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276-292 PLAINS ROAD EAST MID-RISE APARTMENT DEVELOPMENT

Housing Impact Statement: Report Addendum (284 Plains Road Development Inc.)

Burlington, ON

Prepared for **284 Plains Road Development Inc.**

August 2, 2023





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August 2, 2023

284 Plains Road Development Inc.
c/o Corley Developments Inc.
621 Clarke Road
London, ON, N5V 2E1

Dear Mr. Przewieda:

RE: **276-292 Plains Road East** – Housing Impact Statement: Report Addendum (284 Plains Road Development Inc.) (Burlington, ON)

urbanMetrics inc. ("uMi") is pleased to provide the following report addendum, updating the market information and analytical findings initially summarized in uMi's "Housing Impact Statement, September 22, 2021". This initial report was completed on behalf 284 Plains Road Development Inc. for the development site municipally known as 284 -292 Plains Road East, Burlington ON. This addendum is provided to assess a new, modified development proposal for a purpose-built rental apartment building proposed for a now larger, expanded consolidation of the properties located at 276-292 Plains Road East (the new and amended "subject site"). This addendum also provides an update of the previously report's market data and trends incorporating the latest inputs available from Halton Region's 2022 State of Housing Report.

Through this addendum, this analysis has demonstrated that the development of a new 141 purpose built rental apartment units on the subject site will increase the overall supply of rental apartment housing in the City of Burlington and in Halton Region. Further, this proposed development will be the first higher density rental building to be developed in the Aldershot area of Burlington in over a decade.

This addendum has assessed the benefits associated with the proposed development in terms achieving both the City and Region's intensification and density targets. Also, this addendum has evaluated both the direct and indirect contribution that the proposed new supply of rental apartment units on the subject

site will provide to Burlington's housing supply relative to the City's and Region' affordable housing policies.

It has been a pleasure to provide this addendum update on behalf of 284 Plains Road Development Inc. We look forward to discussing these results with you.

Yours truly,



Shawn Donahue
Vice President & Associate Partner
urbanMetrics Inc.

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1.1 Introduction

urbanMetrics inc. ("uMi") is pleased to provide the following report addendum, updating the relevant market information and analytical findings initially summarized in uMi's "Housing Impact Statement, September 22, 2021", ("uMi's 2021 Report") completed on behalf 284 Plains Road Development Inc. (the "Applicant"). uMi's 2021 Report was originally submitted to the City of Burlington's Planning department, on behalf of the Applicant, for a 117-unit mid-rise apartment building on a 0.313-hectare development site located on Plains Road East in the City of Burlington. At the time of this initial submission, it was not yet determined whether the subject site would be developed and sold as a condominium apartment project or built and operated as a purpose-built rental apartment units.

Since the submission of uMi's 2021 Report, the Applicant has acquired additional property and expanded the development area along the eastern and western boundaries of the original development site. This new land has been consolidated with the original development site, into a larger development property totalling approximately 0.504-hectare and comprised of the properties municipally referenced as 276-292 Plains Road East (the new and amended "subject site,"). The Applicant is proposing to develop the expanded subject site with a larger, 6-storey mid-rise purpose-built rental apartment building containing 141-rental apartment units, underground parking, and tenant amenity space.

1.2 Renewing Land Use and Proposed Development Concept

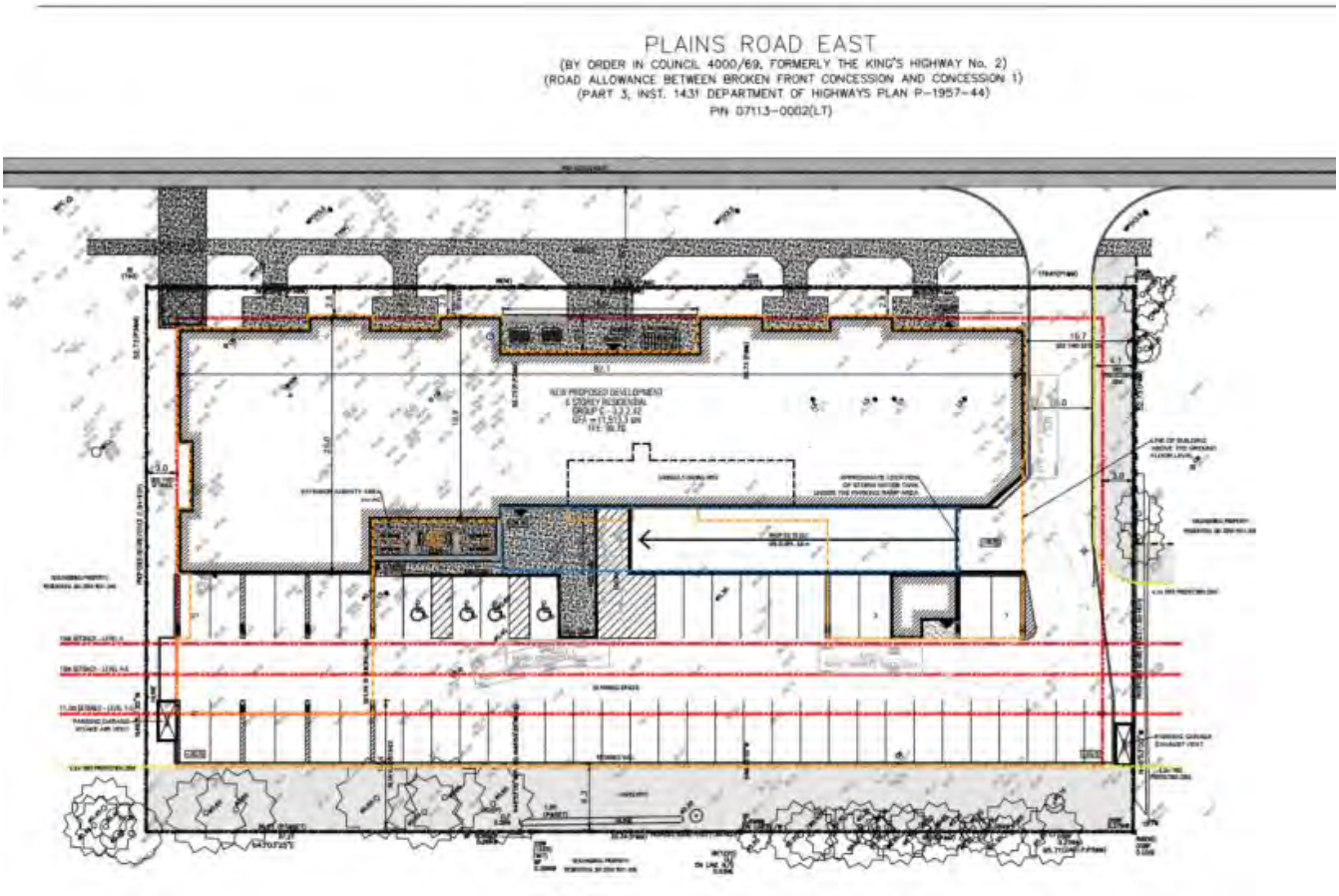
In uMi's 2021 Report the land area of the Applicant's development site consisted of approximately 0.313-hectares and was comprised of the properties municipally referenced as 284-292 Plains Road East. At the time of this report, land uses in the vicinity of the site along Plains Road East were reported to be predominantly occupied by commercial and residential uses. Specifically at that time, the properties consisting of 284-292 Plains Road East were reported to be occupied with two single-detached dwelling units that were being used for commercial purposes.

