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urban Metrics

1396 GUELPH LINE

Housing Impact Statement

Burlington, Ontario

Prepared for **Infinity Development Group**

March 8, 2022

urban Metrics

INFINTY DEVELOPMENT GROUP

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March 8, 2022

Arjun Anand
Infinity Development Group
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L6H 0C3

Dear Mr. Anand:

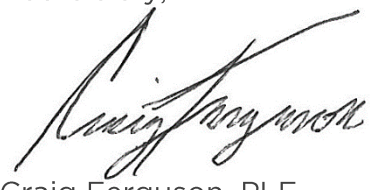
RE: 1396 Guelph Line – Housing Impact Statement (Burlington, Ontario)

urbanMetrics inc. ('urbanMetrics") is pleased to submit the following *Housing Impact Statement* in support of the application by Infinity Development Group ("Infinity"), to construct a high-density residential building located at 1396 Guelph Line, in the City of Burlington, hereafter referred to as the subject site.

The purpose of this *Housing Impact Statement* is to determine how the proposed development contributes to the Region of Halton's housing targets and more general affordable housing needs, and addresses the policies and requirements outlined in Section 3.1.1(2) of the City of Burlington *Proposed New Official Plan (2020)* (Interim Working Version).

It has pleasure conducting this assignment on your behalf and we look forward to discussing the results with you.

Yours truly,



Craig Ferguson, PLE
Partner
cferguson@urbanMetrics.ca

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Executive Summary

urbanMetrics inc ("urbanMetrics") was retained by Infinity Development Group ("Infinity") to prepare a *Housing Impact Statement* for their proposed development of a site known municipally as 1396 Guelph Line, in the City of Burlington, hereafter referred to as the subject site.

The Proposal

The subject site is currently occupied by Letter Carrier Depot, a 9,993 square foot Canada Post building. The proposal for the subject site includes the redevelopment of the site with a high-density residential development including 236-units with a mix of bachelor, one-bedroom and two-bedroom units.

The proposed re-development of the subject site will contribute towards increasing the supply of housing in the City. As per policies of Burlington's current *Official Plan (Office Consolidation December 2019)*, hereafter referred to as the Current Official Plan, the subject site is located within the *Urban Planning Area Boundary*, and is designated *Residential – Medium Density* on *Schedule B – Comprehensive Land Use Plan – Urban Planning Area*. The site is also located within the delineated built boundary of the city, meaning units on the site will contribute towards meeting the City's and Region's intensification targets going forward.

In completing a *Housing Impact Statement*, the Region's Terms of Reference identifies several elements that must be addressed. The table below summarizes these elements and how they are addressed in this report and on the subject site, in particular.

Policy	Analysis
1) Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the City's Proposed New Official Plan (2020);	
(i) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development of 236 apartment units on the subject site would contribute towards the Region's achievement of two housing targets: 3) **Policy 86 (6) a)** – As all units in the proposed development will be apartment units, the development will contribute towards the Region's achievement of the target that 50% of new units be in the form townhouse and apartment units. 4) **Policy 86 (6) b)** – As the proposed development is located within the built-up area, all units will contribute towards the Region and City meeting the intensification target.

	At this time, Infinity has not determined if any of the new units in the proposed development will meet the regional definition of affordable or assisted housing units. However, the increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply of housing to accommodate forecast demand. Also, by introducing a mix of unit formats and sizes, the proposed development would appeal to a range of current and future residents.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential rent or sale price for units in the proposed development has not been determined. If the development was to be constructed as condominium apartment units, it is not expected that the units will meet the Region's definition of affordable housing.
(iii) Where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable.	As this development includes only one building, it is not expected that the development will occur in phases.
(iv) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long term affordability of units, where applicable.	While Infinity is currently not committing to the development of affordable housing units on the subject site, the provision and inclusion of affordable housing City-wide could be supported by existing and potential future policies and mechanisms. These mechanisms include rent-geared-to-income assistance, the Halton In-Situ Program, inclusionary zoning and Community Benefits Charges.
2) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.	The subject site is currently occupied by a commercial building. The 236 units that are proposed will result in the denser form of development that will help the City and Region meet their housing needs. Based on the current concept plan for the subject site, 6% of units will be bachelor,

	71% of units will be one-bedroom units, with the remaining 24% of units being two bedrooms.
3) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report (note: the Region issues a State of Housing Report annually and any justification should reflect the current year report); and	As noted previously, by proposing to include apartment units at a location within the built-up area, the subject site would help achieve Policy 86(6) in the Regional Official Plan. The subject site would increase the overall supply of new housing units in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand.
4) Should identify and discuss other relevant and current housing information available.	If the City of Burlington develops an Inclusionary Zoning by-law, it will provide an opportunity to secure affordable units in new developments within PMTSAs. Furthermore, if the City were to implement a development permit system, it would provide an opportunity to also secure affordable units outside of PMTSAs, including on the subject site.

2.0 Introduction

urbanMetrics inc. ("urbanMetrics") was retained by Infinity Development Group ("Infinity") to prepare a *Housing Impact Statement* for their proposed development of a site known municipally as 1396 Guelph Line, in the City of Burlington.

2.1 Purpose & Approach

The City of Burlington requires that a *Housing Impact Statement* be prepared when more than 100 units are included in a development proposal. In completing a *Housing Impact Statement*, the City of Burlington has provided a Terms of Reference (TOR) to guide the preparation of the study. The TOR for the *Housing Impact Statement* outlines the following elements that are required:

- Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the City's *Proposed New Official Plan* (2020);
- Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.
- Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report (note: the Region issues a State of Housing Report annually and any justification should reflect the current year report); and
- Should identify and discuss other relevant and current housing information available.

Section 3.1.1(2) h) of the City of Burlington *Proposed New Official Plan (2020)* provides additional clarification on the items that must be addressed as part of a *Housing Impact Statement*. This includes:

(i) how the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units;

(ii) how the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;

(iii) where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable; and

(iv) the proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long term affordability of units, where applicable.

Each of these elements has been addressed in the following *Housing Impact Statement* and will be summarized in the conclusions of this report.

2.2 Subject Site

Location

The subject site is located at 1396 Guelph Line in the City of Burlington, Ontario. As shown in Figure 2-1, the subject site is situated on the west side of Guelph Line, at Palmer Drive. It comprises some 0.41 hectares of land (some 4,094 square metres). Currently, the majority of lands located on the west side of Guelph Line—surrounding the subject site—are developed with residential and some commercial uses. The subject site is currently occupied by a 9,993 square foot Canada Post building. Therefore, the proposed development of a 236-unit apartment building will help intensify the site, by adding residential uses to the site.

