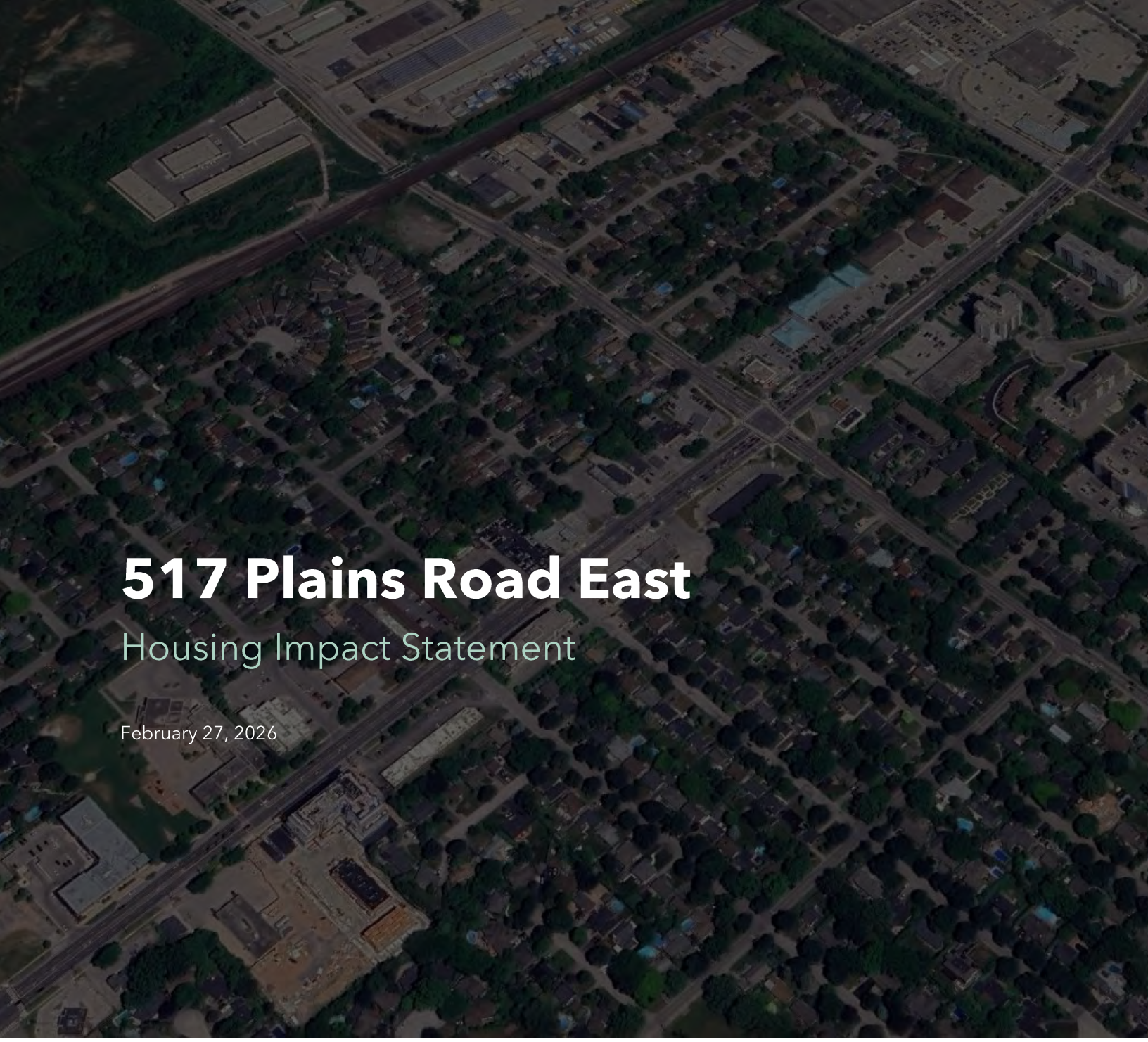


517 Plains Road East

Housing Impact Statement

February 27, 2026

Parcel

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February 27, 2026

2024-0114

This document is available in alternative formats upon request.

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Executive Summary

The Proposal

The subject site is currently being used for short-term accommodation purposes and is occupied by Knights Inn. The proposed development for the subject site foresees an 11-storey mixed-use building with 179 purpose-built rental apartment units of various unit types and sizes. The development also proposes to have 8 commercial units at grade, equating to roughly 422 square metres of commercial space.

Subject Site Context

The proposed development will contribute towards increasing the supply of housing in the City of Burlington and Halton Region. The subject site is located in the *Regional Intensification Corridor* within the Regional Urban Boundary of the Halton Region Official Plan. Not only is the subject site in a location where intensification and increased densities are to be promoted, but higher-density and mixed-use development are also encouraged at this location.

Furthermore, the subject site is designated as *Mixed Use Corridor – General* on *Schedule B – Comprehensive Land Use Plan – Urban Planning Area* of the *City of Burlington Current Official Plan*. It is also located within the delineated built boundary of the city, meaning units on the site will contribute towards meeting the City's and Region's intensification targets going forward.

Housing Provision

In completing a *Housing Impact Statement*, the Region's Terms of Reference identifies several elements that must be addressed. These items are reiterated in Section 3.1.1(2) h) of the *City of Burlington Proposed New Official Plan*. Below we have summarized these elements, including how the report and the subject site address each item.

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 179 housing units will contribute towards the Region's achievement of its housing targets:

Policy 86(6) a) – As all units in the proposed development will be apartment units, the development will contribute towards the Region's achievement of its target of 65% of new units being in the form of townhouse and apartment units. This is of particular importance recognizing that the Region previously only required that 50% of housing units be in these formats.

Policy 86(6) b) – At this time, the applicant has not yet determined if any of the new units in the proposed development will meet the Regional definition of affordable or assisted housing units. However, the increased supply of housing would indirectly support housing affordability by increasing the overall housing stock, particularly in formats that are generally more attainable than lower-density formats. By introducing a mix of apartment formats and sizes, the proposed development would appeal to a range of current and future residents, including those of various incomes and backgrounds.

When in the future the applicant has determined that (if) any of the proposed units meet the Region's definition of affordable or assisted housing, the development will contribute towards meeting the Region's target that at least 30% of new housing units produced annually in Halton be affordable or assisted housing.

How the estimated rents and / or initial sales prices of the development are at or below the affordable housing thresholds by type.

The estimated potential rent for units in the proposed development has not yet been determined. The average monthly rent for units will likely be based on market demand and prevailing lease rates.

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.

The proposed development includes one building, therefore it is not expected that the development will occur in phases.

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

While there is currently no commitment to include affordable housing units on the subject site, the provision and inclusion of affordable housing citywide could be supported by existing and potential future policies and mechanisms. These mechanisms include rent-geared-to-income assistance, rent supplements, and assisted housing development subsidies by higher levels of government.

Other Elements

The Terms of References for a Housing Impact Statement stipulates other elements that are required as part of this study, including (1) a comprehensive review of the proposal, (2) the context of the proposal in the context of Halton Region's housing policies and the 2024 State of Housing Report; and (3) a discussion of other relevant and current housing information available. These items have been addressed below.

