

## Supplemental Staff Memo

---

**SUBJECT:** Memo providing information regarding P3 parking opportunity, protection of rental stock, additional information regarding affordable/attainable housing, downtown parking characteristics

**TO:** Council

**FROM:** Development and Growth Management  
Community Planning

Report Number: DGM-37-2025

Wards Affected: Ward 2

Date to Council: June 17, 2025

---

Staff Report DGM-37-25 was presented to the Committee of the Whole on June 10, 2025, which outlined staff's recommendation for approval for the proposed development. The Committee voted to approve DGM-37-25 with the following amendment:

Direct the Commissioner, Development and Growth Management to consult with stakeholders and report back by the June 17, 2025 Council meeting on any negotiations for any additional municipal parking assets that may be feasibly incorporated into the development proposal potentially funded by the Downtown Parking Reserve Fund – Growth (SD-06-25).

Committee also requested that Staff follow up to provide additional details for Council's consideration. The additional information falls into the following categories: 1. Public-Private Partnership (P3) Municipal Parking Opportunity; 2. Purpose-built Rental Protections Against Conversion; 3. Definition of Affordable/Attainable Housing; and 4. Downtown Parking – Status and Study.

Since the Committee meeting, staff have engaged with internal staff, and this memo represents staff's response to Committee's requests.

### 1. Public- Private Partnership (P3) Municipal Parking Opportunity

Staff were directed to initiate discussions with Reserve Properties in regard to the opportunity

to pursue P3 parking opportunities as part of the forthcoming development at 409 Brant Street. Specifically, it was asked if it was financially viable to construct an additional level of underground parking and sell to the city for public use.

Staff initiated discussions with the applicants who provided the City with a formal response which indicated that the applicant appreciated the City's collaborative approach and willingness to consider innovative solutions to expand downtown municipal parking supply. The applicants completed a high-level review of the feasibility of constructing an additional level of underground parking, and it was estimated that the cost to construct one additional level of parking (approximately 35 stalls) would be approximately \$5.1 million dollars. Staff have confirmed that the Downtown Parking Reserve Fund - Growth has a current balance of \$7.59 million dollars.

It was also noted that adding another level of underground parking would require a significant project redesign, delaying the start of construction by several months which would jeopardize the developer's ability to meet an imminent construction start deadline that is tied to CMHC funding.

Staff do not recommend further pursuing P3 parking opportunities as part of this development given the estimated cost and risk to the project timeline and CHMC funding commitments. However, consideration of P3 partnerships and the role they may play in strategically expanding municipal parking supply in underserved areas will be addressed through the Downtown Parking Plan, will be before Committee in Q4 2025.

## 2. Purpose-built Rental Protections Against Conversion

Staff have reviewed the suggestion to include provisions that regulate parking rates for a purpose-built rental building, and for a condominium building in order to further safeguard against the potential for a conversion from rental to private ownership.

The Planning Act serves as the foundation for planning responsibilities and outlines what can be included in documents such as Zoning By-laws. The Act sets out what forms of uses can be regulated in Zoning By-laws, and states that planning authorities cannot regulate uses based on tenure. In this case, that means that uses cannot be differentiated based on whether or not they are privately owned or rented. As a result, the notion of establishing different parking rates based on tenure is not permitted by the Planning Act. It is noted that the applicants have indicated that their agreement with the Canadian Mortgage and Housing Corporation (CMHC) is tied to the delivery of affordable rental units. As such, while the City is not party to that agreement, it does provide some level of certainty that this project will proceed as a rental project with an affordability component.

The Regional Official Plan, local 1997 Official Plan and 2020 Official Plan all contain policies that are intended to preserve rental stock and ensure that if removals or conversions take place that replacements are offered.

The Regional Official Plan requires that municipalities use a threshold vacancy rate of 3%, when considering conversion or demolition of rental housing options.

The City of Burlington Official Plan (1997) and 2020 Official Plan offer similar policies to protect rental stock within the City. The policies state that conversion or demolition of rental units, in a building with six or more units should not be permitted unless:

- The vacancy rate for Burlington has been greater than 3% for the preceding two years;
- The building meets the Property Standards By-law, Ontario Building Code, and any other applicable law, or will be upgraded to comply with these standards;
- Where demolition occurs, replacement of rental housing units are provided for those units that are demolished;
- The negative economic and other impacts upon tenants are minimized; and
- The requirements of any applicable Provincial legislation or regulation, as amended, are met.

