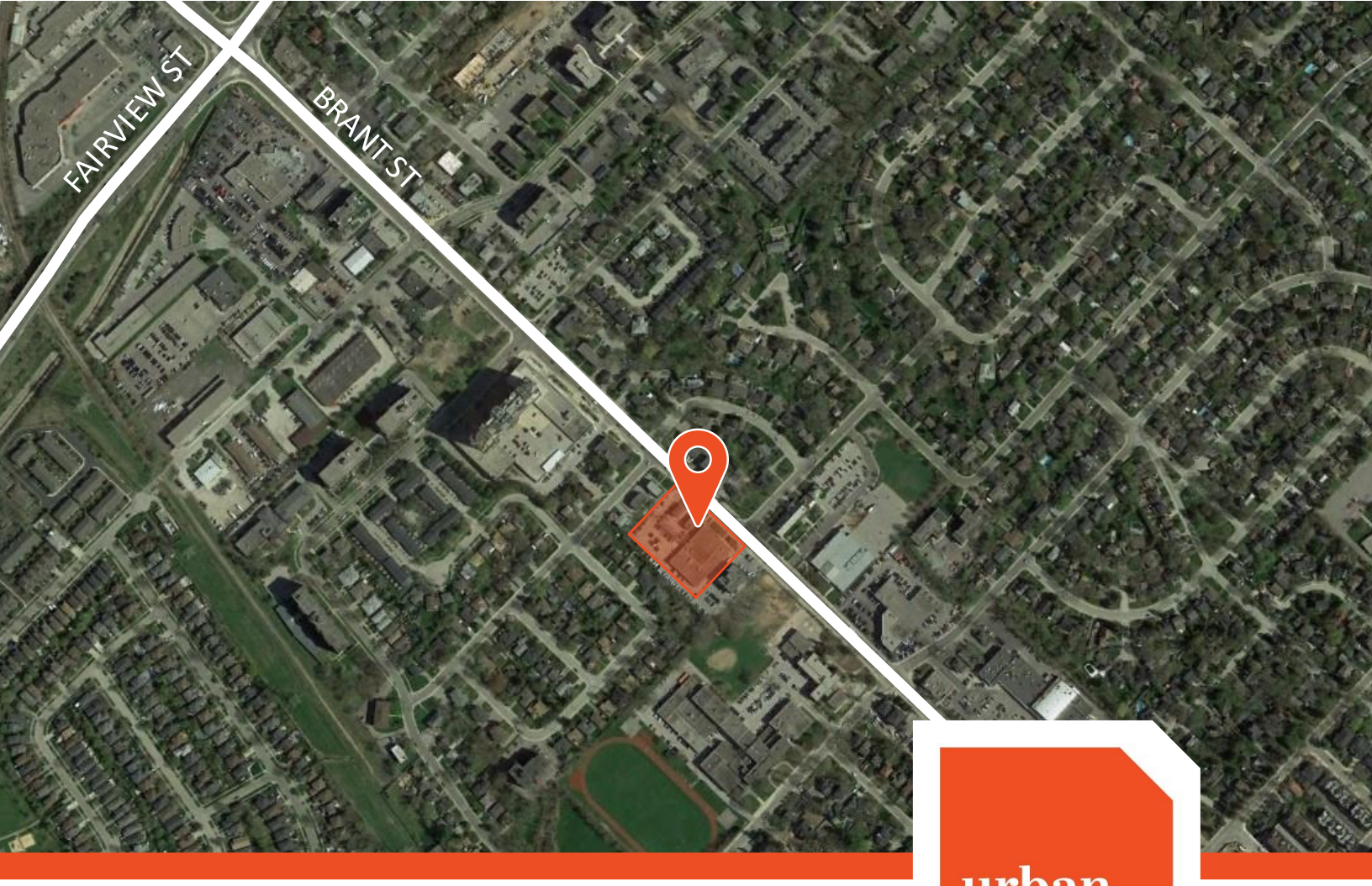


urban Metrics

688, 694 & 698 BRANT STREET

Housing Impact Statement

Burlington, Ontario

Prepared for Elite 688 Brant Holdings Inc. (c/o Weston Consulting)

January 16, 2023



This document is available in alternative formats upon request by contacting:
info@urbanMetrics.ca
416-351-8585 (1-800-505-8755)

January 16, 2023

Elite 688 Brant Holdings Inc.
3410 S Service Road, Suite 101
Burlington, Ontario
L7N 3T2

RE: **688, 694 & 698 Brant Street** – Housing Impact Statement (Burlington, Ontario)

urbanMetrics inc. is pleased to submit the following *Housing Impact Statement* in support of the development application submitted by Elite 688 Brant Holdings Inc., to construct a vertically integrated mixed-use high-density condominium apartment development at 688, 694 & 698 Brant Street, in the City of Burlington. This development is proposed to add 293 condominium apartment units, and 12-walkup two-storey townhouse units to the City's housing supply and will be accompanied by a ground floor retail component fronting onto Brant Street.

This report is designed to fulfill the City of Burlington's new Official Plan (2020 Interim Working Version) policy requirements as outlined in Section 3.1.1(2)(h) for a *Housing Impact Statement* pertaining to any development applications that will result in the delivery of more than 100 residential units. Furthermore, this report is also intended to demonstrate how the proposed residential component of the development contributes to the Region of Halton's housing targets and overall affordable housing needs.

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

Yours truly,



Shawn Donahue, PLE
Associate Partner

urbanMetrics Inc.

67 Yonge Street,
Suite 804
Toronto, ON
M5E 1J8

T: 416 351 8585
Toll Free: 1 800 505 8755
E: sdonahue@urbanmetrics.ca

urbanMetrics.ca

Contents

Executive Summary 1
Existing Uses 2
The Development Proposal 2
Terms of Reference Summary 3
1.0 Introduction 6
1.1 Purpose & Approach 7
2.0 Site Assessment 9
2.1 Subject Site 10
Location 10
Existing Site Uses 11
Planning Context 12
Proposed Development 13
3.0 Housing Policy Context 16
3.1 Halton Region Official Plan 17
Intensification & Growth 17
Housing Mix & Affordability 20
3.2 City of Burlington Official Plan 22
3.3 Halton Region State of Housing Report 24
Report Purpose 24
Key Indicators 25
4.0 Local Housing Market Trends 29
4.1 Local Housing Supply 30
4.2 Affordable Housing Opportunities 32
Current Opportunities to Provide Affordable Housing 32
Emerging Opportunities to Provide Affordable Housing 33
5.0 Conclusions 35

urban Metrics

Figures

Figure 2-1: Subject Site 10
Figure 2-2: Existing Uses 11
Figure 2-3: Regional Urban Structure 12
Figure 2-4: Proposed Site Statistics 14
Figure 2-5: Proposed Site Plan 14
Figure 3-1: Minimum Number of New Housing Units in the Built-Up Area 2015-2031 18
Figure 3-2: Regional Phasing Inside the Built-Up Area, City of Burlington 2012-2031 19
Figure 3-3: Affordability Share of New Housing Sales, Halton Region 26
Figure 3-4: Affordability Share of New Housing Sales, Burlington 26
Figure 3-5: New Affordable Housing Sales, Halton Region, 2021 27
Figure 4-1: City of Burlington, Inventory of Available New Condominium Apartment Units Monthly (2010-2022) 31
Figure 4-2: City of Burlington, Inventory of Available New Condominium Apartment Units (2017-2022) 31

urban Metrics

Executive Summary

urbanMetrics inc ("urbanMetrics") was retained by Elite 688 Brant Holdings Inc. ("Elite") to prepare a *Housing Impact Statement* in support of their development application for the proposed redevelopment and intensification of the site known municipally as 688, 694 & 698 Brant Street (the "subject site"), in the City of Burlington ("City" or "Burlington"). This study is intended to evaluate and summarize the impact that the proposed development will have on the local and regional housing market and its contributions to affordable housing in the City.

Existing Uses

The subject site is currently occupied by three buildings consisting of a one-storey vacant commercial building formerly occupied by Canada Post, a two-storey apartment complex consisting of five rental units, and a two-storey house currently used for short-term accommodation rental and listed on Airbnb, as shown in Figure 2-1: Subject Site and Figure 2-2: Existing Uses herein.

