1200 King Road, City of Burlington

Housing Impact Statement

February 26, 2026

KPEC
Planning + Economics

1200 King Road,

City of Burlington

Housing Impact Statement

Prepared for:

Alinea Land Corporation

Keleher Planning & Economic Consulting Inc.

75 Main Street East, Milton ON, L9T 1N4

February 26, 2026

EXECUTIVE SUMMARY

Keleher Planning & Economic Consulting Inc. (KPEC) was retained by the Alinea Land Corporation to prepare a Housing Impact Statement for the proposed development located east of the Aldershot GO Station in the City of Burlington.

The subject site is approximately 49 hectares and is located at 1200 King Road in the City of Burlington, in the vicinity of the Aldershot GO station which is located to the west of the subject site. The lands are north of the rail corridor, south of Highway 403, west of King Road.

The proposed plan would include a mix of uses ranging from residential, institutional campus, entertainment uses, commercial retail uses, and parkland. The site would be developed with a total of 8,823 residential units, which would generate a population of 13,358 persons, and provide non-residential space to generate approximately 2,247 jobs.

The subject development provides a range and mix of new housing that contributes to the achievement of the City and Regional housing targets. The development will be made up of mid-rise and high-rise buildings, as well as a mix of townhouse and stacked townhouse dwellings. As one of the City's last designated greenfield areas, the development can help the Region achieve Region-wide minimum density targets in the Growth Plan and Regional OP.

The subject site is located near a GO station but is not within the boundaries of the MTSA. While the MTSAs have significant potential for future development, a City study found that even if the MTSAs achieved the minimum density target by 2051, the City's MTSA would represent only 40.3% of the population growth allocated to the City. The other nearly 60% of the City's forecast to 2051 the City needs to achieve as a minimum will need to be accommodated in other areas of the City, which would include Secondary Regional Nodes, designated greenfield areas such as the subject site, and other intensification opportunities throughout the built-up area. The proposed development can contribute to the City's achievement of its City-wide housing targets.

Even to achieve the City's 2041 forecasts, the City will need to see medium- and high-density housing production increase by 126% over the next 20 years compared to what was experienced over the past 20 years. To achieve the City's 2041 population, the City's population growth will need to be 104% higher than it was over the past 10 years (2011-2021), and 213% higher than it was during the past five years (2016-2021). The proposed development can contribute to the City's achievement of its population forecasts.

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1. INTRODUCTION

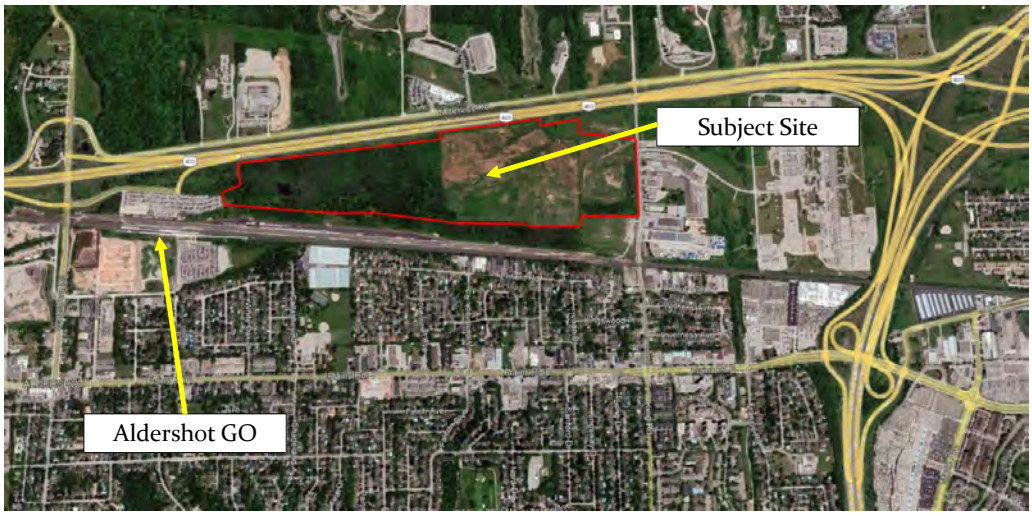
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1.1. Overview of Proposed Development

The subject site is approximately 49 hectares and is located at 1200 King Road in the City of Burlington, in the vicinity of the Aldershot GO station which is located to the west of the subject site. The lands are north of the rail corridor, south of Highway 403, west of King Road.