At present, the subject site has been increased to 0.504-hectare through the acquisition of additional land, situated along the west perimeter of the initial development site. This parcel is presently occupied with a commercial medical/arts building and tenanted by Wellum Chiropractic Clinic.

Through the consolidation of each of these properties, the developable area of the subject site has been increased by approximately 61.0%. This increased site area provides the Applicant with a broader scope of development options and has enabled the design of the project to employ a more cost-effective approach to developing the subject site.

Figure 1-1 below, illustrates the Applicant's current proposed development concept for the subject site.

Figure 1-1: The Proposed Concept Plan of the Subject Site



Source: 284 Plains Road Development Inc., July 2023

Based on a new, more extended rectangular configuration than was initially proposed for the development of subject site, Figure 1-2 below summarizes various modifications to the number and variety of units available within the new updated

proposed development concept versus the previous plan evaluated in the uMi 2021 Report.

Figure 1-2: Changes to the Unit Distribution of the Subject Site

	uMi 2021 REPORT			2023 REPORT ADDENDUM		
		Size Range - Sq. Ft.			Size Range - Sq. Ft.	
	Units Count	Low	High	Units Count	Low	High
One-Bedroom (Efficiency)	n/a	n/a	n/a	10	520	520
One-Bedroom	89	530	776	78	575	921
Two-Bedroom	25	636	884	50	793	941
Three-Bedroom	3	968	982	3	969	1,163
Total Units	**117**			**141**		

Source: urbanMetrics Inc. using statistics provided by 284 Plains Road Development Inc., July 2023

The new concept building is proposed to offer a wider variety of unit types, particularly in terms of the size ranges of available units. One feature of the new development concept is a more diverse offering of three types of one-bedroom unit formats. This new concept introduces both a new smaller one-bedroom efficiency unit, as well as a significantly larger one-bedroom + den model within this unit category increasing the range in unit size from 520 square feet to as high as 921 square feet. This has resulting in, an up to approximately 20% larger unit than was previously being offered in the one-bedroom category.

Another feature of the development concept is the doubling of the number of two-bedroom units available. These units too, are also generally larger than were previously being offered.

Overall, these changes represent an increase of approximately 20.0% more available unit supply and approximately 21.9% greater building gross floor area to be developed on the subject site than was previously evaluated in the uMi 2021 Report. These upgrades will directly contribute to an increase in the potential asking rents that will be sought by the Applicant.

The larger land area of the subject site also allows the façade of the building to be fully oriented towards the Plains Road East frontage of the site, allowing for other site uses such as resident parking, building amenities, waste disposal and loading facilities to managed in the rear of the site. In addition, the larger site area also allows for approximately one third of the building's parking spaces, 53 in total, to

