

HOUSING IMPACT STATEMENT

1010 Downsview Drive & 355 Plains Road East

City of Burlington

Date:
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Prepared for:
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(Coletara Development)

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EXECUTIVE SUMMARY

This Housing Impact Statement (the "Statement") has been prepared in support of a proposed Official Plan and Zoning By-law Amendment to facilitate the redevelopment of the property located at 1010 Downsview Drive & 355 Plains Road East, in the City of Burlington (the "Subject Lands"). MHBC Planning was retained by 335 Plains Holdings Inc. & 355 Plains Holdings Inc. (the "Applicant") to prepare a Housing Impact Statement for the Subject Lands.

The proposed development will provide for total of 584 residential units with a mix of one-bedroom and two-bedroom apartment-style units and townhouse-style units. The Subject Lands are currently occupied by one-storey commercial plazas and surface parking. As per the policies of the Halton Region Official Plan and the City of Burlington New Official Plan (2020), the Subject Lands are located within the Urban Area and are designated Mixed-Use Nodes and Intensification Corridors. The Subject Lands are located within the delineated built boundary of the City of Burlington. The proposed residential units will contribute towards meeting the City and Region's intensification targets and will supply housing for the City of Burlington in conformance with the housing intensification policies of the Regional Official Plan and the City of Burlington New Official Plan.

The City of Burlington's New Official Plan (2020) identifies several components to be addressed. The table below summarizes these components and how they are addressed by the proposed development.

Policy	**Analysis**
1) Completed in accordance with Section 3.1.1(2)h) of the City's New Official Plan (2020);	
(i) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development will provide for a total of 584 townhouse and apartment units and represents an intensification opportunity that supports sustainable, cost-effective, and transit-supportive growth. The proposal will provide for a total of 584 condominium apartment units and conform to applicable housing policies of the Halton Region Official Plan. This increased supply of housing supports overall housing affordability by ensuring there is sufficient supply to accommodate anticipated demand. The proposed unit mix will appeal to a range of residents in the City of Burlington, including young families.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The proposed development will market for sale units and/or market rental units. This will be determined based on market conditions just prior to construction.
(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	The development is expected to occur in two 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.	It is expected that proposed residential units will market for sale units and/or market rental units. This will be determined based on market conditions just prior to construction.
1) 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 Lands are currently in use as one-storey commercial plazas with surface parking. The 584 proposed residential units will result in an increased density for the site, which supports the City and Region in meeting their housing needs. A mix of 1-bedroom and 2-bedroom units will be offered.
2) 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	The proposed development would increase the overall supply of new housing units in the City of Burlington and in Halton Region. The proposed development also contributes to the shift in primary residential built form in Burlington by proposing apartments and townhouses. All new affordable housing sales in Halton Region were comprised of townhouses and apartment units which supports the link between higher density and affordability.
3) Identify and discuss other relevant and current housing information available.	The City of Burlington is currently preparing its City-wide Housing Strategy. Action #6 states that the City of Burlington will support, permit and encourage the development of alternate forms of housing, including higher density types of housing, where feasible and appropriate. The proposed development is at a proposed density and height that the surrounding area can support and will support the fulfillment of a complete community in this area.

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1.0 Introduction

MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") has been retained by 335 Plains Holdings Inc. & 355 Plains Holdings Inc. (the "Applicant") to seek planning approvals to redevelop the properties located on the north side of Plains Road East on either side of Downsview Drive, municipally addressed as 1010 Downsview Drive & 355 Plains Road East, in the City of Burlington (the "Subject Lands").

This Housing Impact Statement has been prepared in support of proposed amendments to the in-force City of Burlington Official Plan ("In-force OP") and Zoning By-law (the "Applications") to facilitate the redevelopment of the Subject Lands with a total of 584 residential units, 751 parking spaces, and 64 bicycle parking spaces.

1.1 Purpose and Approach

The City of Burlington's New Official Plan (2020 – Under Appeal) requires that a Housing Impact Statement (the "Statement") be prepared when more than 100 units are included in a development proposal. This Statement conforms to the Terms of Reference (TOR) provided by the City of Burlington to guide its preparation. The TOR for the Statement requires conformance with the following components:

- Completed in accordance with Section 3.1.1(2) h) and other applicable policies of the City's 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; and
- Identify and discuss other relevant and current housing information available.

Section 3.1.1(2) h) of the City of Burlington's New Official Plan (2020) provides additional clarification on the components that must be addressed as part of a Housing Impact Statement. This includes the following relevant policies:

(i) how the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units;
(ii) how the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;
(iii) where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable; and
(iv) the proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long term affordability of units, where applicable.

Note that this Statement has been prepared in the context of the City's New Official Plan (2020) ("New OP") as per the terms of reference noted above. The New OP is currently under appeal and thus not in-force. Each of these components have been addressed and will be summarized in the conclusions of this Statement.

2.0 Existing Site & Planning Context

2.1 Site Description

As shown on **Figure 1**, the Subject Lands consists of two parcels on the north side of Plains Road East, separated by Downsview Drive in the City of Burlington. The Subject Lands are municipally addressed as 1010 Downsview Drive and 355 Plains Road East. The two parcels have a total site area of 1.48 ha (3.67 acres) consisting of 1010 Downsview Drive which is 0.73 ha (1.81 ac) with 48.3 m of frontage on Plains Road East and a depth of 105 m and 355 Plains Road East which is 0.75 ha (1.86 ac) with 71.8 m of frontage on Plains Road East and a depth of 105 m.

As of the date of this Statement, each parcel is currently occupied by a one-storey commercial plaza and surface parking area. Lot A, 1010 Downsview Drive, contains 7 occupied units including a restaurant, financial services, mattress store, day care, and residential sales centre. Lot B, 355 Plains Road East, contains 11 occupied units, including a coffee shop, patio furniture store, karate studio, financial services, place of worship, plant/flower store and a jewelry store. There is currently 1 vacant unit.

Pedestrian access is provided from both Plains Road East and Downsview Drive. Vehicular access and parking for 355 Plains Road East is currently provided from Plains Road East and Downsview Drive. Vehicular access and parking for 1010 Downsview Drive is currently provided from Downsview Drive. There is a signalized intersection at Plains Road East and Downsview Drive.

The proposed mixed-use development of two mid-rise residential buildings and stacked townhome blocks will provide for a total of 584 residential units which will intensify the site, in comparison to the existing uses.



FIGURE 1: Location Map

2.2 Surrounding Land Uses & Neighbourhood Context

The surrounding uses are described as follows:

NORTH: Immediately north of the Subject Lands is a low-rise residential neighbourhood with single detached residential houses. Further to the northwest is the Aldershot Park and Aldershot GO Station.

EAST: Immediately east of the Subject Lands is East Plains United Church, which contains a Child Care Centre and a cemetery. Further east, there is a mix of residential buildings and low-rise commercial buildings.

SOUTH: Immediately south of the Subject Lands, across Plains Road East, is a mix of residential apartments and mixed-use buildings. Further to the south is a low-rise residential neighbourhood.

WEST: Immediately west of the Subject lands are 3-storey townhouses. Further to the west are Holy Rosary Church and Holy Rosary Catholic Elementary School, as well as a mix of townhouses and low-rise commercial uses.

The surrounding context of the area includes both the concentration of a range of uses along the Plains Road corridor as well as within the surrounding community. The area is served by retail and service commercial uses, as well as community, parks, recreational and institutional uses.