The Development Proposal

The development concept, as summarized in Figure 2-4: Proposed Site Statistics and shown in Figure 2-5: Proposed Site Plan herein, proposes an 11-storey, vertically integrated, mixed-use, high-density condominium apartment and townhouse development with street-front retail. The residential component is proposed to consist of 293 residential condominium apartment units of varying sizes, including a mix of bachelor, one-bedroom+, and two-bedroom+ units, and 12 walk-up two-storey townhouse units incorporated into the backside of the building. The street-front retail component will consist of approximately 1,500 square metres of space fronting along Brant Street. As proposed, the re-development of the subject site will contribute towards increasing the overall supply of housing available in the City.

As per the policies of the *Halton Region Official Plan ("Halton OP")* the subject site is located within an Urban Growth Centre and is part of a Major Transit Station Area, as identified in *Map 1h: Regional Urban Structure* and shown in Figure 2-3 herein. These areas are intended to accommodate a significant share of future population and employment growth in the City of Burlington.

Elite's development application will assemble three properties planned for intensification and higher density uses in the future. Through the assembly of a larger site, the proposed development concept offers a more balanced mixed-use development, in terms of size, scale, relative height and compatibility with the existing surrounding land uses in the area, than what could likely be achieved if each of the properties were to be redeveloped individually. Further this will contribute to the achievement of more intensive and integrated land uses with Brant Street's mixed use corridor, that is consistent with the objectives and vision of the Burlington OP.

Terms of Reference Summary

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

Policy	Analysis
1) Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the new Burlington OP;	See below
(i) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development of 293 apartment units and 12 townhouses on the subject site would contribute towards the Region's achievement of two major housing targets from the Region OP: 1. **Policy 86 (6) a)** – As all units in the proposed development will be condominium apartments or townhouses, the development will contribute towards the Region's achievement of the target that 50 per cent of new units developed be in the form of townhouse and apartment units. 2. **Policy 77 (2.1)** – As the proposed development is located within the Region's built-up area, all units will contribute towards the Region and the City meeting their intensification target of a minimum of 40 per cent of new residential units being constructed in the built-up area. New units in the proposed development are not expected to meet the regional or local definition of affordable or assisted housing units. However, the increased supply of housing would indirectly support housing affordability by contributing towards the supply of new housing available to accommodate forecasted demand. Also, by introducing a mix of unit formats and sizes, the proposed development would appeal to a broader range of current and future residents.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential sale price for units in the proposed development has not yet been determined. However, based on current market rates, it is not anticipated that the units within the proposed development will be priced below the Region's 2021 Maximum Affordable Purchase Price threshold or will satisfy regional or local definitions for affordable housing.

(iii) Where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable.	As this development includes only one building, it is not expected that the development will occur in phases.
(iv) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long-term affordability of units, where applicable.	Elite is not explicitly committing to the development of 'affordable' housing units on the subject site and the development does not qualify for any related financial or other incentives. However, in terms of contributing to the City-wide provision and inclusion of affordable housing in new development, Elite's development application is not prohibited from support of other existing and potential future policies, tools and mechanisms for assisted housing. Support incentives and/or developer contributions potentially may be generated from the following: Halton Region's Assisted Housing Program, Halton's In-Situ Program, and Community Benefit Charges.
2) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.;	The subject site is currently occupied by a vacant commercial building and low-density residential uses. The proposed mixed-use composition of the development will maintain the general land use character of the overall site while increasing the density of residential uses over the three assembled properties. Developing 293 new condominium apartment units and 12 townhouses on the site is consistent with the new Burlington OP's growth intensification objectives for this area of the City and will contribute towards the City and Halton Region achieving their various housing supply targets. Further, based on the current concept plan, the proposed development will contribute to diversifying the City's housing stock by adding a range of unit formats and varying unit sizes including: 12% of units will be bachelor units, 49% of units will be one-bedroom units, 35% of units will be two-bedroom units, and 4% of the units will be townhouses.
3) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent *State of Housing Report*; and	As noted previously, Elite's proposal to develop apartment and townhouse units at on the subject site situated within the built-up area of the Region, contributes to the Region achieving its housing intensification and minimum unit target as defined in Policy 77 (2.1) of the *Halton OP*. The development of the subject site as proposed will increase the overall supply of new housing units in Burlington and in Halton Region. Further, this increased supply of housing will indirectly support housing affordability by contributing towards the supply of new housing to accommodate forecasted demand.

4) Should identify and discuss other relevant and current housing information available.	Recently, the monthly supply of new condominium apartment units available in Burlington has been declining and is well below historic averages, falling behind demand. This emphasizes the importance of Elite's proposed development adding 305 new housing units to the City's future housing supply to continue to satisfy market demand in the City. While Elite's development proposal will not directly contribute to affordable housing targets in the City and the Region, the proposed development is not prohibited from support of other existing and potential future policies, tools, and mechanisms for assisted housing. The potential for community support incentives, developer contributions or other positive outcomes potentially may be generated from opportunities such as the following: Halton Region's Assisted Housing Program, Halton In-Situ Program or Community Benefit Charges

1.0 Introduction

urbanMetrics inc. ("urbanMetrics") was retained by Elite 688 Brant Holdings Inc. to prepare a *Housing Impact Statement* in support of their development application for the proposed redevelopment and intensification of the site known municipally as 688, 694 & 698 Brant Street in Burlington. This study is intended to evaluate and summarize the impact that the proposed development will have on the local and regional housing market and contributions to affordable housing in the City.

1.1 Purpose & Approach

The *City of Burlington 2020 Official Plan – Interim Working Version* ("new Burlington OP") requires that a *Housing Impact Statement* be prepared whenever more than 100 residential units are included in a development proposal. As part of the Development Application Pre-Consultation process, City Planning Staff, have provided a Terms of Reference (TOR) to guide the preparation of this study. The TOR for the *Housing Impact Statement* outlines the following elements that are required:

- Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the new Burlington OP;
- Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.;
- Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent *State of Housing Report*; and
- Should identify and discuss other relevant and current housing information available.

Section 3.1.1(2)(h) of the new Burlington OP provides additional clarification on the items that must be addressed as part of a *Housing Impact Statement*. This includes:

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

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

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

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

Each of these elements have been studied and addressed in the following *Housing Impact Statement* and have been summarized in the conclusions of this report.

2.0 Site Assessment

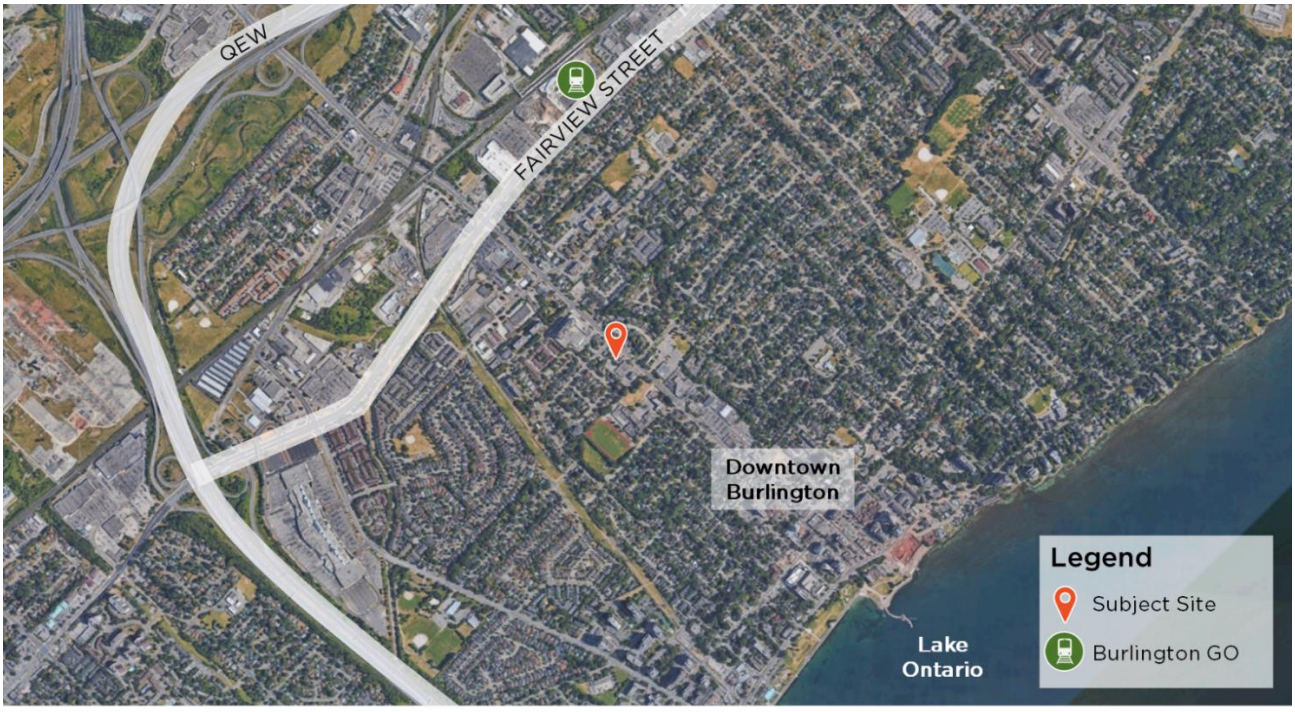
The following section provides a comprehensive review of the existing use(s) of the subject site relative to its surrounding area as well as an overview of the increased density that is anticipated to result from the proposed redevelopment of the subject site as a vertically integrated mixed-use retail, condominium apartment, and townhouse development. This overview has been completed from the perspective of providing additional new housing supply to the City and Region housing inventory and any impacts the proposed development will have on housing affordability, the general distribution of unit types and changes to the housing supply's bedroom inventory characteristics in Burlington.