Figure 1

Location of Subject Site

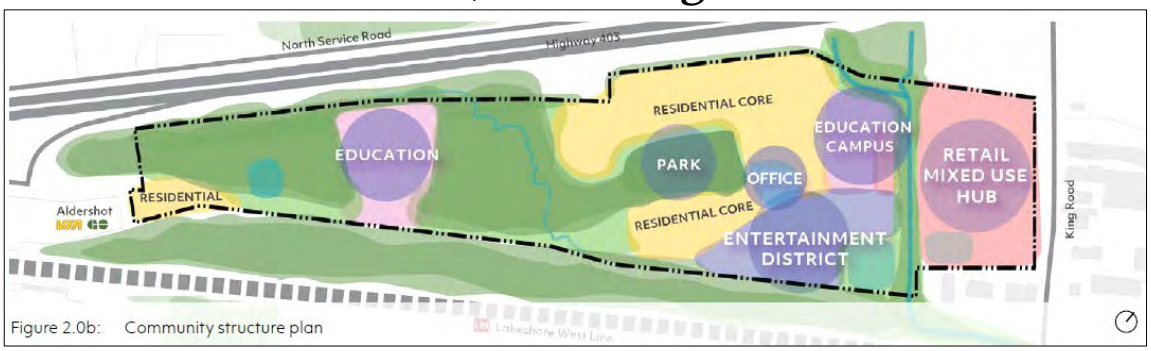


Source: Google Earth

The proposed plan would include a mix of uses ranging from residential, institutional campus, office uses, entertainment uses, commercial retail uses, and parkland.

Figure 2

Overview of Precincts, 1200 King Road



Source: GPA

The subject site is proposed to be developed with a total of 8,823 residential units, which based on average household sizes estimated in the City's 2024 DC Study, would generate a population of 13,358 persons.

In addition, the non-residential gross floor area, using rough assumptions regarding job generation per square metre would generate approximately 2,247 jobs.

Figure 3

Summary of Development Proposal and Estimated Population and Job Generation at Build-Out, 1200 King Road, City of Burlington

Residential Units by Type	Share of Units by Type	Units	Persons Per Unit	Persons
Studio	5%	441	1.36	600
1-Bedroom	30%	2,647	1.36	3,600
1-Bedroom + Den	30%	2,647	1.36	3,600
2-Bedroom	25%	2,206	1.80	3,970
2-Bedroom + Den	5%	441	1.80	794
3-Bedroom	5%	441	1.80	794
Total		8,823		13,358

Non-Residential		Gross Floor Area (m2)	Floor Space per Worker (m2/job)	Estimated Jobs (High)
Retail		11,738	50	235
Office		13,120	21	625
Campus		26,526	56	470
Arena		16,275	51	322
Hotel		16,297	50	326
Community GFA		13,607	51	269
Total Non-Residential	-	97,563		2,247

Source: Plans provided by client, City of Burlington 2024 DC Study

2. POLICY CONTEXT

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 proposed amendment to O.Reg. 232/18 would set the maximum percentage of affordable housing that can be required at 5%. 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 the City's Community Planning Permit area, no affordable housing is required from redevelopment of the subject lands.

2.2. Provincial Policy Statement

Section 2.2 of the Provincial Planning Statement 2024 ("2024 PPS") deals with housing matters:

> *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

2.3. Halton Region Official Plan

2.3.1. Growth Forecasts and Intensification Targets

This section of the report below relies upon the November 4, 2022 consolidation of the Regional Official Plan including the adopted Regional Official Plan Amendment 48 ("ROPA 48"). ROPA 48 identifies the City's three Major Transit Station Areas (MTSAs) where Inclusionary Zoning (IZ) can be applied.

(4) Require the Local Municipalities to prepare detailed official plan policies or an Area-Specific Plan for a Major Transit Station Area, in accordance with Sections 48 and 77(5) of this Plan that also:

i) establishes Affordable Housing targets in accordance with the applicable policies of Section 86 of this Plan, and inclusionary zoning policies authorizing a minimum number of Affordable Housing units, and/or a minimum gross floor area of Affordable Housing, within residential and mixed use buildings, and providing for their maintenance as Affordable Housing units over a period of time where appropriate. The Inclusionary Zoning policies will be based on the completion of an assessment report in accordance with the Planning Act, which is to the satisfaction of the Region.

