

March 27, 2023

Mayor and Members of Council
Community Planning, Regulation and Mobility Committee – City of Burlington
426 Brant St
Burlington, ON

CPRM March 28, 2023
ES-02-23
Correspondence from WE HBA

West End Home Builder's Association | Submission on Proposed Park Provisioning Master Plan

The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Burlington. The WE HBA represents approximately 300 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. In 2022, the residential construction industry employed over 5,300 people, paying \$362.8 million in wages, and contributed over \$701 million in investment value within Burlington.

The WE HBA is concerned that through the work completed to date on the Park Provisioning Master Plan, the City of Burlington prioritizes the development and acquisition of parkland over a pressing need for a significant increase in housing supply. The report provided emphasizes that Burlington has the highest amount of parkland per person out of all the comparable municipalities surveyed, and thus does not have a shortage of parkland. The City is currently well in excess of its own parkland standard, and significantly beyond standards established in the *Planning Act*. In direct contrast, Burlington is facing a historic shortage of housing that is creating significant pressure on housing attainability for newcomers, families, and young people. This is a generational challenge that is creating significant inequities for young people that may wish to live in Burlington. Significant City of Burlington resources should be directed towards the more rapid processing of development applications to help remedy the housing supply shortage.

Through broad stakeholder engagement, the City of Burlington developed a Housing Strategy built on the vision of "*Everyone is Welcome in Burlington*". The proposed Parks Provisioning Master Plan could have a contradictory impact, should the burden of new park development and acquisition be downloaded onto the consumers of new housing supply (renters and home buyers). As such, WE HBA appreciates that the city will shift towards a multi-faceted approach to providing quality parks with less dependency on development (and the next generation front end financing parkland through charges levied on new development) as a primary means for acquiring parkland. With this in mind, WE HBA has several questions on the Proposed Park Provisioning Master Plan outlined under Appendix A. **We are requesting a response to these questions, a detailed inventory of the City's existing park assets, and broader stakeholder engagement with the development community prior to the adoption of the Park Provisioning Master Plan.**

Regards,



Michelle Diplock, MPI, RPP
Manager of Planning & Government Relations
West End Home Builders' Association



Appendix A: Altus Group Economic Consulting – Review of Burlington Parkland Study



March 24, 2023

Memorandum to: Victoria Mortelliti
BILD

Michelle Diplock
WEHBA

From: Daryl Keleher, Senior Director
Altus Group Economic Consulting

Subject: Review of Burlington Parkland Study
Our File: P-6874

Altus Group Economic Consulting was jointly retained by BILD and WEHBA to review the City of Burlington's Park Provisioning Master Plan, dated March 2023 ahead of the March 28, 2023 Community Planning, Regulation and Mobility Committee. This memorandum provides our high-level comments and questions from our review.

Current Level of Service 5.5-Times Higher than Planning Act Standard (and 2.8-times Higher than Pre-Bill 23 Standard)

According to the study, the 'current level of service' was determined through the combination of the catchment analysis, park pressure analysis and park function analysis.

City of Burlington Parkland Provision

Type of Park	Park Area <i>Hectares</i>	% of Park Area	% of Parks
City Park	235.0	33.9%	8%
Community Park	138.2	19.9%	9%
Neighbourhood Park	141.8	20.4%	44%
Parkette	10.9	1.6%	25%
Special Resource Areas & Linkages	168.1	24.2%	15%
Total	694.0	100.0%	101%
Total Private Dwellings (2021)	74,891		
Current Parkland Provision (2021)	5.56 hectares per 600 units		
Planning Act Requirement	1.00 hectare per 600 units		

Source: Altus Group Economic Consulting

The estimate includes usable and non-usable space within City parks, but excludes other open space and natural areas owned by the City such as creek areas, and an additional 460 hectares of natural open

space and parks owned by Conservation Halton. Additional open space is provided in the form of school fields and playgrounds.

Even without the City-owned open space and natural areas being accounted for, according to Figure 11 of the Master Plan, the City’s “existing service level” of 3.7 hectares per 1000 people is by far the highest service level in the municipalities surveyed:

Figure 11: Comparable Municipal Service Level Targets



Priority Acquisition Areas

By 2041 areas that will have a 25% or greater decrease in per capita park area. Given that the City is well in excess of its own parkland standard, and significantly beyond the Planning Act standards, many areas of the City are likely to have such a substantial surplus of parkland, that even a 25% decrease would still leave it well above the City’s standard. The metric to identify “Priority Acquisition Areas” should be reconsidered.

Walking Distance & Major Park Amenities

The focus in the report is on 400-metre catchment areas, however, this is appropriate for local parks, but may be less practical for larger parks with City-wide amenities. It is impractical for the City to expect ALL park needs needing to be within a 400 metre walk, as some uses, such as soccer fields, ball diamonds, etc. are more likely to be located in larger, regional parks that are more difficult to have available to every home within such a small radius.

