Housing Impact Statement

2076 Old Lakeshore Road, City of Burlington

September 9, 2025

KPEC
Planning + Economics

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2076 Old Lakeshore Road, City of Burlington

Prepared for:

1959025 Ontario Inc.

Keleher Planning & Economic Consulting Inc.

75 Main Street East, Milton ON, L9T 1N4

September 9, 2025

EXECUTIVE SUMMARY

Keleher Planning & Economic Consulting Inc. (KPEC) was retained by 1959025 Ontario Inc. Road Inc. to undertake an analysis of the development proposal at 2076 Old Lakeshore and its impacts on the availability and affordability of housing in the City of Burlington.

The subject site is located at 2076 Old Lakeshore Road in the City of Burlington. The site is located in Downtown Burlington, south of Lakeshore Road and east of Pearl Street. The site is surrounded by a proposed 23-storey building at 2072 Old Lakeshore Road, an approved 27-storey building at 2083 Old Lakeshore Road, an existing 22-storey building at 2060 Lakeshore Road, and a 2-storey building at 2084 Lakeshore Road.

The subject lands would be developed with a 23-storey mixed-use building containing 154 hotel rooms on floors 1 through 14, shared amenity space in the building podium and 50 residential apartment units on floors 15 through 23, with a mix of 1-bedroom, 2-bedroom and 3-bedroom units. Of the residential apartments included in the plan, 38% would have two or more bedrooms.

As the subject site is not located within the boundaries of a PMTSA, and is located outside of a City Community Planning Permit area, no affordable housing is required from redevelopment of the subject lands.

The City is directed by the 2024 Provincial Planning Statement to provide an appropriate range and mix of housing options and densities to meet projected needs of both current and future residents of the regional market area by among other things, permitting and facilitating all housing options and all types of residential intensification and promoting densities which efficiently use land, resources, infrastructure and public service facilities.

To meet or exceed Regional phasing targets, the City will need to accommodate at least 1,025 units per year in its built-up area. Even if the City's three MTSAs (Appleby GO, Aldershot GO, Burlington GO) can achieve their minimum density targets a substantial amount of growth in the City (59% of all growth) will need to occur on lands outside of MTSAs to achieve the City's 2051 planning forecasts of an additional 70,160 persons.

Over the past 10 years, the City has seen only 374 apartment units completed per year, which when combined with 60 townhouse units per year, equates to 434 medium-and-high density units. The City will need to increase the annual production of these unit types by more than 1.5-times current levels to achieve minimum planning forecasts.

The City will need to substantially increase housing production to achieve the pace of development implied in its population and housing forecasts. To do so, the City will need a broad-base of development applications and approvals in its pipeline, both by unit type (singles, rowhouses, apartments) and by location (MTSAs, Downtown Urban Centre, designated greenfield areas, generally throughout the built-up area, etc.).

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1. INTRODUCTION

Keleher Planning & Economic Consulting Inc. (KPEC) was retained by 1959025 Ontario Inc. Road Inc. to undertake an analysis of the development proposal at 2076 Old Lakeshore and its impacts on the availability and affordability of housing in the City of Burlington.

1.1. Overview of Subject Site

The subject site is located at 2076 Old Lakeshore Road in the City of Burlington. The site is located in Downtown Burlington, south of Lakeshore Road and east of Pearl Street.

Figure 1

Location of Subject Site



Source: Google Earth

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The site is surrounded by a proposed 23-storey building at 2072 Old Lakeshore Road, an approved 27-storey building at 2083 Old Lakeshore Road, an existing 22-storey building at 2060 Lakeshore Road, and a 2-storey building at 2084 Lakeshore Road.

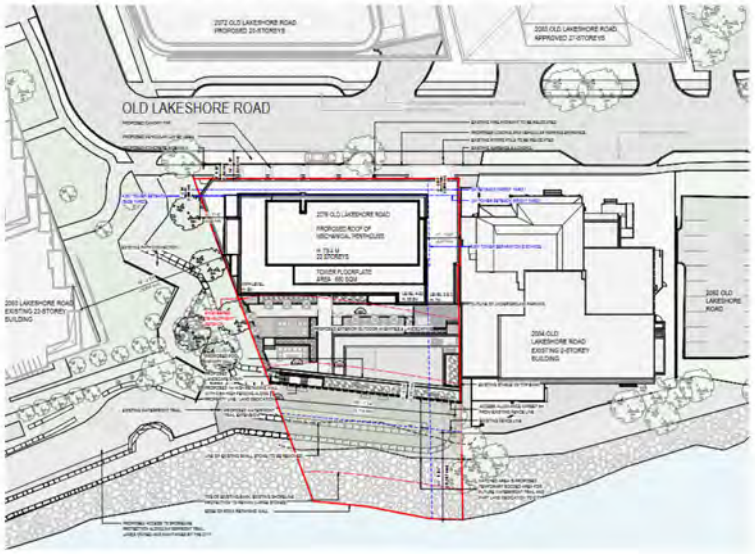
1.2. Details of Proposed Development

Based on plans dated June 20, 2025, the subject lands would be developed with a 23-storey mixed-use building containing 154 hotel rooms on floors 1 through 14, shared

amenity space in the building podium and 50 residential apartment units on floors 15 through 23, with a mix of 1-bedroom, 2-bedroom and 3-bedroom units.

Figure 2

Site Plan, 2076 Old Lakeshore Road



Source: NEUF Architects Inc.

Figure 3

Development Statistics, 2076 Old Lakeshore Road, City of Burlington

Hotel Rooms	154	
Apartment Units	Units	Size (avg.)
1-Bedroom	24	570
1-Bedroom + Den	7	657
2-Bedroom	11	1,132
3-Bedroom & PH	8	1,339
Total	50	

Source: Plans dated September 2025

2. POLICY ANALYSIS

2.1. Planning Act

Sections 16(4) and 16(5) of the *Planning Act* authorizes municipalities to use inclusionary zoning, where for municipalities not prescribed in regulation (such as the City of Burlington), are enabled to have policies requiring affordable housing in a Protected Major Transit Station Area (PMTSA) or in an area where a development permit system is adopted.

> ***Inclusionary zoning policies***
>
> *(4) An official plan of a municipality that is prescribed for the purpose of this subsection shall contain policies that authorize inclusionary zoning by,*
>
> *(a) authorizing the inclusion of affordable housing units within buildings or projects containing other residential units; and*
>
> *(b) providing for the affordable housing units to be maintained as affordable housing units over time. 2016, c. 25, Sched. 4, s. 1 (2).*
>
> ***Same***
>
> *(5) An official plan of a municipality that is not prescribed for the purpose of subsection (4) may contain the policies described in subsection (4) in respect of,*
>
> *(a) a protected major transit station area identified in accordance with subsection (15) or (16), as the case may be; or*
>
> *(b) an area in respect of which a development permit system is adopted or established in response to an order under subsection 70.2.2 (1). 2019, c. 9, Sched. 12, s. 2 (2).*

A recently filed regulation (O.Reg. 54/25) would set the maximum percentage of affordable housing that can be required at 5% of the total residential units that are part of the development, and for a maximum period of time of 25 years. Inclusionary Zoning is not yet in-effect as the Minister has not yet approved the PMTSAs. However, as the subject site is not located within the boundaries of a PMTSA, and is located outside of a City Community Planning Permit area, no affordable housing is required from redevelopment of the subject lands.

2.2. Provincial Planning Statement 2024

2.2.1. Housing

Section 2.2 of the 2024 Provincial Planning Statement (“2024 PPS”) includes the following direction regarding provision of housing:

> *2.2 Housing*
>
> *1. Planning authorities shall provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:*
>
> > *a) establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;*
> >
> > *b) permitting and facilitating:*
> >
> > > *1. all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
> > >
> > > *2. all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
> >
> > *c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
> >
> > *d) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.*

As the planning authority, the City is to provide an appropriate range and mix of housing options and densities to meet projected needs of both current and future residents of the regional market area by among other things, permitting and facilitating all housing options and all types of residential intensification and promoting densities which efficiently use land, resources, infrastructure and public service facilities.

2.2.2. Strategic Growth Areas

The 2024 PPS includes numerous policies regarding Strategic Growth Areas (SGAs):

> *2.4 Strategic Growth Areas*
>
> *2.4.1 General Policies for Strategic Growth Areas*
>
> *1. Planning authorities are encouraged to identify and focus growth and development in strategic growth areas.*
>
> *2. To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned:*

a) to accommodate significant population and employment growth;

b) as focal areas for education, commercial, recreational, and cultural uses;

c) to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and

d) to support affordable, accessible, and equitable housing.

3. Planning authorities should:

a) prioritize planning and investment for infrastructure and public service facilities in strategic growth areas;

b) identify the appropriate type and scale of development in strategic growth areas and the transition of built form to adjacent areas;

c) permit development and intensification in strategic growth areas to support the achievement of complete communities and a compact built form;

d) consider a student housing strategy when planning for strategic growth areas; and e) support redevelopment of commercially-designated retail lands (e.g., underutilized shopping malls and plazas), to support mixed-use residential.

In SGAs, municipalities are to permit development to support achievement of complete communities, and to accommodate significant population and employment growth.

2.3. Region of Halton Official Plan

As of July 2024, the Region of Halton Official Plan is no longer a Regional Plan, but is now a Local Plan for the four Local Municipalities in Halton.

2.3.1. Population Forecasts

Table 1 of the Region's Official Plan allocates the City of Burlington a 2041 population of 240,500 persons, an increase of 45,500 persons over the 2021 population of 195,000 persons. The adopted Regional OP includes the Region-wide 2051 population forecasts of 1,100,000 persons with the City's portion of 2051 population being 265,160 persons, an increase of 70,160 persons from 2021.

