

[REDACTED]
Burlington
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City of Burlington
426 Brant Street
Burlington
L7R 3Z6

2nd December 2022

Dear Mr. Douglas,

Re: 1010 Downsview Dr. and 355 Plains Rd. East

I am writing to you with concerns I have regarding the pending development application for the above mentioned properties (White Oaks Plaza). I am unable to attend the Statutory meeting on the 6th December so please accept my written comments instead of an in person delegation.

I take particular issue that the mixed use general (MXG) zoning designation is being used as a means of gaining intensification at the expense of retail. One only has to review the recent development projects on Plains Road to realize just how minimal the retail options will be as a result of these mixed use developments. To quote some recent applications where the retail space built was significantly less than the space being displaced:

1. 35 Plains Rd East – 2,473 square feet
2. 348 Plains Rd East – 2,000 square feet
3. 484 Plains Rd East – 10,748 square feet

Simply put, the adoption of MXG is merely accelerating the decline of retail and commercial outlets along the Plains Road corridor and leaving the ward residents with fewer local amenities.

It is interesting to read the applicant's justification report¹ in support of their application in which they state:

Planning for the proposed development has been guided by the principles for achieving a complete community which includes the connection and integration of compatible land uses, the achievement of a walkable community where residents can walk to work, shops, services and

¹ <https://www.burlington.ca/en/news/resources/Current-Development-Projects/Ward-1/Coletara-Development---1010-Downsview-Dr.-and-355-Plains-Rd.-E/Supporting-Documents/11.-Planning-Justification-Report.pdf>

park areas, the provision of a diversified range of housing options, and the inclusion of several mobility options. The proposal provides for the completion and build out of the Subject Lands with 584 residential units along with 628.6 m² of ground floor retail.

The breakdown of the retail units, as taken from the architectural plans²:

- Unit 1: 1,454 ft²
- Unit 2: 1,633 ft²
- Unit 3: 888 ft²
- Unit 4: 925 ft²
- Unit 5: 984 ft²
- Unit 6: 882 ft²

Offering 628.6 m² of retail space through 6 units – which is a mere 1.3% of the proposed total gross floor area (48,695.5 m²) - is hardly a sound justification for eliminating the vast retail footprint that is currently offered at this location.

In fact, the applicant seems to acknowledge this themselves on page 14 of their report when it was already raised as a major issue during the initial planning stages:

Retail

Those in attendance raised concerns regarding the loss of the retail plaza and the necessity for the provision of at-grade retail. There is a concern that there is limited retail in the community and small retail units at grade will not adequately service the community.

Response

Although ground floor retail is not a requirement in the planning policies, it has been included in the development proposal to help create a pedestrian friendly animated street. Sufficient retail parking has been provided on site to service the proposed retail. Existing tenants are welcome to request units in the proposed development to remain in the community. The Aldershot community does not have any available land for large scale retail, therefore it is important to provide for mixed use buildings to allow for increased density while still providing amenity for the community.

The applicant's response is inadequate. The White Oaks Plaza contains a number of commercial properties that include a restaurant and a café. How can existing tenants like these be accommodated in the proposed new building(s) given that I see no provision for any kind of commercial venting in their design? As you are aware, proper venting would be required for a restaurant or cafe in order to meet fire code regulations. It is simply not possible for the existing tenants to be rehoused as the applicant purports.

² <https://www.burlington.ca/en/news/resources/Current-Development-Projects/Ward-1/Coletara-Development---1010-Downsview-Dr.-and-355-Plains-Rd.-E/Supporting-Documents/5.-Architectural-Plans.pdf>

Furthermore, under the Evaluation of Healthy Community Guidelines (Mobility section), the applicant states on page 34 that they are in compliance of the proposed development:

The additional residential density will support a variety of commercial uses within walking distance, including the many commercial uses located along Plains Road.

I fail to see how increased residential density can support commercial uses given that all of the existing retail space on the site will be lost. How is this achieved?

The intensification currently occurring within Aldershot, in its current form, will not lead to improved retail options and this proposal is evidence of that by only offering a meagre 628.6 m² for retail space. Retail and commercial opportunities are being eroded and permanently lost.

As I have previously mentioned on other applications I have submitted and/or delegated on, I would like to advocate that commercial venting should be mandatory on all new mixed use applications that exceed a certain height (perhaps this could be 8+ storeys and done through zoning by-laws), as this would expand the variation of retail possibilities (e.g. restaurants and cafes would become feasible). Skimping on commercial venting should not be allowed as it only guarantees that there will be a lack of retail variety. We need better zoning by-laws that govern the specific retail component of MXG. As of now, an applicant can propose an 11 storey with increased density, put a vending machine on the ground floor and have it pass under MXG.

One only has to look at the MXG applications submitted in the past few years and there is not a single one that includes any kind of provision for commercial venting in their design. This effectively eliminates a subset of retail (restaurants, pubs, cafes) that the Plains Road corridor really needs.

In order to increase the retail variety within Aldershot, there needs to be a mechanism in place that will enable quality and variety of retail establishments at the initial planning application stage. I believe that mandatory commercial venting would go some way in helping achieve that goal and would reinforce the "walkable community" message that the City proclaims. The current development path that we are on, and that is endorsed by weak zoning by-laws, is simply not sustainable and will eventually lead to the demise of retail along the entire Plains Road corridor as all the small plazas are acquired and converted to residential with shoebox style partitioned units masquerading as retail space.

I would be grateful if you could acknowledge safe receipt of this letter.

Yours sincerely,

Stephen Miller