:</p> <p>“The Defining Major Transit Requirements in Halton Region (DMTR), completed in 2019, is a continuation and fulfilment of the next steps established through the MMS in support of the vision for a multi-modal transportation network. This study evaluated the existing and proposed MTSAs, higher order transit stations and surrounding areas that are planned for intensification to identify infrastructure gaps, potential barriers to development and potential opportunities; and defined the type, form, and function of the TPCs as identified in the MMS. It identified transit infrastructure investment opportunities for the 2031 and 2041 planning horizons to address potential transit demand and enhance transportation mobility and connectivity between existing and proposed MTSAs.”</p> <p>Additional context should be added to clarify that the focus of this study was Regionally owned/operated transportation infrastructure (which does not include transit) and that the growth/employment/travel scenarios were based on proxy data generated only for the purpose of guiding Regional investments in Regional infrastructure. The suggestions for priority investments in local infrastructure were not based on local data/priorities, were not directive and were for preliminary consideration only.</p>
<p>Page 2 Section 1.3</p>	<p>It is explained that the study considered transportation infrastructure as “regional roadways and major local collectors, transit and provincial facilities”. Does this equate to the “region-wide inter/intra-regional transportation network”, “regional transportation system” and “regional transportation network” that is referenced throughout the memo? If yes, it would be helpful to clearly state this in section</p>

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	1.1 and to expand on: Is “transit and provincial facilities” local transit? local and regional transit? which provincial facilities? Also, will the public understand what is meant by ‘facilities’?
Page 3 Section 1.3.1	Under “Transit”: There should be some language to clarify the nature of the transit assumptions and their intended purpose- and that these assumptions are still subject to further refinement through other planning initiatives (i.e. IGMS & TMP) based on current local municipal planning and priorities.
Page 10 Section 4.3	This is a very general statement “With some minor differences, all four Growth Concepts exhibit similar transportation impacts.” It would be helpful to provide more elaboration.
Page 20 Section 7	The conclusion that “No Growth Concept stands out more than another, in the aggregate, from a technical or financial perspective from a transportation performance point of view.” is concerning, given that there are many assumptions and various forms of proxy data included in the methodology that have not yet been evaluated by local transportation planning and transit staff. Suggest adding a reference to the role for local staff through the public engagement phase related to the Discussion Paper.
Page 20 Section 7	This statement addresses the need for further refinement: “The estimates of future capacity requirements to 2051 are approximate and intended to provide a high-level assessment of potential future capacity constraints and opportunities. This assessment was appropriate only for the relative comparison of the four Growth Concepts. The analysis is subject to further refinement through this study (preferred Growth Concept) and the future transportation master plans.” This could be further strengthened by specifically acknowledging the need for further collaboration with local municipal partners.
Page 20 Section 7	“No Growth Concept stands out more than another, in the aggregate, from a technical or financial perspective from a transportation performance point of view.” It would be very helpful here to edit to suggest some means of differentiating the concepts using other measures that would assist in refining to the preferred growth concept.

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Appendix F: Fiscal Impact Assessment

Page Number	Comment or Question
General	At this stage of the Fiscal Impact Assessment, the work does not consider the full nuances of each concept nor does it consider the nuances of the local context.
General	The Fiscal Impact Assessment considers the cost of transit expansion related to population and employment growth but does not build in assumptions about increased fare box revenues that might result in a shift in mode of transit.
General	The Average Annual Tax Increases 2021- 2051 found in table 3 of Appendix F shows an annual tax increase between 3.90% and 3.79% per annum across the concepts. This is similar to the Tax increase found in the City of Burlington’s 10 year Financial Plan.
General	The higher rates of intensification in concepts 2 and 3A/B would likely result in changes to sizes and configuration of apartment units (larger, more bedrooms) resulting in increased revenue potential. This is of particular note for the City of Burlington where a shift toward a greater proportion of higher density residential units has already begun.
Page 7, Section 4	Is this “infrastructure backlog” mentioned Regional or Municipal? Some clarification would be useful in the document.
Page 10 Section 3, A.	The tax increases shown in table 3 seem quite high. Especially for Burlington. Some elaboration about how these figures were calculated would be helpful along with a discussion of the key determinants.
Page 16, Appendix A	Table A1: Shows concepts 1 and 4 as being the most fiscally viable. Suggest that more elaboration is required here to describe how this was determined.
Page 16, Appendix A	Table A2 shows that for all concepts, Burlington’s share of employment will decrease from 36% to 25%. Would like some details about how this calculation was done. Does this factor in new employment forms and their relatively intensive uses? Suggest that this table should be supported by more detailed information.

