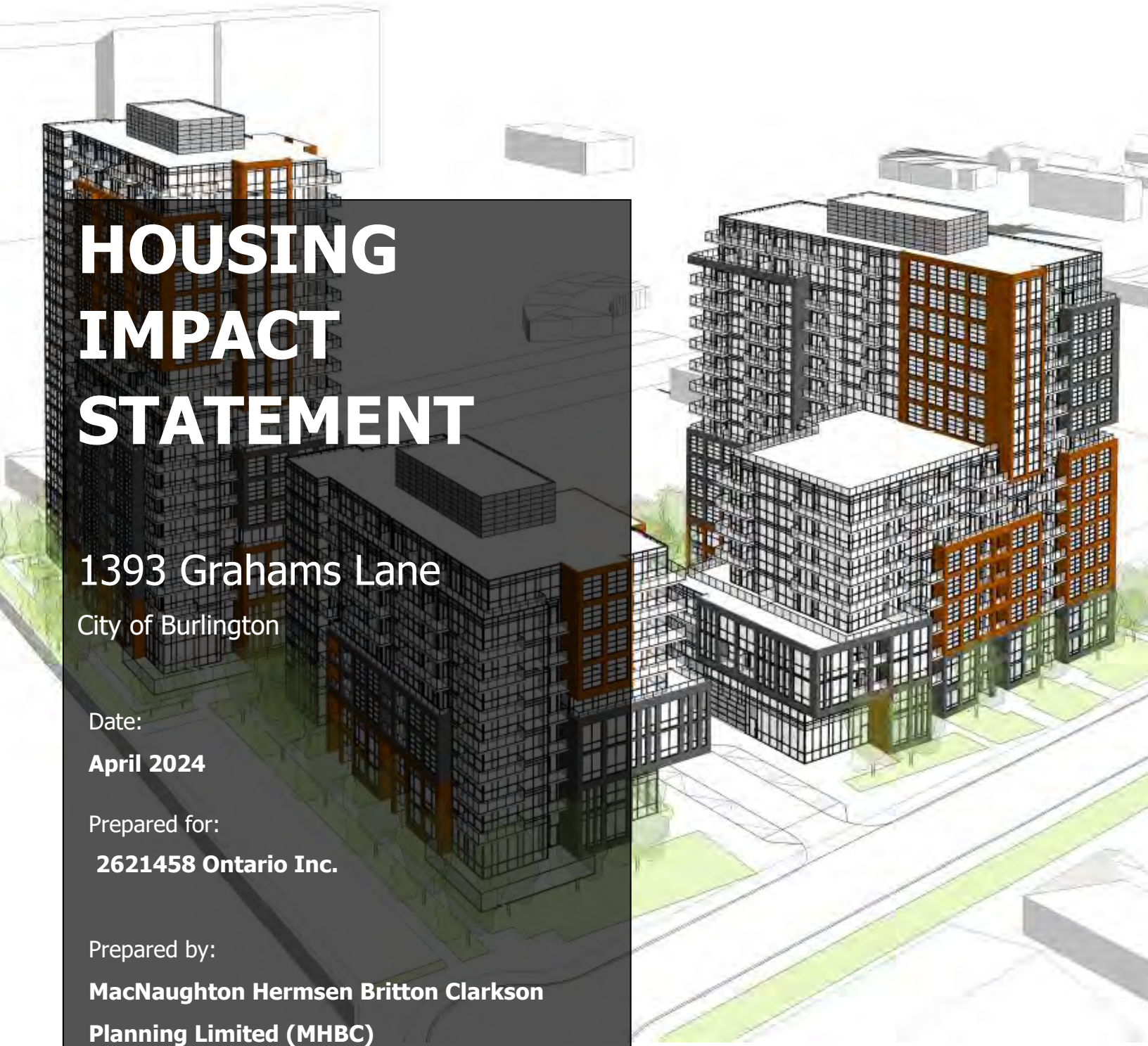


HOUSING IMPACT STATEMENT

1393 Grahams Lane

City of Burlington

Date:

April 2024

Prepared for:

2621458 Ontario Inc.

Prepared by:

MacNaughton Hermsen Britton Clarkson Planning Limited (MHBC)

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EXECUTIVE SUMMARY

This Housing Impact Statement has been prepared in support of a proposed Official Plan and Zoning By-law Amendment to facilitate the redevelopment of 1393 Grahams Lane in the City of Burlington (the "Subject Lands").

The proposed redevelopment on the Subject Lands consists of three residential buildings that will have heights of 9, 16 and 20 storeys. A total of 722 residential dwelling units and a gross floor area of 45,821 square metres are being proposed. The proposed residential development will be supported by two levels of underground parking with 505 spaces for residents and 77 for visitors, while 16 visitor parking spaces will be provided above ground, for a total of 598 parking spaces. Bicycle parking will also be provided with 36 short term residential spaces and 362 long term residential spaces for a total provision of 398 bicycle parking spaces. Approximately 2,888 square metres of amenity area is proposed throughout the site. The development will include a range and mix of unit types and sizes to accommodate housing for a wide range of household types and needs.

As per the policies of the Halton Region Official Plan, the Subject Lands are designated Urban Area and are within an Urban Growth Centre and the Burlington GO Major Transit Station Area. The lands are not designated in the Halton Region Official Plan as Employment Area.