While the Official Plans have demolition and conversion policies related to protecting existing rental housing, there is not currently a by-law in place that would protect the loss of existing rental units at the building permit / demolition stage. Staff would point to Action 9 of the City's Housing Strategy, which is to 'Develop an approach to protect Burlington's rental housing stock'. This action proposes the development of an approach to address the low vacancy rate of the rental stock in Burlington and the loss of existing rental units. This action recommends building on the policy framework and/or regulatory approach (e.g. by-law) to protect Burlington's existing rental housing supply and to ensure that diverse housing options are available and that the overall supply of rental housing meets the needs of residents. This action was identified as a short-term action to be implemented by the City. Staff anticipate that the development of a rental replacement and demolition control by-law will be complete and brought to Council for approval by the end of 2025, which would further protect against the loss of new or existing rental units within the City.

### 3. Definition of Affordable/Attainable Housing

Affordable Housing is a defined term in the Burlington Housing Strategy, and reads as follows:

Housing with a market price or rent that is affordable to households of low and moderate income spending no more than thirty (30) percent of their gross household income.

1. Affordable rental housing should meet the demand of households at the low end, as described in the Region of Halton's annual State of Housing Report (found at <https://www.halton.ca/Repository/2023-State-of-Housing-Report>). Such households would be able to afford at least three out of ten rental units on the market.

2. Affordable ownership housing should meet the demand of households at the high end, as identified in the Region of Halton's annual State of Housing Report. Such households would have sufficient income left, after housing expenses, to sustain the basic standard of living.

Protections for rental housing stock is identified as a priority in the Burlington Housing Strategy which is a document that is intended to inform how the City will address the needs of the community as they pertain to housing. In order to provide protection for this vital housing option, staff are committed to bringing recommendations to Council by the end of the year that will further protect the existing rental options within the City.

### 4. Downtown Parking – Status and Study

The Downtown Parking Plan Existing Conditions Report can be found online at <https://www.getinvolvedburlington.ca/dtparking>.

A review of Downtown parking permit sales has indicated that of the 250 permits currently issued, 60 permits have been sold to downtown condominium/apartment addresses. This represents a combination of commercial/retail employee permits and resident occupant permits. Current permit sales trends do not suggest that residential parking demands are "spilling-over" to municipal parking facilities because of insufficient parking supply on-site. To further substantiate the permit sales analysis, a check of parking utilization during the Downtown Parking Plan study dates (Friday September 20th, 2024, and Saturday September 21st, 2024) was undertaken for all municipal off-street parking supply between the hours of 12:00 AM and 3:00 AM (indicative of downtown residents parking in municipal lots). The analysis revealed overnight parking utilization rates ranging from 10 to 11 percent on Friday and 7 to 12 percent on Saturday, equivalent to approximately 130 vehicles being parked in municipal parking lots overnight. Parking utilization data does not suggest that municipal

parking facilities are accommodating latent residential parking demand.

Finally, an examination of the Waterfront Garage for 24-hour occupancy (including overnight periods) was undertaken. The utilization patterns show distinct peak demands related to weekday business activity and the impact of events at the Burlington Performing Arts Centre (BPAC). On each of the days examined, the BPAC hosted events, with the Saturday event expecting 650 visitors (close to full seating capacity of the theatre). During peak demand, the Waterfront Garage was at 65 percent capacity.

The information provided above is intended to respond to the request for additional information from the Committee of the Whole meeting, on June 10, 2025.

**Authors:**

Benjamin Kissner, MCIP RPP  
Senior Planner – Development Review  
905-335-7777 ext. 7913

and

Bill Wallace, MCIP RPP  
Supervisor of Development Review  
905-335-7777 ext. 7809

**Attachments:**

A. Response Letter From Applicants Regarding P3 Parking Opportunity

**Memo Approval:**

Supplemental staff memos are reviewed and approved by the Commissioner.