Figure 2-1: Subject Site Location



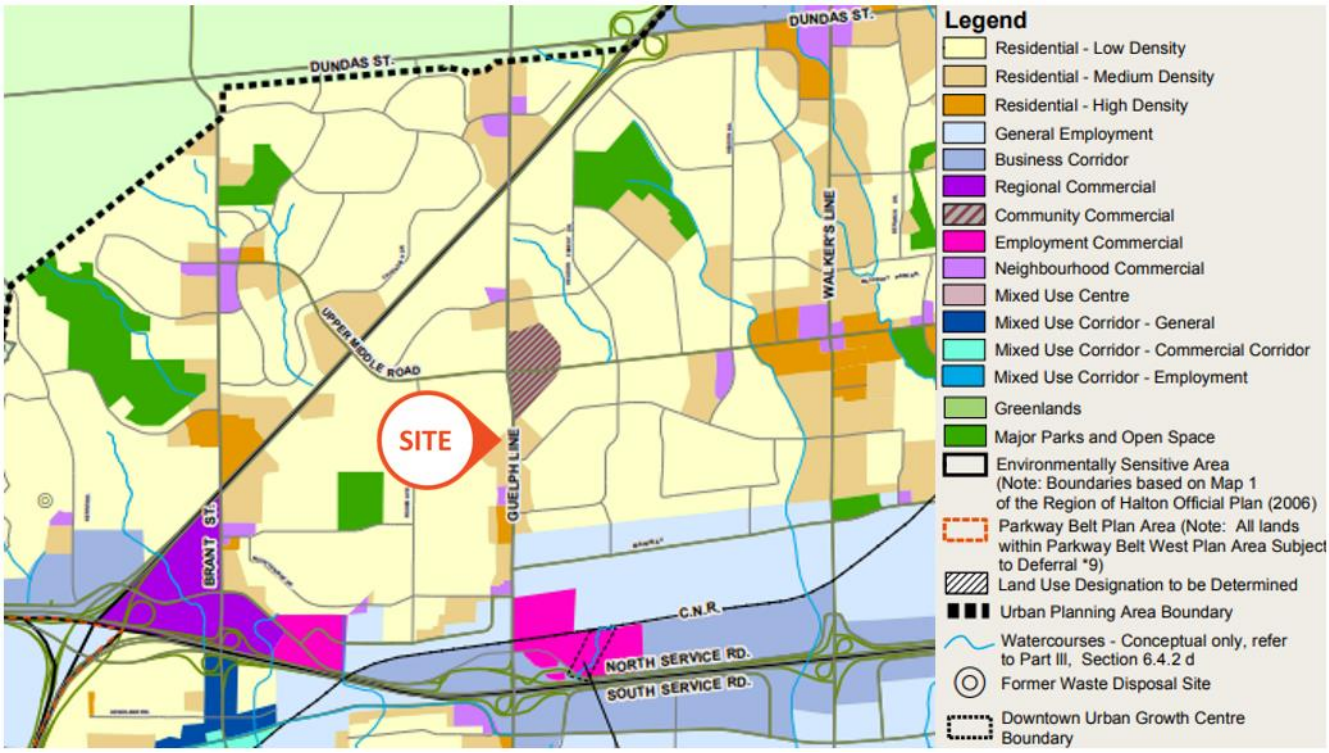
SOURCE: urbanMetrics inc., with Google Earth Imagery.

Planning Context

The *Halton Region Official Plan*, *Map 1: Regional Structure*, shows that the subject site is located on lands within the *Urban Area,* and is within the built boundary of the Region. *Map 3: Functional Plan of Major Transportation Facilities,* indicates that Guelph Line is a Major Arterial Road. Based on Policy 72.1(9) of this *Plan*, the subject site is located in an area where intensification and increased densities are to be promoted.

Map 1h – Regional Urban Structure of the *Halton Region Official Plan* identifies the subject site as being within the delineated Built Boundary, meaning units developed on the site will contribute towards meeting the City's and Region's intensification targets. *Schedule B – Comprehensive Land Use Plan – Urban Planning Area* of Burlington's *Current Official Plan*, shows that the subject site is designated as *Residential – Medium Density* (see Figure 2-2).

Figure 2-2: Schedule B – Comprehensive Land Use Plan – Urban Planning Area, City of Burlington Current Official Plan



SOURCE: urbanMetrics inc. based on City of Burlington's Current Official Plan (December 2019).

2.3 Proposed Development

Infinity is proposing to develop the site to accommodate a high-density residential development containing some 236 units.

Figure 2-3 provides details the project statistics related to the development, as currently proposed. It is anticipated the development will include a mix of bachelor, one-bedroom, and two-bedroom units. The broad unit mix proposed will contribute to the quantity and diversity of units in the built boundary of the City of Burlington.

At this time, Infinity has not yet determined if these units will be developed as purpose-built rental or condominium units, or how many units may qualify as affordable, based on the definition provided by Halton Region.

Figure 2-3: Overview of the Proposed Development

	Units	Share
Bachelor	13	6%
One Bedroom	167	71%
Two Bedroom	56	24%
Total	**236**	**100%**

SOURCE: urbanMetrics inc., based on data provided by Zedd Architects.

3.0 Halton Region Housing Context

This section of the report details the housing policies within applicable planning documents, including the *Region of Halton Official Plan*, the *Halton Region 2020 State of Housing Report* and the *City of Burlington's Current Official Plan* as well as *Proposed New Official Plan*. It also details the various definitions of affordable and/or assisted housing, and low to moderate income households, as defined by each of the *Plans.* We also note that the policies included in the aforementioned regional and municipal planning documents are generally consistent with the definition of affordable in the 2020 *Provincial Policy Statement* ("PPS") and conform to *A Place to Growth – Growth Plan for the Greater Golden Horseshoe* (the "Growth Plan").

3.1 Region of Halton Official Plan

The *Halton Region Official Plan* builds upon the policy direction and goals of the PPS and the Growth Plan. It provides clear direction about how development in Halton Region should take place, considering the current and future needs of residents.