In the City of Burlington's in-force Official Plan (1997), the Subject Lands are within the Mixed Use Activity Areas, and designated Mixed Use Corridor – Employment. Grahams Lane is identified as a Collector Road. In the City's New Official Plan (2020), currently under appeal, the Subject Lands are within a Primary Growth Area, identified as a Mixed Use Intensification Area, that includes the MTSA Special Planning Areas and the Mixed Use Nodes and Intensification Corridors. The Subject Lands are designated as "Urban Corridor - Employment" with Grahams Lane categorized as a Neighbourhood Connector Road and as a Bicycle Priority Street. The Subject Lands are zoned 'Mixed Use Corridor – Employment' (MXE) under the City of Burlington Zoning By-law.

The current applicable, and evolving, land use policies support the intensification of the Subject Lands. The proposed residential units will contribute towards achieving the City and Region's minimum growth and intensification targets for Urban Growth Centres and Major Transit Station Areas and will supply housing for the City of Burlington in conformity with the housing intensification policies of the Regional Official Plan and the City of Burlington New Official Plan. A full assessment of the proposed development against the Regional and City housing objectives and policies, including the Region's State of Housing Report, is included under Section 7.0 of this Statement.

TABLE OF CONTENTS

1.0 INTRODUCTION 1
1.1 Purpose and Approach 1
2.0 EXISTING SITE & PLANNING CONTEXT 3
2.1 Site Description 3
2.2 Surrounding Land Uses & Neighbourhood Context 4
2.3 Planning Context 5
2.4 Proposed Development 7
3.0 PROVINCIAL HOUSING CONTEXT 9
3.1 Provincial Policy Statement 9
3.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020) 10
4.0 HALTON REGION HOUSING CONTEXT 13
4.1 Halton Region Official Plan 13
4.2 Halton Region State of Housing Report (2022) 15
5.0 BURLINGTON HOUSING CONTEXT 19
5.1 City of Burlington Official Plan (In-Force) 19
5.2 New City of Burlington Official Plan (Under Appeal) / Burlington Housing Strategy (2022) 20
6.0 HALTON REGION HOUSING TARGETS 23
6.1 Unit Mix Targets 23
6.2 Intensification Targets 23
6.3 Affordable Housing Targets 24
6.3.1 Current Opportunities to Provide Affordable Housing 24
6.3.2 Future Opportunities to Provide Affordable Housing 25
7.0 CONCLUSIONS 26

LIST OF FIGURES

Figure 1: Location Map of the Subject Lands
Figure 2: Context and Surrounding Uses

LIST OF TABLES

Table 1: Proposed Unit Breakdown
Table 2: Proposed Site Statistics
Table 3: ROPA 49, Intensification and Density Targets
Table 4: ROPA 49, Regional Phasing
Table 5: ROPA 49, Strategic Growth Area Targets
Table 6: ROPA 49, Summary of New Housing in the City of Burlington
Table 7: Response to Criteria of Burlington Official Plan Section 3.1.1(2)

1.0 INTRODUCTION

MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") has been retained by 2621458 Ontario Inc. (the "Owner") to prepare a Housing Impact Statement for the proposed redevelopment of 1393 Graham's Lane 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 to facilitate the development of the Subject Lands with three residential buildings that will be 9, 16 and 20 storeys. The three buildings are identified as Building A (16 storeys), Building B (9 storeys), and Building C (20 storeys). Buildings A and B will front onto Grahams Lane that will provide several pedestrian entry points into the two buildings. Building C will be accessed via the internal courtyard and amenity area. In total, the development proposes 722 new residential units. Vehicular access is proposed through a drive aisle from Grahams Lane with parking located within 2 levels beneath the three buildings.

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 proposed within a development proposal. While not required under the current Official Plan, a Housing Impact Statement has been prepared in conformity with the City of Burlington's Terms of Reference ("TOR"). The TOR requires that the HIS assesses the following:

- City's New Official Plan, s.3.1.1(2) h) and other applicable policies;
- Existing use and proposed uses focussing on affordability, unit/bedroom count;
- Proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report; and,
- Other relevant and current housing information available.

Section 3.1.1(2) h) of the City of Burlington's New Official Plan (2020), under appeal, expands upon the TOR HIS assessment requirements to include the following:

(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.*

This Statement has been prepared in the context of the City's New Official Plan (2020) ("New OP") as per the TOR noted above.

2.0 EXISTING SITE & PLANNING CONTEXT

2.1 Site Description

The Subject Lands are located at 1393 Grahams Lane on the north side of Grahams Lane adjacent to the Hydro Corridor trail system that runs from the QEW to the north to Lake Ontario to the south. The Subject Lands are legally described as Pt Lt 69 RCP P199; Pt 1 20R3140; Pt 1 20R21599, City of Burlington. The Subject Lands are approximately 1.08 hectares (2.67 acres) in area and form an L-shaped lot. The lot has a 128.77 m frontage along Grahams Lane and a lot depth of approximately 118.44 metres along the western lot line and a lot depth of approximately 62 metres along the eastern lot line.