Comprehensive Review of the Proposal

The subject site is currently occupied by Knights Inn and is being utilized for short term accommodation purposes. The 179 units that are currently proposed will result in an intensified use of land, supporting the City and Region in reaching their intensification targets and in increasing the overall supply of housing. The unit mix for the apartment building comprises of 138 one-bedroom unit types (77%), 40 two-bedroom plus den units (22%), and one three-bedroom plus den unit. The development also proposes to have 8 commercial units at grade, resulting in roughly 422 square metres of commercial space.

Proposed Development in the Context of Halton Region

As noted previously, by proposing apartment units at a location within the built-up area, the subject site would help achieve housing targets set out in Policy 86(6) of the Regional Official Plan, in an area designated for intensified development and compact built forms.

The subject site would also increase the overall supply of new housing units in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply of housing units, including a diversified stock of different housing types, tenures, and sizes.

Other Relevant and Current Housing Information

Housing development in the City of Burlington has been lagging recently, especially when compared to the level of new housing activity across Halton Region. New housing supply should be encouraged and supported to ensure there is enough new housing stock for existing and future residents. This is particularly important as the cost of housing in Burlington, Halton, and Ontario more broadly has risen.

1.0

Introduction

1.1 Purpose

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

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

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

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

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

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

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

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

1.2 Site Context

Subject Site Location

The subject site is located at 517 Plains Road East in the City of Burlington (Figure 1.1). It is situated on the north side of Plains Road East, west of King Road, and east of Waterdown Road in the community of Aldershot. It comprises approximately 0.31 hectares of land (some 3,081 square metres).

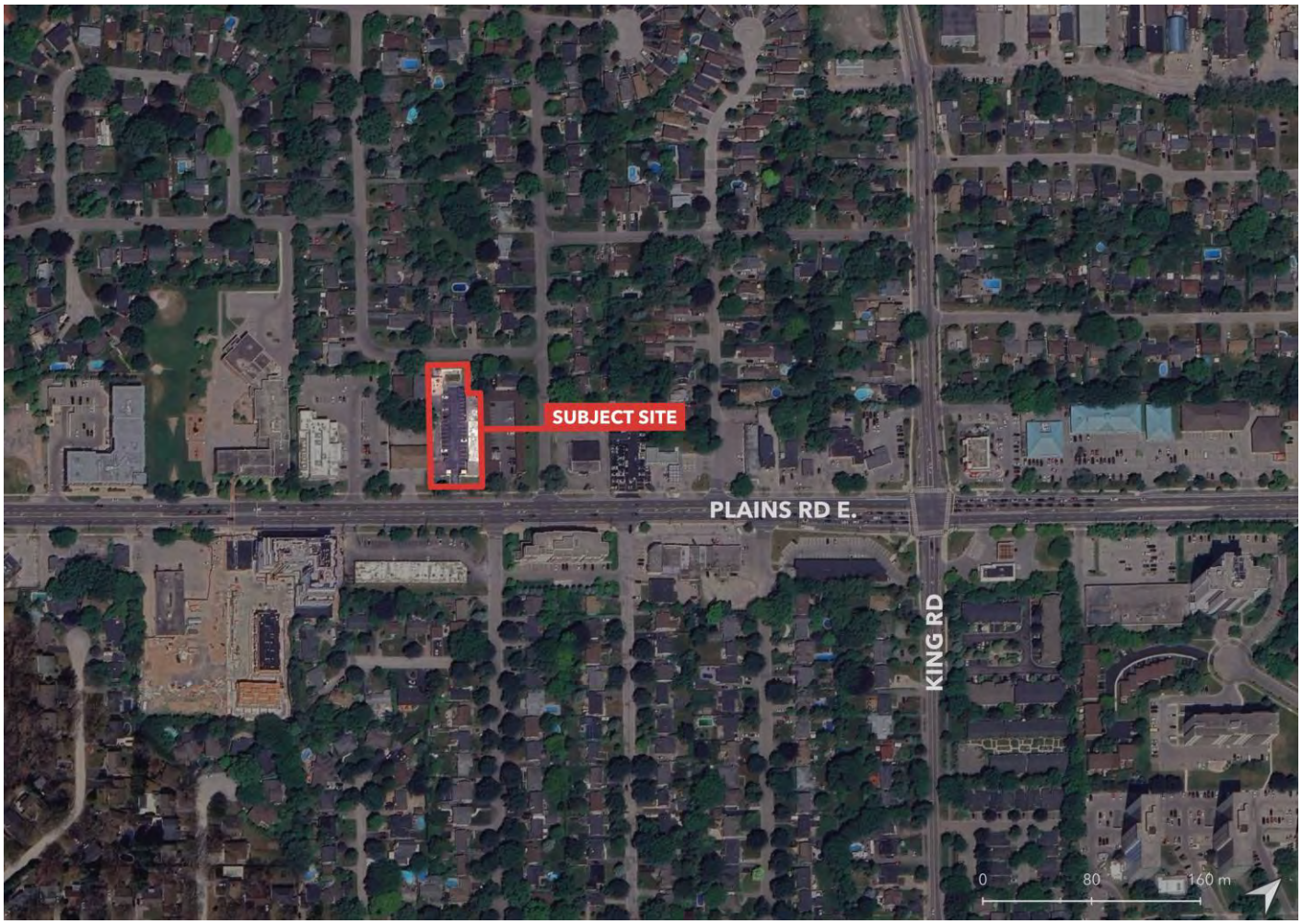
Lands abutting the subject site to each side include another single-storey hotel / motel and a two-storey commercial building with detached single-family suburban homes to the north. Directly to the south across Plains Road East is a single-storey retail commercial building abutting a senior's community housing complex that features a public library on the ground floor, along with a mixed-use multi-family building. Further south is a low-density residential neighbourhood comprised primarily of single-detached housing.

Plains Road East is a regional intensification corridor primarily designated for commercial and mixed-use commercial uses. Hence, within proximity to the subject site are commercial establishments such as retail commercial buildings / plazas, gas stations, a local arena, a golf course, an auto body shop, and a used car dealership along with a few mid- to high-rise residential buildings. Institutional uses including churches and schools (such as Maplehurst Public School Holy and Holy Rosary Catholic Elementary School) are also nearby along Plains Road East.

The subject site can be easily accessed by provincial highways with direct access to the Queen Elizabeth Way from Plains Road East and to Highway 403 from the nearby Waterdown Road interchange. The site is also close to Aldershot GO Station, which is identified as a Major Transit Station Area ("MTSA").

The subject site is currently occupied by the Knights Inn, which provides short-term accommodations. **Recognizing its limited current use, the proposed 179-unit residential development with commercial at grade will help intensify the subject site**.

Figure 1.1
Subject Site Location



Source: Parcel based on Google Earth.