June 9, 2025

Kaylan Edgcumbe, C.E.T.  
Manager, Integrated Mobility  
Transportation Services Department | Public Works Division  
City of Burlington  
426 Brant Street, P.O. Box 5013  
Burlington, Ontario L7R 3Z6

**RE: Public-Private Partnership (P3) Parking Opportunity – 409 Brant Street**

---

Dear Ms. Edgcumbe,

Thank you for your letter of June 6, 2025, and for reaching out on behalf of the Burlington Downtown Parking Committee to explore a potential P3 parking opportunity at our 409 Brant Street development. We appreciate the City's collaborative approach and willingness to consider innovative solutions for downtown parking.

As requested, we have undertaken a high-level review of the feasibility of constructing an additional level of underground parking to be sold to the City for public access. Our preliminary analysis, based on detailed assessments from our quantity surveyor, indicates that the construction of one level of underground parking (approximately 35 stalls) would come at a cost of approximately **\$5.1 million dollars (please find enclosed a draft of the initial detailed estimate)**.

More critically, however, is the impact such a change would have on the project's construction timeline. Incorporating another level of parking at this stage would require a significant project redesign, delaying the start of construction by several months.

Our 409 Brant Street development is supported by a substantial funding commitment from the Canada Mortgage and Housing Corporation (CMHC), which is essential to the project's viability. This funding is strictly conditional upon meeting an imminent construction start deadline. The delays associated with redesigning the project would make it extremely challenging to meet our obligations to CMHC, thereby placing this crucial government funding, and the project as a whole, in jeopardy.

Therefore, while we value the spirit of the partnership, the prohibitive costs and unacceptable risks to our project timeline and committed funding prevent us from pursuing this P3 opportunity at this time. However, we remain open to discussing and exploring potential concepts or ideas following zoning approval and prior to the commencement of shoring, provided they would not affect our project schedule.

We remain fully committed to delivering a high-quality development at 409 Brant Street that will contribute positively to the downtown core and provide much-needed housing for the community.

Thank you again for the discussion. Please do not hesitate to reach out if you have any further questions.

Respectfully submitted,



**Shane Fenton**

Partner/Chief Operating Officer

Reserve Properties Ltd. (on behalf of 409 Brant Street Limited)

110 Eglinton Ave E – Suite 500, Toronto ON, M4P 2Y1

416-440-2904 ext 225

shane@reserveinvest.com

**DRAFT COST ESTIMATE - ADDITIONAL LEVEL OF UNDERGROUND PARKING**

Current Owners Budget (Rental)	Cost per Sq. Ft (G.C.A)	Remarks	
	1 Level UG - 20,875 sq. ft		
<b>Project Costs</b>			
- Residential Construction	4,175,000.00	200.00	Based on an allowance of \$200 per sq. ft of below grade construction area (1 level) as per most recent estimates received from proposed construction managers.
- Residential Construction (Premium for additional Elevator)	100,000.00	4.79	Allowance for premium associated with additional elevator requirements.
- Hard Cost Contingency	208,750.00	10.00	Allowance carried equates to approx. 5% of the construction budget carried above.
- Construction Cost Escalation	0.00	0.00	Allowance for construction cost escalation TBD
- Construction Management Fee	149,308.88	7.15	Allowance for construction management fee at 3.33% of the above construction costs
- Building Permit Fees	18,386.39	0.88	Allowance for Building Permit Fees as per City of Burlington rates (2025) - parking garage.
- Misc Development Expenses	15,000.00	0.72	Allowance for Misc Development Expenses
- Legal and Administration Fee	10,000.00	0.48	Allowance for Misc. Legal and Administration Fees (Insurance, Legal Fees, etc.)
- Design Fees	100,000.00	4.79	Allowance for design fees associated with the proposed parking level.
- Finance Fees (Construction Loan Interest, etc.)	300,000.00	14.37	Allowance for interest carried on potential construction loan balance at time of UG construction at a rate of 4% for a period of 3 months.
- Soft Cost Contingency	23,554.74	1.13	Allowance carried equates to approx. 5% of the soft cost allowance above
<b>Sub-Total - Construction Cost</b>	<b>5,100,000.00</b>	<b>244.29</b>	