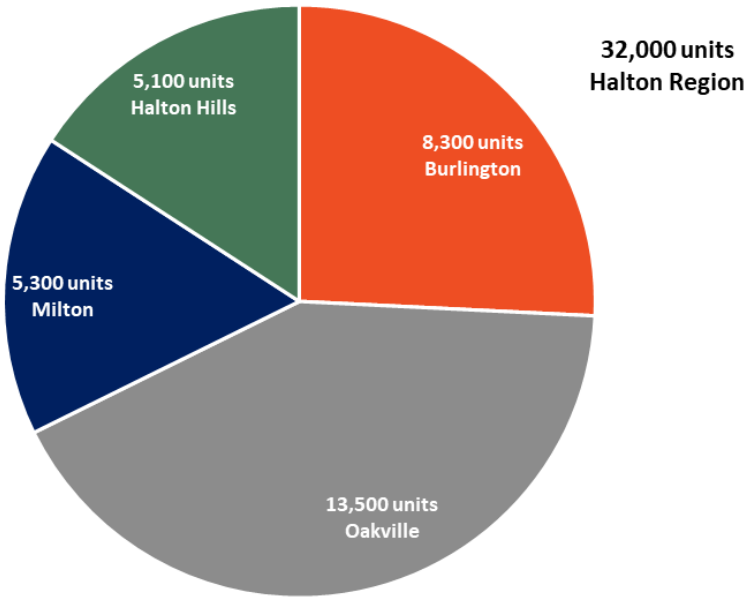
The subject site is located within the *Urban Area* of the Region, meaning it will contribute to meeting the policy directives in **Policy 77 (2.1)** of the *Plan*, that states:

> *"77. It is the policy of the Region to:*
>
> *(2.1) Direct, through Table 2 and Table 2a, to the Built-Up Area a minimum of 40 per cent of new residential development occurring annually within Halton in 2015 and every year thereafter."*

Where Table 2 and Table 2a provide the number of residential units to be accommodated through intensification in the various municipalities, as well as the regional phasing of intensification. Table 2 of the *Halton Region Official Plan*—as summarized in Figure 3-1—details that the City of Burlington is to add a minimum of 8,300 housing units to the Built-Up Area between 2015 and 2031. The proposal for the subject site, which includes 236-units, will contribute towards the City and Region meeting the intensification target.

It is notable that the Growth Plan now requires that 50% of all development in Halton Region to be accommodated within the built boundary. Further, as part of the ongoing Municipal Comprehensive Review ("MCR"), the Region is testing concepts with 50% to 80% intensification. Therefore, it will be increasingly important to accommodate units through intensification, including on the subject site, if the City and Region are to meet these targets.

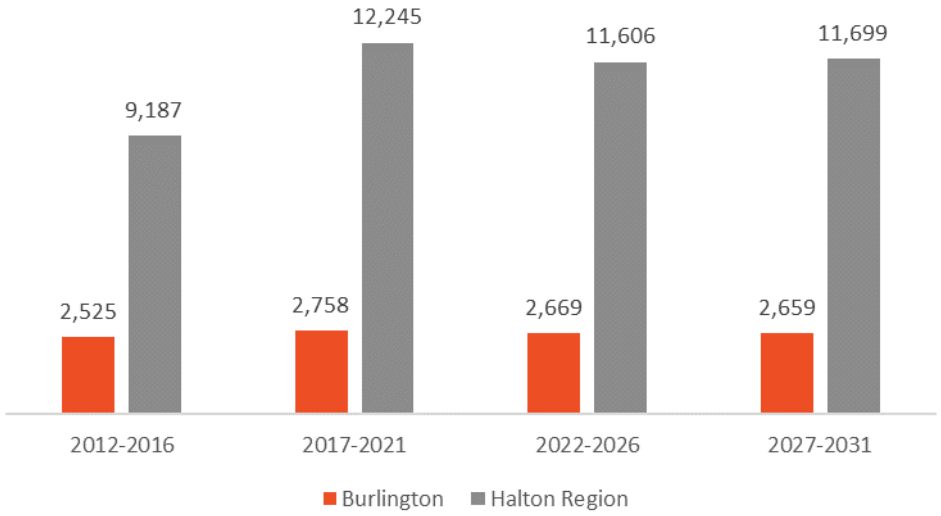
Figure 3-1: Minimum Number of New Housing Units in the Built-Up Area between 2015 and 2031



SOURCE: urbanMetrics inc., based on Table 2: Intensification and Density Targets in the Region of Halton Official Plan.
NOTE: Total new units for Halton Region represents 40% of the new housing occurring the Region between 2015 and 2031.

Table 2A of the *Halton Region Official Plan* provides phasing for intensification units for five-year periods between 2012 and 2031, as shown in Figure 3-2. Table 2 and 2A are included in Appendix A of this report. As shown, Burlington is anticipated to accommodate 2,669 units through intensification between 2022 and 2026. If the units on the subject site are constructed during this period, they would account for approximately 9.7% of new intensification units in the City.

Figure 3-2: Regional Phasing Inside the Built Boundary, City of Burlington 2012 to 2031



SOURCE: urbanMetrics inc. based on Table 2A: Regional Phasing in the Region of Halton Official Plan.

Subject Site

Located in the Built-Up Boundary of the City and Region, the proposed development of the subject site will effectively densify the site. By introducing residential units, the proposed development will also directly support the Region's and City's ability to meet their housing targets through to 2031. More specifically the subject site will account for approximately 9.7% of new housing units required in the Built-Up Area of Burlington between 2022 and 2026.

Part III Land Stewardship Policies of the *Halton Region Official Plan* has a section dedicated to **Housing** and details the goal of providing the people of Halton with an "adequate mix and variety of housing" in Policy 84. Policy 85 addresses the primary objectives for housing delivery and acquisition in the Region. In particular, and as it relates to affordable housing provision:

> *"85. The objectives for housing are:*
>
> *...*
>
> *To make more efficient use of existing developed lands, housing stock and available services to increase the supply of housing while maintaining the physical character of existing neighbourhoods.*

To meet housing needs through the provision of Assisted Housing, Affordable Housing and Special Needs Housing in Halton.

…"

Policy 86 addresses how housing will be effectively delivered in the Region. It emphasizes the importance of maintaining and delivering a variety and consistent supply of housing opportunities. In particular:

"86. It is the policy of the Region to:

…

(4) Define Affordable Housing for the Halton and local municipal markets based on the definition under Section 214.

…

(6) Adopt the following housing targets:

a) that at least 50 per cent of new housing units produced annually in Halton be in the form of townhouses or multi-storey buildings; and,

b) that at least 30 per cent of new housing units produced annually in Halton be Affordable or Assisted Housing.

(6.1) Establish, in conjunction with the Local Municipalities, annual targets for the production of housing units by density type and affordability for each Local Municipality, based on the Regional targets under Section 86(6).

(7) Provide annually a State of Housing report to Council that contains among other things:

a) an update of the definitions of Assisted Housing and Affordable Housing;

b) a review of housing supply, demand and need in Halton *during the past year, covering the various housing segments of* Assisted *Housing, Affordable Housing, Market Housing, Special Needs Housing and housing with universal physical access;*

c) identification of the gaps between supply and demand of Assisted Housing and *Affordable Housing;*

d) state of homelessness in *Halton; and*

e) performance of the housing market towards meeting the housing targets under Sections 86(6) and 86(6.1).