Planning Context

As of July 1, 2024, the *Halton Region Official Plan* is no longer a Regional Plan. It is now a Local Plan for the four local municipalities, including the City of Burlington. As the *Halton Region Official Plan* is now a Local Plan for the City of Burlington, we have reviewed the policies in the *Halton Region Official Plan* in the context of the subject site. The *Halton Region Official Plan*, *Map 1: Regional Structure*, shows that the subject site is located in the *Urban Area,* and is within the *Regional Urban Boundary*. *Map 1h: Regional Urban Structure* identifies the subject site as part of the *Regional Intensification Corridor in the Regional Urban Boundary*. The subject site is identified as a location to

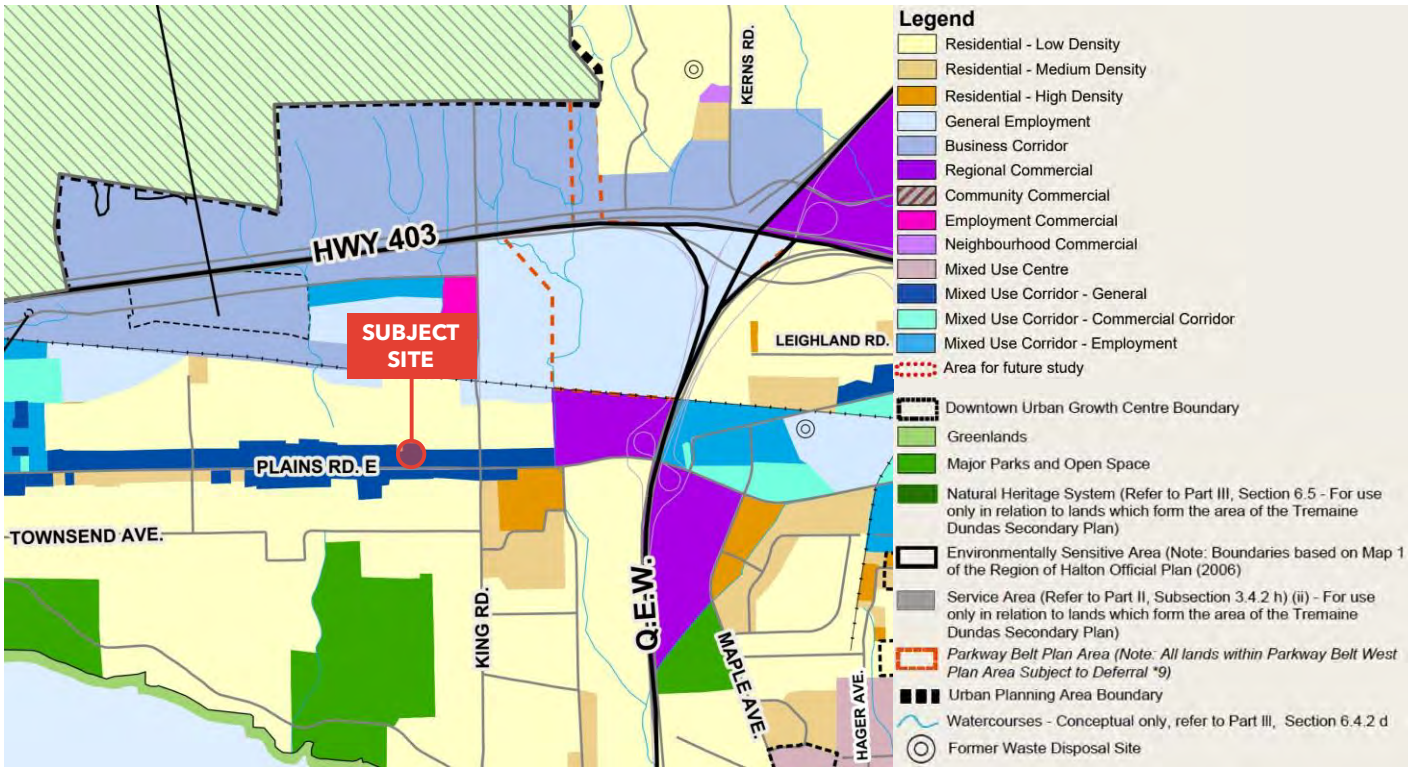
accommodate a significant amount of growth**. Residential units on the subject site will contribute towards meeting the City's and Region's intensification targets**.

Furthermore, *Map 3: Functional Plan of Major Transportation Facilities,* indicates that Plains Road East is a *Multi-Purpose Arterial*. Based on Policy 72.1(9) of the *Halton Region Official Plan*, the subject site is in an area where intensification and increased densities are to be promoted. Mixed-use development is also encouraged at this location.

Schedule B – Comprehensive Land Use Plan – Urban Planning Area of Burlington's *Current Official Plan*, shows that the subject site is designated as *Mixed Use Corridor – General* (Figure 1.2). The subject site is identified in an area for compact, mixed-use residential, and commercial development.

Figure 1.2

Land Use Designation, City of Burlington Current Official Plan



Source: Parcel based on Schedule B: Comprehensive Land Use Plan – Urban Planning of the City of Burlington Current Official Plan, 1997.

1.3 Proposed Development

The proposed concept for the subject site is a **high-density mixed-use development with commercial at grade**. It is anticipated to include 179 residential units, and as detailed below, the residential component of the development includes apartment units with one-, two-, and three-bedroom unit types. These units will be developed as purpose-built rental tenure. The ground floor of the development is proposed to incorporate 422 square metres of commercial space across 8 retail / service commercial units.

Figure 1.3

Proposed Development Overview

Residential Space	
Apartments	**179 units**
1-Bed	68 units
1 Bed + Den	70 units
2 Bed + Den	40 units
3 Bed + Den	1 units
Total Units	**179 units**

Non-Residential Space		
Commercial	422 square metres	4,547 square feet
Total	**422 square metres**	**4,547 square feet**

Source: Parcel based on architectural plans dated December 2024.

2.0

Halton Region Housing Context

This section provides an overview of housing policies in applicable planning documents, including:

- The *Halton Region Official Plan, 1995 (May 2024 Consolidation)*
- The *Halton Region 2024 State of Housing Report*
- The *City of Burlington's Current Official Plan, 1997 (July 2025 Consolidation)*
- The *City of Burlington Proposed New Official Plan, 2020 (July 2025 Interim Working Version)*

Per definitions included in these Plans, details below include the various definitions of affordable and / or assisted housing, and low- to moderate-income households.

2.1 Halton Region Official Plan

In July 2024—through changes to the Planning Act–the Province identified Halton Region as an "upper-tier municipality without planning responsibilities". As a result, the *Halton Region Official Plan* is no longer an official plan for Halton and has instead been deemed an official plan of each of its lower-tier municipalities until it is revoked or amended by the respective municipality.

Thus, **there are now three Official Plans which apply to the City of Burlington**: (1) parts of the *Halton Region Official Plan, 1995*, (2) parts of the *Burlington Current Official Plan, 1997*, and (3) parts of the *Burlington Proposed New Official Plan, 2020*.

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

> *77. It is the policy of the Region to:*
>
> *…*
>
> *(2.1) Direct, through Table 2 and Table 2a, to the Built-Up Area a minimum of 45 percent of new residential development occurring annually within Halton in between 2022 and 2051.*
>
> *…*

Table 2 and Table 2A provide the number of residential units to be accommodated through intensification across municipalities in Halton Region, as well as the regional phasing of intensification. More specifically, Table 2

of the *Halton Region Official Plan*—as summarized in Figure 2.1—details that the City of Burlington is to add a minimum of 20,500 housing units to the Built-Up Area by 2051. As a new residential development that will intensify a site which is presently limited in its use, the proposed 179-unit residential development will support the City and Region in meeting the intensification target.