Vehicular access to the Subject Lands is via Grahams Lane which connects to Brant Street to the east. The Subject Lands are currently occupied by a three-storey building that contains offices and storage facilities. Parking is provided in the front, side and rear yards of the site. The Subject Lands are generally flat in nature.

A location map which identifies the Subject Lands within the context of the City of Burlington is included in this report as **Figure 1**.



Figure 1: Location Map

2.2 Surrounding Land Uses & Neighbourhood Context

An aerial photograph showing the Subject Lands and the surrounding land uses is included in this report as **Figure 2**. The general surrounding context is described further in this section. The surrounding uses are also described as follows:

NORTH: Immediately to the north of the Subject Lands is the surface parking area of the Burlington Legion. A Ford dealership is further north and fronts onto Fairview and Brant Streets, followed by WalMart and the Burlington GO Station.

SOUTH: To the south of the Subject Lands are one-storey office and service commercial units followed by residential uses including a 3 storey senior's care home, row-housing and two 10 storey apartment buildings.

EAST: To the east of the Subject Lands are service commercial low-rise buildings and further, on Brant Street is a 15 storey apartment building.

WEST: To the west of the Subject Lands is CN Rail Spur, the Hydro Corridor with the public trail connecting Grahams Lane to Lake Ontario, followed by a substation and a residential neighbourhood and Thorpe Park.



Figure 2: Context and Surrounding Uses

The Subject Lands are located near the intersection of Fairview and Brant Streets, in a predominantly mixed-use area that consists of service commercial and residential uses. The Subject Lands abut the Hydro Corridor and residential neighbourhood to the west, a community facility use to the north, service commercial uses to the east and service commercial and residential uses to the south. In particular, the Subject Lands are located in close proximity to a number of community and commercial facilities to meet daily needs, including: Burlington Square Plaza; Thorne Park; Wellington Park; Hydro Corridor trail system; Central Public School; Burlington Central Elementary School; Burlington GO Station; and WalMart SuperCentre.

Based on the above physical context and surrounding neighbourhood, the Subject Lands are in a location that is in close proximity to facilities that meet the needs of future residents, including commercial, employment and community uses as well as existing public transit services. In addition to the proximity of Burlington Beach along Lake Ontario and the downtown amenities, the site is within walking distance to the Burlington GO Station, supporting the growth of this area as an Urban Growth Centre; the site is an optimal location for intensification and the provision of additional residential units to support the growth of this area as a complete urban community.

2.3 Planning Context

As per the policies of the Halton Region Official Plan, as amended by ROPA 49, the Subject Lands are located within the Region's built boundary and are designated as "Urban Area" within the delineated boundaries of the Burlington GO MTSA/Urban Growth Centre in Map 1H- Regional Urban Structure of the ROP.

The Regional Structure is accompanied by a growth strategy for Halton based on population and employment forecasts for the planning horizon year of 2051. Overall, the Region is expected to reach a population of 929,400 by 2041 and a population of 1,098,070 by 2051. Of the Regional total, it is intended that the City of Burlington will grow by 45,050 and reach a population of 240,050 by 2041 (Halton ROP, Table 1). The 2051 population projection for Burlington is 265,160 persons, an increase of another 25,110 persons (ROPA 49, Table 1).

The Region has assigned growth to the local municipalities in order to achieve the growth targets. Based on this approach, Burlington is required to accommodate at least 20,500 new housing units within its Built-Up Area between 2022 and 2041 to achieve the Regional target (ROPA 49, Table 2). This is further broken down by unit type with unit targets provided to each municipality in 5-year increments, with Burlington's Built-Up Area counts being as follows (ROPA 49, Table 2A):

- 2022-2026 – 4,790 units
- 2027-2031 – 5,090 units
- 2032-2036 – 5,170 units
- 2037-2041 – 5,270 units

In March, 2023, the City of Burlington Council endorsed the *City of Burlington 2031 Municipal Housing Target Pledge*, wherein Council pledged to accelerate housing supply by providing 29,000 newly constructed homes by 2031.

The proposed redevelopment will contribute to the achievement of Halton Region's minimum growth targets, and specifically provide new housing units in a multiple dwelling forms while also providing for amenity areas at grade. This form of development conforms to the policy direction of the Regional Official Plan related to housing supply. The increased density at this location also contributes to optimizing the use of the existing transit services and generates ridership for future planned upgrades to the system. The proposed development's residents will utilize the existing and proposed active transportation network system. Overall, the proposed development and Official Plan and Zoning By-law Amendments conform to the ROP through the provision of 722 new residential units within the City of Burlington and will assist the City in achieving its Housing Pledge of constructing 29,000 dwelling units by 2031. The proposed development will also support the Region and City in meeting their planned targets for new housing units and planned population targets to 2041.

In the City of Burlington's in-force Official Plan, the Subject Lands are designated "Mixed Use Activity Area" per Schedule A: Settlement Pattern of the City's in-force Official Plan. The Subject Lands are further designated "Mixed Use Corridor – Employment" as per Schedule B: Urban System of the City's in-force Official Plan, and are not "Lands Designated for Employment Uses". In the City's New Official Plan (2020), which is currently under appeal, the Subject Lands are located within a Mixed Use Intensification Areas: Mixed Use Nodes and Intensification Corridors and MTSA Special Planning Areas in Schedule B: Urban Structure. Schedule B-1: Growth Framework indicates that the Subject Lands are within a 'Primary Growth Area'. The Subject Lands are designated as 'Mixed Use Nodes and Intensification Corridors: Urban Corridor - Employment' in Schedule C: Land Use – Urban Area. It should be noted that the Subject Lands are no longer identified within the Employment Area of Halton Region ROPA 49, Map 1C: Future Strategic Employment Areas or Map 1H: Regional Urban Structure.