Table 2A sets out the Regional Phasing strategy, which for the City of Burlington shows a roughly even distribution of the 20,500 intensification units the City is to accommodate over the 2022-2041 period. The forecast in Table 2A is summarized in the figure below:

Figure 4

Period	Total Units in Period	Average Units per Year
2022-2026	4,790 units	958 units / year
2027-2031	5,090 units	1,018 units / year
2032-2036	5,170 units	1,034 units / year
2037-2041	5,270 units	1,054 units / year
Total 2022-2041 BUA	20,500 units	1,025 units / year
Total 2022-2041 DGA (medium- and high-density only)	1,630 units	82 units / year
Total Medium/High-Density	22,130 units	1,107 units / year

On average, the City will need to accommodate 1,025 units each year over a 20-year period within its built-up area.

In addition, Table 2A allocates 2,120 units over the 20-year period in the designated greenfield area, of which 1,630 units are to be medium- and high-density units, or 82 units per year.

Given that most low-density units built in the built-up area are likely replacing existing low-density units and would not count towards the net unit growth in the City, it is assumed that the majority of the 1,025 units per year in the built-up area would be medium- or high-density units. When these 1,025 medium/high-density units per year in the built-up area are combined with the 82 medium/high-density units/year to be built in the City's designated greenfield areas, the City would need to see 1,107 medium- and high-density units constructed each year over the 20-year period.

2.3.2. Primary Regional Nodes and Minimum Density Targets

Table 2B of the Regional OP shows that each of the Primary Regional Nodes have been assigned a minimum density target of 160 persons and jobs per hectare to be achieved by 2051. The Strategic Growth Areas in Table 2B that are located in Burlington that have been assigned minimum density targets are all MTSAs/UGCs and are as follows, as well as their associated 'general target' for a resident and job mix in each:

Figure 5

Strategic Growth Area	Minimum Density Target (residents and jobs combined per hectare)	General Target Proportion of Residents	General Target Proportion of Jobs
Downtown Burlington / Burlington GO	200	65%	35%
Appleby GO	120	40%	60%
Aldershot GO	150	80%	20%

Policy 51.3 defines a regional urban structure that consists of Strategic Growth Areas that include Urban Growth Centres, Major Transit Station Areas, Primary and Secondary Regional Nodes.

> *51.3 Within the Urban Area designation as shown on Map 1, this Plan defines a Regional Urban Structure consisting of the following:*
>
> *(1) Strategic Growth Areas that are subject to policies and/or conditions for development as described in Section 78 to 82.7 of this Plan and which are identified below and shown on Map 1H:*
>
> *a) Urban Growth Centres;*
>
> *b) Major Transit Station Areas;*
>
> *c) Proposed Major Transit Stations;*
>
> *d) Primary Regional Nodes;*
>
> *e) Secondary Regional Nodes; and,*
>
> *f) Regional Intensification Corridors.*
>
> *The detailed boundaries of Urban Growth Centres, Major Transit Station Areas, and Primary Regional Nodes are identified on Map 6.*
>
> *The Strategic Growth Areas are not land use designations and their delineation or identification does not confer any new land use designations nor alter any existing land use designations. Development on lands within Strategic Growth Areas is subject to the applicable policies of this Plan and is to occur in accordance with Local Official Plans and Zoning By-laws.*

Policy 72 and 72.1 are as follows:

> *72. The goal of the Urban Area and the Regional Urban Structure is to manage growth in a manner that fosters complete communities, enhances mobility*

across Halton, addresses climate change, and improves housing affordability, sustainability and economic prosperity.

72.1 The objectives of the Urban Area are: …

(5) To establish a rate and phasing of growth that ensures the logical and orderly progression of development, supports sustainable and cost-effective growth, encourages complete communities, and is consistent with the policies of this Plan.

(6) To identify a Regional Urban Structure that directs growth to Strategic Growth Areas and protects Regional Employment Areas.

(7) To plan and invest for a balance of jobs and housing in communities across the Region to reduce the need for long distance commuting and to increase the modal share for transit and active transportation. …

(9) To facilitate and promote intensification and increased densities.

Policy 77 (including sub policy 1, 2.1, 5 and 6) is as follows:

77. It is the policy of the Region to:

(1) Prepare, in consultation with the Local Municipalities, and adopt population, employment and Regional phasing forecasts in accordance with the distribution of population and employment contained in Table 1. Such forecasts shall:

a) be updated regularly but no less frequently than every five years;

b) be detailed for each Local Municipality;

c) show the annual population and employment increases between the current year and year 2051;

d) contain estimates of the annual number of new housing units by density type, consistent with the housing targets under Sections 86(6) and 86(6.1);

e) contain assignment of population, employment and housing units under Sections 77(1)c) and 77(1)d) to the Built-Up Area, Designated Greenfield Area, Employment Areas, and outside the Urban Area, consistent with Table 2; and

f) contain estimates of Affordable Housing units to be achieved annually, consistent with the housing targets under Sections 86(6) and 86(6.1). …

(2.1) Direct, through Table 2 and Table 2a, to the Built-Up Area a minimum of 45 per cent of new residential development occurring annually within Halton in between 2022 and 2051. …

(5) Require the Local Municipalities to prepare Area-Specific Plans or policies for major growth areas, including the development or redevelopment of

communities. The area may contain solely employment lands without residential uses or solely a Strategic Growth Area. Such plans or policies shall be incorporated by amendment into the Local Official Plan and shall demonstrate how the goals and objectives of this Plan are being attained and shall include, among other things:

a) a general statement of the intended character of the area or community,

b) boundaries of the area or community,

c) policies for the protection of the Regional Natural Heritage System and for the protection of public health and safety within hazard lands,

d) capacity targets of population, housing units and employment, including targets for Affordable Housing,

e) land use patterns that promote mixed-use, compact, transit-supportive, walkable communities, including the locations of local facilities for social, cultural, recreational, educational and religious purposes,

f) location, types and density of residential and employment lands that contribute to creating healthy communities through:

[i] urban design,

[ii] diversity of land uses,

[iii] appropriate mix and densities of housing,

[iv] provision of local parks and open space,

[v] strengthening live-work relationship through a proper balance of residential and employment land uses, and

[vi] promoting active transportation and public transit use.

f.1) consideration for land use compatibility in accordance with Regional and Ministry of the Environment guidelines,

g) overall development density for the area or community and, if it is located within the Designated Greenfield Area, how this density will contribute towards achieving the minimum overall development density for Designated Greenfield Areas in the Local Municipality as set out in Table 2 and the Regional phasing as set out in Table 2a,

h) a transportation network that promotes public transit and active transportation, including a strategy for early introduction of transit services,

Policy 78 is as follows:

78. Within the Urban Area, the Regional Urban Structure, as shown on Map 1H, implements Halton's planning vision and growth management strategy to ensure efficient use of land and infrastructure while supporting transit, and the long-term protection of lands for employment uses. The Regional Urban Structure consists of the following structural components: (1) Strategic Growth Areas; (2) Regional Employment Areas; (3) Built-Up Areas; and (4) Designated Greenfield Areas.

78.1 The objectives of the Regional Urban Structure are:

(1) To provide a structure and a hierarchy in which to direct population and employment growth within the Urban Area to the planning horizon of this Plan;

(2) To focus a significant proportion of population and certain types of employment growth within Strategic Growth Areas through mixed use intensification supportive of the local role and function and reflective of its place in the hierarchy of Strategic Growth Areas identified in this Plan;

(3) To provide increased opportunities for the development of Affordable Housing, particularly within Strategic Growth Areas;

(4) To identify Regional Employment Areas and protect them for long-term employment use, while providing flexibility to address changes in the role and function of these areas in relation to prevailing trends in the economy of the Region.

(5) To support climate change mitigation by directing growth to areas that will support achieving complete communities and the minimum intensification and density target of this Plan as well as reducing dependence on the automobile and supporting existing and planned transit and active transportation.

2.3.3. Strategic Growth Areas

The relevant policies of Policy 79, which deal with the Region's objectives for Strategic Growth Areas are as follows:

79. The objectives of the Strategic Growth Areas are:

(1) To provide an urban form that is complementary to existing developed areas, uses space more economically, promotes live-work relationships, fosters social interaction, enhances public safety and security, reduces travel by private automobile, promotes active transportation, and is environmentally more sustainable in order to promote the development of complete communities.

(2) To provide opportunities for more cost-efficient and innovative urban design.

(3) To provide a range of employment opportunities, facilities and services in centralized locations that are readily accessible by public transit.

(4) To provide a diverse and compatible mix of land uses, including residential and employment uses, to support neighbourhoods.

(5) To create a vibrant, diverse and pedestrian-oriented urban environment.

(6) To cumulatively attract a significant portion of population and employment growth.

(7) To provide high quality public parks and open spaces with site design and urban design standards that create attractive and vibrant places to promote the development of complete communities.

(8) To support transit and active transportation for everyday activities.