Figure 2.1

Minimum Housing Intensification Targets, Built-Up Area (2022-2051)

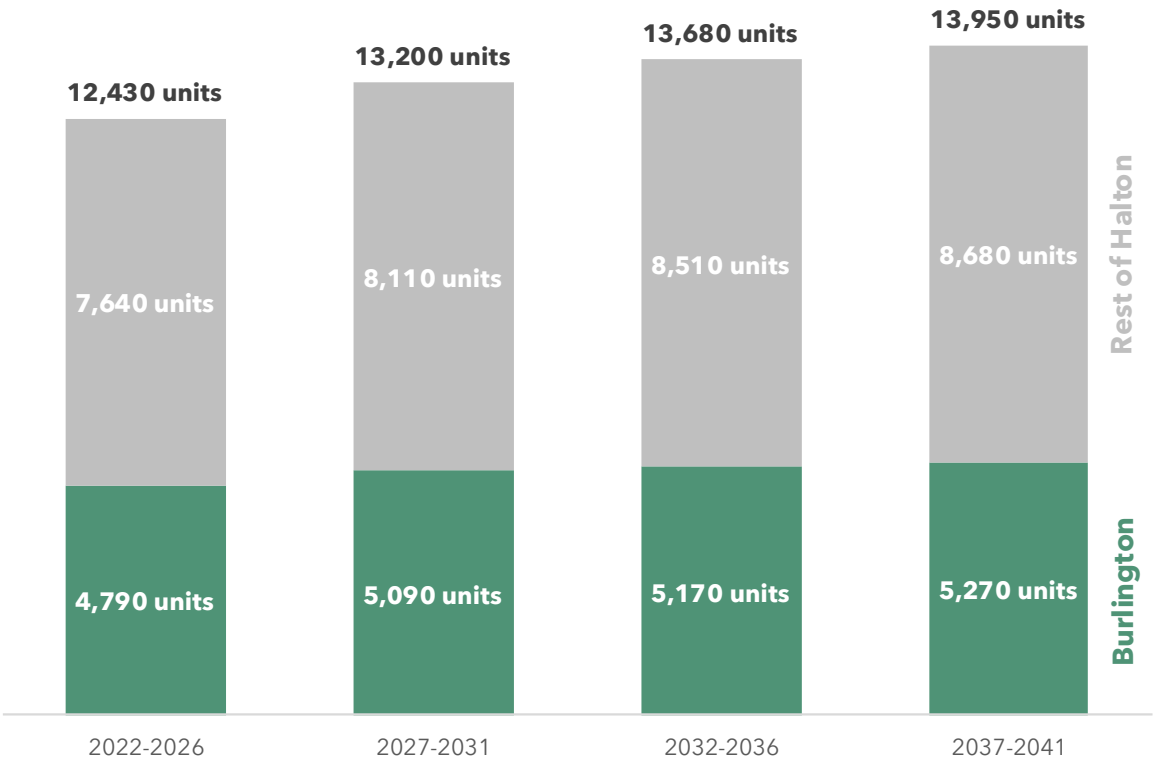


Source: Parcel based on Table 2: Intensification and Density Targets of the Halton Region Official Plan.

Table 2A of the Halton Region Official Plan provides phasing for intensification units (those in the built boundary) for five-year periods between 2022 and 2041. Burlington is expected to accommodate 4,790 units through intensification from 2022 till 2026, with an additional 5,090 anticipated between 2027 and 2031 (Figure 2.2). This equates to 39% of the housing units across Halton Region. The units on the subject site would account for 2% of new intensification units required in Burlington over this 10-year period.

Figure 2.2

Regional Phasing Inside the Built Boundary, 2022-2051



Source: Parcel based on Table 2A: Regional Phasing of the Halton Region Official Plan.

Subject Site

Located in the built boundary of Burlington, the proposed mixed-use development will substantially intensify the site, adding residential units to a site that is currently underutilized. Housing units proposed will directly support the Region and City's abilities to meet their housing targets to 2031 and beyond. If constructed in the next five-years, the units proposed will account for some 4% of intensified units required in Burlington between 2027 and 2031.

See **Appendix** for Table 2 & Table 2A.

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

> *85. The objectives for housing are:*
>
> *(1) To establish housing targets by type and appropriate density for the Local Municipalities and the Region as a whole.*
>
> *(2) To explore and implement new approaches to reduce residential land and construction costs and to effect an adequate supply of Affordable Housing.*
>
> *(3) To coordinate, improve upon, and expedite the development approval process so as to reduce the overall cost of housing.*
>
> *(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.*
>
> *…*

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

> *86. It is the policy of the Region to:*
>
> *(1) Monitor the development approval process to achieve at all times a minimum of three-year supply of draft approved and / or registered residential units for the Region as a whole.*
>
> *(2) Define Affordable Housing for the Halton and local municipal markets based on its definition under Section 214.*

…

(6) Adopt the following housing targets:

a) that the per cent of new housing units produced annually in Halton in the form of townhouses or multi-storey buildings be at least 65 per cent to 2031 and at least 75 per cent each year thereafter; and

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

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

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

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

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

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

d) state of homelessness in Halton; and

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

…

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

…

(20) Require the Local Municipalities, in developing phasing strategies, to ensure that a full range and mix of housing types can be provided in each development phase in accordance with Table 2a.

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

…

As per **Policy 86(2)**, Affordable Housing is defined in Section 214 of this Plan. It states that Affordable Housing is "housing with a market price or rent that is affordable to households of low and moderate income spending no more than 30 percent of their gross household income."

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

Affordable Rental Housing: should meet the demand of households at the low end, as described in Halton's annual State of Housing Report, pursuant to Section 86(7). Such households would be able to afford at least three out of ten rental units on the market.

Affordable Ownership Housing: should meet the demand of households at the high end, as identified in Halton's annual State of Housing Report pursuant to Section 86(7). Such households would have sufficient income left, after housing expenses, to sustain the basic standard of living.

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

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

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

Subject Site

The proposed development would increase the supply, type, and size of housing in this area of Burlington. It does not conflict with neighbouring development, rather provides an appropriate density of housing along primary roadway for the City. Integrated commercial space at grade also helps unify the building with existing retail uses nearby, while providing local-serving amenities for future residents and pass by traffic.