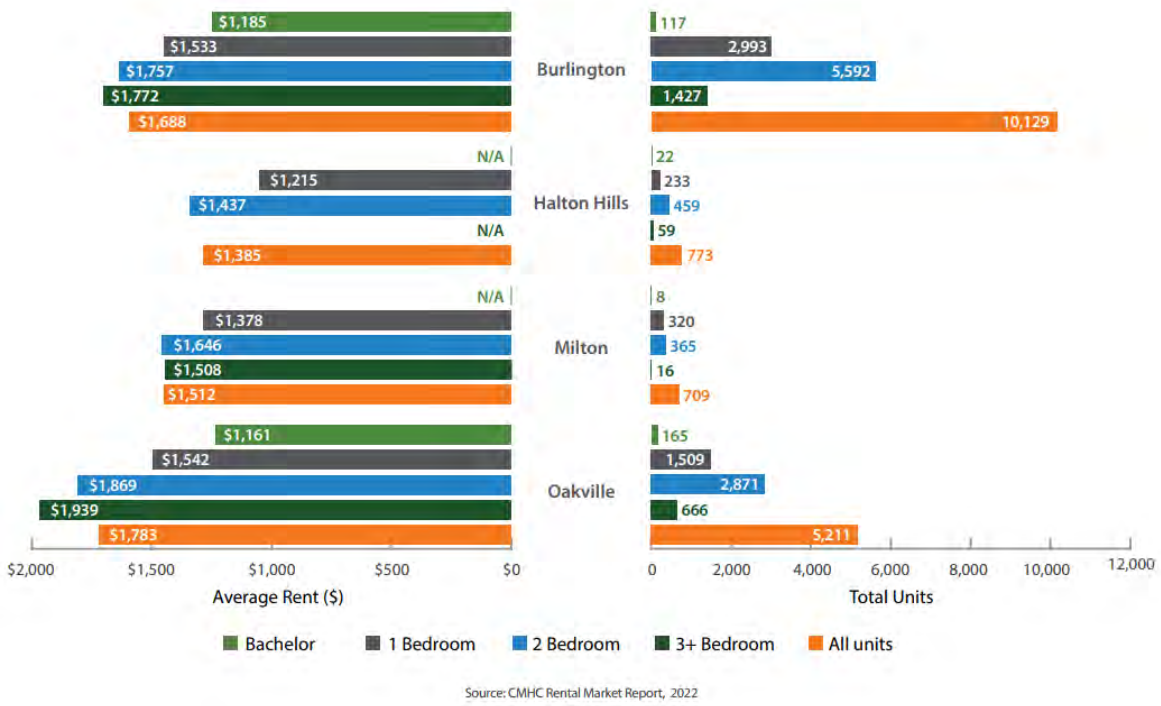
be offered as at-grade surface parking. Other distinguishing attributes that are offered in this proposed concept plan include the incorporation of balconies and terraces, front yard patios and ground floor and roof top amenities space. These distinct features, amenities and attributes are also anticipated to add value to the asking rent potential of these units.

1.3 The Purpose-Built Rental Apartment Market

The most significant change to the proposed development concept for the subject site is the Applicant's decision to advance the project as a purpose-built rental apartment building. Certainly, trends are showing Burlington's new housing supply pipeline is increasingly transitioning towards higher density housing supply projects. According to the Region's 2022 State of Housing Report, 81.1% of all new housing supply under construction in the City, was in the form of condominium apartment units. However, none of these mid to high density developments have been in the purpose-built rental market segment. This places the subject site at the forefront of delivering a long awaited, and greatly needed, type of new rental apartment housing supply to the market. In addition, the proposed development will also contribute towards the City's ambition for the initiation of an annual housing target, that 35% of all new housing units developed in the City, be purpose-built rental housing units as advocated for in the City's recent Housing Strategy.

The proposed development will add 141 new purpose-built residential apartment units to Burlington's rental supply of 10,149 rental units (shown in Figure 1-3, to follow). This development will be the first mid/high-rise rental apartment building added in the Aldershot area of Burlington in over a decade. This development will also contribute to diversifying the City's supply of rental housing across each of the apartment unit-type categories and will increase the City's overall supply of rental units by approximately 1.4%. At a minimum, the addition of this new rental supply to the marketplace will ensure much needed additional new supply is being made available to meet at least a portion of demand forecast for the future. In itself, this will indirectly support addressing housing affordability through appeasing some of the repressed demand in the market and alleviating local vacancy pressures in the market.