(9) To generally achieve higher densities than the surrounding areas. …

79.1 Strategic Growth Areas are integral to the Regional Urban Structure within the Urban Area and consist of:

(1) Urban Growth Centres, as delineated as an overlay on top of the Urban Area on Map 1H and Map 6, subject to specific policies in Section 80.1, in addition to those for Strategic Growth Areas,

(2) Major Transit Station Areas as delineated on Map 1H and Map 6 and identified by symbol on Map 3, which generally consist of areas within 500 m to 800 m of the Major Transit Station, subject to specific policies in Section 81, in addition to those for Strategic Growth Areas,

(3) Primary and Secondary Regional Nodes as shown on Map 1H due to their contribution to the Regional Urban Structure, subject to policies in Sections 82 to 82.2, which have a concentration of residential and employment uses with development densities and patterns supportive of active transportation and public transit;

(4) Regional Intensification Corridors as shown on Map 1H and subject to policies in Sections 82.3 to 82.7, which consist of areas along Higher Order Transit Corridors and selected Arterial Roads within the Urban Area, which connect other elements of the Regional Urban Structure and support achieving residential and employment densities to ensure the viability of existing and planned transit infrastructure and service, and

(5) Local Nodes and Local Intensification Corridors as identified in Local Official Plans, which have a concentration of residential and/or employment uses with development densities and patterns supportive of active transportation and public transit.

79.2 The Regional Urban Structure contains a hierarchy of Strategic Growth Areas as delineated or identified by symbol on Map 1H:

(1) Urban Growth Centres / Major Transit Station Areas on a Priority Transit Corridor;

(2) Urban Growth Centres / Major Transit Station Areas on a Commuter Rail Corridor;

(3) Major Transit Station Areas on a Priority Transit Corridor;

(4) Major Transit Station Areas on a Commuter Rail Corridor;

(5) Primary Regional Nodes;

(6) Secondary Regional Nodes; and,

(7) Regional Intensification Corridors.

The Regional Urban Structure is supported by the Local Urban Structures identified in Local Official Plans which reflect this hierarchy of Strategic Growth Areas and may include additional Local Nodes and Local Intensification Corridors. The Strategic Growth Areas are not land use designations and their delineation or identification does not confer any new land use designations nor alter any existing land use designations. Development on lands within Strategic Growth Areas is subject to the applicable policies of this Plan and is to occur in accordance with Local Official Plans and Zoning By-laws

79.3 It is the policy of the Region to:

(1) Direct development with higher densities and mixed uses to Strategic Growth Areas in accordance with the hierarchy identified in Section 79.2 of this Plan.

(2) Require Local Official Plans to identify Strategic Growth Areas with detailed boundaries in accordance with the objectives and policies of this Plan, and for Urban Growth Centres, Major Transit Station Areas, and Primary Regional Nodes, in accordance with the boundaries as delineated on Map 1H and Map 6.

(3) Require the Local Municipalities to prepare detailed official plan policies or an Area-Specific Plan for the development of a new Strategic Growth Area or the redevelopment of an existing Strategic Growth Area, in accordance with Sections 48 and 77(5) or for a Major Transit Station Area, in accordance with Section 81.2(4) of this Plan. The provisions for Strategic Growth Areas may be incorporated as part of a larger community plan.

(4) Require Area-Specific Plans or policies for Strategic Growth Areas to include:

a) a transportation network designed to integrate active transportation, local transit services and inter-municipal/inter-regional higher order transit services; and

> *b) urban design guidelines to promote active transportation and transit supportive land uses in accordance with Regional standards under Section 79.3(5).*

(5) Adopt alternative design standards for Arterial Roads through Strategic Growth Areas to promote active transportation, pedestrian-oriented development and transit friendly facilities while maintaining the mobility function of the Major Arterial Road.

(6) Require the Local Municipalities to ensure the proper integration of Strategic Growth Areas with surrounding neighbourhoods through pedestrian walkways, cycling paths and transit routes, and the protection of the physical character of these neighbourhoods through urban design.

(7) Require the Local Municipalities to:

> *a) include Official Plan policies and adopt Zoning By-laws to meet intensification and mixed-use objectives for Strategic Growth Areas;*
>
> *b) prescribe in Official Plans and Zoning By-laws minimum development densities for lands within Strategic Growth Areas in accordance with Table 2b, where applicable;*
>
> *c) prohibit site-specific reductions to development density within a Strategic Growth Area unless it is part of a review of the Local Official Plan or a review of the Area-Specific Plan for the Strategic Growth Areas and only if it is not identified as a protected major transit station area and where it is demonstrated that the change will not impact the ability to achieve the targets in Table 2b; and*
>
> *d) promote development densities that will support existing and planned transit services.*

(7.1) Encourage the Local Municipalities to implement a Community Planning Permit System under the Planning Act for development approvals within Strategic Growth Areas and in which case, require that such a system be consistent with policies of this Plan.

(7.2) Consider intensification and development of Strategic Growth Areas as the highest priority of urban development within the Region and implement programs

2.3.4. Regional Nodes

Policy 82 deals with Regional Nodes, as shown in Map 1H. The subject site is within the Secondary Regional Node.

> *82. The objectives of the Regional Nodes, as shown on Map 1H, are:*

(1) To recognize Strategic Growth Areas in the Region which are an integral component of the Regional Urban Structure, and are historic downtown areas, or contain or are planned for a concentration of public service facilities (i.e. hospitals, universities) and/or transit-supportive, high density uses.

(2) To leverage infrastructure investments and the development of public service facilities to support forecasted growth.

(3) To provide a range and mix of transit-supportive uses, such as residential, retail, office and public uses that supports the area in a pedestrian-oriented urban environment.

(4) To reflect and reinforce Local Urban Structures.

82.1 Regional Nodes are shown on Map 1H as follows:

(1) Primary Regional Nodes are delineated on Map 1H and Map 6 and are planned to accommodate growth and contain a concentration of public service facilities or transit-supportive high-density mixed uses, or which perform a regional transit network function at a scale appropriate for their context:

a) Uptown Core, Oakville;

b) Trafalgar Urban Core, Oakville

c) Hospital District, Oakville;

d) Palermo Village, Oakville;

e) Neyagawa Urban Core, Oakville;

f) Dundas Urban Core, Oakville; and

g) Milton Education Village Innovation District, Milton.

(2) Secondary Regional Nodes are identified by symbol on Map 1H and are historic downtown areas or villages, and/or are intended to be a focus for growth through mixed use intensification at a scale appropriate for their context:

a) Uptown Urban Centre, Burlington;

b) Kerr Village, Oakville;

c) Bronte Village, Oakville;

d) Downtown Oakville;

e) Downtown Urban Centre, Burlington;

f) Downtown Georgetown, Halton Hills; and

g) Guelph Street Corridor, Halton Hills.

Local municipalities are required to direct development with higher densities to regional nodes based on the level of existing and planned transit service.

82.2 It is the policy of the Region to:

(1) Direct development with higher densities and mixed uses to Regional Nodes in accordance with the hierarchy identified in Section 79.2, and based on the level of existing and planned transit service.

(2) Require the Local Municipalities to delineate the boundaries of Primary Regional Nodes in accordance with Map 1H and Map 6 and encourage the Local Municipalities to delineate the boundaries of Secondary Regional Nodes.

(3) For Primary Regional Nodes, require the Local Municipalities to plan to achieve the applicable minimum density target and the general target proportion of residents and jobs in accordance with Section 55.3 and Table 2b of this Plan.

(4) Require the Local Municipalities to prepare detailed official plan policies or an Area-Specific Plan for Regional Nodes, in accordance with Sections 48 and 77(5) of this Plan.

2.3.5. Affordable Housing Policies

Policy 86(6) of the Regional OP states the following:

86. It is the policy of the Region to:

(6) Adopt the following housing targets:

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

Affordable Housing is defined in the Regional Official Plan as follows:

AFFORDABLE HOUSING means 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.

a) 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.

b) 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.

According to the latest available version of the Region's annual State of Housing Report, the affordable price and rent thresholds in 2022 were as follows:

Figure 6

Affordable Rent	Affordable Ownership Price
$1,650 / month	$496,300

2.4. City of Burlington Official Plan

2.4.1. 1997 City of Burlington Official Plan

Among the Guiding Principles of the 1997 City of Burlington Official Plan (Section 3 in Part I) ("City OP") is:

> *h) Promote the efficient use of land through intensification within appropriate areas of the City, in accordance with Provincial growth management objectives, while recognizing the need for balancing this objective with other planning considerations. …*
>
> *The boundary of the Downtown Urban Growth Centre, referred to in the "Places to Grow" – the Growth Plan for the Greater Golden Horseshoe, 2006, has been identified on Schedule B and Schedule D of this Plan. It is anticipated that much of the residential and employment intensification will occur within this area. …*
>
> *The boundary of the Downtown Urban Growth Centre, referred to in the "Places to Grow" – the Growth Plan for the Greater Golden Horseshoe, 2006, has been identified on Schedule B and Schedule D of this Plan. It is anticipated that much of the residential and employment intensification will occur within this area. …*

The boundary of the Downtown Urban Growth Centre is identified on Schedule B of the City OP.