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Appendix G: Agricultural Area

Page Number	Comment or Question
General	With respect to natural heritage, agriculture and aggregate resources, the general approach (as dictated by Provincial policy) is that all three must be protected for the long-term, with no guidance as to the relative ranking/priority of each component. Yet, on the ground, the natural order implementation generally places natural heritage as the top priority, followed by aggregate resources, followed by agricultural lands.
General	Although prime agricultural lands are considered a finite and highly limited resource, there is no base line for the amount of land required for a viable system, no quantified goal for preservation, no cumulative impact assessment, and no investment in the restoration and enhancement of remaining lands. However, the long-term impact of removing ‘small’ portions of prime agricultural land is typically characterized as inconsequential and, in some cases, further rationalized by the preservation of natural heritage and aggregate resources.
General	Rather than continuing to present all three as equally protected assets, it would be better to acknowledge this reality to garner additional support for investment in the preservation, restoration and enhancement of remaining agricultural lands.
General	Traditional mitigation measures are focused on simply minimizing negative impacts, which are accepted as an unavoidable outcome, leaving the broader system in a perpetual state of incremental decline. Active investment in remaining lands could at least help to the bring the net impact up from negative to neutral.
General	It is understood that once a final growth concept is selected, a full AIA will be undertaken, and that the above request goes beyond Provincial policy requirements. However, there is risk in not looking more closely at the types of operations (beyond livestock) during this

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	<p>phase, as a critical component of the agri-food network could be overlooked.</p> <p>For example, the background report for the Halton Rural Agricultural Strategy notes that a large decrease in the total value of Gross Farm Receipts in Burlington between 2006 and 2011 is likely due to the closure of one of the last commercial feedlots in Halton Region that occurred following the 2006 Census. This type of information is critical to a comprehensive analysis of both the localized and system-wide agricultural impacts associated with each of the growth concepts.</p>
General	<p>As an alliance member, Halton Region already has access to the GHFFA data and it could be an opportunity to demonstrate leadership and innovation. Prime agricultural lands do not benefit from the same level of protection as the natural heritage system, which all 4 growth concepts avoid compromising. However, there is an opportunity to include additional considerations to ensure the impacts agricultural system are truly avoided to the extent possible, before determining mitigation measures based on the preferred growth concept. The natural heritage system discussion paper is more extensive in evaluating system-wide impacts, including discussion on edge-planning, and additional topics for further consideration.</p>
General	<p>For any agricultural lands impacted by an expansion, there should be a commitment to appropriate edge-planning, with buffers accommodated within the expansion area. Ideally this would be confirmed through the Terms of Reference for the future AIA, in that it is a required mitigation measure.</p>
General	<p>Measure 3.1.3 is heavily focused on the agricultural land base/soil quality and Measure 3.1.4 only addresses the livestock component of the agri-food network. The GHHHA data could provide an opportunity to more comprehensively evaluate the potential impacts to the agri-food network before a preferred growth concept is selected.</p>

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General	The natural heritage system paper is more extensive in evaluating system-wide impacts, including discussion on edge-planning, and additional topics for further consideration. Suggest explaining in the document why a similar approach was not taken with respect to Agriculture.
Section 3.3	The potential livestock maps in Section 3.3 are a good tool for this preliminary analysis. Suggest that there is an opportunity to elevate this further, by producing another set of maps using the Golden Horseshoe Food & Farming Asset Mapping data (and/or Halton LEAR data) for all types of agricultural operations and all components of the agri-food network mapped within each of the study areas?

Appendix H: Natural Heritage System

Page Number	Comment or Question
Page 5 Section 3.2	<p>At the top of the page, the following explanation is provided “Although a Water Resource System has not been established for Halton; through this evaluation, effort has been made through the sub-measures to have regard for the features and areas which are anticipated to comprise the WRS. This has provided the means for conducting a preliminary and high-level analysis in advance of full WRS delineation.”</p> <p>It would be helpful to specify which features and areas are anticipated to comprise the WRS, and which ones have been represented by which components of the NHS.</p>

Appendix I: Aggregate Resources

Page Number	Comment or Question
General	<p>How is the extraction of aggregate resources below the water table, where rehabilitation to agricultural use is not possible, factored in to this measure?</p> <p>Is the value of retaining lands for extraction outside of prime agricultural areas considered through the broader evaluation (i.e. on the premise that it may reduce future pressures for extraction on prime agricultural lands)?</p>