Figure 1-3: Unit Supply and Average Rents by Unit Type Across Halton Region



Source: Halton Region, 2022 State of Housing report

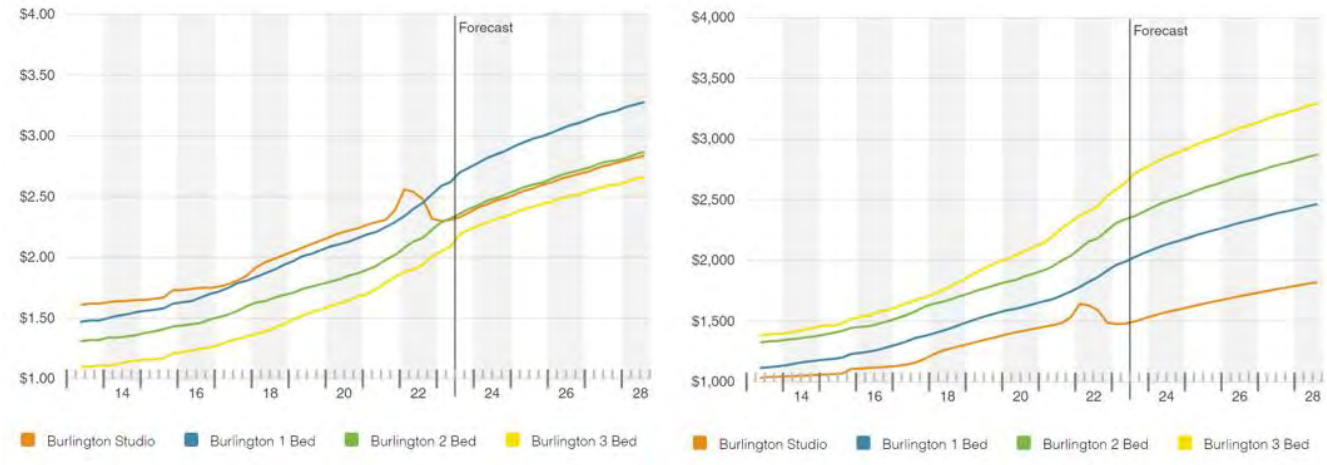
Market Rents and Asking Rents

Various market factors over the past few years, including rising construction costs, labour shortages, increasing consumer mortgage costs and inflation, have contributed to the ever-increasing delay in the delivery of new housing supply and the rapid acceleration of pent-up demand for housing in general, across southern Ontario. Through tightening market conditions, the delivery of affordable housing options has become increasingly more difficult, particularly as rents have continually increased significantly since 2020. In the Burlington context, the Region has reported that in 2022 there were no new apartment completions in Burlington. Further, it has also reported no new apartment housing starts have occurred in the City for the same year. These conditions further add to the shortfall of local affordable housing options available and will continue to contribute pressure to driving asking rents higher as residents in the market compete for limited housing alternatives. Figure 1-3 previous, summarizes the average monthly rental costs by unit type for all forms of residential rental space (i.e., apartment and townhomes) for each municipality in Halton Region based on CMHC data. These rates provide a snapshot of all existing and recently renewed leased transactions at defined point in time, where any periodic change in growth

would occur much slower on an incremental basis. In comparison, changes in the local asking rents have been subjected to more volatile changes in recent years in response to ratcheting market pressures over the past few years. As shown in the graph, rental units in Burlington are already averaging amongst the highest in the Region.

Using local apartment market data for Burlington, obtained from CoStar Group, Figure 1-4 summarizes the changes in historic asking rents per square foot by unit category and the average monthly market rents by unit type for the Burlington apartment rental market. This Figure demonstrates that asking rents for each type of apartment space are currently demanding average rents ranging between $2.30 to $2.75 per square foot in Burlington and that, with the exception of smaller studio units, almost all unit types are averaging monthly rents in excess of $2,000 per unit level.

Figure 1-4: Burlington Asking Rent / SF and Average Monthly Market Rent by Unit



Source: CoStar Group, 2023

Affordability Potential

Generally speaking, the common perception surrounding the rental housing market segment is that renting an apartment unit is typically a more affordable option than ownership. As a result, there often is conjecture that increasing the delivery of rental housing is the most direct solution to addressing affordability. However, given the escalated supply and demand pressures and low vacancy levels in the southern Ontario marketplace in recent years, no housing market segment has been unassailable to escalating housing costs.

Halton Region's Housing Model recognizes that a range of housing types are needed to address the lifelong housing needs of residents over the various stages of life. Under that principle, Figure 1-5 to follow, illustrates that the model estimates Halton Residents' average household (2.8 person) maximum affordable rent threshold for 2022 to be $2,340 per month. In addition to this average household threshold, Figure 1-5 also illustrates the calculation of the small household (1-2 persons) maximum affordable rent threshold to be $1,800 per month. Given the unit composition of the proposed development concept for the subject site, both of these thresholds are noteworthy towards evaluating the affordability potential of the project.

As illustrated previously in Figure 1-2, the majority of rental apartment units proposed for the subject site, are in the one-bedroom (62.4%) and two-bedroom (35.5%) categories. The largest share of these unit types, the one-bedroom, are most likely to be more associated with the Region's definition of small households versus average-sized households. Even the two-bedroom units are likely to also have a propensity towards being occupied by tenants aligned with the Region's definition of small households.

Figure 1-5: 2022 Halton Region Housing Model Thresholds for Assisted and Affordable Housing

Assisted	All households (average - 2.8 people)	Small households (1-2 persons)	Large households (3+ persons)
Income threshold	$ 66,100	$ 61,200	$ 71,600
Maximum purchase price	$ 235,100	$ 217,500	$ 254,500
Maximum monthly rent	$ 1,650	$ 1,530	$ 1,790

Affordable (non-assisted)	All households (average - 2.8 people)	Small households (1-2 persons)	Large households (3+ persons)
Income threshold	$ 121,200	$ 82,500	$ 162,400
Maximum purchase price	$ 496,300	$ 338,100	$ 664,900
Maximum monthly ownership cost	$ 3,030	$ 2,060	$ 4,060
Maximum monthly rent *	$ 2,340	$ 1,800	$ 2,930

* The mid-point between assisted and affordable monthly ownership costs, based on Halton's definition of Affordable Housing.

Source: Halton Region, 2022 State of Housing report

At this point in time, the Applicant has yet to determine the asking rental rates for the units that will be developed at the subject site and is under no requirement to

commit its market rates to qualifying under any affordability threshold. Further, the Applicant has provided no indication that the rental units developed on the subject site will qualify for any affordability related financial funding or other incentives.