Policies 55, as well as 55.1 to 55.3 refer to Tables 1, 2, 2A and 2B of the Regional Official Plan

55. The Regional Structure is accompanied by a growth strategy for Halton based on the distribution of population and employment as contained in Table 1, which has been updated to the planning horizon year of 2051 through the municipal comprehensive review, and in accordance with the Regional phasing outlined on Map 5, as well as by other infrastructure elements such as transportation systems and urban services and other policies of this Plan.

55.1 The Regional Structure also sets out targets for intensification within the Built-Up Area and for the density of Designated Greenfield Areas and Employment Areas, as contained in Table 2.

55.2 The Regional Structure also sets out the Regional phasing to be achieved every five years from 2022 to 2051 between the Built-Up Areas and the Designated Greenfield Areas in Table 2a.

55.3 The Regional Structure also sets out targets that apply to Strategic Growth Areas as contained in Table 2b, including:

a) specific minimum density targets, planned to be achieved by 2031 or earlier for Urban Growth Centres and beyond the 2051 planning horizon of this Plan for other Strategic Growth Areas; and

b) general targets for an overall proportion of residents and jobs to be planned for and achieved over the long-term.

The general targets for an overall proportion of residents and jobs in Strategic Growth Areas may be refined by the Local Municipalities, subject to Regional approval, and provided the change does not compromise the overall intent of the Region's growth strategy.

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 that the City is to accommodate over the 2022-2041 period. The built-up area 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.

Table 2A allocates 2,120 units over the 20-year period in the City's designated greenfield area, of which 1,630 units are to be medium- and high-density units, or 82 units per year. Based on Map 1H of the Regional Official Plan, the subject site is outside of the Region's built boundary, and is identified as 'Urban Area' on Map 1H, and would count towards the City's designated greenfield area.

2.3.2. Primary Regional Nodes and 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%

Other Regional Nodes in the City, those being Secondary Regional Nodes (Downtown Urban Centre, Uptown Urban Centre) will also have minimum density targets set out in the City's Official Plan, but both areas and others, including the City's remaining designated greenfield area and other vacant lands can be expected to continue accommodating a significant amount of housing growth to 2051 to enable the City to meet the population allocations from the Region.

2.3.3. 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.*

2.4. City of Burlington Official Plan

The City of Burlington's new Official Plan ("New City OP") was approved by Halton Region on November 30, 2020, though there are site-specific appeals such that certain parts of the approved New City OP are in-force and others are not yet in-force.

Section 2.3.1 of the New City OP deals with lands identified as Mixed Use Intensification Areas, with policy 2.3.1i) noting that the City has three "MTSA Special Planning Areas" including the Burlington GO, Aldershot GO and Appleby GO, and that these areas will be subject to further detailed, area-specific planning.

> *In Burlington there are three MTSA Special Planning Areas identified by the City around the Burlington GO, Aldershot GO and Appleby GO Stations. All three areas are major transit station areas. In this Plan, the three MTSA Special Planning Areas are identified as areas that will be subject to further detailed area-specific planning. The boundaries of the major transit station*

> *areas and assignment of growth targets will be confirmed through the Region of Halton's municipal comprehensive review in conformity to the Provincial Growth Plan.*

Section 8.1.3(8.3) of the New City OP includes site-specific policies for 1200 King Road.

> *1200 King Road: Notwithstanding the policies of Subsections 8.1.3 (8.2) b) and h) of this Plan, the following additional policies apply to lands designated "Urban Corridor-Employment" and located west of King Road, south of Highway 403, and identified as 1200 King Road:*
>
> *i) no minimum building height is required; and*
>
> *ii) should the sports arena and/or stadium facility referenced in Subsection 8.2.3(3) d) of this Plan, be constructed on the "General Employment" lands located to the south, additional retail and service commercial uses related to the sports arena and/or stadium facility and permitted in the Urban Corridor designation may be permitted. These uses shall consist of those uses permitted in the Urban Corridor designation, with the exception of residential uses, supermarket/grocery store and large building supplies/garden store.*

The City of Burlington Official Plan policies will need to be updated in accordance with the provincially approved ROPA 49 modifications (Map 1C), which removed the employment area designation for the subject lands. The lands are proposed to be redesignated through the planning application to amend the City OP, to support a mixed-use development.