The Subject Lands are well-serviced by existing and planned transit services, as there are several existing Burlington Transit bus stops located in close proximity to the Subject Lands, serving routes 1 and 4. Route 1 is an express route that provides local service along Plains Road East from York Boulevard to Fairview. Route 4 provides local service from Aldershot GO to Appleby GO. An existing transit stop is located in front of 355 Plains Road East. Aldershot GO Station is located approximately 2.5 km northwest of the Subject Lands, providing frequent commuter rail service along the Lakeshore West GO line, to destinations including Niagara Falls, Hamilton, and Toronto.

Based on the above physical context and surrounding neighbourhood, the Subject Lands are in a location that is in close proximity to future residents' daily needs, including commercial, employment and community uses as well as existing and planned transit services.

2.3 Planning Context

The Subject Lands are designated as 'Urban Areas' in the current Regional Official Plan ("ROP") on Map 1: Regional Structure (**Figure 2**). The Subject Lands are located within the built boundary of the Region. Map 3: Functional Plan of Major Transportation Facilities in the ROP indicates that Plains Road East is a Multi-Purpose Arterial Road (**Figure 3**).

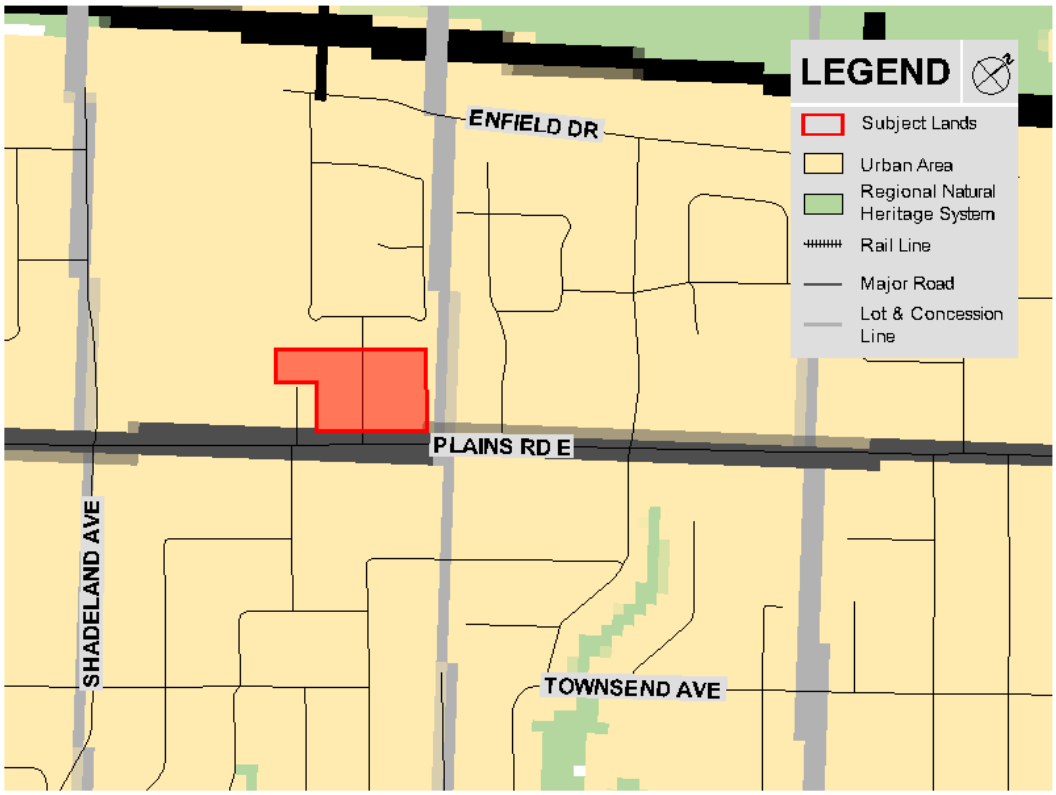


FIGURE 2: Region of Halton Official Plan – Map 1: Regional Structure

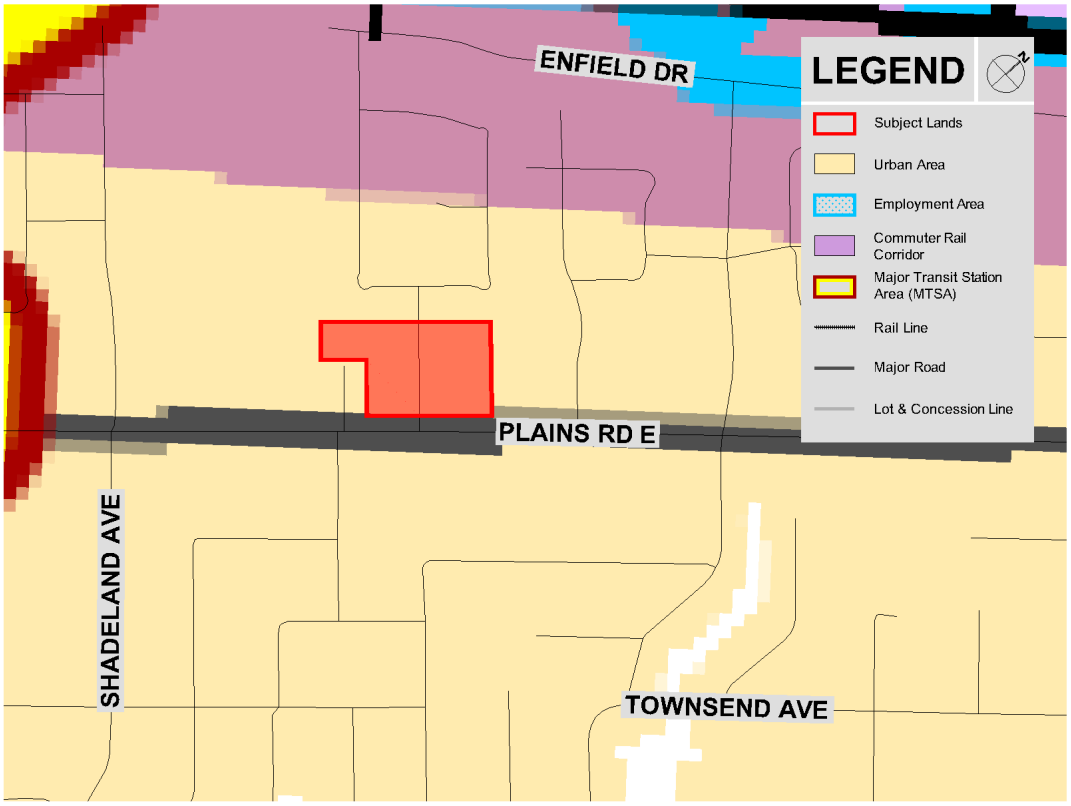


FIGURE 3: Region of Halton Official Plan – Map 3: Functional Plan of Major Transportation Facilities

Schedule A: Settlement Pattern of the in-force City of Burlington Official Plan (1994) shows that the Subject Lands are designated 'Mixed Use Activity Area' (**Figure 4**) within the urban boundary. Therefore, units on the site will contribute towards meeting the City's and Region's intensification targets, as discussed further

in this Statement. Schedule B: Land Use Plan (Urban Planning Area) of the in-force City of Burlington Official Plan (1994) shows that the Subject Lands are designated 'Mixed use Corridor – General' (**Figure 5**).