2.1 Subject Site

Location

The subject site is located at 688, 694 & 698 Brant Street in the southwest quadrant of Burlington. As shown in Figure 2-1, the site is south of the QEW and Fairview Street in the Upper Brant Precinct, a long-established area, of the City's Downtown. The site is also approximately 1.5 kilometres northwest of Lake Ontario and 1.5 kilometres southeast of the Burlington GO Station.

Figure 2-1: Subject Site



SOURCE: urbanMetrics inc., based on Google Earth imagery. Image for illustration only.

Existing Site Uses

The subject site is comprised of three, previously developed (lower-density), properties fronting onto the west side of (688, 694 & 698) Brant Street, south of Olga Drive in the City of Burlington as shown in Figure 2-2 below. When assembled the subject site will total approximately 0.76 hectares (approximately 1.88 acres).

The subject site is currently occupied by the following uses:

- 688 Brant Street – a one-storey vacant commercial building, formerly occupied by Canada Post
- 694 Brant Street – a two-storey apartment building containing five residential rental units
- 698 Brant Street – a two-storey house used for short term accommodation rental and listed on Airbnb

Figure 2-2: Existing Uses



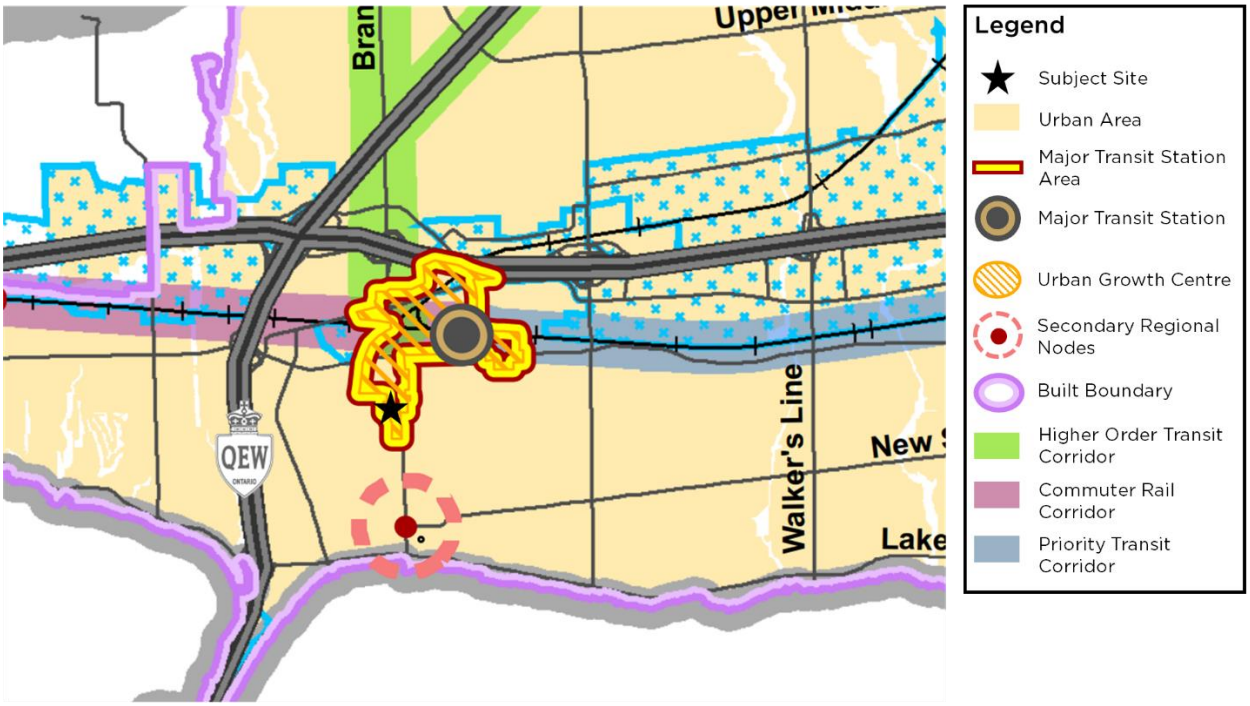
SOURCE: urbanMetrics inc., based on Google Earth imagery.

According to the Burlington OP, the section of Brant Street in the vicinity of the subject site is categorized as a Minor Arterial Road and functions as the main street into Burlington's Downtown Urban Centre. Brant Street contains a range of commercial, retail, and residential uses. These uses include: additional low-density residential uses just off Brant Street to the west and east, including immediately adjacent to the subject site. The introduction of the proposed mixed-use development by Elite would maintain the general land use character of the overall site and surrounding area while increasing the density of residential uses over the three properties comprising the site.

Planning Context

The Halton OP identifies the subject site as part of the Urban Area within the built boundary of the Region. It is located within an Urban Growth Centre and Major Transit Station Area, as shown in Figure 2-3. The site is near a Major Transit Station, Higher Order Transit Corridor, Commuter Rail Corridor, and Priority Transit Corridor, indicating the site's location as exceptionally connected and accessible.

Figure 2-3: Regional Urban Structure



SOURCE: urbanMetrics inc., based on *Map 1h: Regional Urban Structure, Halton Region Official Plan.*

According to the 1997 Burlington Official Plan (consolidated December 2019), whose land use policies currently remain in effect, the subject site is situated in the City's Downtown Urban Growth Centre. This area is anticipated to accommodate a significant portion of the City's future residential and employment intensification.

While not yet in effect, the new Burlington OP reinforces the significance of the Downtown Urban Growth Centre as the City's primary centre, whose continued purpose is to be an area where a variety of uses, including retail, community, entertainment, cultural, institutional, office, and residential are developed. This area is meant to be an enjoyable, safe, walkable, cycling-friendly, and transit-supportive complete community.

Both the current and new OP identify the subject site as being located within a mixed-use area. However, under the new Burlington OP land use designation pertaining to the subject site, the policies will allow for more intensification to occur through the development of a mid-rise building with up to 11 storeys and site setbacks above the third story to achieve a friendly low-rise environment for pedestrians. This designation also requires a minimum of two permitted uses be incorporated into the development as well as providing appropriate transitions with adjacent neighbouring residential low-rise areas. While these land use parameters are not yet in effect, Elite has taken these development characteristics into consideration in the design of the proposed development concept for the subject site.

Overall, the planning policies applicable to the subject site encourage redevelopment and intensification. The site is in a prime location close to transit and amenities but contains older buildings that are not, due to their age, currently aligned with the Burlington OP policy's updated vision for the area. The proposed development will contribute to modernizing underutilized properties in the City's Downtown and will contribute to a more complete urban community.

Proposed Development

Elite is proposing to develop a vertically-integrated mixed-use high-density condominium apartment building on the subject site. The building will consist of an 11-storey tower containing 293 apartment condominium apartment units. The ground floor of the development will consist of approximately 1,600 square metres of retail space fronting along Brant Street and 12 two-storey walk-up townhouse units anchoring the rear side of the proposed building. The project will be constructed in one phase.

Figure 2-4 below provides the distribution of new housing unit supply that will be added in Burlington as a result of the development of the subject site. The proposed development will contribute to diversifying the City's existing housing stock by providing a range of unit formats and varying unit sizes.