E & O.E as at June 9, 2025

June 12, 2025

City of Burlington  
Transportation Services Department, Public Works Division  
426 Brant Street, P.O. Box 5013  
Burlington, Ontario L7R 3Z6  
**Attn:** Kaylan Edgcumbe, Manager, Integrated Mobility

**Subject: Briefing Note considering the economics of ride-share vs car-share**

---

Dear Ms. Edgcumbe,

We are writing in response to the question posed at the City of Burlington's Council of the Whole meeting on June 10, 2025 (Agenda item 13.1), which was to better understand the economics of carshare vs ridehailing services and the strategic value of dedicated car-share parking spaces in supporting Transportation Demand Management (TDM) objectives. We summarize our response below.

## Definitions

- **Car-share** is a car rental service for brief periods of time (typically hourly), which includes insurance and gas (with some exceptions). The vehicle is booked ahead of time and drivers usually have to walk or travel short distances to reach the vehicle.
  - In the GTHA, Communauto, Enterprise CarShare, and Zip Car are the major car-share providers, each with different pricing models, featuring a combination of a membership fee, hourly rate, and distance fees. For example, Communauto drivers pay as low as \$3.60 per hour plus a \$0.30 per-kilometre charge with a \$30/month membership fee.<sup>1</sup> Zipcar offers a monthly or annual membership (between \$90-\$108/year) and drivers can drive up to 200 km per day paying an hourly rate between \$10-\$20.<sup>2</sup> Enterprise CarShare offers hourly rates as low as \$7.22 with 200 km per day included with a \$10/month membership.<sup>3</sup> The different pricing models offer flexibility to drivers based on their needs.
- In the residential context, car-share companies work with property management to set up accounts for residents who pay for their usage of the car-share vehicles. Property management can also allow

---

<sup>1</sup> Communauto Ontario. "Fee Schedule." 2025. <https://communauto.com/wp-content/uploads/pdf/ontario/ontario-fee-schedule.pdf>.

<sup>2</sup> Zipcar. "Rental car rates." 2025. Accessed June 11, 2025. <https://www.zipcar.com/en-ca/pricing>.

<sup>3</sup> Enterprise Holdings. "Toronto car sharing." 2025. Accessed June 11, 2025. <https://www.enterprise-carshare.ca/ca/en/programs/retail/toronto.html#plans>.

visitors (i.e., non-residents) to access and use these vehicles as long as if they are parked in publicly accessible locations.

- **Ride-hailing** is when a rider “hails” or pays for a personal driver to take them to where they need to go. These can be traditional taxis or Uber/Lyft (often known as transportation network companies). Pricing is typically based on a combination of base fare, booking fee, time, and distance, and can be subject to surge pricing during periods of high demand.<sup>4</sup>
  - **Ride-sharing** is often commonly used as a synonym to ride-hailing, but | to when ride-hailing rides are shared with others and are picked up along the way (e.g., Uber Share).
  - Taxi services as well Uber and Lyft are available in Burlington.
- **Transportation Demand Management (TDM)** focuses on the demand, i.e., the user and their experience, in accessing and using transportation. Through TDM programs and services, users can receive information, resources, support, and incentives to encourage them to try alternative forms of transportation. The goal of TDM is to decrease the incidences of driving alone so that fewer single occupancy vehicles (SOVs) are on the road, contributing greenhouse gas (GHG) emissions and leading to other health related deleterious impacts. TDM measures ensure that population growth can be accommodated without having to build more roads, which aligns with the City of Burlington’s Integrated Mobility Plan.