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

2.2 Halton Region State of Housing Report

The Halton Region State of Housing Report has been produced annually by Halton Region since 2006. It provides a review of housing supply and demand in Halton and monitors the Region's progress in implementing the vision and policies included in the PPS and the *Halton Region Official Plan*. **The latest report for the region was completed for the year 2024.**

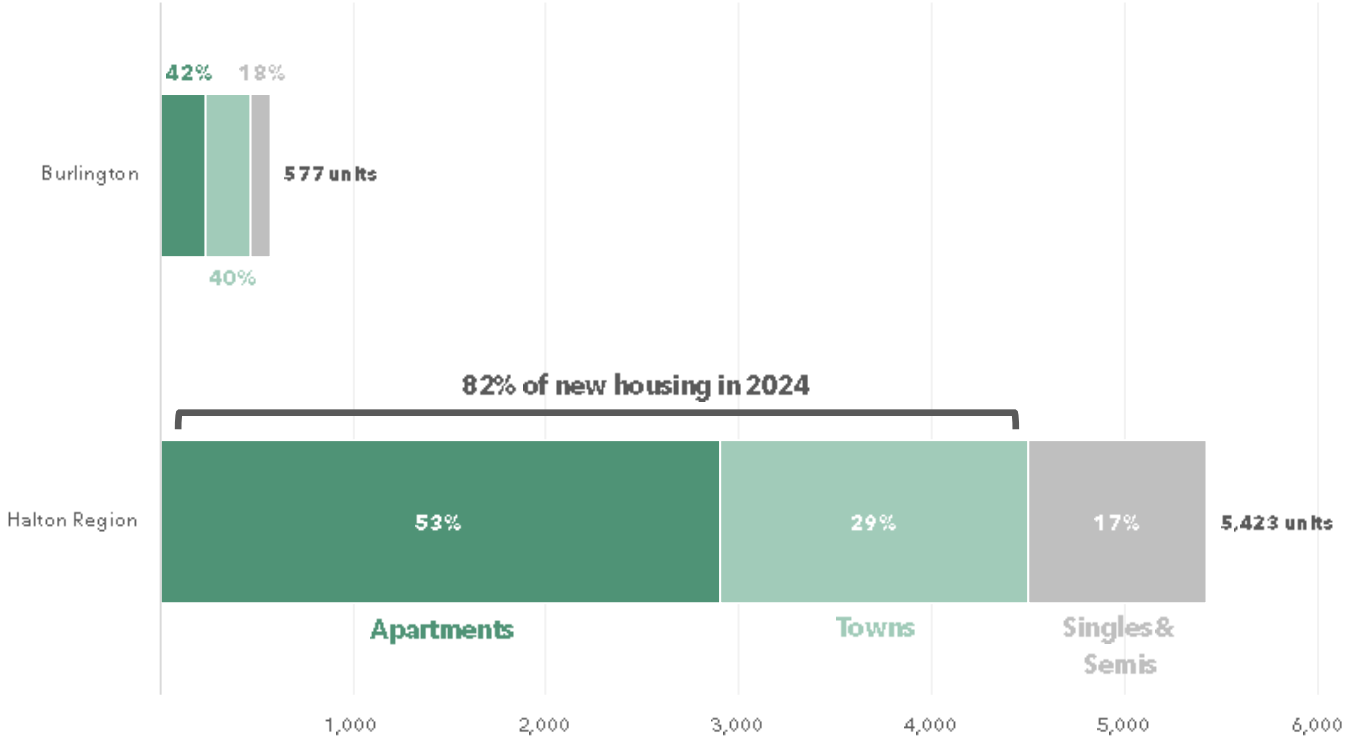
The report includes an overview of housing development across the region and its member municipalities. Currently, the Regional Official Plan calls for a minimum of 65% of new housing to be in the form of townhouses or higher-density (multi-storey) buildings. This represents growth from the previous target of 50%, which was generally achieved for most of the last decade.

The 65% minimum was achieved in 2024, with 82% of new housing in Halton Region being delivered in the form of townhouses or apartments (Figure 2.3). The City of Burlington accounted for a limited share as it experienced minimal housing development during the year. However, similar to patterns across the region, development of apartments and townhouses also made up approximately 82% of new housing delivery in Burlington. Breaking this

down further by dwelling type shows that Burlington contributed to a lower proportion of new apartments built across the region but delivered a higher portion of townhouses.

Figure 2.3

Housing Completions in Burlington & Halton Region, 2024



Source: Parcel based on CMHC data and the Halton Region 2024 State of Housing Report.

Subject Site

The redevelopment contemplated for the site, which includes 179 new apartment units, would increase the supply of housing in Burlington and Halton overall. It would help the Region meets its Regional Housing mix target by introducing diverse housing formats. It would also enhance Burlington's contribution to new housing provision, particularly towards encouraging more market affordable housing.

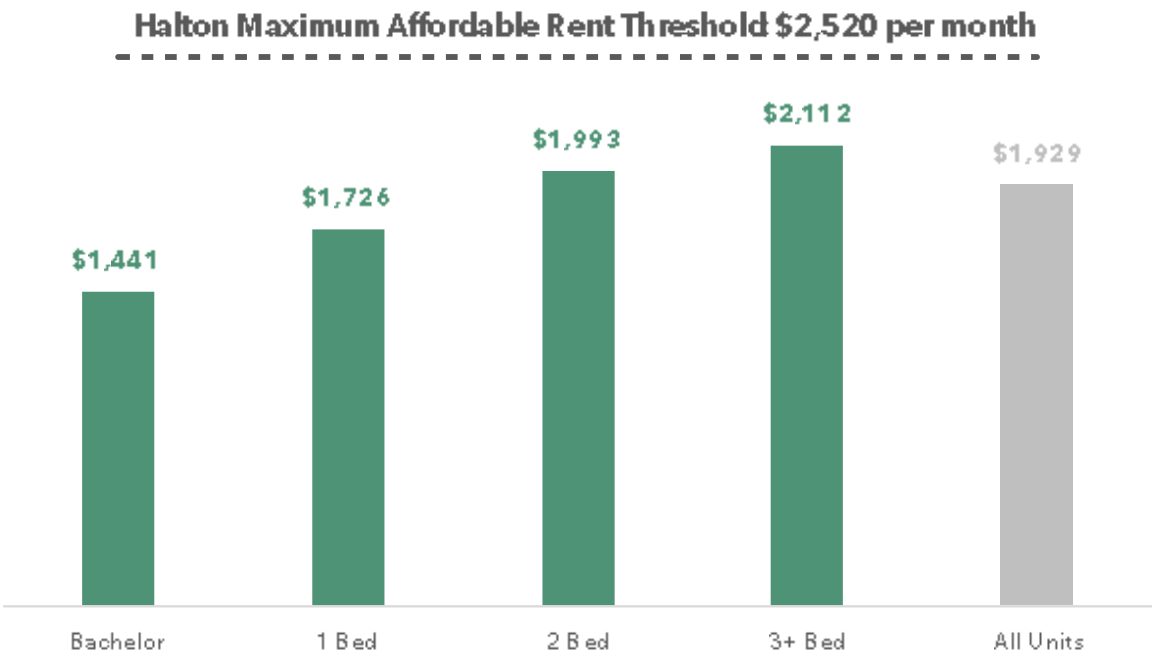
Calculated through the Halton Housing Model and based on the *Halton Region Official Plan's* definitions for affordable housing costs, the 2024 State of Housing Report details the upper limit household incomes (i.e., maximum purchase price) that a household with that income could afford.

In 2024, the affordable (non-assisted) threshold for ownership housing was $471,120. This number is used to determine if the Region is achieving Policy 86(6) of the *Halton Region Official Plan*, that 30% of new annual housing units are affordable or assisted. To that end, as per the 2024 State of Housing Report, the **maximum affordable threshold in Burlington was much lower** ($427,012) than the regionwide value.