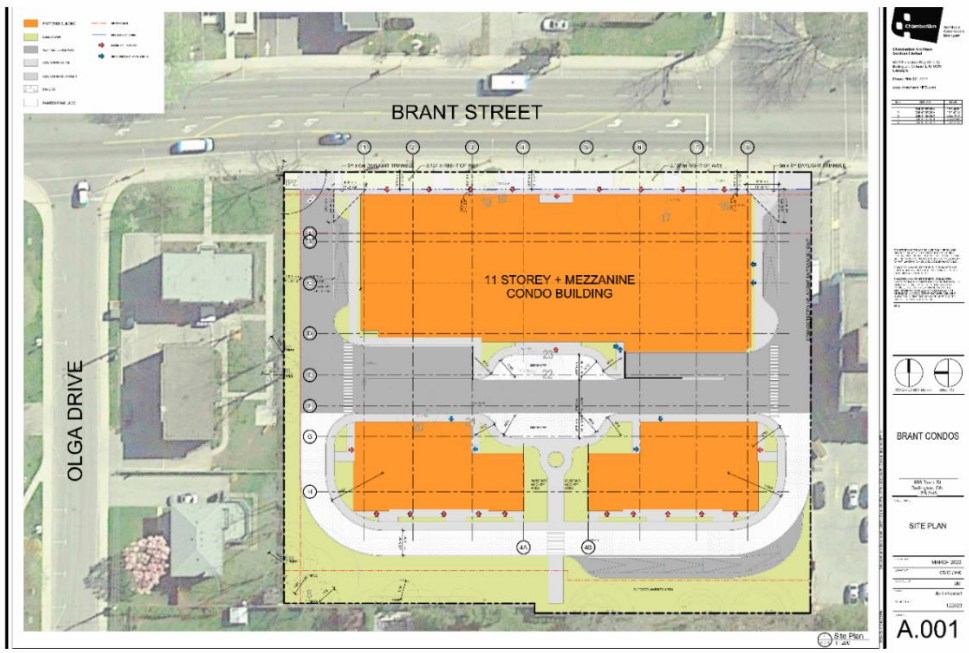
Figure 2-4: Proposed Site Statistics

	Units	Share
Bachelor	38	12%
One Bedroom	97	32%
One Bedroom + Den	52	17%
Two Bedroom	75	25%
Two Bedroom + Den	31	10%
Townhouse	12	4%
Total	305	100%

SOURCE: urbanMetrics inc., based on data provided by Chamberlain Architect Services.

Figure 2-5 provides the proposed concept plan of the development include the mix of bachelor, one-bedroom, one-bedroom plus den, two-bedroom, two-bedroom plus den, and two-storey townhouse units. The units will all be condominium apartment-style and townhouse units and are not anticipated to qualify as affordable, based on the City's and Region's definitions.

Figure 2-5: Proposed Site Plan



SOURCE: Chamberlain Architect Services

Site Assessment Summary

This assessment provides a comprehensive review of Elite's development proposal relative to the existing land uses of the three individual properties comprising the subject site. Currently, the properties comprising the subject site are predominantly single use and occupied with lower density development. Elite's development concept is proposed to augment the subject site's increased land area to deliver a scalable, vertically integrated, mixed-use development. This development is designed to that capitalize on its proximity to a public transit hub as well as other local amenities; is compatible with its surrounding land uses; and conforms with the policy and planning objectives of the current and new Burlington OP. The subject site, once assembled, will be better suited to accommodate a more intensive and integrated mixed-use development, that is consistent with the vision of the new Burlington OP, than is likely to be achieved if each of the properties were to be redeveloped individually.

Elite's proposed development concept will provide an assorted range of new higher-density, housing products which will add to the overall supply of housing in Burlington and Halton Region. The proposed development is expected to occur in one phase and will maintain the character of the surrounding area through combining a concentrated mix of retail, condominium apartments and townhouse units. While no explicit information has been provided by Elite to include an affordable housing component within this development proposal, the concept proposes to offer a mix of varying unit sizes and product types - that will include bachelor, one-bedroom+ and two-bedroom+ units - that will be attractive to satisfying demand from various market segments.

3.0 Housing Policy Context

This section of the report summarizes the various housing policies associated with the Halton OP, and the Burlington OP that are relevant to Elite's development application submission. Specifically, it outlines the definitions of affordable and/or assisted housing, and low to moderate income households, as defined by each of the plans.[1] Building on this summary, this section also examines various housing indicators shown in the Halton Region 2021 State of Housing Report relative to the housing policies of the Halton OP and Burlington OP.

3.1 Halton Region Official Plan

The housing policies from the Halton OP build upon the policy direction and goals of the PPS and the Growth Plan. These policies provide direction about how development in Halton Region should take place, taking into consideration the current and future needs of residents. It also provides specific details related to minimum housing unit intensification targets, development density targets and anticipated development phasing schedules for the lower tier municipalities of the Region in accordance with the growth forecasts of the Growth Plan.

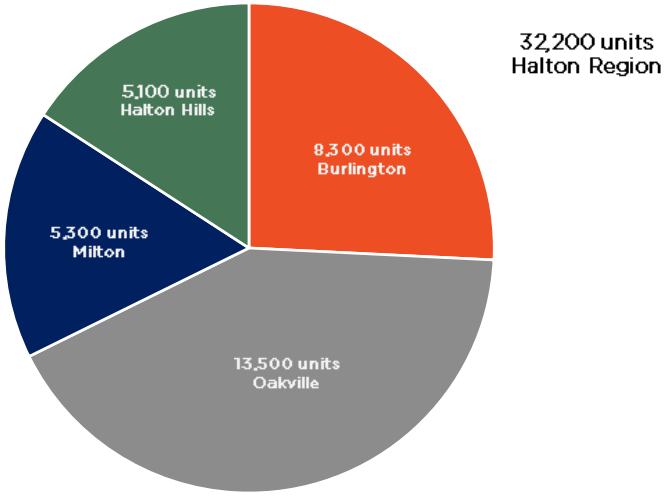
Intensification & Growth

The Halton OP outlines a series of targets to guide intensification and growth in the Region. Currently, the Halton OP directs a minimum of 40 per cent of new residential development to be accommodated in the Built-Up Area, as per Policy 77(2.1). The Region has also set out minimum housing unit intensification targets between 2015 and 2031 for the Built-Up Areas of each lower tier municipality. Burlington is directed to add a minimum of 8,300 housing units to its Built-Up Area by 2031, as shown in Figure 3-1.[2]

[1] We note that the policies stated in the Halton OP and Burlington OP have been developed in accordance with the definition of affordability in the *Provincial Policy Statement, 2020* ("PPS") and are intended to conform to *A Place to Growth – Growth Plan for the Greater Golden Horseshoe* ("Growth Plan").

[2] In June 2022, Halton Regional Council adopted Regional Official Plan Amendment 49 (ROPA 49) which amends Policy 77(2.1) to increase the per cent of future new residential development that occurs in the Built-Up Area to 45 per cent. ROPA 49 also outlines updated minimum housing unit intensification targets for each lower-tier municipality over a longer time horizon from 2022 to 2041. Specifically, Burlington is directed to increase its minimum housing unit threshold by 12,200 addition units to a housing intensification target of 20,500 housing units in its Built-Up Area by 2041. ROPA 49 is currently before the Minister of Municipal Affairs and Housing for final approval.

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

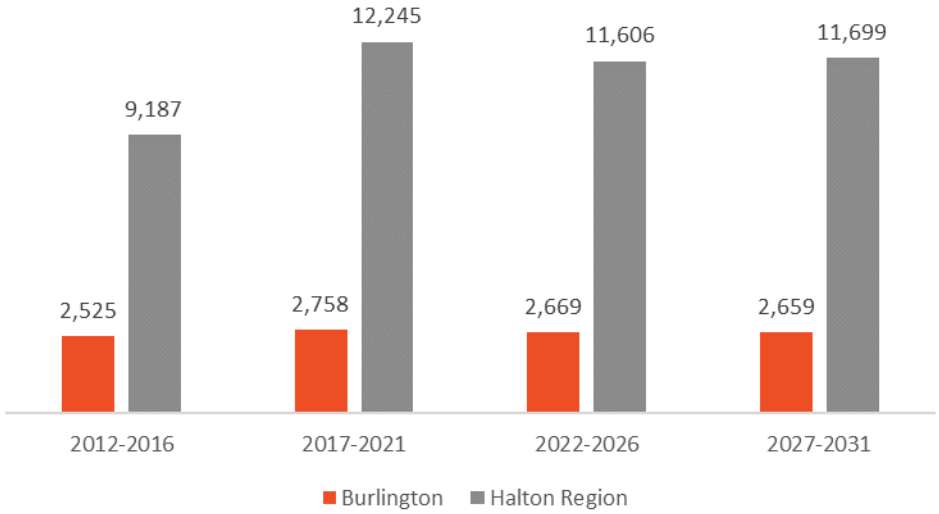


SOURCE: urbanMetrics inc., based on data from Table 2: Intensification and Density Targets, Halton OP.