The proposed development conforms to the land use planning policy context for the Subject Lands, pending the approval of the Official Plan Amendment and Zoning By-law Amendment applications. The Subject Lands are in the designated primary growth area of the City as targeted for intensification and growth by Provincial and Regional policies, located in the Urban Growth Centre and within walking distance to a major transit station and public facilities and amenities. The focus for development in this area is to accommodate intensification and higher residential densities that are transit-supportive in a compact built form. Specific housing policies from the Provincial, Regional, and Municipal level will be explored in detail in the sections further below.

2.4 Proposed Development

Overview

The current development proposal is the result of coordinated planning and design work by the architectural and urban design teams in collaboration with technical experts and City staff inputs. Provincial and Regional policies for managing and directing growth were taken into account during the preparation of the redevelopment proposal, as well as the local land use policy context and the City's emerging Burlington GO MTSA/Urban Growth Centre vision and physical context.

The proposed development represents an intensification of the Subject Lands within the Burlington GO MTSA and Urban Growth Centre. The Subject Lands have an area of approximately 1.08 ha and currently contains one building with service commercial units that includes office space and storage facilities.

The proposal provides for the redevelopment of the Subject Lands with three residential apartments in the form of mid and high-rise buildings with heights ranging between 9, 16 and 20 storeys. Towers are proposed at the heights of 16 and 20 stories, inclusive of 8 and 6-story podiums. The proposed mid-rise building has a height of 9 storeys and is presented at the southern corner of the site. The podium portions of the buildings are adjacent to Grahams Lane, while the 20 storey building is located adjacent to the Hydro Corridor and is setback from Grahams Lane into the western corner of the lot.

The proposal has a total of 722 residential units, with 15% provided as barrier-free units, and with unit types provided in a range of sizes between studio units to three bedroom units. The proposed development will provide indoor amenities in the form of private indoor spaces, and outdoor amenity spaces in the form of green roofs, roof terraces and a Privately Accessible Open Space (POPS). A total gross floor area of 45,821 square metres is proposed with a Floor Area Ratio of 4.25.

Land Use

The proposed redevelopment provides residential uses with several pedestrian access points along Grahams Lane as well as internally via the central courtyard area.

The 722 residential units are located from grade to roof line and will have a breakdown of 43% 1 bedroom units, 11% 1 bedroom plus den units, 37% 2 bedroom units and 9% 3 bedroom units as demonstrated in **Table 1**. A summary of the site statistics for the proposed development is provided in **Table 2.**

Table 1: Proposed Unit Breakdown		
Description	**Units**	**%**
Studio	111	15%
1 Bedroom	397	55%
2 Bedroom	177	25%

Residential – 3 Bedroom	37	5%
Total	**722**	**100%**

Table 2: Proposed Site Statistics	
Site Area	1.08 ha
Total Residential GCA	48,233 sq. m.
Total Residential GFA	45,821 sq. m.
Indoor Amenity Space	1,533 sq. m.
Outdoor Amenity Space	8,431 sq. m.
Total Amenity Space	9,964 sq. m. (13.8 sq. m./unit)
Total FAR	4.25
Resident Parking	505 (0.70 spaces/unit)
Visitor Parking	93 (0.13 spaces/unit)
Total Parking	598 (0.83 spaces/unit)
Long-Term Bicycle Parking	362 (0.5 spaces/unit)
Short-Term Bicycle Parking	36 (0.5 spaces/unit)
Total Bicycle Parking	398

3.0 PROVINCIAL HOUSING CONTEXT

The following is a review of the Provincial housing 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 TOR.

3.1 Provincial Policy Statement

The PPS strongly encourages development that will provide long term prosperity, environmental health and social well-being. A full assessment of these policies may be found in the Planning Justification Report submitted with this application. The PPS policy 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 1.4 - Housing

"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:
i. all housing options required to meet the social, health, economic and well-being requirements of current and future residents, including special needs requirements and needs arising from demographic changes and employment opportunities; and
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 722 new dwelling units in a compact urban built form. As noted, the proposed development provides a variety of unit types (studio to three bedrooms), to ensure housing needs are met for a wide variety of occupants at various stages of their lifecycle, including families. The development will also achieve a transit-supportive density within the MTSA and support the use of active transportation due to the proximity to connecting trails, parks, schools and convenient access to public transit. The development has been designed to integrate with the surrounding community and will contribute to the range and mix of housing options in the neighbourhood to meet the 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)

The Growth Plan directs growth to be accommodated in the Built-Up Areas through intensification. The Growth Plan promotes intensification in Strategic Growth Areas, such as the Burlington GO MTSA/UGC, with transit-supportive densities, a diverse mix of land uses, a range and mix of employment and housing types, affordable housing, high quality public open space and easy access to local stores and services.