The 2024 State of Housing Report does not prescribe the affordable threshold for purpose-built rental housing as it has in previous years. Therefore, Parcel has relied on the definition and values outlined by the Ministry of Municipal Affairs and Housing (MMAH) in its PPS Housing Affordability Tables to determine the maximum affordable monthly rent threshold. As per Table 3, the **average affordable rent for purpose-built rental units in Halton Region in 2024 was $2,520 per month** (Figure 2.3). This threshold is higher than other regional municipalities in the GTA.

Figure 2.4

Purpose-Built Rental Apartment & Townhouse Average Monthly Rent by Unit Type in Burlington, 2024



Source: Parcel based on CMHC data and the MMAH PPS Housing Affordability Table 3.

Subject Site

If the subject site is ultimately developed with purpose-built rental apartment units, it is possible that a portion of these units could meet the regional definition of affordable if the monthly rent is below the applicable affordable rent threshold at the time of development. However, the average monthly rent for units will not be known until the units are leased upon completion of the building.

A rise in new housing activity was evident across Halton Region more generally. This includes an increase in total new sales and in the share of housing sales that were considered affordable**. In 2024, the Region of Halton met its Regional Housing Affordability target of 30%**, as nearly 41% of new housing units were estimated to be under the Affordable Maximum Purchase price of $471,120. That said, new housing activity in Burlington was considerably muted when compared to the region. **New housing sales in Burlington accounted for under a fifth of the region** (564 of 3,118 sales), **while only 9% of these sales were affordable**. Overall, affordable new housing sales in Burlington made up just 4% of the regionwide aggregate. Conversely, the **resale housing market in Burlington was much more robust** (35% gain from 2023), especially compared to the rest of the region where resales diluted from the year prior.

Figure 2.5

Housing Sales Across Halton Region, 2023-2024

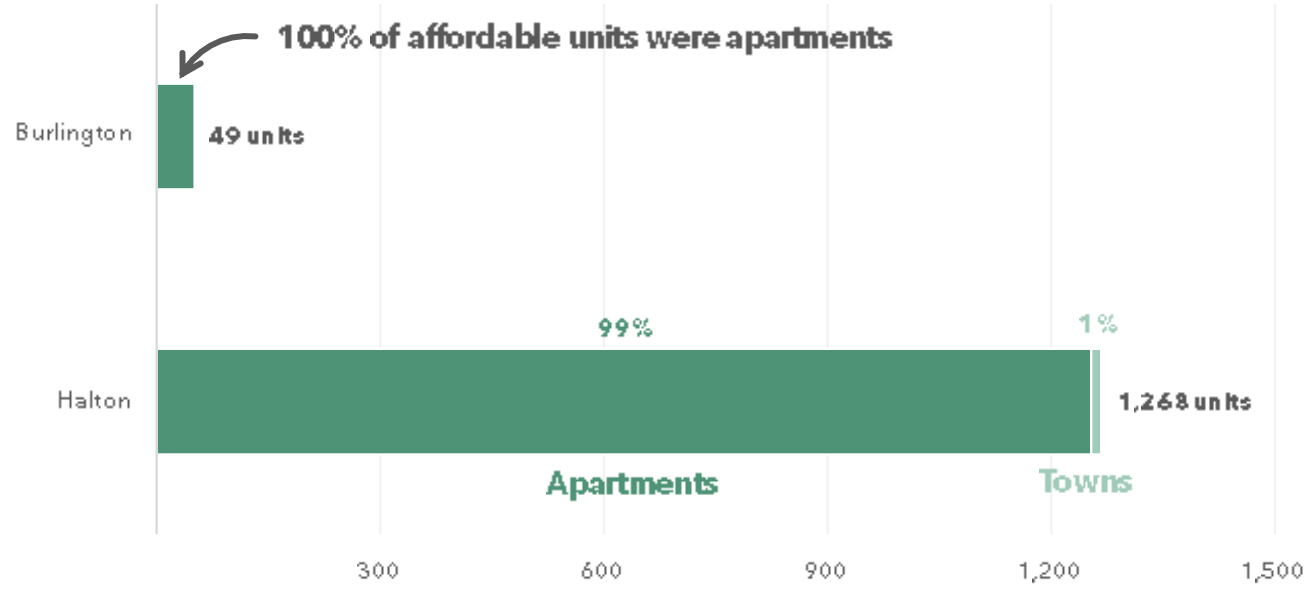
	2023	2024	% Change
New Housing Sales	2,406	3,118	29.6%
Resale Housing Sales	7,050	6,752	-4.2%
Affordable New Sales	932	1,268	36.1%

Source: Parcel based on the Halton Region 2023 and 2024 State of Housing Reports.

The 2024 State of Housing Report acknowledges that **all affordable housing sales in Burlington were in the form of apartments** while across Halton affordable units were either townhouses or apartments (Figure 2.6). This emphasizes the relationship between housing density and housing affordability.

Figure 2.6

New Affordable Housing Sales in Halton Region, 2024



Source: Parcel based on the Halton Region 2024 State of Housing Report.

Subject Site

The subject site would increase the overall supply of new housing in Burlington and Halton Region. Indirectly, this would help support housing affordability by ensuring and maintaining an adequate supply of housing to meet forecast demand. Furthermore, the proposed development contains apartment units. Recognizing that this typology—in addition to townhouses—account for most of the recent affordable home sales in Halton, new units on the subject site will increase the supply of housing that are likely to have an attainable purchase price or monthly rent.

2.3 City of Burlington Current Official Plan

Policies in Section 2.4 Housing Affordability under Part III of Burlington's *Current Official Plan, 1997* identifies the objective "to ensure that a range of housing and tenure types are available to meet the various lifestyle and income group needs of the existing and future population" and "to encourage the development of affordable housing throughout the City".

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

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

Subject Site

The proposed development will provide a form of housing which is not common in the area and will do so by including a variety of unit formats, including one-, two-, and three-bedroom apartment units of varying sizes.

2.4 City of Burlington Proposed New Official Plan (Interim Working Version)

Policies in Section 3.1 of the *City of Burlington Proposed New Official Plan, 2020* centers on Housing and emphasizes that the City needs to "…*promote an appropriate and adequate range of housing choices by type,*

tenure and affordability level…" for all residents and workers. **Policy 3.1.1(2) details how affordable housing will be achieved and maintained** in the city. In particular:

3.1.1(2) Policies

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

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

…

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

…

(v) develop:

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

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

c. minimum targets for two (2) and three (3) bedroom units for residential development applications, including minimum targets for 3 or more bedroom units; (vi) consider financial and other incentives, including grants, property tax reductions, infrastructure improvements and Community Improvement Plans to facilitate the provision of affordable housing and / or assisted and special needs housing.

…

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

Subject Site

The proposed development will assist the City in meeting its minimum housing unit targets by density type. It will also diversify the existing housing stock by providing a range of unit formats of varying sizes and apartment types (i.e. one-bedroom, one-bedroom plus den, two-bedroom plus den, and three-bedroom plus den units).

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

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

1. *Affordable rental housing should meet the demand of households at the low end, as described in the Region of Halton's annual State of Housing Report. Such households would be able to afford at least three out of ten rental units on the market.*

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

Assisted Housing – Housing that is available to low and moderate income households for rent or purchase where part of the housing cost is subsidized through a government program.