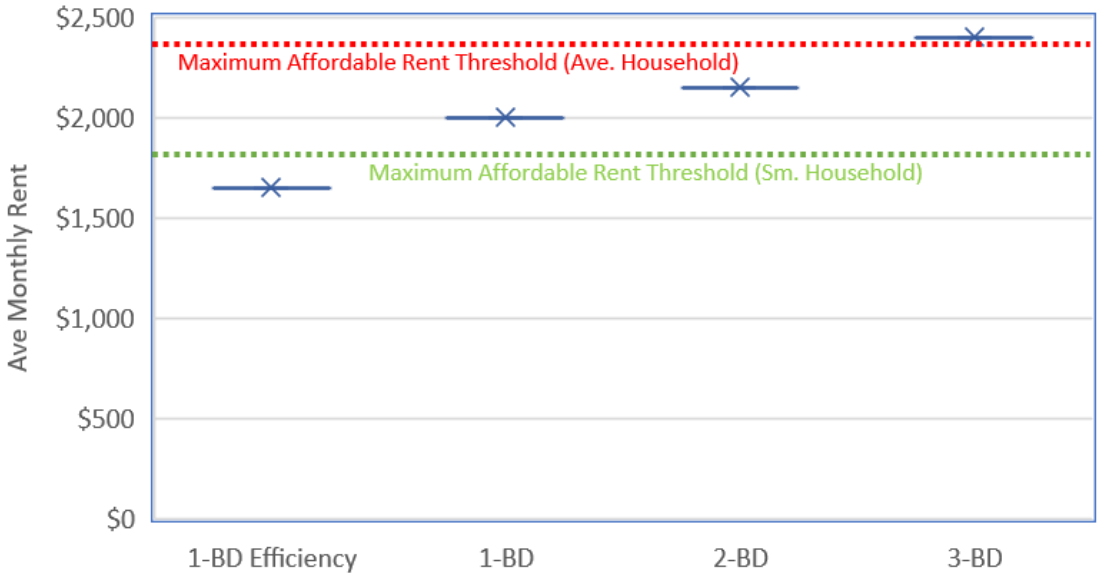
However, taking into consideration the current levels of asking rents (provided by CoStar Group) in Burlington shown in Figure 1-4 above, a conventional assessment of rent affordability potential for the subject site can provide some insights. Figure 1-6 to follow, provides an estimated averaged asking rent value for new apartment rental units in Burlington that would potentially be comparable (Note: this cannot be fully determined until developed) to the average future unit sizes proposed by the Applicant and compares these values to the Region's current maximum affordable rent thresholds. As illustrated in the Figure 1-6, estimated averaged asking rent for most unit types proposed at the subject site are estimated to be below the 2022 average household maximum affordable rent threshold. However, it is important to recognize, as stated previously, that the majority of units proposed to be developed at the subject site will more than likely be associated, and therefore tenanted with, what the Region defines as a small household.

When comparing estimated average asking rents with the small household maximum affordable rent threshold, almost all of the unit types with the exception of the one-bedroom (efficiency) units are estimated to exceed the small household maximum rent threshold.

Therefore, based on this conventional comparative analysis, there may be the potential for a marginal addition to the supply of affordable rental units at the subject site in the future. However, given the recent trends in asking rents, elevated tenant demand and continued supply constraints in the marketplace, it is uncertain whether the appropriate conditions will affiliate a right-sized household with the range of unit sizes available at the subject site to qualify the unit as affordable under the criteria described above.

Nonetheless, the addition of new apartment rental accommodations at the subject site will add much needed new supply to the market segment and will contribute to providing Burlington households a broader availability of housing types to choose from.

Figure 1-6: Estimated Average Asking Rents per Unit



Source: urbanMetrics Inc., Based on asking rent data from CoStar Group and rent thresholds from the 2022 State of Housing report.

Summary of Analysis

The subject site will increase the overall supply of new rental apartment housing in the City of Burlington and in Halton Region. At this point in time, the Applicant has provided no indication as to whether the rental units developed on the subject site will qualify for any affordability related financial funding or other project incentives. Further, the Applicant has yet to determine the asking rental rates for the units that will be developed at the subject site, making it difficult to accurately assess the affordability of this future housing supply. As a result, it is uncertain whether any units of the proposed rental units on the subject site will qualify as affordable units at this time.

However, based on current local market conditions, the analysis provided has demonstrated there is a narrow possibility that a limited number of the smaller units in the development could potentially qualify towards adding to the City's supply of affordable housing under the right circumstances. Nevertheless, based on market trends in recent years as well as the tightening supply and demand conditions in Burlington, it is more likely that the new apartment rental supply proposed for the subject site will instead indirectly support housing affordability by ensuring much needed, additional new purpose-built rental apartment supply is being made available in the marketplace to meet a portion of demand forecast for the future.

1.4 Burlington's Housing Strategy

At the time of the release of the uMi 2021 Report, Burlington was in the early phase of developing its Housing Strategy. The process leading up to the development of the Housing Strategy started initially with the release of the City's Housing Needs and Opportunities Report (November 23, 2021), an integral background component of today's Housing Strategy. The Housing Strategy itself was first submitted to the City's Community Planning, Regulation & Mobility Committee for approval on June 7, 2022, with 12 action items identified as next steps to implementing the Strategy. Currently, the implementation of the Housing Strategy into action remains to be an ongoing work-in-progress with many of the action items still pending or delayed. The majority of these action items are still subject to various hindrances including: supplemental work to be completed by staff, pending decisions on the appeals of the new Official Plan, 2020 policy from the Ontario Land Tribunal, as well as a number of recent forthcoming changes anticipated as an outcome from the passing of Bill 23, More Homes Built Faster Act.