2.5. Draft Official Plan Amendment No. 2

Draft Official Plan Amendment No.2 ("Draft OPA 2") would revise the City's Official Plan to implement the findings of the City's Major Transit Station Area (MTSA) project for the City's three MTSAs, including the Aldershot GO MTSA. Draft OPA 2 sets out the boundaries for the Aldershot GO, and the MTSA does not include the subject site lands.

While the City's OP policies relating to MTSA are under appeal and not yet in-effect. Regional Official Plan 48 established the City's three MTSAs as "Protected" Major Transit Station Areas ("PMTSAs") and identified minimum density targets for each.

The proposed policies in Draft OPA 2 include the following housing policies:

> *8.1.2 (8.6) Housing Policies*
>
> *a) All forms of affordable and assisted housing, including subsidized non-market housing units, are encouraged for integration within neighbourhoods.*
>
> *b) The Community Planning Permit system shall set out that notwithstanding any other requirements, affordable housing and assisted housing, may be permitted as single use developments and are encouraged to be combined with developments that also provide market housing.*

c) The City will collaborate with development proponents, the Region and non-profit housing providers to locate opportunities for subsidized non-market housing units within the Major Transit Station Areas.

d) The City shall require the submission of a housing impact statement where a development proposal includes more than one hundred (100) dwelling units, in accordance with subsection 3.1.1(2)h) of this Plan. The housing impact statement shall also identify how the proposal contributes to achieving the City Council's approved housing targets.

e) To achieve a mix of unit types and to support the creation of a range of housing types, the Community Planning Permit System shall require achievement of housing size and type as identified in the City's Housing Strategy.

The CPP By-law is not applicable for the subject lands and therefore affordable housing is not eligible to be required from development of the subject lands. However, Table 5.4 of the Community Planning Permit by-law sets out the affordable housing contribution requirements for sites within the CPP boundary:

- One of the following shall be provided for a Class 1 Community Planning Permit application:
    - Ownership:
        - At least 2% of the units exceed the affordability threshold for low-income deciles on average;
        - At least 7% of the units are affordable dwelling units to moderate income deciles (5% required to be within 4th and 5th deciles on average); or
        - At least 15% of the units are attainable to low and moderate income deciles (10% required to be within 2nd, 3rd, 4th deciles on average), or:
    - Rental:
        - At least 3% of the units are attainable to low-to-moderate income deciles on average (1% required to be within 1st, 2nd, 3rd deciles on average)
- For Class 2 Community Planning Permit application, the City may grant building heights up to the maximum based on how the proposed development meets or exceeds one or more of the City-wide annual housing targets and provides one of the following services, facilities or matters:
    - An additional 1% of ownership units exceed the affordability threshold for low-income deciles on average; or
    - An additional 3% of ownership units are affordable to the 4th and 5th income deciles on average); or

- An additional 10% of ownership units are attainable to the first five (5) income deciles on average (5% required to be attainable within the 2nd and 3rd income deciles on average); or
- An additional 2% of rental units are attainable to low-to-moderate income deciles on average*; or …

Figure 6 – Aldershot GO MTSA

Aldershot GO MTSA – Boundaries and Draft Transportation Network



Source: City of Burlington Draft OPA2

Tables C.1 and C.2 of the Community Planning Permit by-law sets out the affordable price thresholds by income decile:

Figure 7

Income Decile	Affordable Ownership (Table C.1)	Affordable Rents (Table C.2)
1st Decile (low income)	$164,537	$587
2nd Decile (low income)	$244,478	$834
3rd Decile (low income)	$312,183	$1,115
4th Decile (moderate income)	$384,806	$1,395
5th Decile (moderate income)	$456,001	$1,675
6th Decile (moderate income)	$536,213	$1,990

3. ANALYSIS

3.1. Overview of Proposed Development

The proposed development would see 8,823 residential dwelling units constructed, with a mix of studio (441 units), 1-bedroom (5,294 units), 2-bedroom (2,647 units) and 3-bedroom (441 units) apartment units. It is estimated that the dwelling units would generate a population of 13,358 persons.