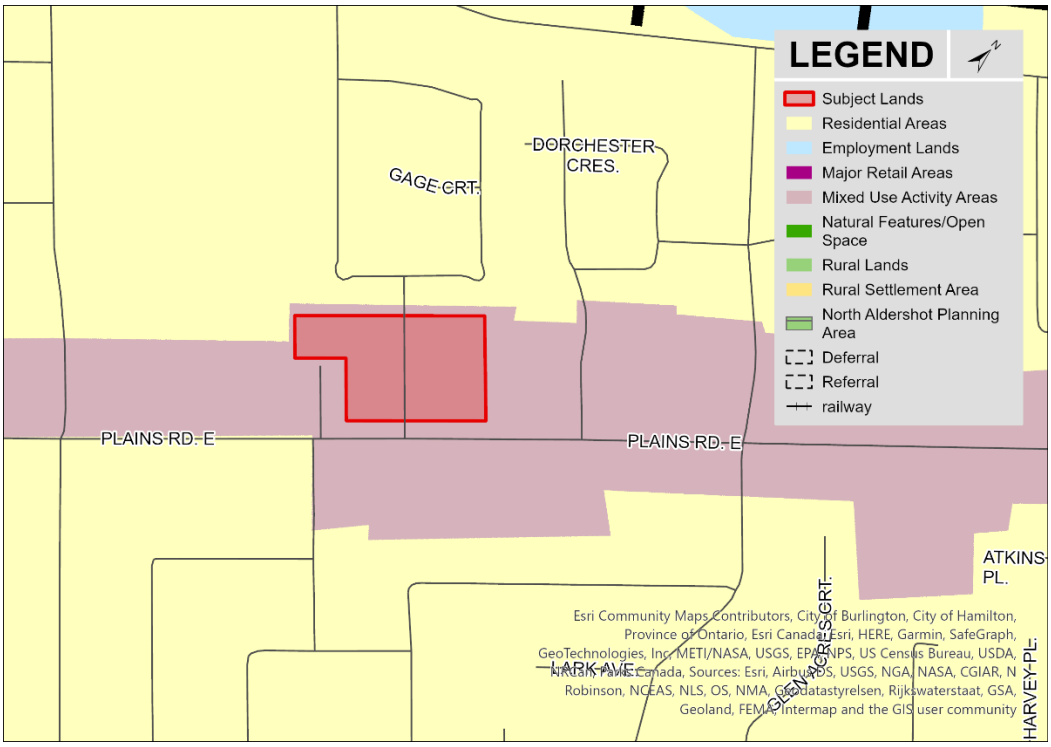


FIGURE 4: City of Burlington In-Force Official Plan – Schedule A: Settlement Pattern

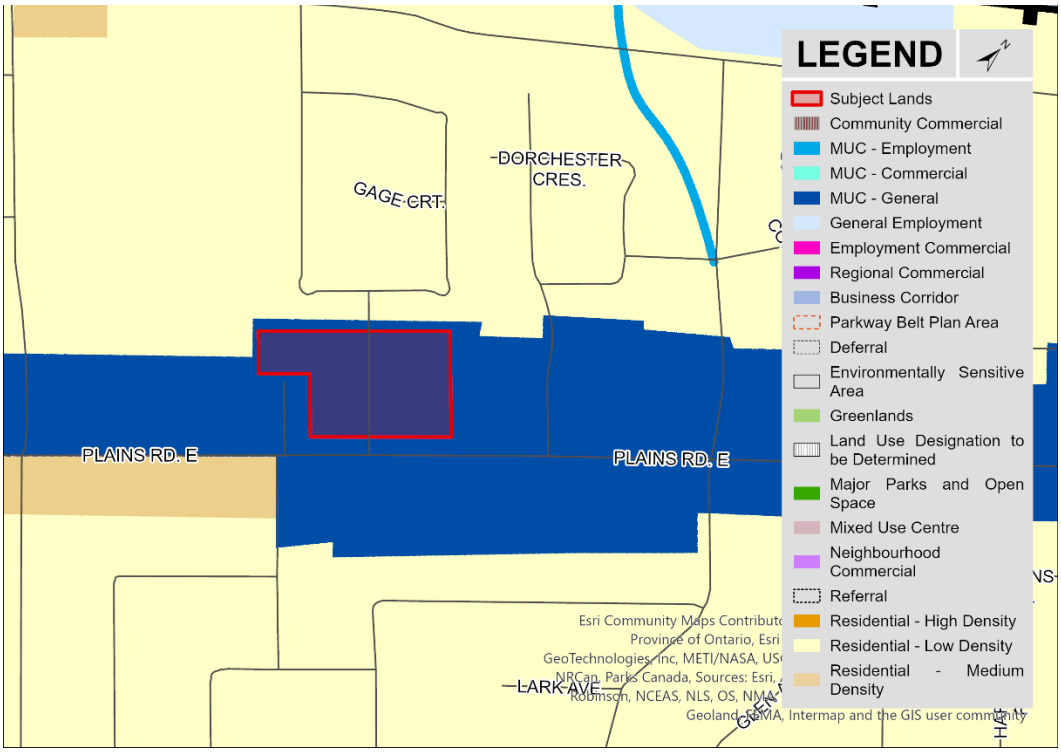


FIGURE 5: City of Burlington In-Force Official Plan – Schedule B: Land Use Plan

Schedule B: Urban Structure of the City of Burlington New OP, shows that the Subject Lands are designated 'Mixed Use Nodes and Intensification Corridors' (**Figure 6**). The site is located within the delineated built boundary of the City of Burlington. Therefore, as stated above, units on the site will contribute towards

meeting the City's and Region's intensification targets. In addition, the proposed development has been designed to be compact, pedestrian-friendly and well-connected to public transportation, especially in its proximity to the Aldershot GO MTSA.