Section 1.2.1 sets out a vision for the development of the Greater Golden Horseshoe and is grounded in several objectives to guide decisions on how land is developed, resources are managed, and public dollars invested, including:

- Supporting the achievement of complete communities;
- Prioritizing intensification and higher densities in strategic growth areas to make efficient use of land and infrastructure and support transit viability; and,
- Supporting 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 a compact, vibrant and complete community in the Burlington GO MTSA/UGC. 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, which will provide residents with additional housing choice and convenient access to the existing public transportation network.

<u>Managing Growth</u>

"2.2.1.2 Forecasted growth to the horizon of the Plan will be allocated based on the following:

a) *the vast majority of growth will be directed to settlement areas that:*
   i. *have a delineated built boundary;*
   ii. *have existing or planned municipal water and wastewater; and*
   iii. *can support the achievement of complete communities;*
c) *within settlement areas, growth will be focused in:*
   i. *delineated built-up areas;*
   ii. *strategic growth areas;*
   iii. *locations with existing or planned transit, with a priority on higher order transit where it exists or is planned; and*
   iv. *areas with existing or planned public service facilities."*

The Subject Lands are located within the delineated built boundary, and provincially recognized Urban Growth Centre, where growth is to be directed and minimum growth targets to be achieved. The site is also within a Strategic Growth Area associated with the Burlington GO Station, defined as a Major Transit Station Area located on a higher order transit corridor. Full municipal services are available, and intensification is to be promoted. There are a number of shopping and employment uses existing within close proximity to the Subject Lands which future residents will be able to utilize, thereby contributing to a mixed use environment and the achievement of a complete community. The Subject Lands are also in proximity to a number of parks, public schools and community facilities.

"2.2.1.4. 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;*
e) *provide for a more compact built form and a vibrant public realm, including public open spaces"*

The Subject Lands are identified for intensification within a Strategic Growth Area by the Province, Region of Halton and City of Burlington, where convenient access to

amenities is available to residents in support of a complete community. These amenities include local stores, places of worship, schools, public facilities, open space, and public transit (both municipal and inter-municipal). The proposed development's multiple entryways will contribute to a vibrant public realm and provide increased street activity. The proposed development will contribute to the provision of a high quality built form by making efficient use of space through the provision of new residential units in a compact mid- and high-density urban form. The proposal will assist in providing a range of housing options, including studio, one, two, and three bedroom units to accommodate the needs of a variety of household formations and sizes, including families. Overall, the proposed development will contribute to the provision of a high-quality built form by making efficient use of space through the provision of new residential units in a compact high-density urban form.

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.

"2.2.6.3 To support the achievement of complete communities, municipalities will consider the use of available tools to require multi-unit residential developments incorporate a mix of unit sizes to accommodate a diverse range of household sizes and incomes."

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. It is intended that the proposed development will have a variety of unit sizes and incomes including families.

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 2022 State of Housing Report, endorsed by Regional Council in July 12, 2023.

4.1 Halton Region Official Plan

The ROPA 49, Part II, Table 2 outlines the population distribution for the City of Burlington to the year 2041.

Table 3: ROPA 49, Intensification and Density Targets	
ROPA 49, Table 2: Intensification and Density Targets	
Municipality	**Minimum Number of New Housing Units in the Built-Up Area to 2041 (45% of all new units)**
Burlington	20,500
Halton Region	53,300

"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 per cent of new residential development occurring annually within Halton in between 2022 and 2051".

The Regional Official Plan establishes a target of 20,500 new housing units being added to the built-up area of Burlington to 2041. The proposed development will support achievement of this minimum target. The proposal will provide 722 residential units within a Strategic Growth Area identified as the top level of the Region's intensification hierarchy in the City of Burlington's Urban Growth Centre and priority GO MTSA. The development proposal will provide housing options, including units appropriate for various household formations and affordability ranges.

Table 2A of the ROPA 49 identifies regional phasing of development within the built boundary:

Table 4: ROPA 49, Regional Phasing				
ROPA 49, Table 2A: Regional Phasing				
Municipality	**2022-2026**	**2027-2031**	**2032-2036**	**2037-2041**
Burlington: Units inside Built Boundary	4,790	5,090	5,170	5,270

Table 2B of the Regional Official Plan sets the Strategic Growth Area Targets for the Strategic Growth Areas in Halton Region:

Table 5: ROPA 49, Strategic Growth Area Targets			
ROPA 49, Table 2B: Regional Official Plan Strategic Growth Area Targets			
Strategic Growth Area	**Minimum Density Target (PPJ/HA)**	**General Target Proportion**	
		Residents	**Jobs**
UGC / MTSAs on a Priority Transit Corridor	200	~65%	~35%

The proposed development will support the phasing of development envisioned by the Region within the built boundary of Burlington. The proposed development will also meet the minimum Strategic Growth Area density target for the UGC/MTSA on a Priority Transit Corridor. Through the provision of 722 residential units, the proposed development will help achieve the general 65% target proportion of residents for the Burlington GO MTSA/UGC.

Housing

ROPA 49, Part III – Land Stewardship Policies, 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 within the built boundary to increase the supply of housing.

The proposed development is an appropriate location to increase the supply of housing within the UGC/Burlington GO MTSA Strategic Growth Area. The proposal will increase the housing options in an area that is within a transit hub and provides services that cater to residents' daily needs.