Figure 8

Summary of Development Proposal and Estimated Population and Job Generation at Build-Out, 1200 King Road, City of Burlington

Residential Units by Type	Share of Units by Type	Units	Persons Per Unit	Persons
Studio	5%	441	1.36	600
1-Bedroom	30%	2,647	1.36	3,600
1-Bedroom + Den	30%	2,647	1.36	3,600
2-Bedroom	25%	2,206	1.80	3,970
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Total		8,823		13,358

Non-Residential		Gross Floor Area (m2)	Floor Space per Worker (m2/job)	Estimated Jobs (High)
Retail		11,738	50	235
Office		13,120	21	625
Campus		26,526	56	470
Arena		16,275	51	322
Hotel		16,297	50	326
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Total Non-Residential	-	97,563		2,247

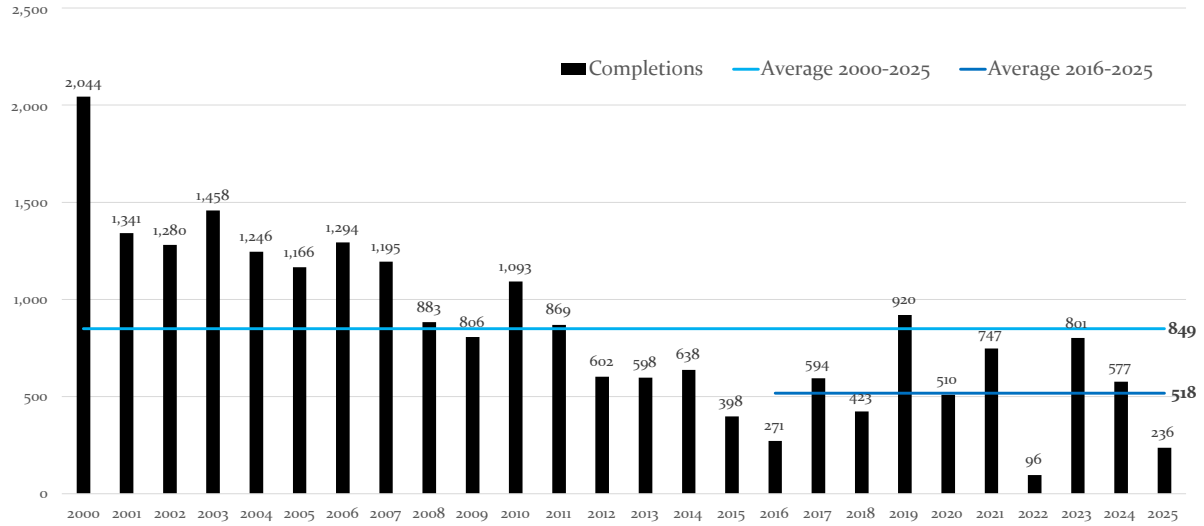
Source: Plans provided by client, City of Burlington 2024 DC Study

3.2. Housing Completions in City of Burlington

Over the past 26 years, the City has seen an average of 849 units completed per year but has only reached this average once since 2011 (920 units in 2019) and, and two of the past four years have been the two lowest since 2000, including the 236 completions in 2025.

Figure 9

Housing Completions, City of Burlington, 2006-2025



Source: CMHC

Over the past 20 years (2006-2025), the City has seen 6,702 apartment units completed, or 335 units of that dwelling type, per year. Combined with the 128 row units completed on average per year, the City has seen 463 units 'medium or high-density units' completed 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 139% over the next 20 years than what it saw over the preceding 20-year period from 2006-2025.

Figure 10

Housing Completions by Year and Unit Type, City of Burlington, 2000-2025

Year	Single	Semi-Detached	Row	Apartment	All
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
2025	50	10	26	150	236
Total 2000-2025	3,483	812	2,554	6,702	13,551
Last 5 Years	76	18	86	311	491
Last 10 Years	78	16	55	368	518
Last 15 Years	110	16	78	348	552
Last 20 Years	174	41	128	335	678

Source: CMHC

3.3. 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 11

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

Year	Population	Occupied Private Dwellings	Population % Change	Population Change	Population 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 240,500 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 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 when its large greenfield areas were developed, and has since slowed as the City has increasingly relied on higher-density forms of housing, the City will need to significantly accelerate housing growth over recent and longer-term levels to fulfill the housing targets set out in the Halton Region Official Plan.