…

(11) Permit intensification of land use for residential purposes such as infill, redevelopment, and conversion of existing structures provided that the physical character of existing neighbourhoods can be maintained.

...

(21) Require Local Official Plans to provide an appropriate mix of housing by density, type and affordability in each geographic area, consistent with current and projected demands reflecting socio-economic and demographic trends."

As per **Policy 86 (4)**, affordable housing is defined in Section 214 of this Plan. It states that Affordable Housing is "housing with a market price or rent that is affordable to households of low and moderate income spending no more than 30 percent of their gross household income."

It also defines Affordable Rental Housing and Affordable Ownership Housing more specifically:

> *Affordable Rental Housing: "should meet the demand of households at the low end, as described in Halton's annual State of Housing Report, pursuant to Section 86(7). Such households would be able to afford at least three out of ten rental units on the market."*
>
> *Affordable Ownership Housing: "should meet the demand of households at the high end, as identified in Halton's annual State of Housing Report pursuant to Section 86(7). Such households would have sufficient income left, after housing expenses, to sustain the basic standard of living."*

The *Halton Region Official Plan* defines assisted housing as "*housing that is available to low and moderate income households for rent or purchase where part of the housing cost is subsidized through a government program.*"

It details that Low and Moderate Income Households are defined as:

> *"Those households defined through Halton's annual State of Housing Report, pursuant to Section 86(7), and in accordance with definitions of Affordable and Assisted Housing under Section 214 and 218. The income thresholds for low and moderate income households should not be more than those as defined in the Provincial Policy Statement."*

Subject Site

The proposed development increases the supply and variety of housing in this area. It does not conflict with neighbouring development, rather compliments existing housing, including on the east side of Guelph Line (Palmer Place Seniors) and just northwest of the site at 1284 Guelph Line (Mod'rn Condominiums).

The proposed apartment units also increase the diversity of housing in the area, helping the Region achieve an appropriate mix of housing at the local level. Indirectly, the new supply of housing on the subject site could support housing affordability by ensuring there is sufficient supply of units to accommodate forecast demand.

3.2 Halton Region State of Housing Report

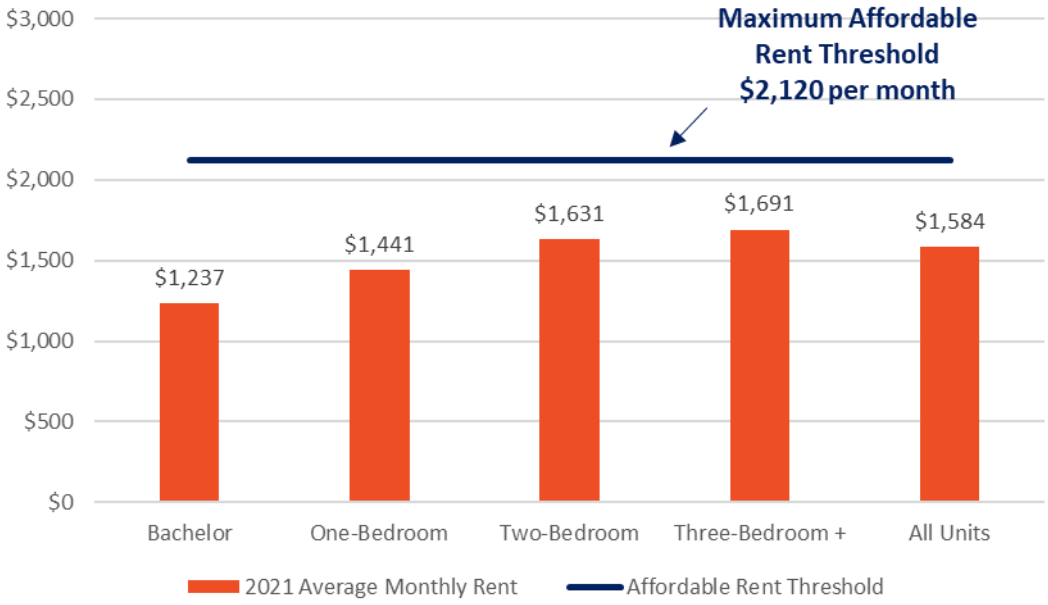
The Halton Region State of Housing Report has been produced annually by Halton Region since 2006. It provides a review of housing supply and demand in Halton and monitors the Region's progress in implementing the vision and policies included in the PPS and the *Halton Region Official Plan*. The latest report for the Region was completed for the year 2020.

Calculated through the Halton Housing Model and based on the *Halton Region Official Plan* definitions for affordable housing costs, the 2020 State of Housing Report details the upper limit household incomes (i.e., maximum purchase price or monthly rent) that a household with that income could afford. In 2020, the affordable (non-assisted) threshold for **ownership housing was $409,500**. This number is used to determine if the Region is achieving Policy 86. (6) of the *Halton Region Official Plan*, that 30% of new annual housing units are affordable or assisted. To that end, the maximum affordable threshold for rental housing in the 2020 State of Housing Report **was $2,120 per month**.

As noted earlier in this *Housing Impact Statement*, Infinity has not yet determined the tenure (i.e., ownership versus rental) for the proposed units on the subject site. If the units are developed as condominium apartment units, the ultimate sales prices for units will be based on the market demand for units. Similarly, if the units are developed as purpose-built rental, the monthly rent will be based on the willingness to pay by potential renters.

In terms of the purpose-built rental market, the 2020 State of Housing Report notes that in Burlington, the average monthly rent for purpose-built rental apartment units was below the maximum affordable rent threshold of $2,120 per month (Figure 3-3). Therefore, if the subject site is ultimately developed with purpose-built rental apartment units, it is possible that a portion of these units could meet the regional definition of affordable if the monthly rent was below the applicable affordable rent threshold at the time of development.