The ROP contains the following objectives and policies with respect to housing:

> *"85. The objectives for housing are:*
>
> *(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.

(13) To promote residential intensification through the development or redevelopment of brownfield and greyfield sites.

86(6) It is the policy of the Region to adopt the following housing targets:

86(6a) 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 percent to 2031 and at leat 75 per cent each year thereafter;

86(6b) that at least 30 per cent of new housing units produced annually in Halton be Affordable or Assisted Housing.

86(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.

86(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."

The proposal is for three residential buildings with heights of 9, 16 and 20 storeys. ROPA 49 has indicated that the Burlington UGC/Burlington GO MTSA will be the primary area for growth and intensification within the Region, where increased unit densities are to occur to accommodate population growth, employment growth, and a mix of housing. The proposed development increases the housing supply in the Strategic Growth Area/UGC by adding 722 residential units in the form of apartments providing for market based housing in a variety of unit sizes offering more attainable housing options in the area. The 722 residential units will contribute to achieving Halton Region's 65 per cent multi-storey target.

4.2 Halton Region State of Housing Report (2022)

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).*

Since 2006, Halton Region has prepared annual State of Housing Reports. These Reports provide reviews of the Region's housing supply and demand, and whether the Region is implementing its vision for growth. The latest available report for the Region was completed in 2022 and endorsed by Regional Council in July 2023.

To prepare State of Housing Reports, Halton Region prepared a Housing Model to gather information that includes household income, spending, costs, and average rents to generate thresholds based on household income and housing costs. The Housing Model generates a maximum housing purchase price and the required household income level representing affordability. In 2022, the maximum affordable purchase price for ownership housing across all households was $496,300 with a maximum monthly ownership cost of $3,030 and an income threshold of $121,200. This threshold is used as the index to measure the Regional Official Plan target that 30 per cent of new housing units produced annually are affordable or assisted.

The State of Housing Report also includes affordable purchase price for small and large households. For small households, consisting of 1 to 2 persons, the maximum purchase price was $338,100 with a maximum monthly ownership cost of $2,060 and an income threshold of $82,500. For large households, consisting of 3+ persons, the maximum purchase price was $664,900 with a maximum monthly ownership cost of $4,060 and an income threshold of $162,400. While these figures are not the current purchase prices for 1, 2, and/or 3-bedroom units across Halton Region, they are provided for the purpose of acting as a threshold to determine when a proposed unit may be under the affordable threshold. At this time, the State of Housing Report does not include information on affordable purchase prices by specific unit types. However, they can still be utilized as a comparison tool.

The Owner has determined that the proposed units will be developed as condominium apartment units and the ultimate sales price for the units will be based on the market demand with the goal of providing units within the market price ranges for such units.

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:

Table 6: ROPA 49: Summary of New Housing in the City of Burlington			
Unit Types	**New Housing Completions**	**New Housing Under Construction**	**New Housing Starts**
Apartment	0	907	0
Townhouse	26	70	0
Semi-detached	12	0	0
Single	58	142	127

The State of Housing Report shows that in 2022, 27.1 per cent of housing completions in Burlington were higher density units (townhouse and apartments). Total housing completions decreased by 87.1 per cent to 96 units in 2022 from 747 units in 2021. Statistics Canada data shows that dwellings by period of construction between 2016 to 2021 made up only 3.9% of the total occupied private dwellings in the City of Burlington. The City of Burlington continues to shift new development from a suburban-oriented community to a combination of suburban and urban centres/corridors. Due to low completion rates of new units, the City of Burlington needs additional housing supply in order to meet the demand of a growing population. However, the Regional data shows that new housing construction has slowed significantly in the last few years.

The Subject Lands are located within the Burlington GO MTSA/UGC and will continue to support the shift in built form within the City of Burlington by providing intensified new housing in a Strategic Growth Area as identified by the Halton Region.

Halton Region's Housing Affordability Target calls for at least 30 per cent of new housing units produced annually to be at or below the affordable threshold, as noted above. In 2022, new housing sales totaled 6.6 per cent of all housing sales, with 20.1 percent of the 6.6 percent total sales representing new affordable unit sales under the Affordable Maximum Purchase Price of $496,300. The average price of these 81 new affordable units that were sold was $273,569. The Region has not provided data on ownership unit types of the sold units (e.g. single, 1, 2 or 3 bedrooms). In addition, Statistics Canada indicates that in the City of Burlington, median household income before taxes is $101,000, despite the region-wide income threshold set at $121,400 for affordable housing. The region-wide median household income in 2020 was $121,000. While the median Regional household generally meets the income threshold, the City of Burlington households do not meet the Region's minimum income threshold for affordable housing.

To make housing more affordable for new and current residents, the City of Burlington can increase housing supply, especially in areas that can support an increased population, like the Burlington GO MTSA/UGC and which can provide unit types and size within the market affordability range to provide attainable housing for a range of household sizes and incomes.

In 2022, sales of affordable new units in Burlington decreased 47.7 percent from 2021 with a 10.7 per cent shortfall in affordable unit supply.