3.4. Estimated Intensification Potential – MTSAs and Aldershot GO (Watson MTSA Study)

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

Figure 12

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), and 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 13

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 will need to be accommodated in other areas of the City, which would include Secondary Regional Nodes, designated greenfield areas, and other intensification opportunities throughout the built-up area.

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. The other 57% of the City's population growth to 2051 will have to occur in areas such as the subject site, Downtown and Uptown Urban Cores, as well as any accessory units, garden suites and other units that can be built generally throughout the built-up area.

3.5. June 2019 Growth Analysis Study

In June 2019, a Growth Analysis Study was released, as authored by Dillon Consulting, with the report addressing questions regarding land supply in the City. The Executive Summary provides an overview of the report's conclusions:

> *The residential land supply analysis shows that there is potential for the City of Burlington to accommodate an additional 58,321 to 85,863 persons … between now and its build-out (depending on the density target used for the Mobility Hubs, the low range represents the Growth Plan target of 150 ppl + jobs/ha while the high range represents the adopted 2018 OP density target of 300 ppl + jobs/ha). The analysis shows that the majority of opportunities for future growth are within the City's built-up area, with a high concentration of future population and jobs planned to be accommodated in its Primary and Secondary Growth Areas. This means that the vast majority of future growth will occur through intensification and redevelopment. …*

The Study notes that the development context in the City will be changing in the years ahead as the City's greenfield areas are built-out, and it will need to increasingly rely on intensification within the City's nodes, corridors and other redevelopment areas within the built-up area. However, given the significant amount of new development required in the City, the City should leverage its remaining greenfield areas, such as the subject lands, to the extent possible.

This suggests that the increased activity in the GO Station MTSAs will be needed, not only to accommodate population growth, but also to offset the declining development potential in the City's greenfields.

> *Over the past 25 years, the City of Burlington has experienced strong population growth across all major demographic groups (i.e. children, adults and seniors), largely driven by steady net migration across all ages and, to a lesser extent, natural increase (i.e. births less deaths). Since 1991, the City's population has grown at a rate well above the provincial average, fueling steady housing construction throughout the City. Historically, residential development activity within Burlington has been dominated by ground oriented housing forms (i.e. single/semi-detached and townhouses) which have largely occurred within the City's greenfield areas. As the City's designated urban lands continue to mature and build out, a growing share of new residential and non-residential development is expected to occur within the City's intensification nodes, corridors and other redevelopment areas within the BUA, as directed by the City's current in-effect 2017 Official Plan and the adopted 2018 Official Plan. This shift in development patterns is anticipated to result in a steady increase in the share of high-density housing forms (i.e. low-, medium- and high-rise apartments) over the medium and long term (i.e. post 2021). As the larger urban centres within the GTHA continue to mature, there is an increasing need to increase utilization of available, designated urban lands to accommodate new development. This represents both an opportunity and a challenge for the City of Burlington and its residents. On the one hand, population growth and increased urbanization are likely to bring new urban amenities and municipal services to the City (i.e. increased transit services, indoor recreation facilities, shopping centres, arts and cultural facilities, etc.) as well as local employment opportunities, which will*

> *benefit both the City and local residents. On the other hand,* ***the City's finite supply of greenfield lands ultimately requires the City to accommodate an increasing share of families in high-density households. However, recent PPU trends within the BUA do not suggest that this is occurring. [emphasis added]***

3.6. Conclusions: How Proposal Contributes to Achievement of Region Housing Targets

City Council endorsed a pledge to permit 29,000 housing units to be built in Burlington by 2031, which equates to an annual average of 2,900 housing units per year. Given the scale of the subject development, it is unlikely to be built-out by 2031, but the achievement of that target by 2031 by all of the necessary development across the City would absorb a significant amount of the City's current development potential, which would need to be 'restocked' as the development within the City's pipeline moves from proposed to approved to permitted to built dwelling units, for development post-2032. To achieve the housing pledge, the City's annual housing production will need to increase by over 4-times from the current long-term (20-year) average of 678 units per year. Additional designated/approved supply will be necessary as existing supply builds-out.

Over the 2006-2021 period, only 15% of the City's housing growth has occurred in the three GO-station based MTSAs, with the remainder locating in the Downtown and other more dispersed areas of the City. The Watson MTSA Study indicates that the GO Station MTSAs will need to accommodate over 40% of the City's growth, with the remainder locating in other parts of the City.