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<p>Page 10</p>	<p>Starting on the bottom of pg. 10, it is stated “In this regard, there are different types of mineral resources to consider in applying and understanding what the Provincial vision is based on, with shale resources being required for brick making (primarily for aesthetic reasons) and with other forms of bedrock being required for primarily roads and infrastructure.”</p> <p>This is a very interesting distinction and lens through which to view the analysis, but it is not clear what the other forms of bedrock are. The rest of the memo references shale and bedrock interchangeably and does not seem to return to this distinction, aside from 2 paragraphs in the middle of pg. 18 which do not go into much more detail.</p>
<p>Page 38 Section 5.2</p>	<p>This section discusses the measure “Retains areas for mineral extraction, which can be rehabilitated to high value agricultural areas”. The concept of rehabilitation back to an agricultural state is strongly supported (even beyond Provincial policy requirements).</p> <p>It is noted that the term “high value” is used rather than “prime agricultural”, is this to signal an expectation for rehabilitation to prior agricultural condition on all agricultural lands, not just prime? To strengthen this concept, could it say, “prime or high value agricultural lands”?</p> <p>Is there supporting evidence to demonstrate the feasibility of this approach? Are there many successful examples of rehabilitation back to an agricultural state? How does the cost of rehabilitation impact future land values- would rehabilitated land be affordable/accessible to agricultural operators? Should these sites be designated for Agricultural Purposes Only, to ensure they remain available for agricultural use over the long-term? Are additional policies/programs needed to ensure rehabilitation occurs? Guidelines to inform the extent/quality of rehabilitation, i.e. define what is meant by “high value”?</p>

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	<p>Was the extraction of aggregate resources below the water table, where rehabilitation to agricultural use is not possible, factored in to this measure?</p> <p>Is the value of retaining lands for extraction, outside of prime agricultural areas, considered through the broader evaluation (i.e. on the premise that it may reduce pressures for extraction on prime agricultural lands)?</p>
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Appendix J: North Aldershot Policy Area

Page Number	Comment or Question
General	<p>From a policy perspective, City planning staff are supportive of the Region’s general conclusions regarding the constraints to urban development for lands within North Aldershot that are not the subject of existing development approvals or Minutes of Settlement that contemplate potential residential development. Specifically, Minutes of Settlement between the City and Paletta International Corporation regarding Paletta’s Eagle Heights lands within North Aldershot recognize Eagle Heights as an approved residential development. Paletta is also seeking to amend its approved development to permit a revised development form. The Minutes of Settlement confirm that the City is supportive of the proposed revised development provided that it is in accordance with the Minutes of Settlement and complies with all applicable law, policies and regulations.</p>
General	<p>It may be helpful to reference the North Aldershot Planning Area Discussion Paper somewhere in the introduction, to provide the context as to why the NAPA was considered separately from the other areas identified as potential sites for an urban boundary expansion (i.e. that the provincial policy analysis had to occur first, to determine the applicable land use- urban, rural settlement or rural- which informed the further application of PPS and Growth Plan policies).</p>
General	<p>The IGMS section of the North Aldershot Area Discussion Paper outlined the provincial policies that would need to be considered in making a determination of whether a settlement area expansion into</p>

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	<p>North Aldershot would conform to the PPS and Growth Plan. The discussion paper also stated that the applicability of the policies will need to be further analyzed and confirmed as part of the development of the growth concepts. With respect to the settlement area expansion policy tests of the Growth Plan (2.2.8.3), it is noted that the technical memo highlights key policies. As such, it would be helpful for the reader to understand the approach to the analysis.</p>
<p>General</p>	<p>Based on the conclusions of the “North Aldershot Planning Area Discussion Paper” (June 2020), the “North Aldershot Policy Area Urban Expansion Assessment” (Feb 2021) and the “North Aldershot Water and Wastewater Constraints and Opportunities” (Feb 2021) technical studies, it has been determined that there are significant constraints to development in the North Aldershot area.</p>
<p>General</p>	<p>The City did not undertake a comprehensive review of its North Aldershot policies during the development of its new Official Plan, as this work was more appropriately undertaken through the Region’s Municipal Comprehensive Review and Integrated Growth Management Strategy. However, the City’s 2019 growth analysis work did not identify North Aldershot as a focus area for future growth and the only area flagged by City Council during the City’s Official Plan review, for future discussion through the Region’s process, was the Bridgeview community (E of Hwy 6, S of Hwy 6/Old York Rd interchange, & N of Hwy 403).</p> <ul style="list-style-type: none"> • The Bridgeview community was originally brought forward for consideration by a landowner. In response to previous staff directions from 2011 and 2013 (CD-14-2011 and PB-53-12-1), staff prepared report PB-42-14, and Council endorsed the recommendation that considering redevelopment of Bridgeview as part of the OP Review was premature. In April 2017, staff prepared report PB-01-17, which concluded that <i>“The appropriate time to consider Bridgeview is through the North Aldershot Comprehensive Policy Review related to the Region’s current Official Plan Review and municipal comprehensive review processes.”</i>