The Halton OP also outlines how this growth should be phased in over five-year intervals between 2012 and 2031, as shown in Figure 3-2. Burlington is anticipated to accommodate 2,669 units through intensification between 2022 and 2026.[3]

[3] Under ROPA 49, Burlington is directed to accommodate 4,790 units through intensification in its Built-Up Area between 2022 and 2026. This is nearly twice as many units as outlined in the current version of the Halton OP.

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



SOURCE: urbanMetrics inc. based on data from Table 2A: Regional Phasing in the Halton OP.

Proposed Development's Applicability to Intensification & Growth

Located in the Built-Up Area of the Region, Elite's development concept proposed for the subject site will effectively intensify the site relative to its existing uses. By introducing more residential units, the proposed development will also directly support the Region and City's ability to meet their housing targets through to 2031 and beyond. More specifically, the subject site will account for approximately 11.4% of the current new housing units targeted in the Built-Up Area of Burlington between 2022 and 2026, based on the current target set out in the Halton OP. Furthermore, as outlined by the changes proposed through ROPA 49, the Region is requiring higher rates of intensification than has been previously targeted, increasing the need and necessity for high-density residential developments, such as the one proposed on the subject site.

Housing Mix & Affordability

The Halton OP provides a series of policies and targets to encourage the development of a preferred housing mix and housing affordability in the Region.

Section 85 addresses the primary objectives for housing delivery and acquisition in the Region. In particular, and as it relates to affordable housing provision:

> *"85. The objectives for housing are:*
>
> *...*
>
> *(4) To make more efficient use of existing developed lands, housing stock and available services to increase the supply of housing while maintaining the physical character of existing neighbourhoods.*
>
> *(5) To meet housing needs through the provision of Assisted Housing, Affordable Housing and Special Needs Housing* in Halton.
>
> *..."*

The Halton OP also sets out specific targets related to housing type and affordability, through Section 86. Specifically, the Region has set a target that at least 50 per cent of all new housing be in the form of denser housing formats such as townhouses or multi-storey buildings.[4] In addition to housing type targets, Section 86 outlines a target that at least 30 per cent of new housing units produced annually in Halton be Affordable or Assisted Housing. The Halton OP defines Affordable and Assisted Housing, as follows:

> *"214. 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.*
>
> *...*

[4] ROPA 49 proposes increasing the 50% target of all new housing to be in the form of denser housing formats to a minimum of 65 per cent to 2031 and a minimum of 75 per cent each year thereafter.

218. ASSISTED HOUSING means housing that is available to low and moderate income households for rent or purchase where part of the housing cost is subsidized through a government program."

As alluded to in the definitions above, the Halton OP outlines that specific affordability measures are to be addressed in Halton's annual State of Housing Report, which is required to contain the following:

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

...

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

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

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

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

d) state of homelessness in *Halton; and*

e) performance of the housing market towards meeting the housing targets under Sections 86(6) and 86(6.1)."[5]

[5] Section 86(6) of the Halton OP refers to the target that at least 50 percent of new housing units produced in Halton annually are townhouses or multi-storey buildings and that at least 30 per cent of new housing units are affordable or assisted housing. Section 86(6.1) outlines the need to establish, in conjunction with local municipalities, annual targets for the production of housing units by density type and affordability in each local municipality based on the Regional targets noted in Section 86(6).

Proposed Development's Applicability to Housing Mix & Affordability

Elite's proposal will increase the supply and variety of housing units available in Burlington and in Halton Region. The proposed development concept will consist entirely of denser housing formats in the form of townhouses and multi-storey condominium apartment units, which will contribute to the Region achieving its current goal that at least 50 percent of new housing supply be delivered in the form of townhouses or multi-storey buildings. In addition, Elite's proposed concept is consistent with the Region's expanded objective to increase the delivery of more dense forms of housing in the future as conveyed in ROPA 49. Furthermore, the addition of a variety of new housing supply and unit types on the subject site indirectly supports housing affordability by adding to the delivery of greater supply and variety of unit types needed to satisfy various target segments of market demand and thereby reduce direct competition in the Burlington housing market.

3.2 City of Burlington Official Plan

The *new* Burlington OP[6] is a policy document that guides development, land use, and resource management, including policies related to housing and affordable housing.

Section 3.1 of the new Burlington OP contains policies that center on Housing and emphasize that the City needs to "*promote an appropriate and adequate range of housing choices by type, tenure and affordability level*" for all residents and workers. Policy 3.1.1(2) details how this supply of housing will be achieved and maintained in the City. In particular:

> Policy *3.1.1(2) states,*
>
> > *"a) To the extent to which land is available in the Urban Area, the City shall maintain the ability to accommodate its share of residential growth within the regional market area. The City will assist the Region of Halton in the establishment and monitoring of annual minimum targets for the production of housing units by density type, and for the production of assisted and affordable housing, based on targets established in the Regional Official Plan.*
> >
> > *b) The City will work with the Region of Halton to provide opportunities for housing for a wide array of socio-economic groups and those with differing physical needs and household compositions, using all available planning mechanisms and tools.*

[6] Burlington's 2020 Official Plan was adopted by City Council in 2018 and approved by Halton Region in 2020. Parts of the Official Plan are still under appeal; however, the *Planning Act* states that all parts of an approved Official Plan that are not subject to appeal will come into effect on the day after the end of the appeal period, which was December 22, 2020 for the Burlington Official Plan.

> ...
>
> *g) The City will develop a city-wide housing strategy that will support the Region of Halton's Housing Strategy and will:*
>
> ...
>
> *(v) develop*
>
> *a. minimum targets in support of achieving the Region of Halton's housing mix and affordable and assisted housing targets;*
>
> *b. minimum targets within mid-rise and tall buildings for affordable, assisted and/or special needs housing;"*
>
> *c. minimum targets for two (2) and three (3) bedroom units for residential development applications; including minimum targets for 3 or more bedroom units;*
>
> *(vi) consider financial and other incentives, including grants, property tax reductions, infrastructure improvements and Community Improvement Plans to facilitate the provision of affordable housing and/or assisted and special needs housing.*
>
> *(vii) research and develop, in association with the Region of Halton and local municipal partners, an inclusionary zoning by-law as part of either Region-wide program, or as a city-wide program.*

The Burlington OP includes definitions *for Affordable Housing, Assisted Housing*, and *Low and Moderate Income Households*. These definitions are consistent with the definitions contained in the Halton OP, discussed in Section 3.1.

The Burlington OP also emphasizes the role of rental housing in Burlington and the importance of maintaining a balance within the City's supply of rental housing and home ownership in Policy 3.1.2(1) through, "protecting the existing supply of rental housing and encouraging the provision of new rental housing." Further, Section 3.1.2(2) of the Burlington OP also defines a minimum threshold for protecting rental housing supply to be six units or more and provides policy tools for rental replacement as well as tenant relocation and assistance plans when the removal of rental supply exceeds this threshold.[7]

Specific to housing affordability, Section 3.1.3 of the Burlington OP outlines objectives to promote a range and mix of affordable housing, support affordable housing programs, encourage development of affordable housing, and explore new approaches to reduce residential land and construction costs.

[7] Bill 23, which recently received Royal Assent, includes amendments to the *Municipal Act, 2001* that gives the Minister the authority to make regulations imposing limits and conditions on the powers of a local municipality to prohibit and regulate the demolition and conversion of residential rental properties.

Proposed Development's Applicability to Burlington Official Plan

The development application submitted by Elite proposes to redevelop and intensify three previously developed properties and will have no impact on the inventory of greenfield development land in the City's defined Urban Area. While the redevelopment of the site will result in the loss of five rental units from Burlington's existing supply of rental housing, the removal of these units remains below the minimum threshold for protecting existing rental housing in the City as defined in Section 3.1.2(2)a) of the new Burlington OP. Therefore, being under this minimum threshold does not require Elite to offer new supply towards rental replacement or provide a tenant relocation assistance plan for the removal of these existing rental units, in order to redevelop the subject site as proposed. Ultimately, the rental housing lost to redevelopment of the site will be more than substantially offset with the delivery of 305 new housing units across the entire larger site.