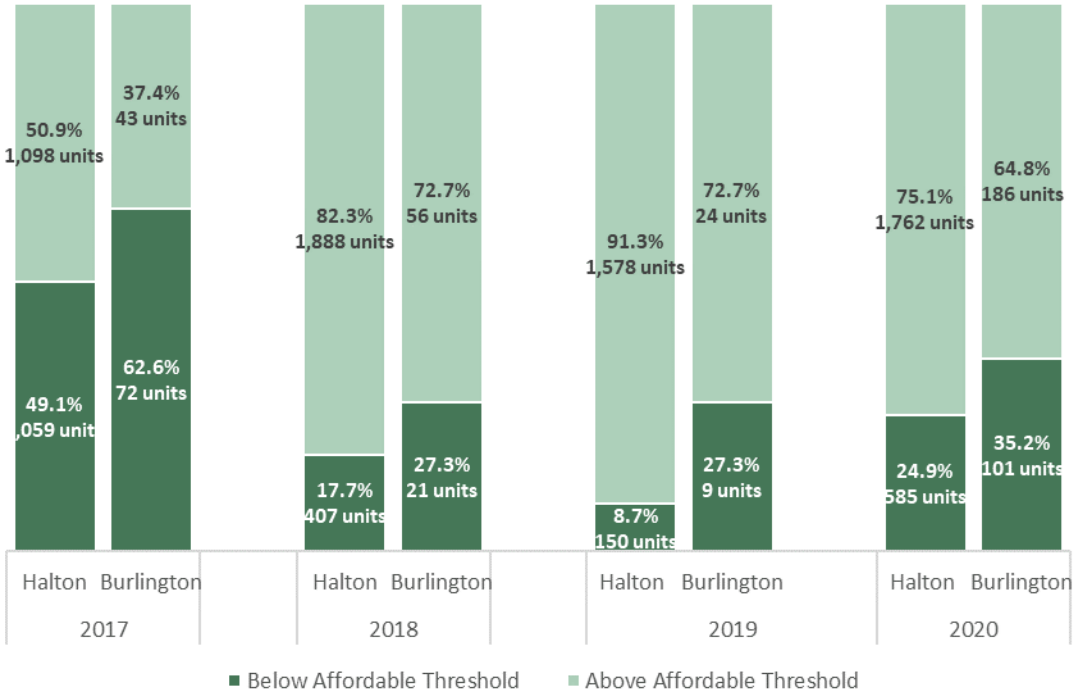
Figure 3-3: Purpose-Built Rental Apartment Average Monthly Rent by Unit Type, City of Burlington, 2020



SOURCE: urbanMetrics inc. based on 2020 Halton Region State of Housing Report.

The 2020 State of Housing Report also found that the percentage of new housing sales that meet the definition of affordable in the Region and the City of Burlington increased in 2020 after declining in previous years. In fact, Figure 3-4 shows that in 2020, nearly 25% of all new market housing units in the Region were considered affordable. This is up from only 8.7% in 2019. Similarly, in 2017 in the City of Burlington approximately 62.6% of new housing units sold were considered affordable. This has dropped to 27.3% of new housing unit in 2019, or only nine units. However, in 2020, the share of market units considered to be affordable rose to 35.2%, or 101 units.

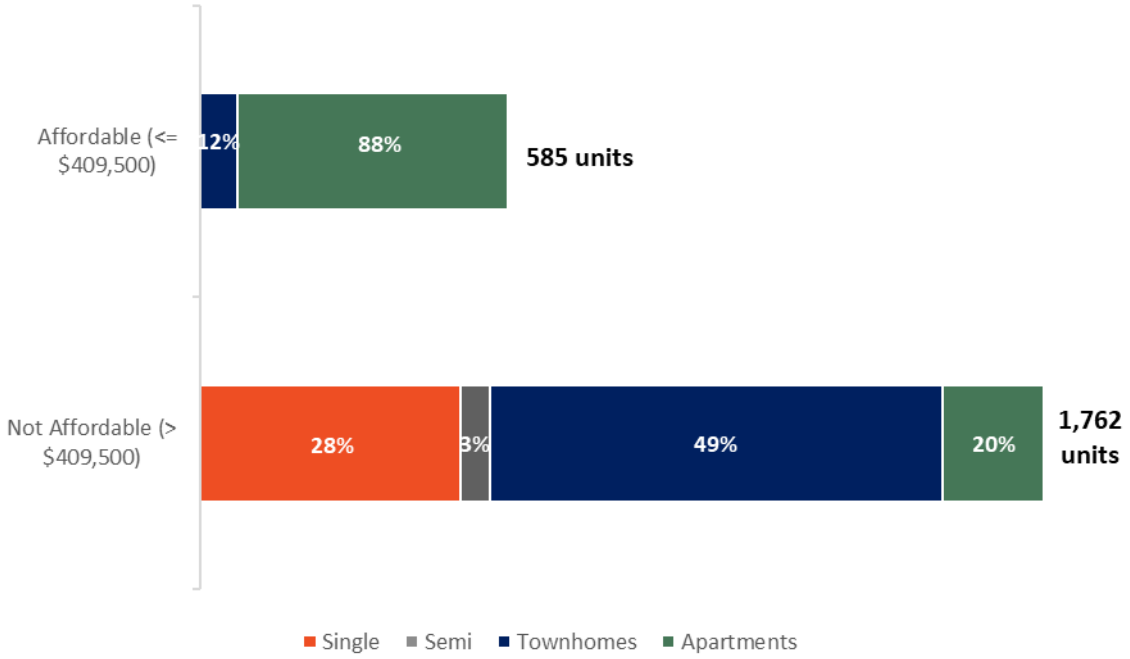
Figure 3-4: New Affordable Housing Sales based on Affordability, Halton Region and Burlington



SOURCE: urbanMetrics inc. based on 2017, 2018, 2019 and 2020 Halton Region State of Housing Report(s).

The 2020 State of Housing Report also notes that most affordable new housing sales were in the form of townhomes or apartment units. As shown in Figure 3-5, new townhome and apartment units comprised 100% of affordable new housing sales in the Region in 2020. This emphasizes the link between higher density housing and affordability in the Region. Therefore, if the subject site is developed with condominium apartment units, it will increase the supply of units that have a more attainable price, even if they do not meet the regional definition of affordable.

Figure 3-5: New Affordable Housing Sales, Halton Region, 2020



SOURCE: urbanMetrics inc., based on data from MPAC as included in the Halton Region 2020 State of Housing Report.

Subject Site

The subject site would increase the overall supply of new housing in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand.

Furthermore, the proposed development is comprised of apartment units. Given that recent affordable new home sales in the Region have largely been townhome and apartment units, new units on the subject site will increase the supply of units in the City and Region that are likely to have an attainable purchase price or monthly rent.

3.3 City of Burlington Current Official Plan

Policies in Section 2.4 Housing Affordability of Burlington's Current Official Plan identifies the objective "to ensure that a range of housing and tenure types are available to meet the various lifestyle and income group needs of the existing and future population"

The City of Burlington's Current Official Plan also includes definitions *for Affordable Housing* and *Assisted Housing*. These definitions are as follows.

> *"Affordable Housing – Housing with market price or rent that is affordable to households of low and moderate income spending 30 percent of their gross household income without government subsidies. Such households would be able to afford, at the low end, at least three out of ten rental properties on the market and, at the high end, ownership housing with sufficient income left, after housing expenses, to sustain a basic standard of living."*
>
> *"Assisted Housing – Housing that is available to low and moderate income households for rent or purchase where part of the housing cost is subsidized through a government program."*

Subject Site

The proposed development will provide a range of housing by including a variety of unit formats, including bachelor, one-bedroom and two-bedroom units of varying sizes.