Section 5.5.1 in Part III of the City OP says:

> *a) … the principles of the Downtown Burlington Urban Growth Centre are as follows:*
>
> *(i) this area shall accommodate a significant share of population and employment growth within the City; and (ii) this area shall accommodate high density employment.*
>
> *b) As a Mixed Use Centre the Downtown shall take advantage of the unique qualities that set it apart from all other areas of the City and contribute to a distinct identity. These qualities include the waterfront location and related activities, historic buildings, streetscapes and development pattern, cultural activities, pedestrian orientation, and recognition as a centre of business and civic activity.*
>
> *c) The Downtown is a lively, vibrant "people place" with a wide variety of employment, shopping, leisure, residential and tourism opportunities. …*

> *e) Specialty retail, community retail, and government and institutional, service and other business office development, as well as residential uses should be located in the Downtown. …*
>
> *h) The Downtown shall be re-developed through the infilling of existing surface parking lots, the rehabilitation of existing buildings and the intensification of under-utilized lands and buildings, in keeping with its role as Provincial Growth Centre, ensuring that such development shall encourage transit use and that an adequate supply of parking is provided. …*

Among the objectives for the Downtown Mixed Use Centre (Section 5.5.2 in Part III of the City OP) are: …

> *b) To establish minimum density targets for residents and jobs in accordance with "Places to Grow" Growth Plan for the Greater Golden Horseshoe.*
>
> *c) To establish a unique role for the Downtown so that it provides for certain uses such as offices, and residential, as well as unique opportunities such as independent specialty, retail activities and waterfront recreational opportunities.*
>
> *d) To establish and maintain the Downtown's primary role as the City centre for cultural, governmental, civic and waterfront activities.*
>
> *e) To create a compact Downtown city core with a mix of residential, commercial and other uses, as an alternative to the car oriented shopping plazas, malls and business corridors. …*
>
> *g) To increase the resident population and provide a variety of housing types mainly at medium and high densities that will strengthen the live/work relationship, ensure the Downtown is used after business hours, and create a local market for convenience and service goods. …*
>
> *j) To create a unique waterfront area to accommodate recreational, cultural and leisure pursuits. …*

Policy 5.5.3 b) in Part III of the City OP establishes the intensification target for the Downtown urban growth centre:

> *Within the Urban Growth Centre Boundary … the target is established of a minimum gross density of 200 residents and jobs per hectare …*

2.4.2. New City of Burlington Official Plan

On April 26, 2018, Burlington City Council adopted a new Official Plan ("New City OP") - on December 4, 2018 the City was advised that it did not conform with the Regional Official Plan, and subsequently, on November 30, 2020 the Region approved the New City OP with revisions to address the non-conformity issues. During the 20-day appeal period, a total of 48 appeals to the New City OP were received, however on January 4, 2023 the OLT approved some sections of the New City OP bringing those sections into full force and effect. As a result, some sections of the New City OP are now in-force and considered determinative for this subject development and application. The policies that are now in-force a primarily related to the overall objectives of the plan and population

projections, while more specific policies such as land use designations remain under appeal. The 1997 City OP continues to be the primary local municipal planning policy document that applies to the redevelopment of the subject site.

Downtown Burlington is identified as an "Urban Centre" in the New City OP. The New City OP includes policies regarding Mixed-Use Intensification Areas, which include the City's "existing urban centres, emerging MTSAs and other mixed-use nodes and intensification corridors". Policy 2.3.1a) of the New City OP states that "Mixed-Use Intensification Areas will offer substantial development opportunities and represent a key element in this Plan's strategy to accommodate and direct growth in the city over the planning horizon and beyond."

The policies for the Urban Centres notes that the Downtown Urban Centre "will continue to develop as the city's centre, taking advantage of the unique qualities that contribute to its distinct identity".

The New City OP includes discussion of Mixed-Use Intensification Areas (MUIAs), which is one of the seven major components of the City's urban structure. Policy 2.3.1c) states that these MUIAs include the City's existing urban centres, emerging MTSAs and other mixed-use nodes and intensification corridors, with the City's approach to MUIAs reinforcing that "while all areas are considered part of the intensification areas, each has an important and distinct role".

Policy 2.3.1 d) to f) state the following:

> *Urban Centres*
>
> *d) The city has two existing Urban Centres: the Downtown Urban Centre and the Uptown Urban Centre. These areas represent established mixed use development areas with both established neighbourhood areas and dynamic evolving growth areas.*
>
> *e) Lands identified as Urban Centres provide for a broad range and mix of uses in areas of higher, yet appropriate, intensity in relation to the surrounding neighbourhoods, designed in a compact built form, oriented to support transit and facilitate active transportation in accordance with the underlying land use designations. They bring a variety of public service facilities and a mix of other uses such as retail uses to support residents and employees.*
>
> *f) The Downtown Urban Centre will continue to develop as the city's centre, taking advantage of the unique qualities that contribute to its distinct identity.*

The population forecasts summarized in section 2.2.4 of the New City OP includes population forecasts to 2031, with a 2031 population forecast of 193,000 persons. ROPA 49 extended the Regional and City planning horizons to 2051.

Section 5.4.5 of the New City OP states that the Downtown has a 'spectrum' of major public service facilities and institutional uses, and that the Downtown Urban Centre is "also a MTSA".

> *5.4.5 DOWNTOWN URBAN CENTRE*
>
> *a) The Downtown is a centre where jobs are found in a spectrum of major public service facilities and institutional uses as well as a wide range of offices and retail and service commercial uses. The Downtown Urban Growth Centre will see further intensification. There will be opportunities in the Urban Growth Centre to add new employment through mixed use development.*
>
> *b) Over the long-term, the Downtown Urban Centre, also a MTSA, will continue to contribute to accommodating jobs and will significantly contribute to accommodating employment and meeting the City's economic objectives*

Schedule D of the New City OP shows the subject site as being within the Downtown Urban Centre boundary.

3. REVIEW OF RELEVANT DOCUMENTS

3.1. Downtown Mobility Hub Market Analysis (2017)

The 2017 NBLC market analysis of the Downtown Burlington Mobility Hub included the following insights into the evolution of Downtown Burlington:

> *Downtowns are concentrated urban areas that allow for the efficient use of land and municipal resources for the social and economic benefit of the community. A vibrant mix of residential, commercial and public uses creates a lively area that can become a source of community pride and identity. Large or small, well-defined and healthy Downtowns create a sense of place that yields benefits in terms of improving the quality of life for residents, creating a strong investment environment, and supporting growth.*
>
> *Thanks to continued public investment, Burlington's Downtown has evolved from a deteriorated commercial centre to one of the most vibrant urban cores in the GTA over the past 30 years. Investments in the public realm, especially on the waterfront, as well as high quality programming have helped encourage new investment especially in high-density residential development. Downtown has now become the premier location for new apartment investment in Burlington. The combined effect of these private and public sector investments have, in turn, created a market for new retail and commercial services that further enhances the desirability of the Downtown.*
>
> *Transit in the Downtown Mobility Hub Area is centred around the Burlington Transit Terminal on John Street which sees seven different local bus lines connecting through it, as well as Greyhound buses which provide interregional transit service.*
>
> *Brant Street has continued to serve as an ever-evolving main street strengthened through recent development. Downtown Burlington includes a mix of restaurants, office space, retailers, residential neighbourhoods, civic buildings, and high quality open spaces. Walkable access to Joseph Brant Hospital is a unique feature in this Mobility Hub that drives residential demand from both employees and community members, as well as supporting commercial services. Commercial uses range from small scale storefronts to larger chains focused primarily on population serving retail. Office development is primarily located above retail on Brant Street in addition to a small number of standalone buildings. (page 14)*

The NBLC report compared the Downtown Burlington area with the other three mobility hubs, the three MTSAs located around the City's three GO stations, noting that **the Downtown is the only area that offers "all of the features" associated with a complete community**.

> *Amongst the four Mobility Hubs,* ***Downtown is the only area that offers all the features typically associated with a complete community.*** *Its broad range of*

amenities, character streets and open spaces, access to the waterfront, and established walkable character ensure that Downtown is likely to attract a significant component of the City's high and medium density development interest in the future.

3.2. MTSA Planning Areas Market Analysis

The City retained Watson & Associates to undertake a Market Analysis of its MTSA areas ("Watson MTSA Study"), dated June 24, 2022.

Figure 13 of the Watson MTSA Study shows the trends in average household sizes in the City, which have fell from 2.63 persons per unit (PPU) in 2001 to 2.56 PPU in the 2021 Census.

According to the Watson MTSA Study, the "downward trend in housing occupancy in Burlington has been driven by the aging of the population which increases the proportionate share of empty-nester and single-occupancy households". Any estimate of housing need to achieve 2031 or 2051 population forecasts needs to account for the falling population in existing units, and provide additional housing units to offset the decline in average household sizes.

Figure 16 of the Watson MTSA Study shows that over the 2006-2021 period, roughly 15% of the City's housing development has been in the MTSAs, with 85% of the City's housing development activity being in "other locations", which would include the former Downtown Burlington UGC. To-date, the City's MTSAs have not been a significant source of new housing in the City.

Figure 7

Housing Development Activity by Area, City of Burlington, 2006-2021, Building Permits

MTSA	2006-2010	2011-2015	2016-2021	Total 2006-2021	% of Total 2006-2021
Downtown Burlington UGC / Burlington GO MTSA	-	175	385	560	5%
Aldershot GO MTSA	470	400	245	1,115	10%
Appleby GO MTSA	5	-	-	5	0%
Other Locations	4,570	2,335	2,845	9,750	85%
Total	5,045	2,910	3,475	11,430	100%

Source: Watson MTSA Study, Figure 16

The Watson MTSA Study estimates the existing population and jobs in each of the City's three MTSAs (as of the 2021 Census). Based on the number of existing residents and jobs in each MTSA, and the approximate planned split between residents and jobs in each MTSA as set out in Table 2B of the Halton Region Official Plan, to achieve the

minimum densities in each MTSA, a total of 28,272 persons would need to be accommodated in these areas of the City.