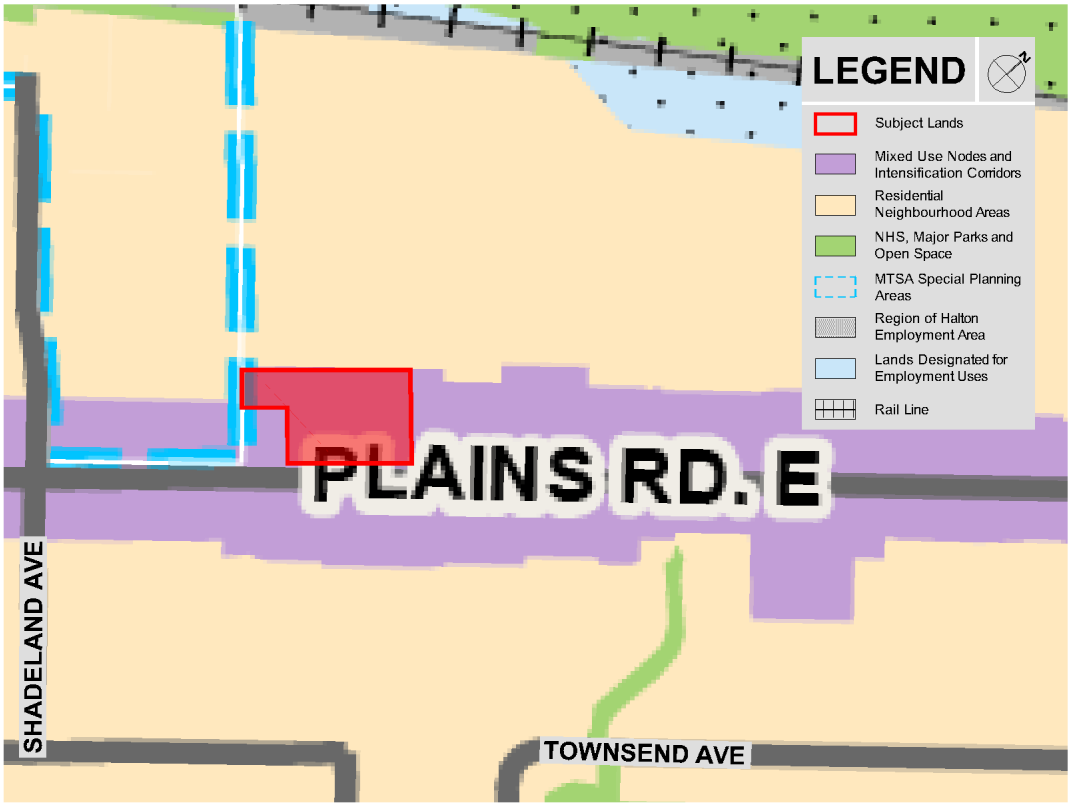


FIGURE 6: City of Burlington New Official Plan – Schedule B: Urban System

Schedule B-1: Growth Framework of the City of Burlington New OP shows that the Subject Lands are located in a Secondary Growth Area (**Figure 7**). Schedule C: Land Use – Urban Area designates the Subject Lands as Urban Corridor **(Figure 8**). Under this designation, Policy 8.1.1 states that the Subject Lands are identified as a location to "intensify and accommodate a significant portion of the demand for higher intensity employment, commercial and residential development within the City." The proposed development will provide transit-supportive residential density on an underutilized site with existing municipal servicing capacity. This development will reduce land consumption and servicing costs, provide amenities, and contribute to a compact built form near a higher-order transit corridor.

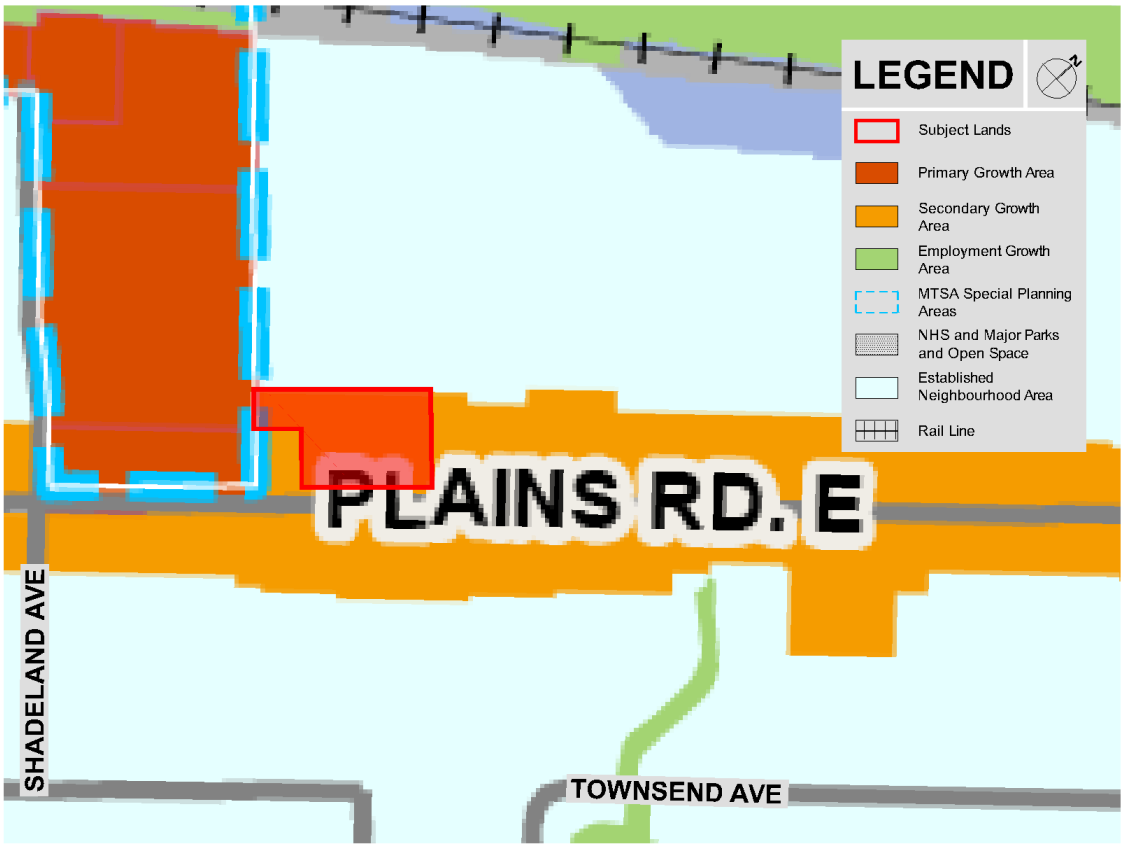


FIGURE 7: City of Burlington New Official Plan – Schedule B-1: Growth Framework



FIGURE 8: City of Burlington New Official Plan – Schedule C: Urban Area

As discussed in the accompanying Planning Justification Report, the proposed development is appropriate for the Subject Lands and conforms to the land use planning policy context. The proposal maintains compatibility with the surrounding area, can be accommodated with existing servicing and transportation infrastructure, supports existing and planned transit while significantly contributing to the housing supply. The proposal will result in the development of a currently underutilized site within an area designated for intensification, significantly contributing to the housing supply.

2.4 Proposed Development

The proposed development provides for a mixed-use development consisting of three mid-rise residential buildings with ground floor retail at the base of each building and stacked townhome units along the rear of both parcels.

The proposed development on 1010 Downsview (Building A) is for one 8-storey residential building, with a total gross floor area of 15,109.8 m^2. The building will provide for a total of 141 apartment units. There are 56 townhouse-style units proposed along the northern lot line. The 8-storey building and the townhomes will provide for a mix of 1-bedroom and 2-bedroom units. The proposed floor area ratio is 2.07:1 for this site.

The proposed development on 355 Plains Road East (Building B) is for a residential apartment building with two mid-rise buildings of 9 and 11 storeys, connected by a 6-storey podium, with a total gross floor area of 33,585.7 m^2. The apartment building consists of a total of 347 apartment units and provides for a mix of 1-bedroom and 2-bedroom units. There are 40 townhouse-style units provided along the rear of the site. The proposed floor area ratio is 4.48:1 for this site. The townhouse units and 2-bedroom units will provide opportunities to accommodate families in a growing area of the City of Burlington that is located in close proximity to transit along Plains Road East and the Aldershot GO Station. The proposed development will market for sale units and/or market rental units. This will be determined based on market conditions just prior to construction.

Vehicular access to each site is provided from Downsview Drive through internal drive-aisles providing access to the underground parking as well as the buildings' loading areas. Building A proposes 2 levels of underground parking, with additional surface parking, for a total of 262 parking spaces. This includes 8 accessible parking spaces and 15 parking spaces allocated for the non-residential uses. Building B proposes 2 levels of underground parking and 2 levels of aboveground structured parking, with additional surface parking, for a total of 489 parking spaces, including 15 accessible parking spaces and 12 parking spaces allocated for non-residential uses. Parking will be provided at a rate of 1.23 spaces per unit for residential parking and 3.5 spaces per 100 m^2 of commercial space for the non-residential use parking.

Amenity area for Building A is proposed at-grade and on the 3rd floor of the building, including both outdoor and indoor shared amenity areas. A total of 4,298.0 m^2 of amenity space is proposed; 730.6 m^2 of indoor amenity space, 1,660.9 m^2 of outdoor amenity space including 438.9 m^2 of rooftop amenity spaces, and 1,467.6 m^2 of private balcony amenity space. Amenity area for Building B is proposed at-grade and on the 2nd, 3rd, and 7th floors, including both outdoor and indoor shared amenity areas. A total of 5,865.5 m^2 of amenity is proposed; 696.3 m^2 of indoor amenity space, 513.9 m^2 of outdoor amenity space, 2,243.8 m^2 of rooftop amenity spaces, and 2,411.5 m^2 of private balcony amenity space. The proposed townhouses provide for private outdoor amenity spaces at-grade as well as rooftop amenity space. These amenity spaces have been included in the above calculations.