While Burlington's Housing Strategy is presently only loosely in effect, the proposed development of purpose-built rental apartment units on the subject site is germane to the achievement of several of the Housing Strategy's action items, relating to the following:

- Item 4: Relating to the achievement of the objectives of the Housing Strategy through "building upon the policies of the new Official Plan, 2020 and use the findings of the Housing Strategy Project to establish minimum targets around housing."
- Item 7: Through the achievement of higher density purpose-built rental apartment units that "Support, permit and encourage the development of alternate forms of housing, including higher density types of housing, where feasible and appropriate."
- Item 9: As an example of intensified higher density residential uses that compliment the City's existing housing supply and will contribute to "protect Burlington's rental housing stock."

Relative to these action items, the characteristics of the proposed development aligns with the objectives of the City's Housing Strategy and the new Official Plan, 2020 as an intensification of the use of the subject site, which contributes to the achievement of the City's policies to deliver more new housing supply and contribute to its housing targets. Further this development will deliver a higher density form of housing that is both an indispensable alternative to home

ownership while complimenting and adding to the City's stock of purpose-built rental apartment units.

1.5 Updated Conclusions

In completing this addendum for the *Housing Impact Statement* relating to the subject site, there are various elements that the City's Terms of Reference identified must be addressed. The following table summarizes these elements and how they are addressed in either the original report (see Appendix A) or the report addendum and in particular, how they relate to the proposed updated development concept for the subject site.

Policy	Analysis
1) Completed in accordance with Section 3.1.1(2)(h) and other applicable policies of the new Burlington OP;	See below
(i How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development of 141 apartment units on the subject site would contribute towards the Region's achievement of two major housing targets from the Region OP: 1. **Policy 86 (6) a)** – As all units in the proposed development will be mid-rise rental apartments. This development will contribute towards the Region's achievement of its target that 50 per cent of new units developed be in the form of townhouse and apartment units. 2. **Policy 77 (2.1)** – As the proposed development is located within the Region's built-up area, all units within the development will contribute towards the Region and the City meeting their intensification target of a minimum of 40 per cent of new residential units being constructed in the built-up area. Based on current market conditions, there is a low probability that most, if not all, of the new units in the proposed development would qualify as affordable or assisted housing units under the Region's or City's local definitions. However, the increased supply of rental housing would, at a minimum expand the availability of rental supply in Burlington and indirectly support housing affordability by contributing towards the supply of new housing available to accommodate a portion of forecasted demand in the future. Also, by introducing a mix of unit formats and sizes, the proposed development would appeal to a broader range of current and future residents.

(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential rental rates for the units in the proposed development have not yet been determined. Also, the majority of units proposed to be developed at the subject site will more than likely be associated to, and therefore tenanted with, what the Region defines as a small household. Based on local current asking rent market data, it is not anticipated that the majority of the units within the proposed development will be priced below the Region's 2022 small household Maximum Monthly Affordable Rent threshold, or will they satisfy regional or local definitions for affordable housing.

(iii) Where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable.	As this development includes only one building, it is not expected that the development will occur in phases.
(iv) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long-term affordability of units, where applicable.	Often, there is conjecture that increasing the delivery of rental housing is the most direct solution to addressing affordability. However, given the escalated supply and demand pressures in the southern Ontario marketplace in recent years, no housing market segment has been unassailable to escalating housing costs. At this time, the Applicant has provided no indication that the rental units developed on the subject site will qualify for any affordability related financial funding or other incentives. However, in terms of contributing to the City-wide provision and inclusion of providing new affordable rental housing through new development, the Applicant's development application is not prohibited from support of other existing and potential future policies, tools and mechanisms for affordable and assisted housing. In addition, the prospect of other direct and indirect support incentives and/or developer contributions remain under consideration by the Applicant as the development process advances and could potentially include proceeds from the following resources: Halton Region's Assisted Housing Program, Halton's In-Situ Program, and Community Benefit Charges.
2) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.;	Land uses in the general vicinity of the subject site along Plains Road East have traditionally been occupied with low density commercial and residential uses. Over time, many of the residential dwellings along Plains Road have been converted to also accommodate commercial tenants. The subject site is currently developed with a commercial medical/arts building and two low-density residential dwellings that have most recently been occupied with commercial tenants. The proposed new rental apartment development will be a return to the general residential character along Plains Road East while

	increasing the density of residential uses on the assembled properties. Developing 141 new rental apartment units on the site is consistent with the new Burlington OP's growth intensification objectives for this area of the City and will contribute towards the City and Halton Region achieving their various housing supply targets. Further, based on the current concept plan, the proposed development will contribute to diversifying the City's supply of rental housing across each of the apartment unit-type categories and will increase the City's overall supply of rental units by approximately 1.4%.
3) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent *State of Housing Report*; and	As noted previously, the Applicant's proposal to develop mid-rise purpose-built rental apartment units on the subject site situated within the built-up area of the Region, contributes to the Region achieving its housing intensification and minimum unit target as defined in Policy 77 (2.1) of the *Halton OP*. The development of the subject site as proposed will also increase the overall supply of new rental housing units in Burlington and in Halton Region. At a minimum, the addition of this new rental supply to the marketplace will ensure much needed additional new supply is being made available to meet at least a portion of demand forecast for the future. In itself, this will indirectly support addressing housing affordability through appeasing some of the repressed demand in the market.
4) Should identify and discuss other relevant and current housing information available.	According to the Region's 2022 State of Housing Report, 81.1% of all new housing supply under construction in the City, was in the form of condominium apartment units. However, none of these mid and high-density developments have been in the purpose-built rental market segment. The development of the subject site will be the first mid/high-rise rental building added in the Aldershot area of Burlington in over a decade. This development will contribute to diversifying the City's supply of rental housing across each of the apartment unit-type categories and will increase the City's overall supply of rental units by approximately 1.4%. This places the subject site at the forefront of delivering a long awaited and greatly needed type of new housing supply to the market. Also, 2022 marked a period of no new apartment completions in Burlington. Adding to this, it has also been reported that no new apartment housing starts occurred in the City for the same year. These conditions add to the shortfall of local affordable housing options available and will continue to contribute pressure to driving asking rents higher as residents in the market compete for limited housing alternatives. The analysis provided herein has demonstrated there is a narrow possibility that a limited number of the smaller units in the