The proposed residential condominium units will increase the supply of apartment-style units ranging from studio to 3-bedroom in size and will ensure that available units keep up with market demand and are provided in an appropriate location to support residential intensification. Higher density units, such as provided within condominium mid and high-rise developments, have been associated with increasing the supply of affordable housing and represent a significant portion of new housing completions in the City of Burlington. This clearly shows the correlation between higher density and affordability in the City and the Region, especially for sites with access to local and regional transit services, such as the Burlington GO MTSA/UGC.

5.0 BURLINGTON HOUSING CONTEXT

This section of the Statement describes the applicable housing policies within the City of Burlington in-force OP 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 Official Plan (In-Force)

Section 2.3 of the Burlington Official Plan (the "current Official Pllan") contains policies related to housing supply.

> *"2.3.1 Objectives*
>
> *a) To ensure that a sufficient supply of suitably designated and serviced residential land is maintained to meet existing and future housing needs."*

The proposal represents an efficient use of serviced land that will add new housing opportunities in the UGC/Burlington GO MTSA. The increased density will support local businesses and public transit while future residents will be able to take advantage of a number of public service and community facilities located in the area.

Section 2.7 of Part II of the OP provides applicable policies on Sustainable Design and Compatibility as follows:

> *"2.7.3 Policies*
>
> *e) The City will encourage development that provides choices in housing, shopping, employment, and transportation."*

The proposal provides for a range of unit types in an area that envisions the creation of a complete community. The redevelopment is located in proximity to employment uses, retail and commercial and various public service facilities, supporting accessibility for future residents through active transportation networks that include walking, cycling and public transit.

Section 3.0 contains the Guiding Principles of the plan:

"The urban and rural environment that is desired for the City of Burlington is summarized as follows:

> *a) Provide a community plan and growth strategy aimed at creating an attractive, liveable community that offers a wide range of housing, employment, transportation, and leisure opportunities for all its citizens.*

g) Promote safety and health in the community as well as fair access to housing, municipal services, community facilities, education facilities and economic opportunity."

The proposal has carefully considered these guiding principles in its design. The development supports intensification in an area targeted for significant growth within the City. It advances the Province's growth objectives while balancing other objectives of the current Plan. It will contribute to the achievement of an attractive and livable community through the provision of housing within close proximity to parks, shopping, professional services, and community facilities.

Section 4.3, The Future Built Form and Natural Environment, identifies key changes encouraged by the Plan, which is to develop with a greater diversity of housing types to meet the changing needs of the population. With respect to population growth, the Plan directs development toward underutilized or vacant parcels in existing communities where new residential growth will be mainly in the form of more compact housing that is served by various modes of transportation and in closer proximity to jobs, shopping and leisure areas.

The proposal has carefully considered these guiding principles in its design. The development provides for intensification at an appropriate location in the City. It advances the Province's growth objectives while balancing other objectives of the current Plan. It will contribute to the achievement of an attractive, livable and complete community providing access to housing within close proximity to parks, shopping, professional services, medical services, and community facilities. The proposal represents an efficient use of serviced land that will add new housing opportunities in the UGC/Burlington GO MTSA. The increased density will support local businesses and public transit service while future residents will be able to take advantage of a number of recreational and community facilities located in the area. The proposed compact built form diversifies housing supply and reflects the changing needs of a range of household formations, as well as an aging population who may be seeking smaller and more affordable housing options close to transit in a familiar community. The height, form, and density of the development is consistent and compatible with other approved developments in the area and with the goals of the Province's GO MTSAs.

5.2 New City of Burlington Official Plan (Under Appeal) / Burlington Housing Strategy (2022)

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 are the applicable policies that describe the City of Burlington's housing policies:

"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."

In order for the City of Burlington to reach its minimum dwelling unit requirements per density type, the proposed development will be important in implementation of this policy. By offering a variety of unit sizes and types, the development will diversify the current housing supply and accommodate a range of households. Additionally, the Subject Lands can be serviced through existing municipal infrastructure.

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;"

On Tuesday, June 7, 2022, City of Burlington Staff presented the "Burlington's City-Wide Housing Strategy" to the Community, Planning, Regulation, and Mobility Committee with staff recommending the approval of the strategy. This Strategy was subsequently approved by City Council. The report addresses community needs pertaining to housing supply by setting various initiatives that were be undertaken over a five year period (e.g. 2022 to 2027). In total, the report contains 12 initiatives to support Burlington's overall housing vision. Of particular relevance to the Subject Lands, is Action #7, in which the City of Burlington shall, in the medium-term, "Support, permit, and encourage the development of alternate forms of housing, including higher density types of housing, where feasible and appropriate". Medium-term timing is identified as within "two to five years, as part of ongoing review and updates to the Official Plan and Comprehensive Zoning By-law in response to Regional conformity matters."

The proposed development will be at a height and density that is compatible with the evolving area and will help facilitate the creation of a complete community with more affordable and attainable housing within the time frame envisioned by the City of Burlington, that being between 2024 and 2027.

6.0 HALTON REGION HOUSING TARGETS

6.1 Unit Mix Targets

As previously noted, Policy 86(6)a) of the Halton Region Official Plan states that at least 65 percent of new housing units produced annually to 2031, and 75 percent each year thereafter, will be in the form of townhouses or multi-storey buildings. The 2022 State of Housing Report shows that the target was not achieved as only 48 percent of new completed units within the Region represented townhouse or multi-storey buildings. In Burlington, the report shows that less than 0.5 per cent of housing completions in 2022 were higher density units (townhouse and apartments). This demonstrates a trend in Burlington that higher density units are not being built.