The table below provides a detailed breakdown of the proposed development site statistics:

Table 1: Summary of Proposed Redevelopment Statistics

Characteristic	Description	
	LOT A	LOT B
Total Site Area	7294.74 m^2	7,500.47 m^2
Proposed Total Gross Floor Area	15,109.8 m^2	33,585.7 m^2
Proposed Residential Units	197	387
Townhouse	56	40
Apartment	141	347
Proposed Density	270.1 units / hectare	516.0 units / hectare
Floor Area Ratio	2.07 : 1	4.48 : 1
Total Parking Spaces	262 Spaces (Including 8 accessible spaces)	489 Spaces (Including 15 accessible spaces and 48 tandem parking spaces)
Residential	252	477
Commercial/Retail	10	12
Short Term Bicycle Spaces	21 Spaces	31 Spaces
Commercial Bicycle Parking Spaces	4 Spaces	8 Spaces

3.0 Provincial Housing Context

The following is a review of the provincial land use policies applicable to the proposal, and a summary of how the proposal meets these policies. The policies identified below are focused on housing, as per the City of Burlington's Terms of Reference.

3.1 Provincial Policy Statement (2020)

The Provincial Policy Statement (2020) (the "PPS") was issued under Section 3 of the Planning Act and came into effect on February 28, 2020. The PPS establishes the policy foundation for regulating the development and use of land in Ontario and provides policy direction on matters of provincial interest related to land use planning and development. It provides a vision for land use planning in Ontario that encourages an efficient use of land, resources and public investment in infrastructure.

The PPS strongly encourages development that will provide long term prosperity, environmental health and social well-being. These directives depend on the efficient use of land and development patterns that support strong, livable and healthy communities that protect the environment and public health and facilitate economic growth.

Section 1.0 – Building Strong and Healthy Communities describes how healthy, liveable and safe communities are sustained.

"1.1.1 Healthy, liveable and safe communities are sustained by:

b) accommodating an appropriate affordable and market-based range and mix of residential types (including single-detached, additional residential units, multi-unit housing, affordable housing and housing for older persons), employment (including industrial and commercial), institutional (including places of worship, cemeteries and long-term care homes), recreation, park and open

space, and other uses to meet long-term needs;

The proposed redevelopment consists of a mix of unit sizes in order to improve the range of residential housing types and sizes available within the City of Burlington. The location of the proposed redevelopment along Plains Road East will also support the continued economic investment along the Plains Road Corridor by providing additional population density supportive of public transit. The proposed development will also provide for commercial/retail uses to continue to serve the area.

Section 1.4, Housing, provides policies to support housing options across the province as follows:

"1.4.3 Planning authorities shall provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the regional market area by:

b) permitting and facilitating:

ii. all types of residential intensification, including additional residential units, and redevelopment in accordance with policy 1.1.3.3;

c) directing the development of new housing towards locations where appropriate levels of infrastructure and public service facilities are or will be available to support current and projected needs;

d) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation and transit in areas where it exists or is to be developed;

e) requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations; and,

f) establishing development standards for residential intensification, redevelopment and new residential development which minimize the cost of housing and facilitate compact form, while maintaining appropriate levels of public health and safety."

The proposed development represents a form of residential intensification in an area where appropriate levels of infrastructure and public services exist. It will efficiently utilize land and infrastructure by providing 584 residential units in a compact urban built form on a site which currently consists of a two 1-storey commercial plazas. The proposed development provides a mix of unit types (1- and 2-bedrooms), in order to ensure housing needs are met for a wide variety of occupants, including families. The development will also assist in achieving a transit-supportive density within the area and support the use of active transportation with the proximity to trails, parks, walking paths, and convenient access to local and regional public transit. The development has been designed to integrate with the surrounding community and will contribute to a mix of housing types in the neighbourhood to meet current and future needs of residents and achieve a complete community.

3.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020)

A Place to Grow: Growth Plan for the Greater Golden Horseshoe (the "Growth Plan") was prepared and approved under the *Places to Grow Act, 2005* and updated on August 28, 2020. The Growth Plan establishes a long-term framework for growth and development in the Greater Golden Horseshoe ("GGH"). The Growth Plan encourages the efficient use of land through the development of complete communities that are

compact, transit-supportive, and provide a range of housing and employment opportunities. The Growth Plan sets out the population and employment forecasts for a land use planning to 2051. The *Planning Act* also requires that decisions affecting a planning matter conform to the Growth Plan.

Section 1.2.1 sets out a vision for the development of the Greater Golden Horseshoe. That vision is grounded in several principles that provide the basis for guiding decisions on how land is developed, resources are managed, and public dollars invested, including:

- Support the achievement of complete communities;
- Prioritize intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability
- Support a range and mix of housing options, including second units and affordable housing, to serve all sizes, incomes, and ages of households.

The proposal satisfies this vision for growth in the Greater Golden Horseshoe by contributing to compact, vibrant and complete communities. In addition, the proposal optimizes the use of existing water, wastewater and stormwater infrastructure to support growth in a compact and efficient form. The proposal will also provide for a mix of housing options in the neighbourhood that is close proximity to an existing GO transit station.

Policy 2.2.1.2 states that the vast majority of the forecasted growth to the horizon of the Growth Plan will be directed to Settlement Areas that have a delineated built boundary, have existing or planned municipal water and wastewater systems, and can support the achievement of complete communities. Within Settlement Areas, growth will be focused in delineated built-up areas, Strategic Growth Areas, locations with existing or planned transit, and areas with existing or planned public service facilities.

In accordance with Section 2 of the Growth Plan, the proposed development constitutes an intensification project and focuses new growth to the existing Built-Up Area, along Major Arterial Roads, on existing transit routes and along a Higher Order Transit Corridor. The Subject Lands are also identified as being within a Strategic Growth Area as defined by the Growth Plan. The proposed development will add to the range of housing choices available in Burlington and will contribute to a mixed-use environment and the achievement of a complete community.

Policy 2.2.1.4 of the Growth Plan states that applying the policies of this Plan will support the achievement of complete communities that:

> *a) feature a diverse mix of land uses, including residential and employment uses, and convenient access to local stores, services, and public service facilities;*
> *c) provide a diverse range and mix of housing options, including second units and affordable housing, to accommodate people at all stages of life, and to accommodate the needs of all household sizes and incomes;*
> *d) expand convenient access to:*
> *i. a range of transportation options, including options for the safe, comfortable and convenient use of active transportation;*
> *ii. public service facilities, co-located and integrated in community hubs;*
> *iii. an appropriate supply of safe, publicly-accessible open spaces, parks, trails, and other recreational facilities;*
> *e) ensure the development of high-quality compact built form, an attractive and vibrant public realm, including public open spaces, through site design and urban design standards;"*

The Subject Lands are located in an area identified for intensification by the Province, Region of Halton and City of Burlington, where convenient access to amenities, which provide for a complete community, are available to residents. The Subject Lands are in close proximity to a range of land uses, services and public service facilities including stores, community centres, and recreational amenities. The proximity to transit provides convenient access to a range of transportation choices with a focus on higher-order transit. The proposed development will contribute to the provision of high-quality built form and will make efficient use of space through the optimization of an underutilized parcel of land. The mid-rise buildings and townhouses have been designed to integrate and be compatible with the existing context in terms of design and scale and shall be designed to address climate change impacts.