Figure 8

Existing and Planned Density, City of Burlington MTSAs

	Downtown Burlington GO MTSA	Appleby GO	Aldershot GO	Total
Gross Hectares	102	179	86	
Planned Minimum Density (Persons & Jobs/Hectare)	200	120	150	
General Target Proportion (Table 2B ROP)				
Residents	65%	40%	80%	
Jobs	35%	60%	20%	
Needed Persons and Jobs				
Residents	13,260	8,592	10,320	32,172
Jobs	7,140	12,888	2,580	22,608
Total	20,400	21,480	12,900	54,780
Existing Persons and Jobs				
Residents	1,700	1,100	1,100	3,900
Jobs	2,700	6,400	1,100	10,200
Total	4,400	7,500	2,200	14,100
Existing Density	43	42	26	
Additional Persons and Jobs				
Residents	11,560	7,492	9,220	28,272
Jobs	4,440	6,488	1,480	12,408
Total	16,000	13,980	10,700	40,680

Source: Halton Region Official Plan Table 2B, Watson MTSA Study, Figure 31

Based on Table 1 from the approved Regional OP that included population allocations to the City of Burlington 2051, the City is projected to grow from 195,000 persons in 2021 to 265,160 persons in 2051, an increase of 70,160 persons.

The additional 28,272 persons that would need to be accommodated in the MTSAs to fully achieve the minimum density targets for each, represents 40.3% of the Region's needed population growth. The other 41,888 persons (70,160 persons less 28,272 persons) will need to be accommodated in other areas of the City.

The estimate of population growth in the MTSAs presented in the Watson MTSA Study is 30,400 persons over the 2021-2051 period. The Watson MTSA study estimates that the MTSAs will accommodate 43% of the City's population growth, and 71% of the City's employment growth. Other Burlington locations are projected by the Watson MTSA Study to accommodate 41,100 persons, or 35% more growth than the MTSAs combined.

3.3. City of Burlington Development Pipeline

The City of Burlington prepares an ongoing report to update stakeholders on the current pipeline of development, including approved developments available to apply for building permit, those pending a decision from the OLT (including those still waiting for a hearing), those with additional planning applications to undertake despite prior approvals, and applications pending recommendation by City staff or approval via Council or other delegated authority, and those in pre-consultation stages.

In total, based on the City's July 2025 reporting, the City of Burlington's report finds that there are 44,109 dwelling units in the "housing pipeline", of which:

- 16.1% (7,119 units) are fully approved and able to apply for building permits.
- 8,087 units are waiting for site plan applications to be submitted;
- 2,469 units that are under appeal to the OLT, and
- 3,603 units are 'under review', being applications received by the City for consideration
- 23,231 units are in 'pre-application' stage, being those that are not yet under application, but the City is in consultation with developing landowners.

While 16.1% of the City's development pipeline have approvals, this means that the other 83.9%, or 36,990 units are without full planning approval, are under appeal, under review, or have not yet submitted applications for City consideration.

The City's 10-year housing target is 29,000 units, or 2,900 units per year. The 7,119 units that are fully approved with planning permissions and ready for building permit application and become a 'housing start' consistent with the metric of the housing pledges (housing starts), represents just over 2.45-years of supply that can be converted to permitted and under construction.

Assuming all 7,119 units with full planning approval are commenced in the next 10 years as proposed, to achieve the 29,000 unit target based on these 'pipeline' units becoming 'housing starts', the remaining 21,881 units needed to reach targets would require that of the 59.2% of the other 36,990 'pipeline' units without full approval would have to commence construction by 2032 to achieve the City's housing target.

Even if all of the units with partial but not full approvals are approved without any loss of unit count (8,087 units), all of the units at OLT are approved at full unit count at-issue (2,469 units), and all those awaiting decision from City Council (3,603 units) are approved at their current unit counts, this would equate to 14,159 units, which when

combined with the 7,119 units with full planning approvals, results in 21,278 units with active applications in the pipeline. This would mean to achieve the 29,000 housing target, 100% of the units with applications/approvals would need to proceed to completion and 7,722 of the 23,231 units (or 33.2%) currently without an application would need to be submit applications, receive approval from Council/OLT, gain all site plan approvals and gain permission to construction by 2032.

The more robust the City's development approvals pipeline is, the lower the percentage of 'pipeline' units need to clear numerous hurdles in the remaining planning, legal, design, and marketing processes, including:

- Being built with as many units as approved;
- Being approved with as many units as originally proposed and captured in the City's estimates;
- Being approved by the OLT, and being approved without reductions in unit counts;
- Being approved with sufficient units to be feasible to construct given other policy requirements, fees, charges, property taxes, financing costs; that can change and deteriorate from the time the application was made to the time the application was approved, permitted or built;
- The proportion of development units in pre-consultation stages that will result in development applications – many prospective development applications in pre-consultation stages can be aborted due to differences in perceived permissions, density allowances and appetite for continuing with prospective development application.

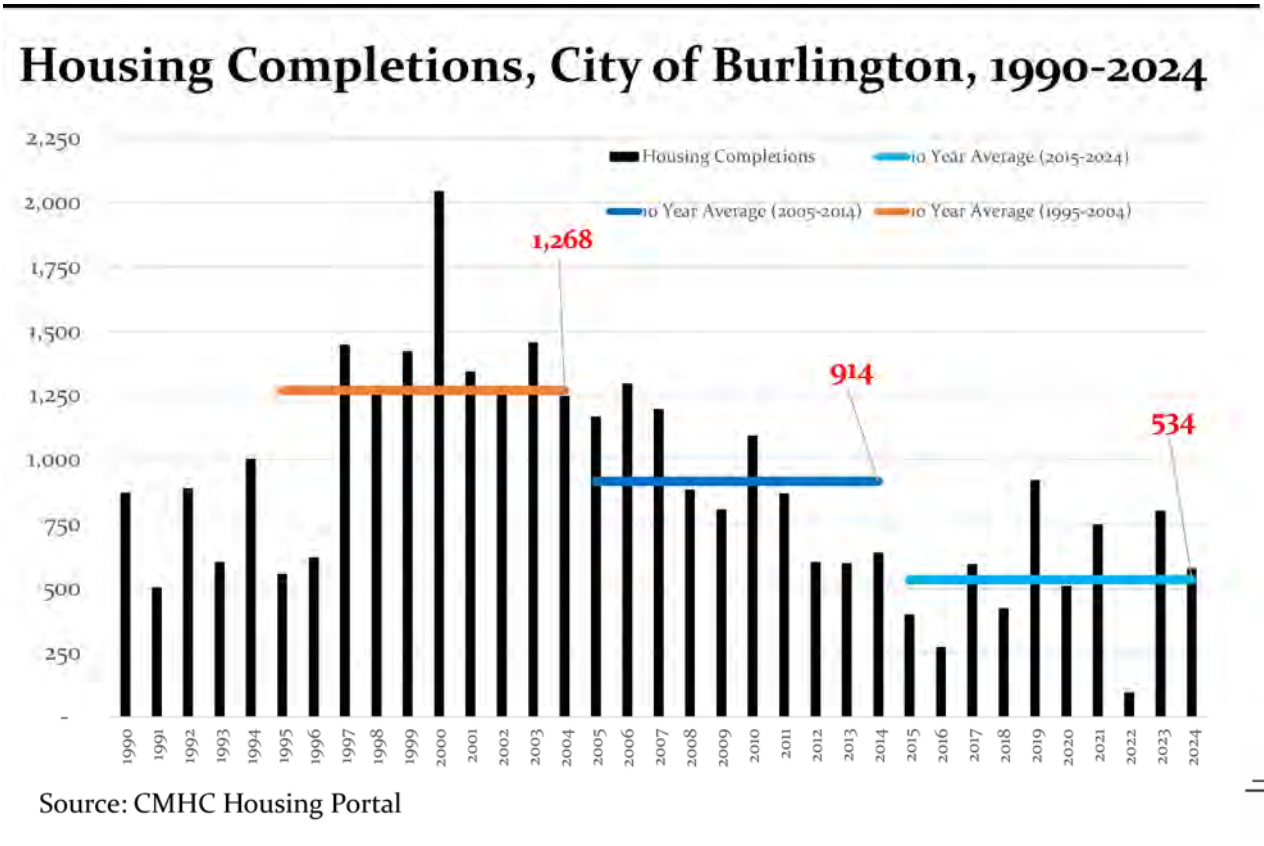
4. DATA ANALYSIS

4.1. Housing Production

4.1.1. Completions

Over the past 10 years (2015-2024), the City has seen an average of 534 units completed per year, and the 10-year averages have fallen in each successive period from 914 units per year over the 2005-2014 period and from 1,268 units per year in the 1995-2004 period. The City has not exceeded 1,000 housing completions in a single year since 2010.