	Applicant's proposed development could potentially qualify towards adding to the City's supply of affordable housing under the right circumstances. While this realization may appear unlikely, as the market continues to tighten supply and demand conditions and increase asking rents, the subject site's new apartment rental supply will, at the very least, indirectly support housing affordability by ensuring much needed new rental apartment supply is added in the marketplace. This new supply will satisfy a portion of demand forecast for the future. While the Applicant development proposal is unlikely to significantly contribute to affordable housing targets in the City and the Region, the proposed development is not prohibited from support of other existing and potential future policies, tools, and mechanisms for assisted housing. The potential for community support incentives, developer contributions or other positive outcomes potentially may be generated from opportunities such as the following: Halton Region's Assisted Housing Program, Halton In-Situ Program or Community Benefit Charges

Appendix A – The uMi 2021 Report



urbanMetrics inc.
market, economic and strategic advisors

284-292 PLAINS ROAD EAST

Housing Impact Statement

Burlington, Ontario

Prepared for **284 Plains Road Development Inc.**

September 22, 2021



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September 22, 2021

284 Plains Road Development Inc.
c/o Corley Developments Inc.
1065 Clarke Road
London, Ontario
N5V 3B3

RE: 284-292 Plains Road East – Housing Impact Statement (Burlington, Ontario)

urbanMetrics inc. ('urbanMetrics") is pleased to submit the following *Housing Impact Statement* in support of the application by Corley Developments and 284 Plains Road Development Inc., to construct a six-storey residential building located at 282-292 Plains Road East, in the City of Burlington, hereafter referred to as the subject site.

The purpose of this *Housing Impact Statement* will be to determine how the proposed development contribute to the Region of Halton's housing targets and more general affordable housing needs, and addresses the policies and requirements outlined in Section 3.1.1(2) of the City of Burlington Official Plan.

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

Yours truly,

Craig Ferguson, PLE
Partner
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Executive Summary

urbanMetrics inc. ("urbanMetrics") was retained by Corley Developments and 284 Plains Road Development Inc., hereafter referred to as the Landowners to prepare a *Housing Impact Statement* for their proposed development of a site known municipally as 284-292 Plains Road East, in the City of Burlington, hereafter referred to as the subject site.

The Proposal

The subject site is currently occupied by two single-detached dwelling units that were previously used for commercial purposes. The proposed re-development of the subject site will contribute towards increasing the supply of housing in the City. As per policies of the Burlington Official Plan, the subject site is located within the *Urban Area* and is designated *Mixed Use Nodes and Intensification Corridors.* The site is also located within the delineated built boundary of the city, meaning units on the site will contribute towards meeting the City's and Region's intensification targets going forward.

Proposed development of the subject site includes 117 units with a mix of one-bedroom, two-bedroom and three-bedroom apartment units. One-bedroom units are anticipated to account for 76% of all units on the subject site.

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

Policy	Analysis
1) 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 of 117 apartment units on the subject site would contribute towards the Region's achievement of two housing targets: 1) **Policy 86 (6) a)** – As all units in the proposed development will be apartment units, the development will contribute towards the Region's achievement of the target that 50% of new units be in the form townhouse and apartment units. 2) **Policy 86 (6) b)** – As the proposed development is located within the built-up area, all units will contribute towards the Region and City meeting the intensification target. At this time, the Landowners have not identified if any of the new units in the proposed development will meet the regional definition of affordable or assisted housing units. However, the increased

	supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand. Also, by introducing a mix of unit formats and types, the proposed development would appeal to a range of current and future residents.
(ii) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential rent or sale price for units in the proposed development have not been determined. If the development was to be constructed as condominium apartment units, it is not expected that the units will meet the Region's definition of affordable housing.
(iii) Where construction of the units is expected to occur in phases, information regarding the number of affordable housing units to be provided per phase, where applicable.	As this development includes only one building, it is not expected that the development will occur in phases.
(iv) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long-term affordability of units, where applicable.	While the Landowners are currently not committing to the development of affordable housing units on the subject site, the provision and inclusion of affordable housing City-wide could be supported by existing and potential future policies and mechanisms. These mechanisms include rent-geared-to-income assistance, the Halton In-Situ Program, inclusionary zoning and Community Benefits Charges.
2) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.	The subject site is currently occupied by two residential dwellings that were previously used for commercial purposes. The 117 units that are proposed will result in the denser form of development that will help the City and Region meet their housing needs. Based on the current concept plan for the subject site, 76% of units will contain one-bedroom, with the remaining 24% of units containing two or more bedrooms.

3) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report (note: the Region issues a State of Housing Report annually and any justification should reflect the current year report); and	As noted previously, by proposing to include apartment units at a location within the built-up area, the subject site would help achieve Policy 86(6) in the Regional Official Plan. The subject site would increase the overall supply of new housing units in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand.
4) Should identify and discuss other relevant and current housing information available.	If the City of Burlington develops an Inclusionary Zoning by-law, it will provide an opportunity to secure affordable units in new developments within PMTSAs. Furthermore, if the City were to implement a development permit system, it would provide an opportunity to also secure affordable units outside of PMTSAs, including on the subject site.