In describing “Community Parks”, the Master Plan states that these parks are to service “larger residential districts” and not just the 400 metre catchment area used throughout the study to define parkland needs:

Community parks are larger parks designed and located to serve the outdoor recreational needs of several neighbourhoods within a larger residential district

In the City of Toronto's 2022 parkland study, it used a 500 metre radius as the basis for a 'walkable distance'. Can the City of Burlington provide a rationale why it used 400 metres instead of a more typical 500 metre radius to represent a 5-minute walk?

Residual Need and Sports Fields

The Master Plan states that 51.48 hectares are based on the identified needs of each individual area, including:

When looking at the future parkland need from an individual policy area, the total amount of land required is 51.48 hectares by 2041.

However, the Master Plan finds that there is 104 hectares of parkland needed to be added by 2051, which includes the 51.48 hectares by local area as follows, with only 27.48 hectares identified for the key growth areas of the City.

Figure 3

Area	Identified Amount of Park Need	2041 Parkland Target Service Level by Area
Burlington GO UGC	7.76 hectares	1.0 hectare per 1000 ppl
Aldershot GO UGC	6.62 hectares	1.0 hectare per 1000 ppl
Appleby GO UGC	2.88 hectares	1.5 hectares per 1000 ppl
Downtown Urban Centre	1.81 hectares	1.2 hectares per 1000 ppl
Uptown	1.64 hectares	2.0 hectares per 1000 ppl
Corridors	2.58 hectares	0.2 hectares per 1000 ppl
Designated Greenfield Areas	4.16 hectares	1.0 hectare per 1000 ppl
Remaining Built-Up Areas	Not stated	2.8 hectares per 1000 ppl
Rural Areas	Not stated	4.0 hectares per 1000 ppl
Total	Total (excluding RBUA and Rural) = 27.48 hectares	

The total also includes 36 hectares in land requirements to 'maintain existing service levels' for new rectangular sports fields by 2041, and an additional 14 hectares for recreational diamond/field needs by 2051.

Beyond the issue where the 51.48 hectares of parkland are not specifically shown beyond the 27.48 hectares shown for the UGCs, MTSAs, Uptown, Corridors and DGA, there are additional key issues with this approach:

- It is unclear why the area-specific parkland standards change from one area to the next – as one example, Appleby GO has a parkland standard of 1.5 hectares per 1000 people, while Aldershot GO has a parkland standard of 1.0 hectares per 1000 people.
- The need for additional sportsfields should give an indication of how the new parks should be programmed, or how existing parks are re-programmed, not used as a justification for additional land itself. The need to bring amenity-specific service levels to target is only an indication of the lack of amenities and how parkland is programmed, not an indication of the lack of land available. That the City's parkland provision is 2.8-times higher than the old Planning Act alternative standard, without accounting for open spaces and natural areas suggests that the lack of land is not the reason why certain types of amenities have fallen below the City's standard.
- The breakdown of parkland needs within the 2041 horizon (51.48 hectares based on local area needs to achieve 2041 targets and another 36 hectares for sportsfields) and within the 2041-2051 horizon (14 hectares) are not consistent with the overall City-wide target. While the study implies that the vast majority of identified parkland needs accrue pre-2041, the split does not appear proportionate to population growth:
 - The breakdown above implies that 86.2% of the parkland needs to 2051 will accrue over the 2021-2041 period, and the remaining 13.8% will be additional needs arising over the 2041-2051 period. This breakdown would require the additional population pre-2041 to provide parkland at a rate of 1.63 ha per 1000 people, while post-2041 development would provide parkland at a rate of 0.67 ha per 1000 people.
 - Table 25 shows the need for additional parkland to 2051, which it calculates as being 104 hectares to service a population of 265,160 persons. However, if the parkland need analysis was done over the 2021-2041 and 2041-2051 and the needed growth in parkland was proportionately allocated between the two periods based on the respective shares of population growth, the split would be 68% (or 71.2 hectares) pre-2041, and 32% (or 32.8 hectares) post-2041.

Figure 4

Breakdown of Calculated Parkland Needs to 2051, by Period, City of Burlington

Additional Parkland Need 2021-2041	Existing Parkland (ha)	Population	Service Level Target	Total Parkland at Service Level	Additional Parkland vs. 2021	Share of Additional Parkland
City-Wide (2021)	691.50	186,948	3.70 ha per 1000	691.50	-	
City-Wide (2041)	691.50	240,500	3.17 ha per 1000	762.70	71.20	68%
Additional Parkland Need 2021-2041						
City-Wide (2041)	691.50	240,500	3.17 ha per 1000	762.70		
City-Wide (2051)	691.50	265,160	3.00 ha per 1000	795.48	32.78	32%
Total 2021-2051					103.98	100%

Source: City of Burlington, Park Provisioning Master Plan, March 2023