## Car-sharing vs ride-hailing as TDM measures

- Car-sharing and ride-hailing are recognized TDM measures that provide access to existing transportation vehicles and services for occasional use, thereby diminishing the necessity for private car ownership. Both services may encourage reliance on alternative transportation modes, offering first/last mile options to/from other modes such as public transit.
- Research consistently shows that households joining car-share services often sell existing vehicles or forgo planned vehicle purchases. For instance, a notable study found that average vehicle ownership in car-sharing households dropped from 0.47 to 0.24 vehicles per household, with 80% of these households becoming carless.<sup>5</sup> Other research indicates that each a car-share vehicle can remove up to 15 personally-owned vehicles from the road.<sup>6</sup> This reduction in car ownership translates directly into lower parking demand in residential developments and urban areas.
  - While ride-hailing is accessible for those without a driver’s licence, there is limited research that supports the notion that it replaces private car ownership. Research from Great Britain showed that in urban areas like London where alternative forms of transportation are available, ride-hailing can replace private vehicle ownership.<sup>7</sup>

---

<sup>4</sup> Uber. “Taxi Fare Calculator in Your City.” 2025. Accessed June 11, 2025. <https://www.uber.com/global/en/r/taxi-calculator/>.

<sup>5</sup> Martin, Elliot and Susan Shaheen. “The Impact of Carsharing on Household Vehicle Ownership.” Access Magazine, No. 38 (2011). [https://www.accessmagazine.org/wp-content/uploads/sites/7/2016/01/access38\\_carsharing\\_ownership.pdf](https://www.accessmagazine.org/wp-content/uploads/sites/7/2016/01/access38_carsharing_ownership.pdf).

<sup>6</sup> Innovation, Science and Economic Development Canada. “Car Sharing.” Updated January 30, 2024. Accessed June 11, 2025. <https://ised-isde.canada.ca/site/office-consumer-affairs/en/buying-and-leasing-big-ticket-items/car-sharing>.

<sup>7</sup> Bilgin, Pinar, Giulio Mattioli, Malcolm Morgan, Zia Wadud. “The effects of ridesourcing services on vehicle ownership: The case of Great Britain.” *Transportation Research Part D: Transport and Environment* 117 (2023). Uber also held its own “One Less Car Challenge” in 2024 and found that 20% of participants said they were likely giving up their vehicles for good. <https://www.uber.com/newsroom/one-less-car-results/>

- Uber recently conducted its own One Car Less Challenge and its Canada and US results found that people need reliable access to four other modes of transportation to replace their vehicle.<sup>8</sup> In the case of 401 Brant Street, given its location, residents will have access to walking, cycling, car-sharing, public transport on-site or within 100 m of their home.

## The Economics of Car-Share vs Ride-Hailing

- For short, direct, one-way trips without intermediate stops or waiting, ride-hailing is often more convenient and can be cost-effective.
- For round trips, multi-stop errands, transporting of bulky or many items, or trips requiring a vehicle for several hours, car-sharing generally becomes more economical. Furthermore, car-share is more amenable to transporting pets, which are often not allowed with ride-hailing services. Using ride-hailing for such trips can lead to rapidly escalating costs due to waiting times or the need to book multiple separate rides.
- An example of trips originating from 401 Brant St yield the following costs:

Trip purpose	Distance (round-trip)	Total time the car is in your possession*	Communauto (Value Extra plan) \$3.60/hr + \$0.30/km	Enterprise CarShare \$6.94/hr (100 km incl.)	UberX / Lyft (\$5.25 minimum each way)	Ideal choice
Grocery trip to No Frills (571 Brant St)	~1.2 km	1 hr (incl. 20 min in store)	\$3.96	\$6.94	\$10.50	Car-share
Weekly shop to Costco (Fairview & Brant)	~ 6.1 km	1 h 15 m	\$6.33	\$8.68	~\$16-18	Car-share
Day trip to Toronto (Union Station area)	~ 112 km	2 h 30 m	\$42.6	\$20.71	\$125-135	Car-share

- The decision for choosing between car-share and ride-hailing involve multiple factors as outlined above. However, if we conducted an analysis on cost alone to determine at what distance car-share would be more economical than Uber, the following analysis shows that Uber is more affordable if travelling less than 12.5 km to 21 km in a month, assuming that Uber’s base rate is approximately \$1.35/km and that someone is making 2-hour trips 4 times a month:

Service	Breakeven Point (km per hour)
Communauto	~14 km
Zipcar	~21 km
Enterprise	~12.5 km

<sup>8</sup> Uber. “The results are in: Car-light living is possible – and it may surprise you.” Uber Newsroom. October 29, 2024. <https://www.uber.com/newsroom/one-less-car-results/>.