The proposed development will provide for 722 residential units, which will assist the City and Region in achieving the established target.

Based on data provided by the State of Housing Report, the number of new housing completions in the City of Burlington has consistently declined since 2019 despite the population of Burlington continuing to grow.

The 722 proposed new residential units will increase housing supply and support housing accessibility City-wide. It is important to note that the current apartment stock is still a minor component of overall housing stock in the City compared to the existing low density housing which is the predominant housing form in the City of Burlington. New apartment units will be needed to achieve planning policy goals and objectives for a transit-oriented community.

The 2022 State of Housing Report shows that in Halton Region, vacancy rates by unit types differ. For 1-bedroom units, the vacancy rate was 1.2%. For 2-bedroom units, the vacancy rate was 1.1%. For 3+ bedroom units, the vacancy rate was 1.2%.

This proposed development will provide a total of 103 Studio units (15%), 389 1-bedroom units (55%), 188 2-bedroom units (25%), and 42 3-bedroom units (5%). Therefore, the proposed units will make a significant contribution to the City of Burlington's existing housing stock and potentially increase vacancy rates to above the 3 per cent threshold as discussed above.

6.2 Intensification Targets

Table 2A of the Halton Region Official Plan shows that the City of Burlington must add a minimum of 9,880 new housing units in the City of Burlington's built-up area between 2022 and 2031. This represents nearly 38% of the minimum new housing units required in the Region of Halton 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."

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 potential price of the units has not yet been determined and will depend on market demand when the units are made available for purchase. Therefore, no specific number of affordable units are currently being proposed, but the proposed development will increase the availability of housing most likely within the market affordability range in the Region, helping to accommodate anticipated growth.

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 2022 Halton State of Housing Report shows that there were 870 rent supplements issued, with 455 funded through the Halton Rental Assistance Program.

Halton Region also offers Portable Housing Benefits that offers an ongoing housing allowance to residents who qualify for assisted housing who are on the HATCh waitlist. In 2022, this program

provided 150 Halton families with a monthly rental allowance that is a permanent and portable housing solution.

Social housing development is also financially supported through Halton Region's development charges' revenues. Based on the current Social Housing Development Charge rate, the 722 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.

In June, 2022, the City of Burlington adopted the City's Housing Strategy. Action Item No. 12 is to undertake a formal assessment of the potential to introduce inclusionary zoning. The time-frame for this action item is short-term. 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 ("PMTSAs"). In accordance with Ontario Regulation 232/18, the City of Burlington is required to prepare a peer-reviewed Municipal Assessment Report that contains recommendations related to the feasibility of Inclusionary Zoning in each of the PMTSAs.

Community Benefits Charges or "CBCs" are paid by developers to lower and single-tier municipalities for high-density developments with 5 or more storeys and 10 or more units. The City of Burlington adopted its CBC By-law 66-2022 on September 14, 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. The Community Benefits Charge Study and By-law were presented at a public meeting on July 11, 2022, followed by the Study being presented to Council on September 14, 2022 and wherein the Council approved the CBC By-law.

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 and the supply of much needed new housing units.

The proposal introduces a mid to high-rise residential development on the site, providing 722 new residential units. The proposed development will make efficient use of underutilized lands by proposing residential intensification on a 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:

Table 7: Response to Criteria of Burlington new Official Plan Section 3.1.1(2)h)	
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);	
3.1.1(2)(h) (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 meets the applicable goals, objectives and policies of the Region of Halton Official Plan, and represents an intensification opportunity that supports sustainable, cost-effective and transit-supportive growth. The proposal will provide for a total of 722 units and conform to applicable housing policies of the Halton Region Official Plan. This increased supply of housing supports overall housing affordability by increasing housing options in the area to accommodate anticipated demand. The proposed unit mix will appeal to a range of households in the City of Burlington.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential sale price for units in the proposed development have not been determined. It is expected that the proposed units will be offered at market rates at the time of building completion.

(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.	Development phasing has not been determined during proposed amendments to land use policies and regulations.
(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 the units will be offered at market rate.
Pre-Con Item 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 occupied by a one-storey warehouse building that contains storage facilities and offices with surface parking surrounding the building. The 722 proposed units will result in an increased density for the site, in support of the City and Region's achievement of housing target provisions. A range of 1 to 3 bedroom units in a range of unit sizes will be offered.
Pre-Con Item 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 will increase the overall supply of new housing units in the City of Burlington and in Halton Region, in context of the City of Burlington having decreased its supply of actual housing units since 2021. The proposed development also contributes to the transition from low-density single detached built forms to a higher-density form in Burlington to ensure that growth occurs within walking distance of public transit and the Burlington GO MTSA/UGC.
Pre-Con Item 3) Identify and discuss other relevant and current housing information available.	The City of Burlington Housing Strategy, Action #7 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 density and height that the surrounding area can support and will support the fulfillment of a complete

	community with needed new housing supply in the Burlington GO MTSA/UGC.