3.4 City of Burlington Proposed New Official Plan

Policies in Section 3.1 of the City of Burlington *Proposed New Official Plan (2020)* centers on *Housing* and emphasize that the city needs to "*promote an appropriate and adequate range of housing choices by type, tenure and affordability level*" for all residents and workers. **Policy 3.1.1(2)** details how affordable housing will be achieved and maintained in the City. In particular:

> *"3.1.1(2) Policies*

a) *To the extent to which land is available in the Urban Area, the City shall maintain the ability to accommodate its share of residential growth within the regional market area. The City will assist the Region of Halton in the establishment and monitoring of annual minimum targets for the production of housing units by density type, and for the production of assisted and affordable housing, based on targets established in the Regional Official Plan.*

b) *The City will work with the Region of Halton to provide opportunities for housing for a wide array of socio-economic groups and those with differing physical needs and household compositions, using all available planning mechanisms and tools."*

...

g) *The City will develop a city-wide housing strategy that will support the Region of Halton's Housing Strategy and will:*

...

(v) develop:

a. minimum targets in support of achieving the Region of Halton's housing mix and affordable and assisted housing targets;

b. minimum targets within mid-rise and tall buildings for affordable, assisted and/or special needs housing;

c. minimum targets for two (2) and three (3) bedroom units for residential development applications; including minimum targets for 3 or more bedroom units;

(vi) consider financial and other incentives, including grants, property tax reductions, infrastructure improvements and Community Improvement Plans to facilitate the provision of affordable housing and/or assisted and special needs housing.

(vii) research and develop, in association with the Region of Halton and local municipal partners, an inclusionary zoning by-law as part of either Region-wide program, or as a city-wide program.

Subject Site

The proposed development will assist the City in meeting its minimum housing unit targets by density type. It will also diversify the existing housing stock by providing a range of unit formats, including bachelor, one-bedroom and two-bedroom units of varying sizes.

The City of Burlington *Proposed New Official Plan* also includes definitions *for Affordable Housing, Assisted Housing*, and *Low and Moderate Income Households*. These definitions are consistent with the definitions contained in the *Halton Region Official Plan*.

> *"Affordable Housing – 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. 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."*
>
> *"Assisted Housing – Housing that is available to low and moderate income households for rent or purchase where part of the housing cost is subsidized through a government program."*
>
> *"Low and Moderate Income Household – Those households defined through the Region of Halton's annual State of Housing Report, pursuant to the Region of Halton Official Plan, and in accordance with the definitions of Affordable and Assisted Housing under the Region of Halton Official Plan. The income thresholds for low and moderate income households should not be more than those as defined in the Provincial Policy Statement."*

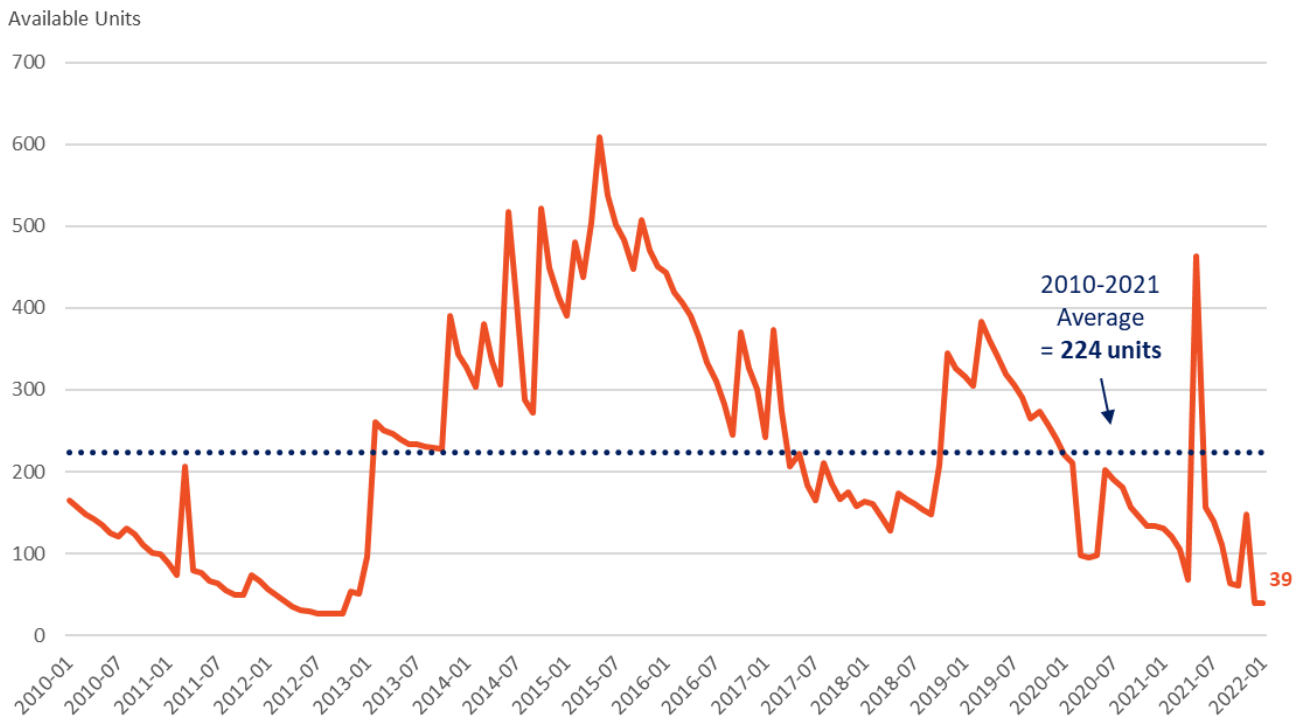
4.0 Halton Region Housing Targets

4.1 Unit Mix Targets

As noted earlier, Policy 86. (6) a) of the *Halton Region Official Plan* identifies a housing target that at least 50% of new housing produced annually in the Region be in the form of townhouse or multi-storey buildings. The 236 units proposed on the subject site will assist the Region in achieving this target, as all units will be apartment units.

Further, the units proposed on the subject site will help increase the supply of housing in Burlington. By accommodating new apartment units on the subject site, it will indirectly support housing affordability City-wide by ensuring there is a sufficient supply of apartment units to meet forecast demand. As shown in Figure 4-1, the supply of new condominium apartment units available for sale in Burlington in early-2022 (39 units), was well below the average number available between 2010 and 2022. If the units proposed on the subject site are ultimately developed as condominium apartment units, it will increase the supply of units available for sale.