Section 2.2.6 contains policies related to housing and the achievement of complete communities by considering the range and mix of housing options, the densities of the existing housing stock, and policies to diversify the overall housing stock across the Province.

The proposal conforms to these policies by diversifying the range and mix of housing options in Burlington through intensification that provides a range of unit types and sizes that will contribute to achieving forecasted growth and increasing housing supply and choice. The proposed redevelopment will provide for a total of 584 residential dwelling units of varying sizes in a mixed-use development. The proposal has been designed to include units capable of accommodating residents with diverse needs as well as families. The proposal will support the creation of complete communities by providing for an appropriate density and mix of uses on site which are within close proximity to transit networks and active transportation infrastructure. A number of nearby amenities that support daily living including schools, community centres, shops, and personal services are within walking distance to the Subject Lands.

4.0 Halton Region Housing Context

This section of the Statement describes the applicable housing policies within the Region of Halton Official Plan and the Halton Region 2020 State of Housing Report.

4.1 Halton Region Official Plan

The Region of Halton Regional Official Plan (the "ROP") serves as Halton's guiding document for land use planning and is intended to manage growth across the Region's four municipalities and was originally adopted in 1994. Since that time the ROP has undergone numerous amendments.

In 2021, the Region adopted Region Official Plan Amendment No. 48 ("ROPA 48") regarding Urban Structure, as the first phase of the Region's Official Plan Review. ROPA 48 has established Strategic Growth Areas throughout the lower-tier municipalities, which are areas targeted for residential intensification and population growth to 2051. The ROP outlines intensification and density targets in Part II, Table 2 of the ROP.

Table 2 Intensification and Density Targets	
Municipality	Minimum Number of New Housing Units to Be Added To the Built-Up Area Between 2015 and 2031
Burlington	8,300
Halton Region	32,200

The ROP projects that 8,300 new housing units will be added to the built-up area of Burlington between 2015 and 2031. The proposal supports this projection by providing 584 residential units within an area identified for intensification as part of an Intensification Corridor.

The Subject Lands are located within the Urban Area of the Region and are within an Intensification Area as part of an Intensification Corridor. Specifically, the Subject Lands will contribute to Policy 77 (2.1) which states that:

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

Table 2A sets out the Regional phasing to be achieved every five years from 2012 to 2031 between the Built-Up Areas and the Designated Greenfield Areas.

Table 2A Regional Phasing		
Municipality	**2022-2026**	**2027-2031**
Halton Region – Units inside the Built Boundary	11,606	11,699
Burlington – Units inside the Built Boundary	2,669	2,659

Table 2A states that Burlington is anticipated to accommodate 2,669 units through intensification between 2022 and 2026 and 2,659 units between 2027-2031. If the units are constructed during either of these periods, the proposed development would account for approximately 22% of new intensification units in the City of Burlington.

Part III – Land Stewardship Policies of the Halton Region Official Plan contains the Housing policy section for Halton Region. The overall goal for housing in Halton Region is to "supply the people of Halton with an adequate mix and variety of housing to satisfy differing physical, social and economic needs." This goal will be accomplished through making more efficient use of underutilized lands to increase the supply of housing. The proposed development is an appropriate location to increase the supply of housing along an Intensification Corridor. The proposal will increase the diversity of housing in an area that is well-connected to transit and daily needs.

Policy 86(6) a) of the ROP states that at least 50 per cent of new housing units produced annually in Halton Region be in the form of townhouses or multi-storey buildings. The proposal satisfies this policy by offering new housing opportunities in a mixed use multi storey building in the form of one and two bedroom units as well as in the form of townhomes.

By proposing to include a mix of townhouse and apartment units, the Subject Lands would increase the housing diversity in the area and provide additional housing for people of different age groups, including young families. The increased supply of housing also supports affordability across Halton Region by providing sufficient supply to meet regional demand.

Through Draft Regional Official Plan Amendment 49 ("ROPA 49"), Halton Region will accommodate population and employment growth with Halton's existing Regional Urban Boundary to 2041. In order to accommodate this growth, ROPA 49 proposes to significantly increase the applicable intensification and regional phasing targets for Halton Region. Therefore, it will be increasingly important to accommodate additional units through intensification, including on the Subject Lands.

4.2 Halton Region State of Housing Report (2020)

Policy 86(7) of the Halton Region Official Plan states that the Region will provide a State of Housing Report that contains the following:

(i) an update of the definitions of Assisted Housing and Affordable Housing;
(ii) 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;
(iii) identification of the gaps between supply and demand of Assisted Housing and Affordable Housing;
(iv) state of homelessness in *Halton; and*
(v) performance of the housing market towards meeting the housing targets under Sections 86(6) and 86(6.1).

Halton Region has prepared the State of Housing Report annually since 2006. The Report provides a review of the Region's housing supply and demand and how the Region is implementing its vision for growth. The latest available report for the Region was completed in 2020 and endorsed by Regional Council in June 2021.

Through their State of Housing Report, Halton Region has prepared a Housing Model which gathers information including household income, spending, costs, and average rents to generate thresholds based on household income and housing costs. The maximum purchase price generated by the Housing Model represents what a household with that income could afford. In 2020, the affordable threshold for ownership housing across all households was $409,500 with an income threshold of $107,800.

In terms of the purpose-built rental market, the 2020 State of Housing Report notes that in Burlington, the average monthly rent for purpose-built rental apartment units was below the maximum affordable rent threshold of $2,120 per month.

The maximum purchase price or monthly rent generated by the Housing Model represents what a household with that income could afford, based on ROP definitions on housing costs for assisted and affordable housing. **Affordable housing** is a housing with a market price (for purchase) or rent that is affordable to households of low and moderate income, spending no more than 30 per cent of their gross household income on housing, without government assistance. In 2020, there was an increase in affordable new unit sales. However, despite the increase in new affordable units, resale home prices outpaced household income and the overall shortfall of affordable units has trended upward from 6.1 per cent in 2019 to 6.9 per cent in 2020. Growth management policy resulted in a steady increase of higher density housing completions and sales, generally improving affordability.

The following table shows the new housing completions, new housing under construction, and new housing starts in the City of Burlington based on unit type:

Unit Types	New Housing Completions	New Housing Under Construction	New Housing Starts
Apartment	379	1,006	503
Townhouse	76	130	56
Semi-detached	0	62	62
Single	55	90	60

The State of Housing Report shows that in 2020, 89.2 per cent of housing completions in Burlington were higher density units (townhouse and apartments). However, total housing completions in Burlington decreased by 44.6 per cent to 510 units in 2020 from 920 units in 2019. The City of Burlington continues to shift from a majority suburban community to community with a mixture of stable suburban communities with urban centres and corridors. However, the City of Burlington needs additional housing supply in order to meet the demand of a growing population. The Subject Lands are located along the Plains Road Urban Corridor and will continue to support the shift in built form within the City of Burlington.

The proposed development will market for sale units and/or market rental units. This will be determined based on market conditions just prior to construction. The 2020 State of Housing Report states that all new affordable housing sales were comprised of townhouses and apartments. This clearly shows the link between higher density and affordability in the Region, especially along sites with access to local and regional transit services. In 2020, new sales in Burlington accounted for 12.0 per cent of total new sales in Halton Region. Only 35.2 per cent of the new sales in Burlington were at or below the affordable threshold ($409,500). The proposed residential units will increase the supply of units and ensure that available units keep up with market demand and are provided at a more attainable price in appropriate location to support residential intensification.

5.0 Burlington Housing Context

This section of the Statement describes the applicable housing policies within the City of Burlington in-force Official Plan (1994) and the City of Burlington New OP. Significant portions of the City of Burlington New OP were appealed and remain under appeal, including policies that would apply to the Subject Lands.