Low- and Moderate-Income Household – Those households defined through the Region of Halton's annual State of Housing Report, pursuant to the Region of Halton Official Plan, and in accordance with the definitions of Affordable and Assisted Housing under the Region of Halton Official Plan. The income thresholds for low and moderate income households should not be more than those as defined in the Provincial Policy Statement.

3.0

Halton Region Housing Targets

3.1 Unit Mix Targets

As noted earlier, Policy 86(6) a) of the *Halton Region Official Plan* identifies that "housing units produced annually in Halton in the form of townhouses or multi-storey buildings be **at least 65 per cent to 2031** and at least 75 per cent each year thereafter". The 179 units proposed on the subject site will assist the Region in achieving this target, recognizing that all units proposed are in the form of apartment units.

The units proposed on the subject site will help increase the supply of housing in Burlington. By accommodating new apartment units on the subject site, it will indirectly support housing affordability citywide by ensuring there is a sufficient supply of apartment units to meet forecast demand.

The **rental apartment vacancy rate of 2% in Burlington in 2025** was below the 3% vacancy rate identified by CMHC as necessary to ensure adequate competition and housing options in an area (Figure 3.1). Recognizing historical and existing trends, if the units on the subject site are ultimately developed as rental apartment units, it will add to the supply of rental units in the city and region while simultaneously increasing housing choice.

Figure 3.1

Rental Apartment Vacancy Rate in Burlington



Source: Parcel based on CMHC data.

3.2 Affordable Housing Targets

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

More generally, new housing—and its potential affordability—on the site and throughout the region, can be supported by a variety of housing programs, some of which are detailed below.

Housing Programs & Opportunities in Halton Region

Halton Region utilizes various programs to support affordable housing opportunity and delivery in the area. As detailed below, many of these programs apply to households who have applied for assisted housing programs in Halton. These households are consolidated on the Halton Access to Community Housing (HATCH) waitlist as households who have applied and are eligible for financial support.

The Region's Assisted Housing Portfolio

In 2021, Halton Region exemplified their commitment to support the creation of affordable housing across Halton Region by establishing a regional housing portfolio. This portfolio committed the Region to creating a maximum of 600 new assisted housing units by 2031. These units would be distributed across the region, with opportunities created by (1) local private, non-profit, and cooperative housing partnership, (2) residential development on Regional-owned lands and those owned by the Halton Community Housing Corporation (HCHC), (3) Regional purchase of units to address and support growing waitlist of households needing support, and (4) providing rent supplement to eligible Halton residents.

This program has helped position the Region and HCHC owned sites as development ready for potential capital investment from senior levels of government.

Halton Region's Assisted Housing / Rent Supplement Program

This program 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 (RGI) assistance. RGI provides rental supports to individuals and households who cannot afford their existing rental rates. The program relies on working with private-sector landlords who contribute "RGI units" to the program, enabling Halton Region to then match eligible units to provided units. Households who receive and qualify for rental assistance are sourced directed from the HATCH

waitlist. The housing subsidy provided, is determined based on the household income of each applicant and is paid directly to the landlord.

Portable Housing Benefits

The Canada-Ontario Housing Benefits (COHB) program offers an income tested housing allowance to qualified applicants with an immediate need for a portable housing benefit to assist with private market rent. This allowance is tied directly to the applicant, not a unit, allowing them to move anywhere within Ontario.

Canada-Ontario Community Housing Initiative (COCHI)

Halton Region recently benefitted from receiving $15 million collectively from the Province—nearly $12 million from COCHI along with $3 million from Last Mile Funding—and roughly $9 million from CMHC's Rapid Housing Initiative's (RHI) Cities Stream. This fund helped develop a new 52-unit seniors' supportive housing facility with a ground floor Community Wellness Hub on Kerr Street (Oakville). The Region has also received about $6 million from the Province with some federal funding to develop 14 semi-detached one-bedroom bungalows on Rebecca Street (Oakville) for older adults with mobility concerns. The construction of 12 one-bedroom supportive housing units for individuals with mental health and addiction challenges is also slated to be constructed in Halton Hills with the assistance of $2 million of federal funding.

4.0
Conclusions

Below we have summarized how the proposed development addresses each of the criteria identified in the Terms of Reference for a Housing Impact Statement.

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 179 housing units will contribute towards the Region's achievement of two housing targets:

Policy 86(6) a) – As all units in the proposed development will be apartment units, the development will contribute towards the Region's achievement of the target that 65% of new units be in the form of townhouse and apartment units. This is of particular importance recognizing that the Region previously only required that 50% of housing units be in these formats.

Policy 86(6) b) – At this time, the applicant has not yet determined if any of the new units in the proposed development will meet the Regional definition of affordable or assisted housing units. However, the increased supply of housing would indirectly support housing affordability by increasing the overall housing stock, particularly in formats that are generally more attainable than lower-density formats. By introducing a mix of apartment formats and sizes, the proposed development would appeal to a range of current and future residents, including those of various incomes and backgrounds.

When in the future the applicant has determined that (if) any of the proposed units meet the Region's definition of affordable or assisted housing, the development will contribute towards meeting the Region's target that 30% of new housing units produced annually in Halton be affordable or assisted housing.

How the estimated rents and / or initial sales prices of the development are at or below the affordable housing thresholds by type.

The estimated potential rent for units in the proposed development has not been determined. Average monthly rent for units will likely be based on market demand and prevailing lease rates.

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.

The proposed development includes one building, therefore it is not expected that the development will occur in phases.

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

While there is currently no commitment to include affordable housing units on the subject site, the provision and inclusion of affordable housing citywide could be supported by existing and potential future policies and mechanisms. These mechanisms include rent-geared-to-income assistance, rent supplements, and assisted housing development subsidies by higher levels of government.

Other Elements

The Terms of References for a Housing Impact Statement stipulates other elements that are required as part of this study, including (1) a comprehensive review of the proposal, (2) the context of the proposal in the context of Halton Region's housing policies and the 2024 State of Housing Report; and (3) a discussion of other relevant and current housing information available. These items have been addressed below.

Comprehensive Review of the Proposal

The subject site is currently occupied by Knights Inn. The 179 purpose-built rental apartment units which are proposed will result in an intensified use of land, supporting the City and Region in reaching their intensification targets and in increasing the overall supply of housing. Based on the current concept plan for the subject site, 77% (138 units) of the apartment units are proposed to be one-bedroom, 22% (or 40 units) of units will be two-bedroom plus den, in addition to one three-plus den unit. The development also proposes to feature 8 commercial units at grade, resulting in roughly 422 square metres of commercial space.

Proposed Development in the Context of Halton Region

As noted previously, by proposing apartment units at a location within the built-up area, the subject site would help achieve housing targets set out in Policy 86(6) in the Regional Official Plan, in an area designated for intensified development and compact built forms.

The subject site would also increase the overall supply of new housing units in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply of housing units, including a diversified stock of apartment types, tenures, and sizes.

Other Relevant and Current Housing Information

Housing development in the City of Burlington has been lagging recently, especially when compared to the level of new housing activity across Halton Region. New housing supply should be encouraged and supported to ensure there is enough new housing stock for existing and future residents. This is particularly important as the cost of housing in Burlington, Halton, and Ontario more broadly has risen.