Elite's proposed development concept will contribute to the City meeting its minimum housing unit targets by density type and housing mix. It will also contribute to diversifying the City's existing housing stock by providing a range of unit formats, including bachelor, one-bedroom+ and two-bedroom+ units of varying sizes. Elite's Development application does not explicitly offer an affordable and/or assisted and special needs housing component in the proposal and as a result their submissions is not subject to any direct legal, financial and other forms of incentives from the City. However, relative to the City's affordability policy objectives, other support mechanisms such as Halton Region's Assisted Housing Program, Halton In-Situ Program, Community Benefit Charges, may be pertinent to unit absorption upon completion of the development in the future.

3.3 Halton Region State of Housing Report

Report Purpose

The *Halton Region State of Housing Report* ("Housing Report") is an annual publication produced by Halton Region since 2006. It provides a review of housing supply and demand in the Region and monitors Halton's progress in realizing the vision and housing policies of the Halton OP and Growth Plan. The Housing Report utilizes the Region's Housing Model to generate an annual snapshot of housing conditions for Halton residents and the needs of those looking to live in the Region at a moment in time. The Region's latest report was completed for the year 2021.

As discussed above, Policy 86(6) of the Halton OP defines a target of 30 per cent of the Region's annual new housing unit supply be produced as 'affordable' or 'assisted'. In measuring this, one of the key indicators provided in the Region's Housing Report is

the calculation of the annual Maximum Affordable Purchase Price (or in the case of rental units – maximum affordable monthly rent) level for the Region.

Using the Region's housing model, annual 'thresholds' (based on household income and housing costs) are determined for various household sizes. The average of these thresholds is calculated and used as an index to measure the share of new housing units produced annually which satisfy the Halton OP's definition for affordable or assisted housing costs.

Key Indicators

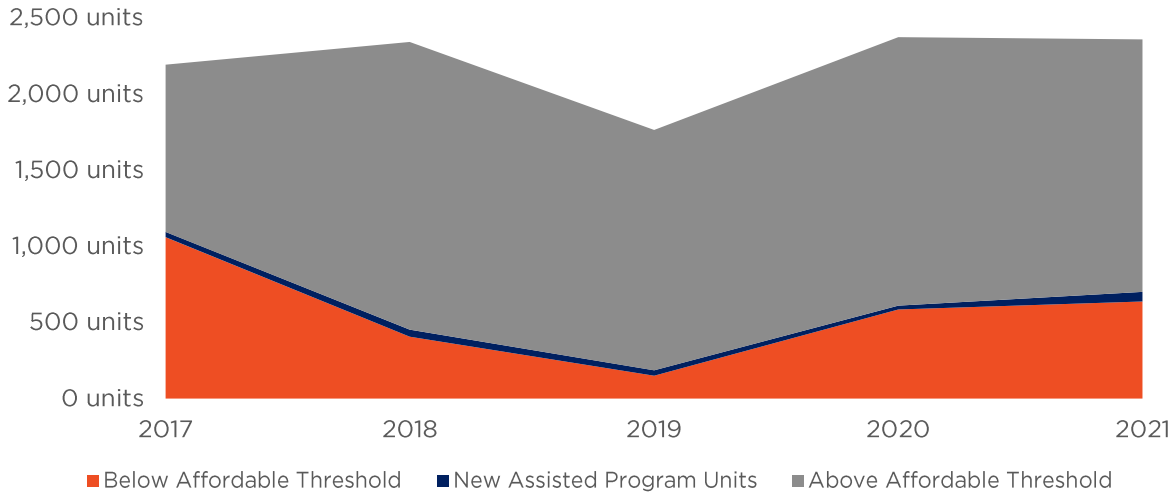
In 2021, the Housing Report defined the Maximum Affordable Purchase Price (affordability) threshold for housing ownership as $480,700. This threshold is used to benchmark whether the Region is meeting its 30 per cent affordability target.

Figure 3-3 and Figure 3-4 show the share of new housing sales that were below the affordability threshold in Halton Region and Burlington between 2017 and 2021.[8] Statistics for Halton Region also include the number of new assisted program units that contribute to the affordability target. Based on this data, the following 2021 trends were observed:

- The Region achieved its target of 30 per cent of units being below the affordability threshold. Specifically, 30.5 per cent of new units qualified as "affordable". This included 637 affordable new sales and 63 new assisted program units. These 700 units represented the highest number and percentage of "affordable" units in the Region since 2017.
- The number of assisted program units that contribute to meeting the Region's target was the highest in more than five years.
- Burlington also exceeded its 30 per cent target with 41 per cent of units (212 units) below the affordability threshold. This represented the highest number and percentage of affordable units in Burlington within the last five years.
- Of the four jurisdictions that make up the Region, Burlington contributed the second highest number of "affordable" units. Milton contributed the most with 240 new units below the affordability threshold.

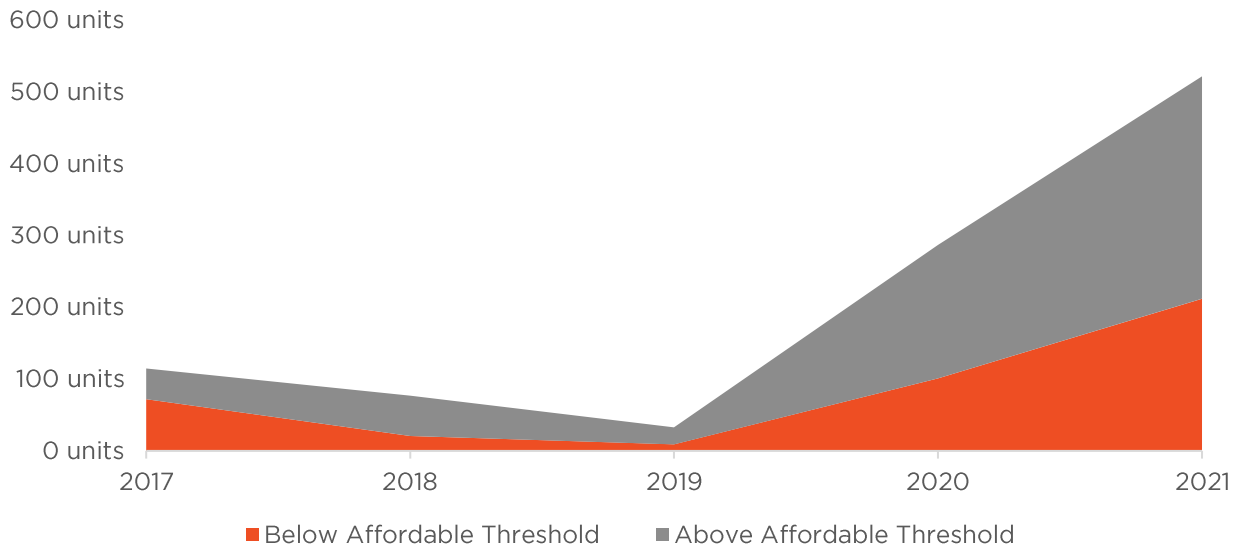
[8] The 2021 Housing Report indicates that the number of units identified as being sold in each year "is based on the closing date, when ownership of the property is transferred to the buyer."

Figure 3-3: Affordability Share of New Housing Sales, Halton Region



SOURCE: urbanMetrics inc., based on Halton Region State of Housing Report(s) from 2017-2021.

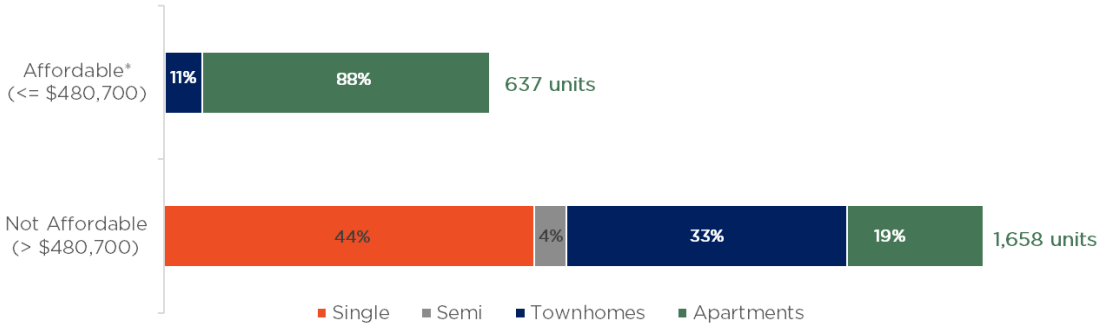
Figure 3-4: Affordability Share of New Housing Sales, Burlington



SOURCE: urbanMetrics inc., based on Halton Region State of Housing Report(s) from 2017-2021.