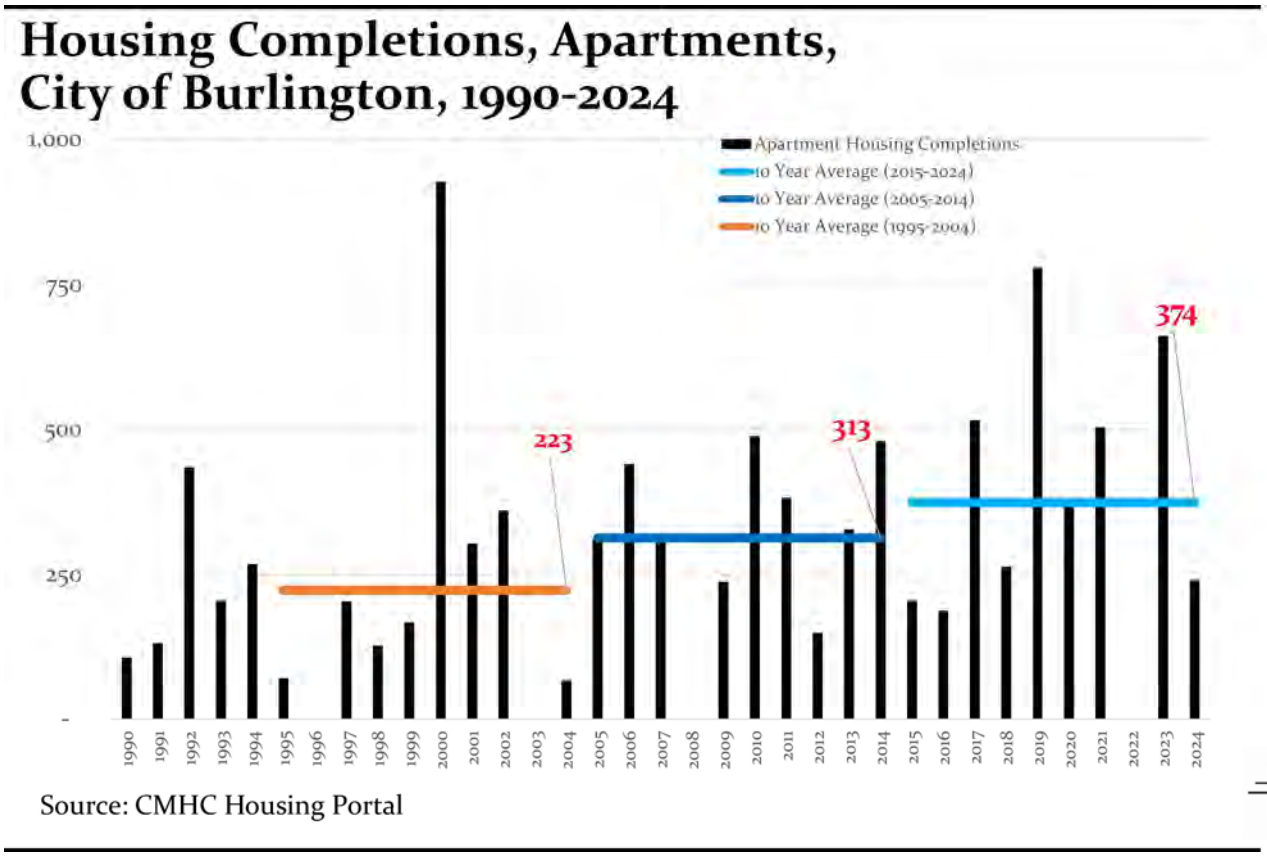
Figure 9



4.1.2. Apartment Completions

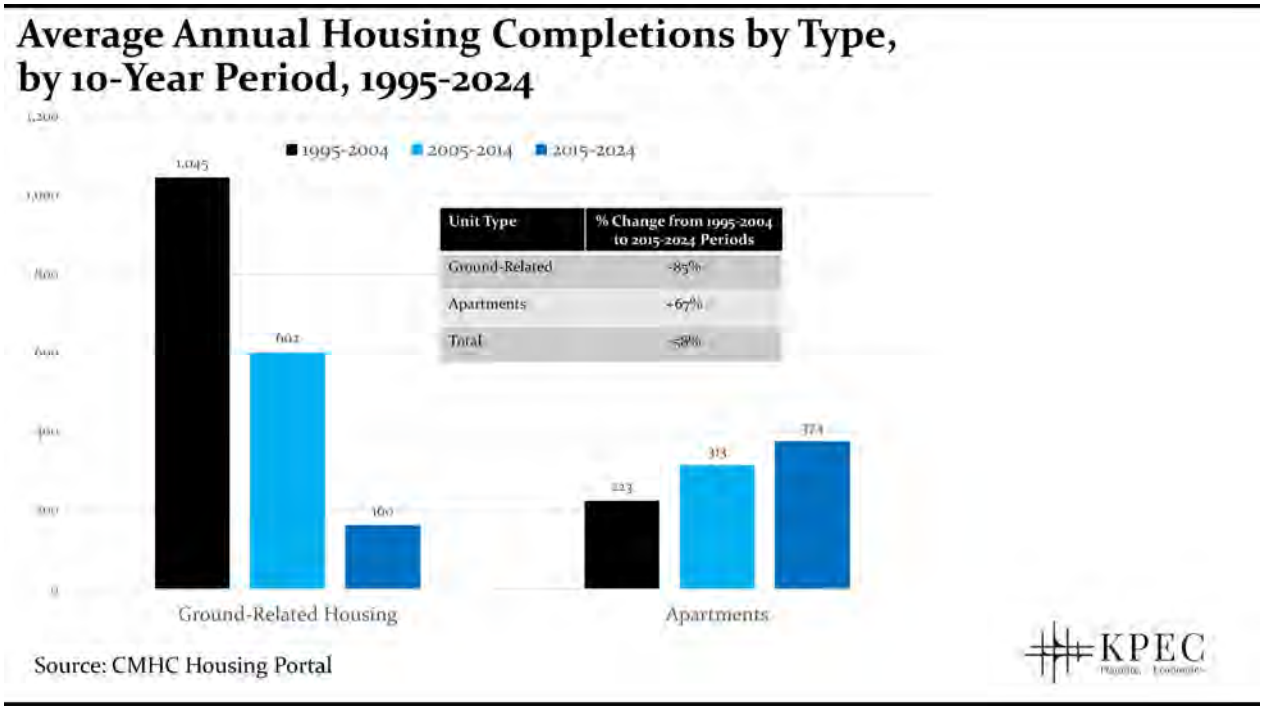
Over the past 10 years, the City has seen an increasing number of apartment completions, with the 10-year average being 374 units per year, up from the prior 10-year averages of 313 from 2005-2014 and 223 apartment units per year from 1995 to 2004.

Figure 10



The rate of new housing by type has seen ground-related housing production in the City fall by 85% from levels over the 1995-2004 period, and apartment housing production rise by 67%, however, overall housing production per year has fallen by 58%, as the increased amount of apartment units have not been enough to offset the decline and build-out of ground-related housing forms within the City's urban boundary.

Figure 11

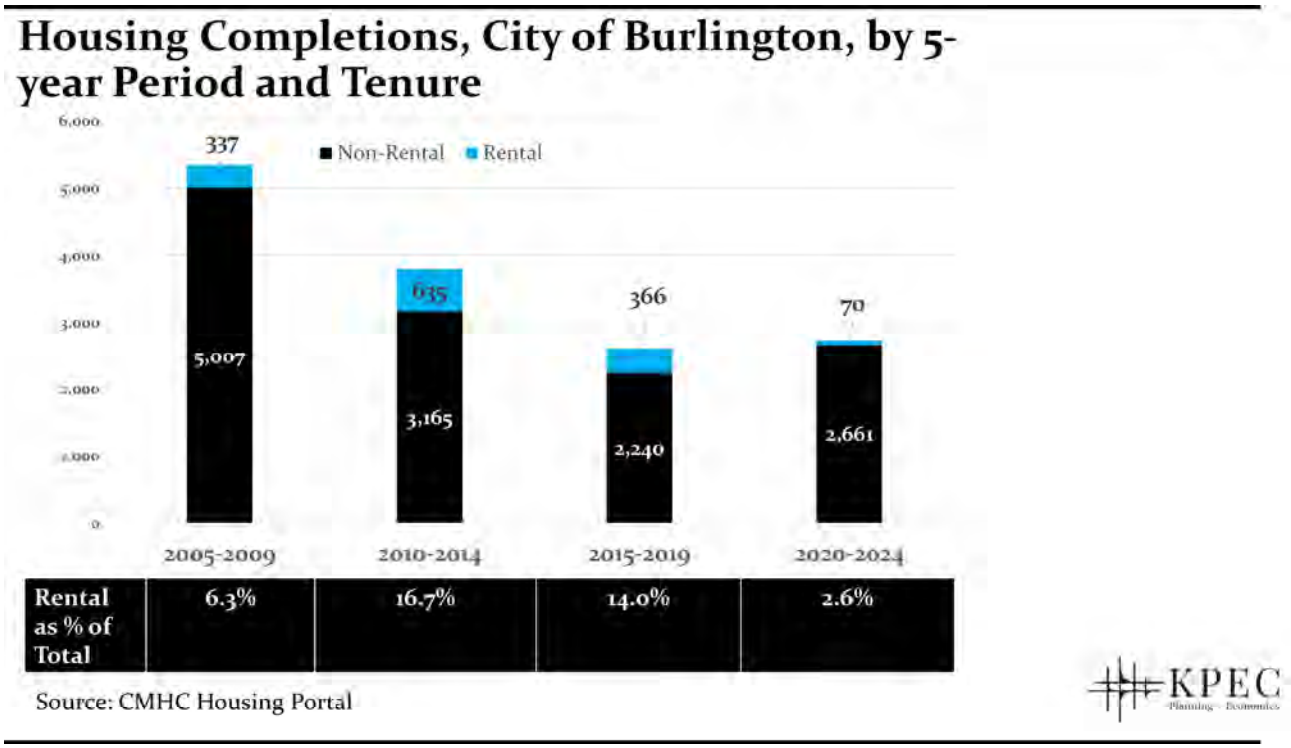


4.1.3. Rental Housing

Should the residential apartment units to be constructed in the proposed development be rental in tenure, they would contribute to the range and mix of housing available in the City.

The share of rental housing production as a share of total new housing has fallen in each of the last three five-year periods, from 16.7% in the 2010-2014 period to 2.6% in the 2020-2024 period. The number of rental housing units built in the City has also fallen from 635 units in the 5-year period starting in 2010 to just 70 rental units over the past five years.

Figure 12



According to CMHC, the number of private rental apartments in the City has been stagnant, ranging between 10,045 and 10,168 units each year from 2017 to 2024.