5.1 City of Burlington in-force Official Plan (1994)

The Official Plan for the Burlington Planning Area, The Official Plan (1994), was adopted by the Council of the Corporation of the City of Burlington on July 11, 1994. It was subsequently approved, with modifications, by the Region of Halton, on March 5, 1997. Certain parts of the Plan were referred by the Region to the Ontario Municipal Board for a decision, and certain parts were deferred for further consideration. The City's OP was approved by the Ontario Municipal Board on October 24, 2008. The OP has undergone a number of amendments with the most recent consolidation being December 2019. Section 2.0 notes that the planning horizon of the OP is to 2021.

Section 2.5 contains policies related to housing intensification. It should be noted that these are general policies which apply to every residential property in the City of Burlington, including residential uses that are proposed in non-residential designations.

"2.5.1 Objectives

a) To encourage residential intensification as a means of increasing the amount of available housing stock including rooming, boarding and lodging houses, accessory dwelling units, infill, re-development and conversions within existing neighbourhoods, provided the additional housing is compatible with the scale, urban design and community features of the neighbourhood.

b) To encourage the re-development of under-utilized residential lands where appropriate at the periphery of existing residential neighbourhoods for non-ground-oriented housing purposes."

The proposed development will significantly increase the amount of housing stock available in the Mixed-Use Corridor through appropriate infill development on a currently underutilized portion of land. The proposed development will provide 584 residential units in a range of unit types and sizes, which will serve all residents, including families. The proposed development is proposed at a density that is supported by the current Provincial, Regional, and in-force Official Plan policies for Mixed-Use Corridors.

"2.5.2 General Policies

a) The following criteria shall be considered when evaluating proposals for housing intensification within established neighbourhoods:

i. adequate municipal services to accommodate the increased demands are provided, including such services as water, wastewater and storm sewers, school accommodation and parkland;"

The proposed redevelopment will take advantage of existing infrastructure available to the Subject Lands, reducing servicing costs. A Site Servicing Plan and Functional Servicing Report have been prepared in support of the proposed redevelopment, and further describe the adequacy of existing infrastructure to service the proposed redevelopment. Schools and parks are located in close proximity to the Subject Lands. School capacity will be evaluated by the school board through the circulation of the application.

ii. "off-street parking is adequate;"

A reduced off-street parking standard has been proposed which is consistent with recommendations in the Parking Justification Report. The accompanying Parking Justification Report provides additional justification for why the proposed parking rates are adequate for the development.

iii. "the capacity of the municipal transportation system can accommodate any increased traffic flows, and the orientation of ingress and egress and potential increased traffic volumes to multi-purpose, minor and major arterial roads and collector streets rather than local residential streets;"

The accompanying Transportation Impact Study demonstrates that the proposed development will not have a negative impact on existing traffic conditions along Plains Road East. Ingress and egress is oriented towards Downsview Drive.

iv. *"the proposal is in proximity to existing or future transit facilities;"*

The proposal is located along a Primary Bus Service route on Plains Road East. There are several existing Burlington Transit bus stops located in close proximity to the Subject Lands, serving routes 1 and 4. Aldershot GO Station is located approximately 2.5 km northwest of the Subject Lands, providing frequent commuter rail service along the Lakeshore West GO line, to destinations including Niagara Falls, Hamilton, and Toronto.

v. *"compatibility is achieved with the existing neighbourhood character in terms of scale, massing, height, siting, setbacks, coverage, parking and amenity area so that a transition between existing and proposed buildings is provided;"*

The proposal consists of a compact, mid-rise built form that is compatible with the surrounding area. The setbacks from the street along Plains Road provide an appropriate framing of the street that can accommodate an enhanced public realm and street wall. The mid-rise components of the proposal are adequately set back from adjacent properties to not cause adverse impacts. The siting of the proposed buildings orients the buildings towards the intersection and provide transition between adjacent properties through landscaping, angular planes, setbacks and step backs.

As demonstrated through the supporting studies submitted under separate cover in support of the application, the proposed development is not anticipated to have negative impacts from shadow, noise, or wind. The at-grade commercial uses will contribute to a street front that is compatible with the surrounding area. The townhome entrances and amenity areas will provide for an added residential opportunity on the site and provide for an appropriate built form.

vi. *"effects on existing vegetation are minimized, and appropriate compensation is provided for significant loss of vegetation, if necessary to assist in maintaining neighbourhood character;"*

As shown on the accompanying Tree Inventory, Protection and Removal Plan, a total of 89 trees will require removal. Most of these trees are in fair condition. Removal of trees is intended to be compensated through street tree planting, on-site planting, and financial compensation, if required.

vii. *"significant sun-shadowing for extended periods on adjacent properties, particularly outdoor amenity areas, is at an acceptable level;"*

The potential shadow impact of the proposed development is limited and reasonable and will not significantly impact the adjacent land uses.

viii. *"accessibility exists to community services and other neighbourhood conveniences such as community centres, neighbourhood shopping centres and health care;"*

There are a number of shopping and employment uses existing on Plains Road East. The Subject Lands are also in proximity to a number of parks and community facilities.

ix. *"capability exists to provide adequate buffering and other measures to minimize any identified impacts;"*

The surrounding residential uses to the east and north will be buffered from the Subject Lands through a combination of landscaping, building setbacks and fencing, as required.

x. *"where intensification potential exists on more than one adjacent property, any re-development proposals on an individual property shall demonstrate that future re-development on adjacent properties will not be compromised, and this may require the submission of a tertiary plan, where appropriate;"*

The proposed development will be provided through infill intensification. The adjacent properties have already been developed over the past 10-15 years. Landscape buffers, building setbacks and fencing will be provided so as to minimize any potential impacts to future development.

xiii. *"proposals for non-ground oriented housing intensification shall be permitted only at the periphery of existing residential neighbourhoods on properties abutting, and having direct vehicular access to, major arterial, minor arterial or multi-purpose arterial roads and only provided that the built form, scale and profile of development is well integrated with the existing neighbourhood so that a transition between existing and proposed residential buildings is provided."*

The Subject Lands are located at the periphery of an existing neighbourhood that has direct access to a Multi-Purpose Arterial Road (Plains Road East). This represents an appropriate location for non-ground oriented housing intensification. The proposal introduces a high-quality built form that will add to the visual appeal and sense of identity of the neighbourhood and will help define the planned character of the Plains Road Corridor at a complementary scale. The proposal also maintains appropriate setbacks as well as landscaping and a parking configuration that maintains compatibility with surrounding lands uses. The accompanying Transportation Impact Study demonstrates the proposed access will not negatively impact existing traffic conditions along Plains Road East. Landscape screening through the provision of tree planting in the side and rear yards is proposed to provide added transition to existing low density residential properties to reduce overlook.

5.2 City of Burlington New Official Plan (2020)

A new Official Plan was adopted by City Council on April 26, 2018. The New OP was forwarded to the Region of Halton for approval on May 11, 2018. This plan was approved, with modifications, by Halton Region on November 30, 2020. The New OP is currently appealed and thus not in-force. While these policies remain under appeal, they are assessed for the purposes of being informative of Council's direction but are not determinative.

Section 3.1 of the City of Burlington New Official Plan (2020) provides the Housing policies for the City of Burlington. Specifically, the Official Plan states that the City of Burlington will promote an appropriate and adequate range of housing choices by type, tenure and affordability level in order to accommodate the needs of city residents. The following is the applicable policies that describe how the City of Burlington's housing objectives will be achieved.