As shown in Figure 3-5, one of the key trends identified in the 2021 Housing Report is that most of the affordable new housing units sold were primarily apartment units followed by townhouses in 2021. This emphasizes a link between higher density housing and affordability in the Region. Consequently, the townhouse and apartment units proposed for the subject site will increase the supply of mid-range valued higher density units in the Region and based on average housing sales in the Region are more likely to be sold at a more reasonable price point relative to the affordability threshold (i.e., compared to lower density single-detached units).

Figure 3-5: New Affordable Housing Sales, Halton Region, 2021



SOURCE: urbanMetrics inc., based on data from MPAC as included in the Halton Region 2021 State of Housing Report. * NOTE: In addition to the 11% of townhomes and 88% of apartments, there was 1 single-detached home sold in Halton that was below the affordability threshold. This sale represented 0.2% of new affordable housing sales and is not visible on the graph.

Proposed Development's Applicability to 2021 State of Housing Report

The development concept for the subject site proposes to increase the overall supply of new, higher density, housing units in the City of Burlington and in Halton Region. Typically, when new housing supply is sufficient, or even exceeds levels needed to meet local market demand, these conditions often indirectly support affordability objectives through reducing direct competition within lower priced market segments. Increased overall housing supply also equates to potentially more units that could be eligible for housing assistance programs and potentially increased developer contributions in the future, which have become increasingly more prevalent to the Region achieving its' affordable housing targets each year.

In recent years, nearly all of the affordable new home sales in the Region have largely been comprised of primarily apartment units, followed to a lesser degree, by townhouses. Given that the proposed development is comprised mostly of condominium apartment units, complemented with 12 townhouses, it will effectively increase the supply of mid-range value units in the City and Region. These mid-range value units are more likely to be attained at a more reasonable price point relative to the affordability threshold (i.e., versus lower density single-detached units).

Section Summary

This section identified and discussed the proposed development in the context of applicable housing policies in Halton Region and in the City of Burlington relative to the Halton OP, Burlington OP, and the Region's 2021 State of Housing Report.

As discussed in detail throughout this section, the proposed development contributes to the City's and Region's intensification goals by providing 293 new condominium apartment units and 12 townhouses intended as more compact and dense forms of housing products. While the redevelopment of the site will result in the loss of five rental units, the removal of these units is below the minimum threshold required to protect an existing rental housing project in Burlington and therefore does not require Elite to offer replacing rental these units or to provide a Tenant Relocation and Assistance Plan for the redevelopment of the site. Ultimately the rental housing lost to the redevelopment of the site will be more than substantially offset with the delivery of 305 new housing units across the entire site.

Finally, while the estimated sale price points of units delivered through Elite's proposed development are not expected to be at or below the minimum affordable housing threshold, the project will continue to add new supply to the mid-range value unit market segment. Maintaining an adequate supply of units for this segment of the market, remains vital to ensuring market prices remain free from scarcity and can be sustained at reasonable levels relative to the affordability threshold.

4.0 Local Housing Market Trends

This section of the report describes local housing market information for Burlington, namely statistics on housing supply, as well as current and emerging housing affordability opportunities. The purpose of this section of the report, is to identify and discuss current and relevant housing information that is available and not yet addressed through the previous site context and policy analyses.

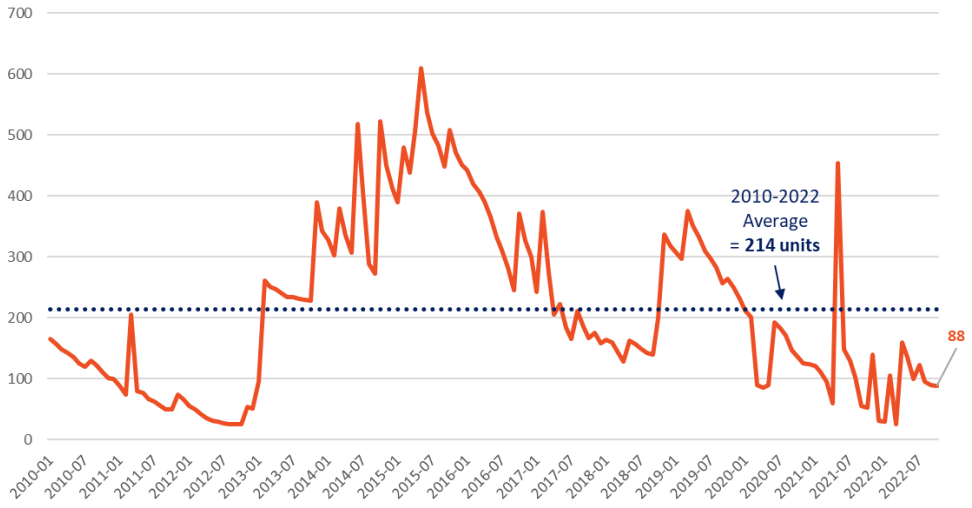
4.1 Local Housing Supply

As discussed in Section 3.1 above, the Halton OP identifies a housing target that at least 50 per cent of new housing produced annually in the Region be in the form of townhouse or multi-storey buildings. The proposed development helps contribute to this target as all 305 units in the development are planned to be in the form of townhouses or condominium apartments in a multi-storey building.

Further, the units proposed on the subject site will help increase the overall supply of housing in Burlington. By accommodating new apartment and townhouse units on the subject site, it will indirectly support housing affordability City-wide by ensuring there continues to a sufficient supply of apartment units available to meet localized forecasted demand.

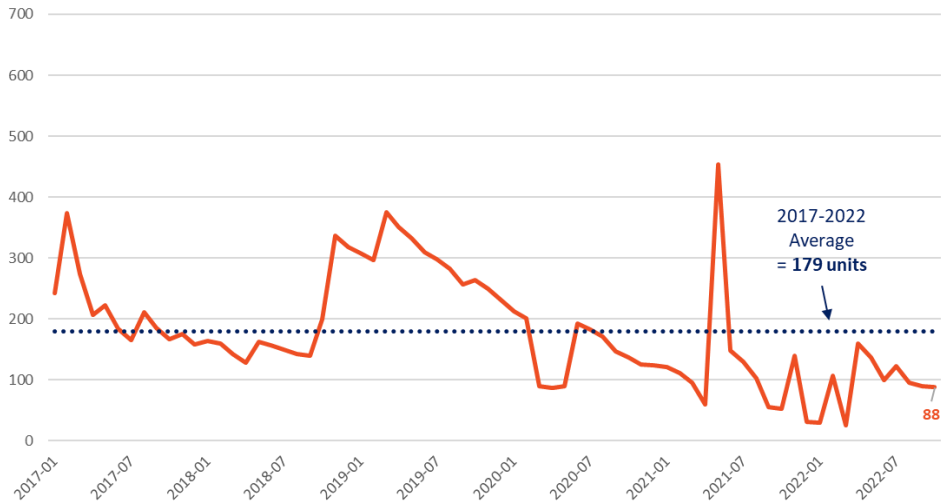
As shown in Figure 4-1 to follow, the monthly supply of new condo apartment units available for sale in Burlington toward the end of 2022 (88 units) was well below the 2010 to 2022 annual average (214 units). It is also notable that the overall supply of new condo apartment units in Burlington has been steadily declining in recent years. As shown in Figure 4-2, the average monthly supply of new condominium apartment units available for sale in Burlington between 2017 and 2022 was only 179 units. The units proposed on the subject site are largely anticipated to be developed as condominium apartment units (e.g. 293 units) and will add to the supply of apartment category units available for sale in the future.

Figure 4-1: City of Burlington, Inventory of Available New Condominium Apartment Units Monthly (2010-2022)



SOURCE: urbanMetrics inc. based on Altus Data Studio.

Figure 4-2: City of Burlington, Inventory of Available New Condominium Apartment Units (2017-2022)



SOURCE: urbanMetrics inc. based on Altus Data Studio.

4.2 Affordable Housing Opportunities

The proposed development is still at the development application stage of the development process. As a result, the potential price of units—and related affordability—has not yet been determined. The ultimate sales price will depend on market demand and housing conditions when the units are made available. That said, the composition and diversity of units being proposed on the subject site, represents a potential opportunity to increase the stock of new attainable housing units in the City and Region.