4.1.4. Need for Accelerated Pace of Housing to Meet ROP Minimums

In addition to the 374 apartments being completed per year in the City, there have been 60 townhomes completed per year, for a total housing production of medium-and-high density units of 434 units per year. The Region Official Plan requires that 1,107 medium- and high-density units completed per year to meet the phasing set out in Table 2A.

The City will therefore need to see these unit types increase by 155% over the next 20 years than what it saw over the last 10 years from 2015 to 2024.

Figure 13

Housing Completions by Year, City of Burlington, 1990-2024

Year	Single-Detached	Semi-Detached	Row	Apartment	Total
1990	455	14	296	107	872
1991	144	4	224	132	504
1992	190	18	247	434	889
1993	246	-	151	205	602
1994	295	32	408	268	1,003
1995	194	20	270	72	556
1996	320	24	275	-	619
1997	734	68	444	204	1,450
1998	538	128	468	128	1,262
1999	564	148	545	168	1,425
2000	482	172	463	927	2,044
2001	570	36	432	303	1,341
2002	520	104	296	360	1,280
2003	642	66	750	-	1,458
2004	531	94	553	68	1,246
2005	577	12	266	311	1,166
2006	364	146	344	440	1,294
2007	411	32	440	312	1,195
2008	521	108	254	-	883
2009	284	70	214	238	806
2010	246	220	139	488	1,093
2011	287	60	140	382	869
2012	298	-	154	150	602
2013	107	2	161	328	598
2014	74	8	77	479	638
2015	113	2	78	205	398
2016	57	4	22	188	271
2017	66	-	13	515	594
2018	159	-	-	264	423
2019	62	68	11	779	920
2020	55	-	76	379	510
2021	90	50	104	503	747
2022	58	12	26	-	96
2023	95	-	44	662	801
2024	86	20	231	240	577
1990-1994	1,330	68	1,326	1,146	3,870
1995-1999	2,350	388	2,002	572	5,312
2000-2004	2,745	472	2,494	1,658	7,369
2005-2009	2,157	368	1,518	1,301	5,344
2010-2014	1,012	290	671	1,827	3,800
2015-2019	457	74	124	1,951	2,606
2020-2024	384	82	481	1,784	2,731

Source: CMHC

4.2. Population Growth

Over the 2001-2021 period, the City saw its population increase from 150,836 persons to 186,948 persons, which equates to annual population growth of approximately 1,800

persons per year. The five-year growth rates have slowed considerably in each subsequent five-year Census period, from growth of 13,579 persons from 2001-2006, decreasing each period to growth of just 3,634 persons from 2016-2021.

Figure 14

Change in Population and Occupied Private Dwellings, City of Burlington 2001-2021

Year	Population	Occupied Private Dwellings	Population % Change	Population Change	Avg. Annual Change
2001	150,836	57,340			
2006	164,415	63,159	9%	13,579	2,716
2011	175,779	68,779	7%	11,364	2,273
2016	183,314	71,373	4%	7,535	1,507
2021	186,948	73,180	2%	3,634	727
Change 2001-2021					
Total	36,112	15,840			
Avg. Annual	1,806	792			
Growth 2021-2041					
Total	45,500				
Avg. Annual	2,275				

Source: Statistics Canada Census data

To grow to 240,050 persons by 2041 (from the population of 195,000 persons in 2021 which includes Census undercount), the City will need to grow by an average of 2,275 persons per year each year for 20 years – this amount of annual population growth is:

- 213% higher than the population growth seen in the City over the 2016-2021 period;
- 104% higher than the growth seen over the 2011-2021 period;
- 26% higher than the average annual population growth seen over the past 20 years.

Given that the bulk of the population growth in the City over the past 20 years has occurred during periods (2001-2011) when its large greenfield areas were developed, and as those areas have built-out and the City has increasingly relied on higher-density forms of housing, population growth has since slowed significantly. The City will need to significantly accelerate housing growth over recent levels to fulfill the housing and population targets set out in the Halton Region Official Plan.

4.3. Estimated and Approved Density in Downtown Burlington

An analysis completed by the City in September 2020 estimated the density of the original Downtown Burlington UGC at 188 people and jobs per hectare based on "current and approved development projects".

The measurement of density excludes the Spencer Smith Park lands, which would reduce the 'denominator' of the density calculation and make the calculated density higher than it would be had the park lands been included. Density Measurements

Based on review of this analysis, the estimate of density in the Downtown includes the following elements:

- Estimate of 2016 density – 157 people/jobs per hectare ("pj/ha"), including 9,217 persons and 7,162 jobs over a land area that is 104.3 hectares;
- Projects completed or under construction would add another 2,068 persons and jobs to the area, bringing the density to 177 pj/ha. This grouping includes:
    - 2030 Caroline Street
    - Bridgewater (2050 Lakeshore);
    - Hospital Expansion (1000 jobs);
- Projects with draft approved site plans would add 922 persons and jobs to the area, bringing the density to 186 pj/ha;
- Projects with some approvals, but awaiting site plan approval would add another 285 jobs to the area, bringing the density to 189 pj/ha;
- Development applications without approvals are estimated to add another 2,891 people and jobs to the area, bringing the density to 217 pj/ha;

There are numerous issues with the assumptions and inclusions in the above density estimates:

- The land area excludes the Spencer Smith Park, resulting in a land area of only 104 hectares. The Provincial document from Spring 2008 showing the size and location of UGCs showed the Downtown Burlington UGC as being 125 hectares, with the difference in size is due to the removal of the Spencer Smith Park from the land area.

- If the 125 hectares was used, using the same estimates of population and employment from the baseline 2016 estimates, the 9,217 persons and 7,162 jobs would equate to 131 pj/ha instead of 157 pj/ha, and the 'planned' density would fall from 217 pj/ha to 180 pj/ha.
- The UGC land area of 104 hectares is only roughly half of the land area that a full 800-metre radius around the John Street Bus Terminal would include (201 hectares), meaning that the calculated density per hectare leaves out vast areas of low-density homes within proximity to the John Street Bus Terminal, meaning that the overall estimates of density per hectare in the area are somewhat overstated.
- A footnote on page 2 of the City's analysis states that the population estimates are "based on 2011 Statistics Canada custom data plus Statistics Canada population growth by Dissemination Area (2011-2016) which includes the UGC and portions of adjacent neighbourhoods. This assumes that all new growth over the 2011-2016 timeframe occurred in the UGC"
- Despite the low-density residential areas not being part of the 'denominator', the density analysis by virtue of including Dissemination Areas in the UGC, includes numerous land areas in the estimated 'baseline' population that are not within the UGC boundaries, meaning that the estimated baseline density is overstated.
- Of the additional density reviewed in the September 2020 report there are 2,711 residential units estimated to generate a population in new units of 4,285 persons. In addition, there are 1,807 new jobs estimated to be generated through non-residential developments (Hospital Expansion) or non-residential components of mixed-use developments, including 7,638 m2 of commercial and 8,512 m2 of office space, the latter of which was largely to be provided through an 8-storey office building provided on 2030 Caroline Street, which would generate 271 jobs.
- The version of the 2030 Caroline Street application in the September 2020 analysis would include 190 persons and a total of 330 jobs, for a total of 520 persons and jobs. The updated application would include 302 residential units and 382.83 m2 of retail space, which would generate 464 persons and 11 jobs, or 495 persons and jobs, or a combined 25 persons and jobs less than contained in the September 2020 report.

4.4. Nearby Developments and Development Applications

Based on current information available from the City's planning pipeline information, there are 2,208 dwelling units under application or approved in the area surrounding the

subject lands. A list of the active development applications and recent approvals not yet built is provided in the figure below.

Figure 15

Active Development Applications and Approvals, Downtown Burlington

Address	Units	Status
2093-2101 Old Lakeshore Road	315	Fully Approved
535 Brant Street	259	Fully Approved
2069-2075 Lakeshore Road	320	Fully Approved
2082-2090 James Street	150	Fully Approved
407 Martha Street	111	Partial Approval - Waiting for Site Plan
2085 Pine Street	38	Partial Approval - Waiting for Site Plan
2030 Caroline Street	302	Appealed to OLT
2072 Lakeshore Road	165	Under Review
409 Brant Street	201	Under Review
2107 Old Lakeshore Road	196	Under Review
Total	2,057	

Total by Status	
Fully Approved	1,044
Partial Approval - Waiting for Site I	149
Appealed to OLT	302
Under Review	562

Source: City of Burlington Planning Pipeline Database (as updated August 18 2025)

5. HOUSING ANALYSIS

5.1. Sources of Requiring or Funding Affordable Housing

5.1.1. Inclusionary Zoning

As the subject site is not located within the delineated Major Transit Station Area, or within the City's proposed CPP By-law boundaries for GO station areas, it is not subject to inclusionary zoning requirements.

5.1.2. Community Benefits Charges

Section 37 of the Planning Act allows municipalities to impose a fee of up to 4% of the land value of developments with more than 5 storeys and more than 10 residential units.

The City's 2022 Community Benefits Charges Strategy Study ("CBC Study") included plans to fund the following capital works with CBC funds generated by eligible high-density development:

- Off-street parking facilities;
- Performing Arts Centre;
- Public Art;
- EV Charging Stations;
- Information Technology;
- Studies;

Other municipalities have utilized their CBC to fund affordable housing, and the City could update its CBC strategy to allow for CBCs to be used to fund or incentivize affordable housing production.