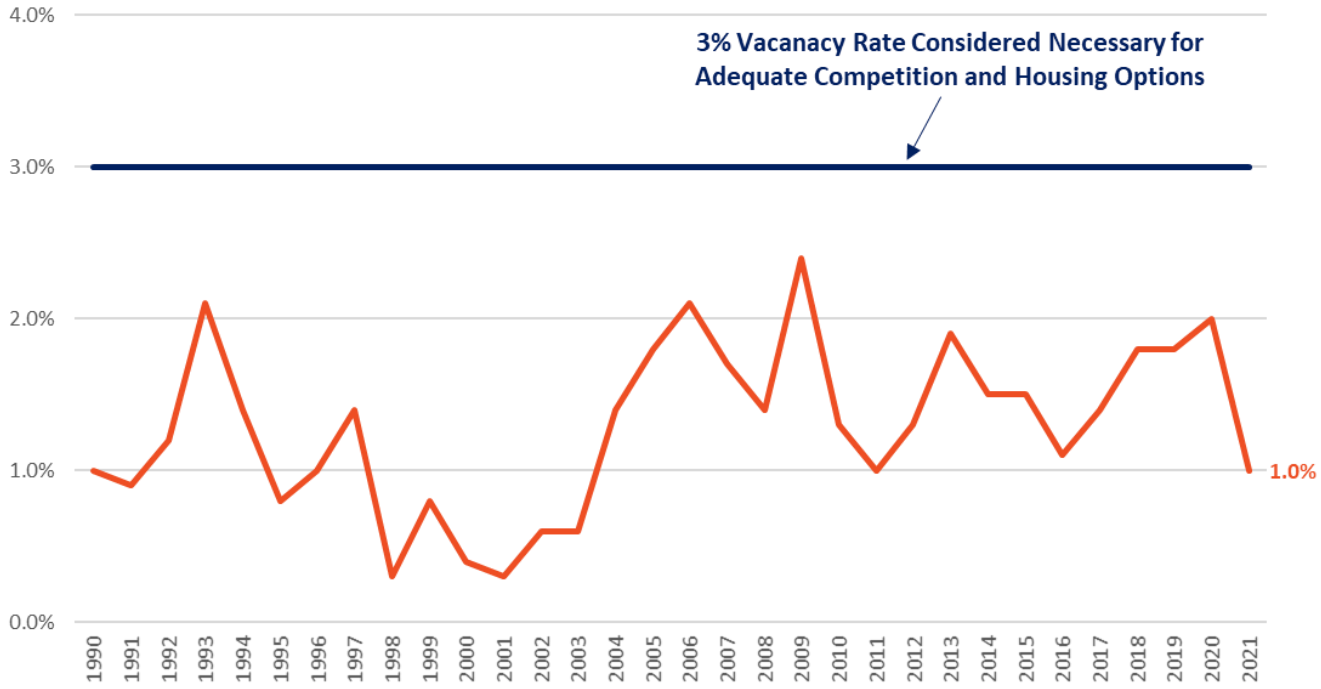
Figure 4-1: City of Burlington, Inventory of Available New Condominium Apartment Units



SOURCE: urbanMetrics inc. based on Altus Data Studio.

Similarly, the vacancy rate of 1.0% in Burlington in 2021 was below the 3% vacancy rate identified by CMHC to ensure adequate competition and housing options. Therefore, if the units on the subject site are ultimately developed as rental apartment units, it will add to the supply of rental units in the City and increase housing choice.

Figure 4-2: City of Burlington Purpose-Built Rental Apartment Vacancy Rate



SOURCE: urbanMetrics inc. based on data from CMHC.

4.2 Intensification Targets

As previously mentioned, Table 2 of the *Halton Region Official Plan* details that the City of Burlington must add a minimum of 8,300 new housing units in the city's built-up area between 2015 and 2031, nearly 26% of the minimum new housing units required in the Region over this period.

The proposal for the subject site will directly support the City's and Region's ability to meet their intensification target through to 2031. Furthermore, as part of the ongoing MCR, the Region is testing growth concepts with 50% to 80% intensification. Therefore, it will be increasingly important to accommodate units through intensification, including on the subject site, if the City and Region are to meet these targets.

4.3 Affordable Housing Targets

The proposed development is still in the preliminary stages of the development process. As a result, the potential price / monthly rent of units—and related affordability—has not yet been determined. The ultimate sales price or monthly rental rate will depend on market demand and housing conditions when the units are made available. That said, the composition and diversity of units being proposed on the subject site, represents a *potential* opportunity to increase the stock of new affordable housing units in the City and Region.

Housing, and the potential affordability of units on the subject site and throughout the Region, can be supported by a variety of programs. Some of these programs and opportunities to accommodate affordable units City-wide are detailed below.

Current Opportunities to Provide Affordable Housing

Currently, Halton Region utilizes various programs to support affordable housing opportunity and delivery. Programs exist that convert condominium or apartment units from market priced units to assisted units. One program is **Halton Region's Assisted Housing Program**, which centers on reducing the cost of housing for individuals and families who cannot afford their rent. The program is grounded on **Rent-Geared-to-Income** assistance, and provides rent supports to individuals and households who cannot afford their existing rental rates. The program relies on landlords contributing a number of units to the program. Halton Region, based on individual or household eligibility, then places applicants in these units. The housing subsidy for the required rental fees—which is determined based on each individual's household income—is paid directly to the landlord. At the time of the 2020 State of Housing Report, there were 781 households in Halton Region utilizing these rent supports.

Halton Region also offers the **Halton In-Situ Program** ("HIP") that offers an ongoing housing allowance to residents who qualify for assisted housing. This program provides residents with a monthly rental allowance with the goal of keeping people in the communities where they live. At the time of the 2020 State of Housing Report, there were over 290 families in Halton Region supported by the HIP program.

Furthermore, social housing development is supported through **Regional Development Charges.** Halton Region has a social housing development charge included in the development charges by-law. Based on current development charge rates, the 236 units proposed on the subject site will contribute approximately $91,200 in development charges for social housing.

Emerging Opportunities to Provide Affordable Housing

In addition to these current opportunities to increase the supply of affordable units in the City and Region, there are new tools that are available to support the delivery of affordable housing. This includes inclusionary zoning and community benefits charges.

Inclusionary Zoning

Policies under 3.1.1 (2) of the *City of Burlington Proposed New Official Plan* indicate how the City will help develop and implement affordable housing. Specifically, Policy 3.1.1 (2) (vi) and (vii) state:

> *"(vi) consider financial and other incentives, including grants, property tax reductions, infrastructure improvements and Community Improvement Plans to facilitate the provision of affordable housing and/or assisted and special needs housing;*
>
> *(vii) research and develop, in association with the Region of Halton and local municipal partners, an inclusionary zoning by-law as part of either a Region-wide program, or as a city-wide program."*

In January 2021, the City of Burlington prepared a staff report outlining a proposed Terms of Reference to complete a Housing Strategy. A component of this Housing Strategy is the completion of an inclusionary zoning municipal assessment report. The results of this inclusionary zoning municipal assessment report will provide direction on the viability of adopting an inclusionary zoning by-law in the City. An inclusionary zoning by-law will allow the City to secure affordable units within Protected Major Transit Station Areas (PMTSAs).