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General	<p>Given the significant servicing constraints identified in the “North Aldershot Water and Wastewater Constraints and Opportunities” study (Feb 2021), as well as the extensive natural heritage system components present in the area (including the Cootes to Escarpment EcoPark System, which the City has previously recommended to the Province for inclusion in the Greenbelt Area), it is unlikely that urban expansion in the North Aldershot area would support climate-related planning objectives as much as a focus on building complete communities via intensification.</p>
General	<p>Therefore, apart from historic obligations under the Eagle Heights Minutes of Settlement, the City is supportive of the Region’s conclusions that the North Aldershot Policy Area as a whole does not merit consideration for settlement area boundary expansion, when compared to the areas identified as potential areas for settlement boundary expansion in the four Growth Concepts.</p> <ul style="list-style-type: none"> • Minutes of Settlement between the City and Paletta International Corporation regarding Paletta’s Eagle Heights lands within North Aldershot recognize Eagle Heights as an approved residential development. Paletta is also seeking to amend its approved development to permit a revised development form. • The Minutes of Settlement confirm that the City is supportive of the proposed revised development provided that it is in accordance with the Minutes of Settlement and complies with all applicable law, policies and regulations.
Page 22	<p>Within the conclusion section of the memo, it states that through the HUSP and ROPA 38 process that extending the urban area into the NAPA was not a consideration and provides some details as to why. It would be helpful to include this information earlier in the memo when the HUSP and ROPA 38 processes are discussed.</p>

Appendix K: Evaluation Summary

Page Number	
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	Comment or Question
General	Appendix K provides an evaluation of the growth concepts from a high level regional perspective and as such, the evaluation lacks local context especially in terms of transportation and finance considerations. The evaluation framework and the technical appendices that underpin them are built on high-level assumptions that may be subject to change over time and do not take into consideration the local context and impacts of the growth concepts.
General	Overall the suggestion that a higher share of low-density housing units show better fiscal outcomes, that the concepts do not differ in the Transportation assessment and that concepts that propose more greenfield expansion are more advantageous for employment all are challenging to understand. On the surface it seems to suggest that the addition of more greenfield land is good from a financial and employment perspective and benign from a transportation perspective.
General	Suggest a small section at the end of the document that attempts to describe a path forward for distinguishing among the concepts where it appears little differentiate the currently.
General	It is encouraging to see climate change embedded throughout the Evaluation Summary as a key Theme in light of the current climate emergency. However, the lack of measurable data against which to evaluate each concept through a climate change lens results in an inability to effectively determine which concepts would perform better. This is especially striking in instances like the Transportation Analysis where the technical report finds that there is no measurable difference across concepts despite substantial differences in compactness and use of greenfield for development.
Page 9 Section 2, 1.2	While concept 3 has the greatest quantum of employment land conversions, suggest that the discussion could reference that concept 3 will generate more opportunities for new employment forms which are described as: office and other relatively intensive employment uses that are attracted to amenities of a mixed-use community distinct from office buildings that occur in employment areas.
Page 13	More density provides more choice and access to neighbourhoods, unit types and affordability. Since the existing built form in these

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Section 2, 1.4.1	areas are predominantly ground related (80% in 2021), wouldn't the introduction of more intense forms of development create more diversity and a greater mix? Suggest adding the point that the local municipalities are largely developed including lower density ground related housing. The total mix of unit types should be discussed, and the diversity of the total mix should be cited as an important consideration.
Page 14 Section 2, 1.5.1	Response to bullet point number 3: see comments above
Page 16 Section 3, 2.1	Do all concepts perform equally well? See Transportation technical report comments.
Page 23 Section 3, 2.3.3	Bullet point number 2: Clarify - Does this mean rental units? Or condos? what is the ratio?
Page 24 Section 3, 2.4.1	The report is unclear as to how concept 4 performs the same as the other concepts. It is specifically noted that less intensification provides fewer opportunities for integration.
Page 31 Sections 3 and 4	While it is encouraging that Climate Change has been embedded throughout the evaluation, it really only comes up in sub sections of sections 3 and 4. The lack of measurable data against which to evaluate each concept through a climate change lens results in an inability to effectively determine which concepts would perform better
Page 39, Section 4.4	In the analysis moving forward, the economic impact of preserving agricultural lands and enhancing the long-term viability of the agricultural system should be factored into “Theme 4: Growing the Economy and Moving People and Goods”, even if Provincial policy is focused on traditional employment. The inter-relationship should, at the very least, be acknowledged conceptually.