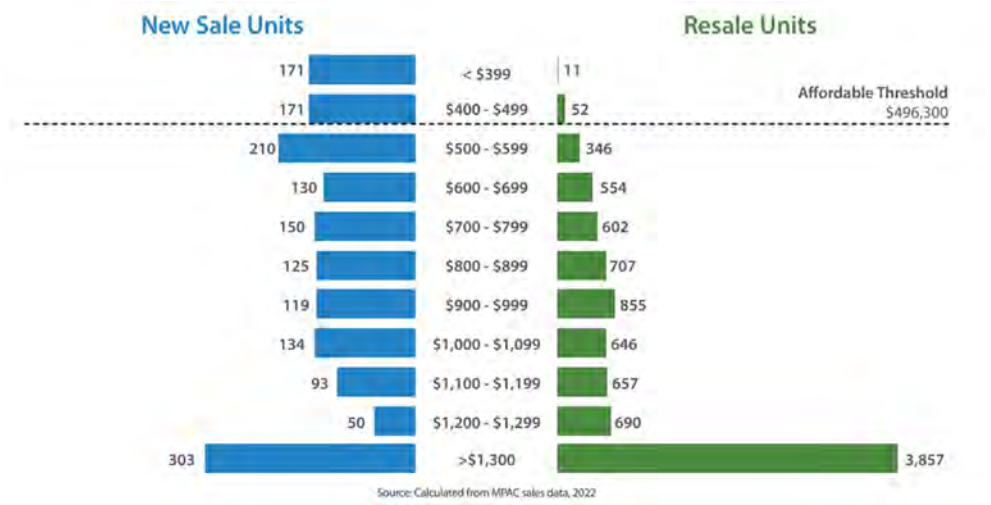
5.2. Halton Region 2023 State of Housing Report

The Region's 2023 State of Housing Report (released August 16, 2024) estimated that 932 of the 2,406 new housing unit sales (38.7%) in the Region in 2023 were under the Affordable Maximum Purchase Price of $531,900, while 269 of 7,050 resale homes (3.8%) were below the affordable price threshold. The affordability threshold used ($531,900) is what would be affordable to a household with an increase of $126,300. The rate of 38.7% of new housing units sales being deemed affordable under the City's

threshold would surpass the Region's goal to achieve 30% of new housing units produced annually to be affordable or assisted.

There were also 156 new assisted program units, up over 6-fold since 2022 (25 units). The construction of new housing is a far more productive source of affordable housing options than the current existing mix of housing in the City. Of the 333 affordable housing units, all were apartment units.

Figure 16 – Number of New Sale and Resale Units by Price Threshold, Halton Region, 2022 (Source: Halton Region 2022 State of Housing Report)



While similar municipal-level data is not reported for the 2023 State of Housing Report, based on the 2022 edition, in relation to the City of Burlington alone:

- The share of new home sales in Burlington below the affordable price threshold has increased each of the past four years from 27% in 2019 to nearly 74% in 2022.
- The City's share of new units meeting the affordable price threshold is by far the highest of any other municipality in Halton Region,

These trends and Burlington's ability provide a high rate of homes below affordability thresholds likely owes to the City of Burlington's higher-than-average share of higher-density housing forms, which are more likely to be priced at or below the prevailing price threshold.

Figure 17

Trends in New Home Sales Above/Below Affordable Price Threshold, 2019-2022

Halton Region	Below Affordable Price Threshold	Above Affordable Price Threshold	Total		% Affordable by Unit Type
Single/Semi	-	762	762		0.0%
Row	1	281	282		0.4%
Apartment	332	280	612		54.2%
Total	333	1,323	1,656		20.1%
By Municipality					
Burlington	81	29	110		73.6%
Halton Hills	-	165	165		0.0%
Milton	1	514	515		0.2%
Oakville	251	615	866		29.0%
By Year - Halton Region				Affordable Price Threshold	
2019	150	1,578	1,728	$ 393,400	8.7%
2020	585	1,762	2,347	$ 409,500	24.9%
2021	637	1,658	2,295	$ 480,700	27.8%
2022	333	1,323	1,656	$ 496,300	20.1%
By Year - Burlington					
2019	9	24	33		27.3%
2020	101	186	287		35.2%
2021	212	310	522		40.6%
2022	81	29	110		73.6%

Source: Halton Region based on annual State of Housing Reports

5.3. Provincial Affordable Housing Bulletin

Based on the Provincial bulletin for Affordable Residential Units as updated July 15, 2025, the affordable price and rent thresholds for units in Burlington are as follows:

Figure 18

Ownership Unit Type	Price
Detached House	$484,100
Semi-Detached House	$484,100
Townhouse/Row	$484,100
Condominium Apartment	$484,100

Rental Unit Type	Rent
Bachelor Unit	$1,464
1-Bedroom	$1,733
2-Bedroom	$2,008
3-Bedroom	$2,330

5.4. Family-Sized Apartments

The proposed development would include 50 residential dwelling units, including 31 one-bedroom units (including 7 one-bedroom + den units),11 two-bedroom units and 8 three-bedroom units (including a penthouse unit), meaning that 19 of the units in the building (or 38%) would have two or more bedrooms.

6. CONCLUSIONS AND FINDINGS

6.1. Conclusions

The conclusions and findings are expressed against the required elements of the Housing Impact Statement.

Figure 19

Required Element of Housing Impact Statement	Analysis
How proposal contributes to achievement of Regional housing targets	Contributing to a range and mix of new housing in the City and bolstering the development pipeline contributes to the achievement of the City and Regional housing targets. As a parcel within one of the Region's Primary Regional Nodes and a Secondary Node in the City's OP, the development can help the Region achieve Region-wide minimum density targets for Strategic Growth Areas. By utilizing and supporting existing infrastructure in the Downtown area, the redevelopment optimizes existing infrastructure. By adding additional residential units to the City's existing pipeline, it improves the City's prospects of achieving its housing targets and exceeding its minimum planning forecasts set out in Region and City Official Plans.
How the rents or sales prices of the development are at or below the affordable housing thresholds	Based on the Region's annual housing report, a significant proportion of home sales in high-density units in Burlington meet the Provincial definition of affordable. The Provincial bulletin finds that the affordable price threshold in the City is $484,100, and the affordable rents are $1,464 for a studio apartment, $1,733 for a 1-bedroom apartment, $2,008 for a 2-bedroom apartment and $2,330 for a 3-bedroom apartment.

Required Element of Housing Impact Statement	Analysis
Information Regarding Number of Affordable Housing Units to be Provided per Phase	As the subject site is not located within one of the City's GO Major Transit Station Areas, and is not part of the City's Community Planning Permit areas, the subject site is not subject to the requirement to provide affordable housing within the development.
Proposed Legal and/or Financial Mechanisms to Ensure Delivery of Any New Proposed Affordable Housing Commitments and Mechanisms to Retain Long-Term Affordability of Units	While no affordable housing is required, should any housing types be required or provided, an appropriate legal mechanism will be made available for review. The City has the ability to utilize Community Benefits Charge (4% of land value for eligible high-density developments) reviews for a variety of purposes, which may include allocating CBC funding generated from the proposed redevelopment for affordable housing.

6.2. Findings

Beyond the specific conclusions that respond to the required elements of the Housing Impact Statement, the following presents the other high-level findings from the research and analysis into housing issues pertaining to the development proposal at 2076 Old Lakeshore Road in the City of Burlington:

- The subject lands are not within a geographic area where affordable housing is a requirement, such as in a Protected Major Transit Station Area or a Community Planning Permit (CPP) area;
- To meet or exceed Regional phasing targets, the City will need to accommodate at least 1,025 units per year in its built-up area;
- Even if the City's three MTSAs (Appleby GO, Aldershot GO, Burlington GO) can achieve their minimum density targets (28,272 additional persons over existing populations), a substantial amount of growth in the City (59% of all growth) will need to occur on lands outside of MTSAs to achieve the City's 2051 planning forecasts of an additional 70,160 persons.
- The City's development pipeline has 44,109 housing units, however only 16% of these units have full approvals and are able to proceed to building permit stage – the

other 36,990 units need some additional approval or decision to continue through to the construction phase. Of these, 100% of those with an application would need to be approved and 33% of those in pre-application stages (21,278 units) would need to have applications submitted, approved, and permitted to be constructed by 2031. The more extensive the City's development pipeline is, the greater the likelihood that the City is able to meet or exceed its population and housing forecasts.

- The Region Official Plan requires that 1,107 medium- and high-density units completed per year to meet the phasing set out in Table 2A. Over the past 10 years, the City has seen only 374 apartment units completed per year, which when combined with 60 townhouse units per year, equates to 434 medium-and-high density units. The City will need to increase the annual production of these unit types by 155% to achieve minimum planning forecasts.
- Over the past 10 years (2015-2024), the rate of ground-related housing production in the City was 85% lower than what was built over the 1995-2004 period. While apartment construction increased by 67%, this was not enough to offset the substantial decline in ground-related housing, resulting in overall housing production per year falling by 58%. Even with the increased amount of apartment units being built in the City, it has not been nearly enough to offset the decline of ground-related housing forms being built within the City's urban boundary, a trend that is likely to persist as greenfield opportunities in the City continue to be exhausted as the City has built-out.
- To grow to 240,500 persons by 2041 (from the population of 195,000 persons in 2021 which includes Census undercount), the City will need to grow by an average of 2,275 persons per year – this amount of annual population growth is:
    - 213% higher than the population growth seen in the City over the 2016-2021 period;
    - 104% higher than the growth seen over the 2011-2021 period;

The City will need to substantially increase housing production to achieve the pace of development implied in its population and housing forecasts. To do so, the City will need a broad-base of development applications and approvals in its pipeline, both by unit type (singles, rowhouses, apartments) and by location (MTSAs, Downtown Urban Centre, designated greenfield areas, generally throughout the built-up area, etc.).