Parcel

Figure A.1

Table 2: Intensification and Density Targets

Target	Municipality				
	Halton Region	Burlington	Oakville	Milton	Halton Hills
Intensification Target					
Housing Units in Built-Up Area[1]	**53,300**	20,500	19,400	9,800	3,600
Community Area Density Targets					
People and Jobs per Hectare in the Designated Greenfield Area[2]	**62**	76	70	59	53
Employment Area Density Targets					
Jobs per Hectare in the Employment Areas [3]	**26**	33	36	19	24

[1] Target for the number of new housing units occurring with the Built-Up Area as shown on Map 1H between 2022 and 2041 and representing 45% of all new units during this period.

[2] Target for the number of people and jobs per hectare in the *Designated Greenfield Area* by 2041, consisting of the lands within the Regional Urban Boundary and outside of the *Built-Up Area* as shown on Map 1H and measured in accordance with Section 227.1 of this Plan.

[3] Target for the number of jobs per hectare in the *Employment Areas* by 2041, as shown on Map 1H and measured in accordance with Section 227.1 of this Plan.

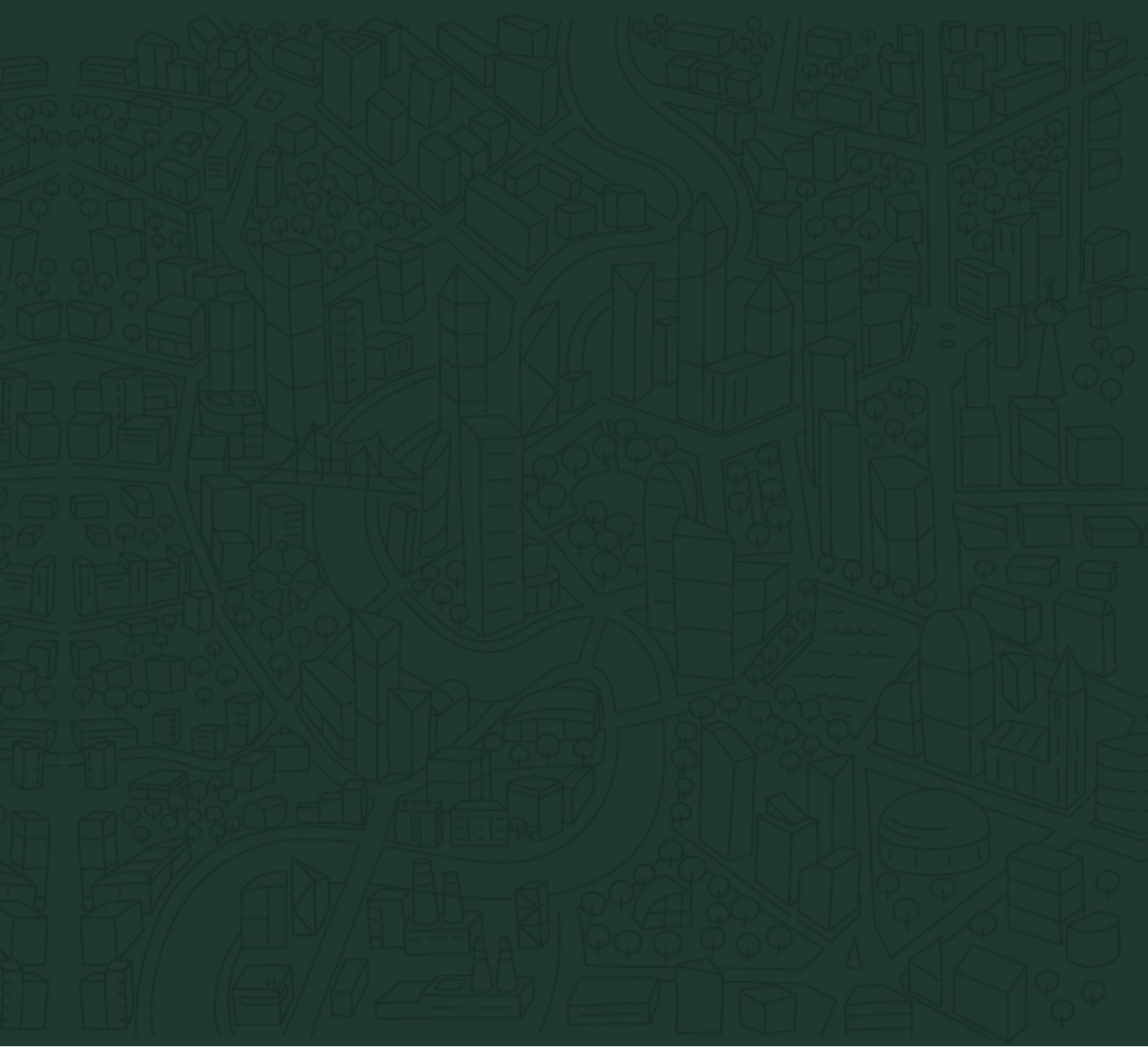
Source: Halton Region Official Plan, 1995.

Figure A.2

Table 2A: Regional Phasing

Municipality	2022-2026	2027-2031	2032-2036	2037-2041
Halton Region				
Units in *Designated Greenfield Area*	**14,970**	**15,900**	**16,470**	**16,810**
Low Density Units	5,920	6,270	6,560	6,690
Medium & High Density Units	9,050	9,610	9,920	10,120
Units inside the *Built Boundary*	**12,430**	**13,200**	**13,680**	**13,950**
Employment	**34,700**	**36,800**	**34,700**	**35,400**
Oakville				
Units in *Designated Greenfield Area*	**6,460**	**6,860**	**6,010**	**6,130**
Low Density Units	2,120	2,250	2,090	2,130
Medium & High Density Units	4,340	4,610	3,920	4,000
Units inside the *Built Boundary*	**4,500**	**4,780**	**4,980**	**5,080**
Employment	**13,500**	**14,300**	**11,300**	**11,500**
Burlington				
Units in *Designated Greenfield Area*	**590**	**620**	**450**	**460**
Low Density Units	220	230	20	20
Medium & High Density Units	370	390	430	440
Units inside the *Built Boundary*	**4,790**	**5,090**	**5,170**	**5,270**
Employment	**4,000**	**4,200**	**4,200**	**4,300**
Milton				
Units in *Designated Greenfield Area*	**5,760**	**6,120**	**8,780**	**8,960**
Low Density Units	2,560	2,710	3,960	4,040
Medium & High Density Units	3,200	3,400	4,820	4,920
Units inside the *Built Boundary*	**2,360**	**2,500**	**2,480**	**2,530**
Employment	**11,700**	**12,500**	**14,000**	**14,300**
Halton Hills				
Units in *Designated Greenfield Area*	**2,160**	**2,300**	**1,230**	**1,260**
Low Density Units	1,020	1,080	490	500
Medium & High Density Units	1,140	1,210	750	760
Units inside the *Built Boundary*	**780**	**830**	**1,050**	**1,070**
Employment	**5,500**	**5,900**	**5,200**	**5,300**

Source: Halton Region Official Plan, 1995.



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