"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.

d) In consultation with the Region of Halton, the City will ensure an adequate level of local municipal infrastructure to meet the demands of residential development.

e) The City will support housing initiatives that facilitate revitalization, particularly the identification and remediation of brownfield, greyfield and bluefield lands, compact built form, flexibility and adaptability in the design and function of the housing stock, and an increased variety of housing alternatives."

The proposed development will assist the City of Burlington in meeting its minimum housing unit targets by density type. The proposal is located on a currently underutilized parcel of serviced land within the Plains Road Corridor in the City of Burlington. The proposed development will diversify the existing housing stock by providing 584 residential units a range of unit sizes and forms, including young families.

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

(i) Describe the current range and mix of housing in the city;

(ii) Establish city-wide housing objectives, including, among other objectives special reference to a seniors housing strategy and long term care facilities;

(iii) Consider the housing policies and strategies from this Plan and area-specific plans;"

The City of Burlington is currently preparing its City-wide Housing Strategy. While the Strategy is still in draft form, the Housing Strategy includes 13 actions that contribute towards the overall Vision for housing in Burlington. As part of these actions, Action #6 states that the City of Burlington will support, permit and encourage the development of alternate forms of housing, including higher density housing types, where feasible and appropriate. The proposed development is at a proposed density and height that the surrounding area can support and will contribute to the fulfillment of a complete community in this area.

6.0 Halton Region Housing Targets

6.1 Unit Mix Targets

As noted above, Policy 86(6)a) of the Halton Region Official Plan states that in Halton Region, at least 50 percent of new housing units produced annually will be in the form of townhouses or multi-storey buildings. The proposed development will provide for 584 residential units, which will assist the Region in achieving this target, as all units will be townhouse and apartment units. The development is expected to occur in two phases.

Based on data provided by the State of Housing Report, the number of new housing completions has decreased in the City of Burlington by 44.6% to 510 units in 2020 from 920 units in 2019. This represents a significant drop-off in housing completions despite demand remaining high, as shown by the low vacancy rates. Therefore, the City of Burlington needs to increase housing supply to meet market demand. The 584 proposed residential units will increase the supply of units available and will indirectly support housing affordability City-wide by ensuring there is a sufficient supply of units. It is important to note that the current apartment stock is still a minor component of overall housing stock compared to the existing low-density housing in the City of Burlington. Therefore, it should be expected that a high percentage of new apartment units will be needed to achieve planning policy goals and objectives.

6.2 Intensification Targets

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

The proposal for the Subject Lands will support the City and Region's ability to meet their minimum intensification targets through to 2031. Further, as part of ROPA 49, the Region of Halton has submitted a preferred growth concept that would result in no urban boundary expansion. Through ROPA 49, the Region of Halton is proposing the following intensification target for population and employment growth between 2022 and 2041:

Target[1]	*Halton Region*	*Burlington*
Intensification Target – Housing Units in Built-Up Area	*53,300*	*20,500*

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.

In addition, the Region of Halton set the following Regional phasing targets to be achieved every five years from 2022 to 2041:

Table 2A Regional Phasing		
Municipality	2022-2026	2027-2031
Halton Region – Units inside the Built Boundary	12,430	13,200
Burlington – Units inside the Built Boundary	4,790	5,090

ROPA 49 has approximately doubled the intensification target for the City of Burlington. Therefore, significant growth, intensification and density within the existing Built-Up Area is necessary. The proposed development remains consistent with ROPA 49's updated intensification target.

6.3 Affordable Housing Targets

The proposed development will market for sale units and/or market rental units. This will be determined based on market conditions just prior to construction. Therefore, no affordable units are currently being proposed. However, the composition and diversity of units being offered will increase the availability of housing in the Region, helping the Region reach current demand and lowering the cost of housing City-wide.

6.3.1 Current Opportunities to Provide Affordable Housing

Halton Region utilizes various programs to support affordable housing opportunity and delivery. This includes programs that convert market-rate units to assisted housing units. For example, Halton Region's Assisted Housing Program reduces the cost of housing for individuals and families who cannot afford their rent. The program relies on landlords contributing units to the program. Following that, Halton Region, based on individual or household eligibility, places applicants in these units. A housing subsidy is then paid directly to the landlord. The 2020 Halton State of Housing Report shows that there were 781 households using these rent supports.

Social housing development is also supported through Halton Region's Development Charges. Based on the current Social Housing Development Charge rate, the 584 units proposed will contribute significant funds for the provision of social housing.

6.3.2 Future Opportunities to Provide Affordable Housing

The City of Burlington continues to explore new opportunities to increase the supply of affordable units. This includes inclusionary zoning and community benefits charges.

On April 14, 2022, the City of Burlington released their draft Housing Strategy. Action Item No. 13 is to undertake a formal assessment of the potential to introduce inclusionary zoning. Inclusionary Zoning is a provincial planning tool that enables municipalities to secure affordable housing units in new developments of 10 units or more. Current Provincial legislation allows for the implementation of Inclusionary Zoning in Protected Major Transit Station Areas only.

Community Benefits Charges or "CBCs" are paid to lower- and single-tier municipalities for high-density developments with 5 or more storeys and 10 or more units. Municipalities will need to adopt CBC by-laws as of September 2022. CBCs are capped at 4% of land value and are based on the value of land the day before building permits are issued. Funds collected through CBCs can be used to fund a variety of programs, including affordable and assisted housing initiatives.

7.0 Conclusions

As outlined in this Housing Impact Statement, together with the supporting technical reports including the Planning Justification Report, the proposed development and associated Official Plan and Zoning By-law Amendments represent an appropriate intensification of the Subject Lands.

The proposal introduces a mixed-use development on the site, providing 584 residential units within an Intensification Area. The proposed development will make efficient use of underutilized lands by proposing residential intensification on site that is well-connected to public transit and makes efficient use of existing municipal servicing and infrastructure.

The table below summarizes how the Subject Lands address each of the criteria identified in Section 3.1.1(2) h) of the City of Burlington Official Plan:

Policy	Analysis
5) Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the City's New Official Plan (2020);	
(i) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development will provide for a total of 584 townhouse and apartment units and represents an intensification opportunity that supports sustainable, cost-effective and transit-supportive growth. The proposal will provide for a total of 584 condominium apartment units and conform to applicable housing policies of the Halton Region Official Plan. This increased supply of housing supports overall housing affordability by ensuring there is sufficient supply to accommodate anticipated demand. The proposed unit mix will appeal to a range of residents in the City of Burlington, including young families.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The proposed development will market for sale units and/or market rental units. This will be determined based on market conditions just prior to construction.
(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.	The development is expected to occur in two 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.	It is expected that proposed residential condominium units will be offered at an acceptable market rate. The provision and inclusion of affordable housing City-wide could be supported by potential future policies including Inclusionary Zoning and Community Benefits Charges.
1) 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 Lands are currently in use as commercial plazas with surface parking. The 584 proposed residential units will result in an increased density for the site along a designated Intensification Corridor, which support the City and Region in meeting their housing needs. A mix of 1-bedroom and 2-bedroom units will be offered.
2) 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	The proposed development would increase the overall supply of new housing units in the City of Burlington and in Halton Region. The proposed development also contributes to the shift in primary residential built form in Burlington by proposing apartments and townhouses.

3) Identify and discuss other relevant and current housing information available.	The City of Burlington is currently preparing its City-wide Housing Strategy. Action #6 states that the City of Burlington will support, permit and encourage the development of alternate forms of housing, including higher density types of housing, where feasible and appropriate. The proposed development is at a proposed density and height that the surrounding area can support and will support the fulfillment of a complete community in this area.

Respectfully submitted,
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