As the subject site is not within the boundaries of an MTSA, the development of the subject lands can contribute to the other 60% of forecast population growth like other areas such as the Downtown Urban Centre and Uptown Urban Centre, or other intensification throughout the built-up area.

4. AFFORDABLE HOUSING ANALYSIS

4.1. Sources of Requiring or Funding Affordable Housing

4.1.1. 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 boundary for Aldershot GO, it is not subject to inclusionary zoning requirements.

4.1.2. 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;

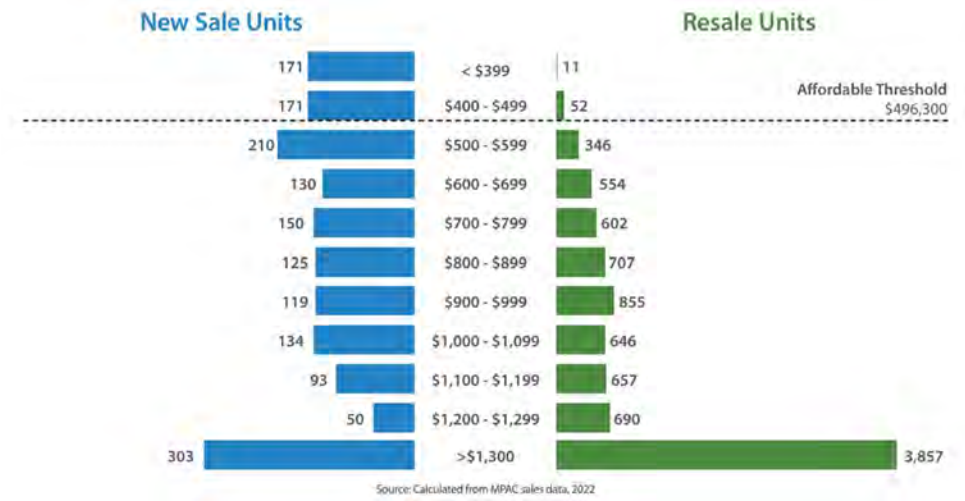
Other municipalities have utilized their CBC to fund affordable housing, and the City could update its CBC strategy to allow for CBCs to be used to fund or incentivize affordable housing production.

4.2. Halton Region 2022 State of Housing Report

The Region's 2022 State of Housing Report estimated that 21.6% of the new housing unit sales in the Region were under the Affordable Maximum Purchase Price of $496,300, which included 333 new sales that were affordable (out of 1,656 new sales), as well as 25 units from the Region's assisted housing program. 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 but one (1) unit was an apartment unit.

Figure 14 – Number of New Sale and Resale Units by Price Threshold, Halton Region, 2022 (Source: Halton Region 2022 State of Housing Report)



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, likely owing to the City of Burlington's increased orientation towards higher-density housing forms, which are more likely to be priced at or below the prevailing price threshold.

Figure 15

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

4.3. Affordable Units within Proposed Development

Based on information provided by the client, the 1200 King Road redevelopment will include a variety of housing typologies, made up of high-rise and mid-rise units, as well as a mix of tenure options. The development will explore attainable housing options, as well as provide for a greater range of home ownership, consistent with municipal (City and Region) planning policies.

4.4. Provincial Affordable Housing Bulletin

Based on the Provincial Bulletin for Affordable Residential Units, the affordable price and rent thresholds for units in Burlington are as follows:

Figure 16

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. CONCLUSIONS

The table below presents a summary of the analysis presented in the report regarding how each required element of the Housing Impact Statement has been addressed, and what the author's opinion is regarding whether those elements have been accounted for through the subject redevelopment proposal.

Figure 17

Required Element of Housing Impact Statement	Analysis
How proposal contributes to achievement of Regional housing targets	Providing a range and mix of new housing that contributes to the achievement of the City and Regional housing targets.
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. The proposed development includes a mix of dwelling unit types including townhouses, stacked townhouses and apartments that may meet the Provincial definitions of affordable, depending on price and the evolution of the Provincial definition by the time the units are developed.
Information Regarding Number of Affordable Housing Units to be Provided per Phase	Student housing is expected to be provided in the redevelopment, as are a mix of tenures and types, in high-rise and mid-rise building forms. As the subject site is not located within a Major Transit Station Area, 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 (attainable, etc.) or tenures need to be secured, 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.