Depending on the direction of the Housing Strategy, if the City of Burlington implemented a development permit system, it could allow the City to also secure affordable units outside of PMTSAs, which would include the subject site.

Community Benefits Charge

Community Benefits Charges ("CBCs") are paid to lower and single-tier municipalities for high-density developments with 5 or more storeys and 10 or more units. Under the revised Section 37 of the Planning Act, municipalities will need to adopted CBC By-laws as of September 2022.

CBCs are capped at 4% of land value and are based on the value of land the day before building permits are issued. Funds collected through CBCs can be used to fund a variety of programs—including but not limited to—services, facilities, and other matters identified by each municipality.

Assuming the City of Burlington adopts a CBC By-law (and related CBC strategy), the CBC would enhance flexibility for which to fund growth-related costs in Burlington. This could include funds to support affordable housing.

5.0 Conclusions

The table below summarizes how the subject site addresses each of the criteria identified in the terms of reference for a *Housing Impact Statement*—as detailed in *Section 3.1.1(2) h)* of the *City of Burlington Proposed New Official Plan (2020)*—have been addressed in this report.

Policy	Analysis
2) Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the City's *Proposed New Official Plan (2020)*;	
(i) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development of 236 apartment units on the subject site would contribute towards the Region's achievement of two housing targets: 5) **Policy 86 (6) a)** – As all units in the proposed development will be apartment units, the development will contribute towards the Region's achievement of the target that 50% of new units be in the form townhouse and apartment units. 6) **Policy 86 (6) b)** – As the proposed development is located within the built-up area, all units will contribute towards the Region and City meeting the intensification target. At this time, Infinity has not identified if any of the new units in the proposed development will meet the regional definition of affordable or assisted housing units. However, the increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand. Also, by introducing a mix of unit formats and sizes, the proposed development would appeal to a range of current and future residents.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential rent or sale price for units in the proposed development has not been determined. If the development was to be constructed as condominium apartment units, it is not expected that the units will meet the Region's definition of affordable housing.

(iii) Where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable.	As this development includes only one building, it is not expected that the development will occur in phases.
(iv) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long term affordability of units, where applicable.	While Infinity is currently not committing to the development of affordable housing units on the subject site, the provision and inclusion of affordable housing City-wide could be supported by existing and potential future policies and mechanisms. These mechanisms include rent-geared-to-income assistance, the Halton In-Situ Program, inclusionary zoning and Community Benefits Charges.
2) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.	The subject site is currently occupied by a commercial building, previously occupied by Canada Post. The 236 units that are proposed will result in the denser form of development that will help the City and Region meet their housing needs. Based on the current concept plan for the subject site, 6% of units will be bachelor, 71% of units will be one-bedroom units, with the remaining 24% of units being two bedrooms.
3) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report (note: the Region issues a State of Housing Report annually and any justification should reflect the current year report); and	As noted previously, by proposing to include apartment units at a location within the built-up area, the subject site would help achieve Policy 86(6) in the Regional *Official Plan*. The subject site would increase the overall supply of new housing units in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand.
4) Should identify and discuss other relevant	If the City of Burlington develops an Inclusionary Zoning by-law, it will provide an opportunity to secure affordable units in new developments within PMTSAs. Furthermore, if the City

and current housing information available.	were to implement a development permit system, it would provide an opportunity to also secure affordable units outside of PMTSAs, including on the subject site.

Appendix A Halton Region Official Plan

Figure A- 1: Halton Region Housing Targets and Phasing

TABLE 2 INTENSIFICATION AND DENSITY TARGETS

Municipality	Minimum Number of New Housing Units to Be Added To the *Built-Up Area* Between 2015 and 2031	Minimum Overall *Development Density* in *Designated Greenfield Area* (Residents and Jobs Combined Per Gross Hectare)[1]
Burlington	8,300	45
Oakville	13,500	46
Milton	5,300	58
Halton Hills	5,100	39
Halton Region[2]	32,200[2]	50

[1] *In the measurement of these densities, the area of the Regional Natural Heritage System is excluded.*

[2] *This number represents 40 per cent of the new housing units occurring within Halton Region between 2015 and 2031.*

TABLE 2A REGIONAL PHASING

Municipality	2012-2016	2017-2021	2022-2026	2027-2031
Halton Region				
Units in *Designated Greenfield Area*	**17,899**	**16,606**	**16,350**	**14,371**
Low Density Units	11,322	11,398	9,855	10,622
Medium & High Density Units	6,577	5,208	6,495	3,749
Units inside the *Built Boundary*	**9,187**	**12,245**	**11,606**	**11,699**
Employment	**37,460**	**39,191**	**28,026**	**34,290**

urban Metrics

Municipality	2012-2016	2017-2021	2022-2026	2027-2031
Oakville				
Units in *Designated Greenfield Area*	**6,155**	**5,152**	**2,206**	**1,251**
Low Density Units	3,382	3,354	477	699
Medium & High Density Units	2,773	1,798	1,729	552
Units inside the *Built Boundary*	**4,235**	**5,068**	**4,323**	**4,189**
Employment	**15,516**	**14,311**	**1,782**	**5,781**
Burlington				
Units in *Designated Greenfield Area*	**428**	**432**	**133**	**221**
Low Density Units	287	302	106	123
Medium & High Density Units	141	130	27	98
Units inside the *Built Boundary*	**2,525**	**2,758**	**2,669**	**2,659**
Employment	**3,055**	**4,136**	**1,299**	**1,204**
Milton				
Units in *Designated Greenfield Area*	**10,644**	**10,175**	**10,075**	**9,126**
Low Density Units	7,030	6,991	7,067	7,398
Medium & High Density Units	3,614	3,184	3,008	1,728
Units inside the *Built Boundary*	**1,910**	**3,502**	**2,558**	**2,764**
Employment	**18,102**	**18,552**	**15,525**	**17,699**
Halton Hills				
Units in *Designated Greenfield Area*	**672**	**847**	**3,936**	**3,773**
Low Density Units	623	751	2,205	2,402
Medium & High Density Units	49	96	1,731	1,371
Units inside the *Built Boundary*	**517**	**917**	**2,056**	**2,087**
Employment	**787**	**2,192**	**9,420**	**9,606**

SOURCE: Halton Region Official Plan.