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

Current Opportunities to Provide Affordable Housing

Currently, Halton Region utilizes various programs to support affordable housing opportunities. Examples of these programs in place include: Halton Region's Assisted Housing Program, the Halton In-Situ Program, and Community Benefit Charges.

Halton Region's Assisted Housing Program

One affordable housing program in Halton Region is the Assisted Housing Program, which centers on reducing the cost of housing for individuals and families who cannot afford their rent. The program is grounded on Rent-Geared-to-Income assistance, and provides rent supports to individuals and households who cannot afford their existing rental rates. The program relies on landlords contributing a number of units to the program. Halton Region, based on individual or household eligibility, then places applicants in these units. The housing subsidy for the required rental fees—which is determined based on each individual's household income—is paid directly to the landlord. At the time of the 2021 State of Housing Report, there were 887 households in Halton Region utilizing this rent support system, an increase from 781 households reported in 2020.

Halton In-Situ Program

Halton Region also offers the Halton In-Situ Program ("HIP"), one of the first portable housing benefit programs in Ontario to assist Halton residents with rent in the homes where they currently reside. The program offers an ongoing housing allowance to residents who qualify for assisted housing. This program provides residents with a monthly rental allowance with the goal of keeping people in the communities where they live. At the time of the 2021 State of Housing Report, there were over 230 families in Halton Region supported by the portable housing benefit.

Community Benefits Charge

Community Benefits Charges ("CBCs") is a tool under the Planning Act that helps lower and single-tier municipalities tackle the cost of high-density developments with five or more storeys and 10 or more units. CBCs are capped at 4% of land value and are based on the value of land the day before building permits are issued. Funds collected through CBCs can be used to fund a variety of programs—including but not limited to—services, facilities, and other matters identified by each municipality.

Under Section 37 of the *Planning Act*, municipalities are required to conduct a CBC strategy that identifies what will be funded by CBCs before passing a CBC by-law. The City of Burlington conducted a Community Benefits Charge Study and passed a CBC bylaw on September 14, 2022. As per the bylaw, CBCs may be imposed in respect of the following: land for park or other public recreational purposes; capital costs associated with parking, public and performance arts services, facilities, information technology, and growth-related services; as well as services not provided under subsection 2(4) of the *Development Charges Act*.

Previously, charges for social housing were imposed through Halton's Regional Development Charges. However, recent amendments to the *Development Charges Act* under Bill 23 have resulted in the removal of housing services as an eligible development charge, and therefore can now be covered through CBC frameworks.

Emerging Opportunities to Provide Affordable Housing

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

Incentives and Inclusionary Zoning

Policies under 3.1.1 (2) of the new Burlington OP indicate how the City will help develop and implement affordable housing. Specifically, Policy 3.1.1 (2) (vi) and (vii) state:

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

In May 2022, the City of Burlington released a Housing Strategy which sets out policies, tools, and actions to address current and future housing needs. The Strategy includes two phases: the first phase delivers the Housing Strategy while the second phase focuses on moving the strategy to action. One of the actions outlined in the

strategy is to "undertake a formal assessment of the potential to introduce inclusionary zoning." As part of this, the City is currently exploring the feasibility of an Inclusionary Zoning policy through a Municipal Assessment Report. Next steps and details on implementation are expected to be outlined in phase two of the Housing Strategy. However, this work is still ongoing and there are not yet any inclusionary zoning policies in effect in Burlington. As such, an Inclusionary Zoning By-law policy does not influence Elite's proposed development application submission.

Section Summary

This section identified additional housing information that is relevant to the Housing Impact Statement objectives in relation to the proposed development of the subject site. This included an overview of the historic supply pipeline of new condominium apartments in the City of Burlington as well as a summary of current and emerging opportunities to support the provision of affordable housing in the City.

In general, the overall inventory supply pipeline of new condominium apartments added in the City has been declining since 2019 and current unit inventory continues to remain well below the market averages for the past 5-year (i.e. 179 units) and 12-year periods (i.e. 214 units), resulting in fewer apartment units available for this segment of local demand. The addition of 293 condominium apartment units proposed on the subject site will contribute to increasing the total supply of apartments units available for sale in the City and will lead towards returning the City's inventory of available apartment units to above average supply levels upon its completion.

Also, as summarized herein, various existing and emerging opportunities have been identified as potential means for new residential developments to contribute to the Region's affordable housing objectives. These include programs such as Halton Region's Assisted Housing Program, Halton In-Situ Program, Community Benefit Charges, and the potential for an Inclusionary Zoning By-law in the future. While these programs are not expected to directly influence the delivery of an affordable housing component within Elite's proposed development, these programs may be more pertinent to unit absorption in the form of a potential surrogate for assisted housing upon completion of the development. Nonetheless, while these programs all represent ways that affordable housing may be provided, they currently do not directly affect Elite's development application submission.

5.0 Conclusions

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

Policy	Analysis
1) Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the new Burlington OP;	See below
(i) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development of 293 apartment units and 12 townhouses on the subject site would contribute towards the Region's achievement of two major housing targets from the Region OP: 3. **Policy 86 (6) a)** – As all units in the proposed development will be condominium apartments or townhouses, the development will contribute towards the Region's achievement of the target that 50 per cent of new units developed be in the form of townhouse and apartment units. 4. **Policy 77 (2.1)** – As the proposed development is located within the Region's built-up area, all units will contribute towards the Region and the City meeting their intensification target of a minimum of 40 per cent of new residential units being constructed in the built-up area. New units in the proposed development are not expected to meet the regional or local definition of affordable or assisted housing units. However, the increased supply of housing would indirectly support housing affordability by contributing towards the supply of new housing available to accommodate forecasted demand. Also, by introducing a mix of unit formats and sizes, the proposed development would appeal to a broader range of current and future residents.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential sale price for units in the proposed development has not yet been determined. However, based on current market rates, it is not anticipated that the units within the proposed development will be priced below the Region's 2021 Maximum Affordable Purchase Price threshold or will satisfy regional or local definitions for affordable housing.
(iii) Where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable.	As this development includes only one building, it is not expected that the development will occur in phases.

(iv) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long-term affordability of units, where applicable.	Elite is not explicitly committing to the development of 'affordable' housing units on the subject site and the development does not qualify for any related financial or other incentives. However, in terms of contributing to the City-wide provision and inclusion of affordable housing in new development, Elite's development application is not prohibited from support of other existing and potential future policies, tools and mechanisms for assisted housing. Support incentives and/or developer contributions potentially may be generated from the following: Halton Region's Assisted Housing Program, Halton's In-Situ Program, and Community Benefit Charges.
2) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.;	The subject site is currently occupied by a vacant commercial building and low-density residential uses. The proposed mixed-use composition of the development will maintain the general land use character of the overall site while increasing the density of residential uses over the three assembled properties. Developing 293 new condominium apartment units and 12 townhouses on the site is consistent with the new Burlington OP's growth intensification objectives for this area of the City and will contribute towards the City and Halton Region achieving their various housing supply targets. Further, based on the current concept plan, the proposed development will contribute to diversifying the City's housing stock by adding a range of unit formats and varying unit sizes including: 12% of units will be bachelor units, 49% of units will be one-bedroom units, 35% of units will be two-bedroom units, and 4% of the units will be townhouses.
3) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent *State of Housing Report*; and	As noted previously, Elite's proposal to develop apartment and townhouse units at on the subject site situated within the built-up area of the Region, contributes to the Region achieving its housing intensification and minimum unit target as defined in Policy 77 (2.1) of the *Halton OP*. The development of the subject site as proposed will increase the overall supply of new housing units in Burlington and in Halton Region. Further, this increased supply of housing will indirectly support housing affordability by contributing towards the supply of new housing to accommodate forecasted demand.
4) Should identify and discuss other relevant and current housing information available.	Recently, the monthly supply of new condominium apartment units available in Burlington has been declining and is well below historic averages, falling behind demand. This emphasizes the importance of Elite's proposed development adding 305 new housing units to the City's future housing supply to continue to satisfy market demand in the City. While Elite's development proposal will not directly contribute to affordable housing targets in the City and the Region, the proposed development is not prohibited from support of other existing and potential future policies, tools, and mechanisms for

	assisted housing. The potential for community support incentives, developer contributions or other positive outcomes potentially may be generated from opportunities such as the following: Halton Region's Assisted Housing Program, Halton In-Situ Program or Community Benefit Charges