2.0 Introduction

urbanMetrics inc ("urbanMetrics") was retained by Corley Developments and 284 Plains Road Development Inc. to prepare a *Housing Impact Statement* for their proposed development of a site known municipally as 284-292 Plains Road East, in the City of Burlington.

2.1 Purpose & Approach

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

- 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 (note: the Region issues a State of Housing Report annually and any justification should reflect the current year report); and
- Should identify and discuss other relevant and current housing information available.

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

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

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

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

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

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

2.2 Subject Site

Location

The subject site is located at 284-292 Plains Road East in the City of Burlington, Ontario. As shown in Figure 2-1, the subject site is situated on the south side of Plains Road East, just west of Filmandale Road. It comprises some 0.31 hectares of land. Currently, the majority of lands located on the south side of Plains Road East—abutting and surrounding the subject site—are developed with service commercial and residential uses. The subject site is currently occupied by two single-detached dwelling units that were previously used for commercial purposes. Therefore, the proposed development of a 117-unit apartment building will help intensify the site, in comparison to the existing uses.

Figure 2-1: Subject Site Location



SOURCE: urbanMetrics inc., with Google Earth Imagery.

Planning Context

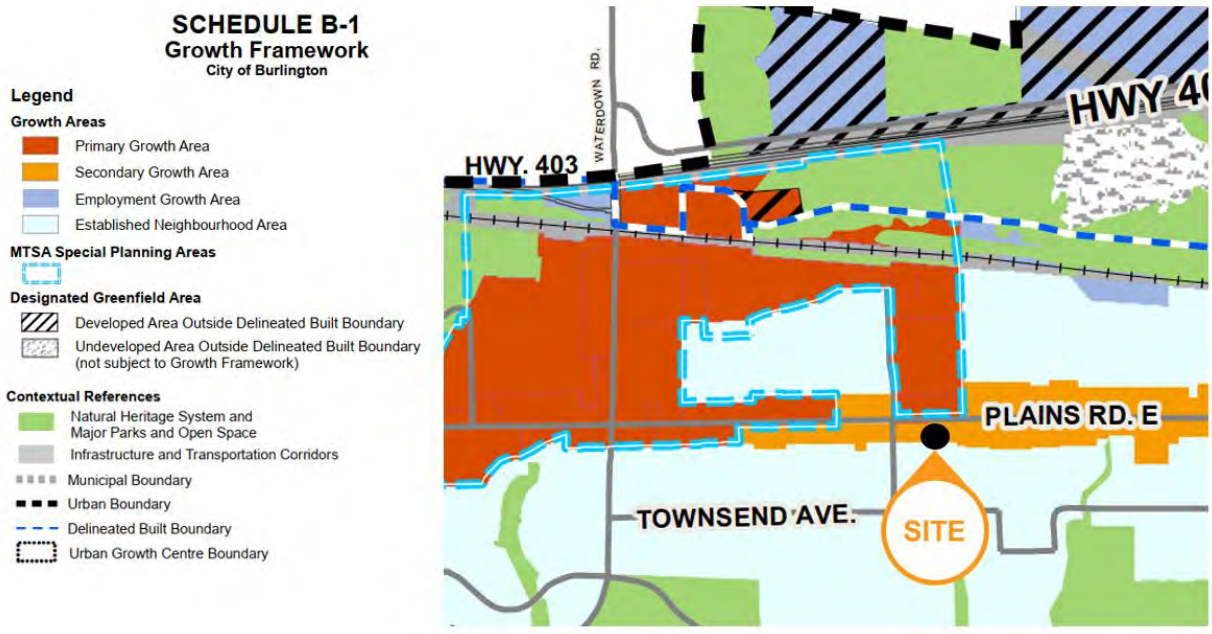
The Halton Region Official Plan, Map 1: Regional Structure, shows that the subject site is located on lands located within the *Urban Area,* and is within the built boundary of the Region.

Map 3: Functional Plan of Major Transportation Facilities in the Region of Halton Official Plan indicates that Plains Road East is a Multi-purpose Arterial Road. Based on Policy 80(3) of this *Plan* this means that the subject site is located along an *Intensification Corridor*.

Schedule B: Urban Structure of the Burlington Official Plan, shows that the subject site is designated as *Mixed Use Nodes and Intensification Corridors.* The site is also located within the delineated built boundary of the city meaning units developed on the site will contribute towards meeting the City's and Region's intensification targets.

Schedule B-1: Growth Framework of the City of Burlington Official Plan, shows that the subject site is located in a *Secondary Growth Area*, and is just south of the southern boundary of the Primary Growth Area of the Aldershot GO Major Transit Station Area ("MTSA") (Figure 2-1). *Schedule C: Land Use* also shows the site as being designated *Urban Corridor*. Under this designation, the subject site is 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*" per Policy 8.1.1 of the City of Burlington Official Plan.

Figure 2-2: Schedule B: Urban Structure, City of Burlington Official Plan



SOURCE: urbanMetrics inc. based on City of Burlington Official Plan (2020) – Interim Working Version: February 2021.

2.3 Proposed Development

The Landowners are proposing to redevelop the subject site to accommodate a six-storey residential building containing 117 units.

Figure 2-3 provides details the project statistics related to the development, as currently proposed. It is anticipated that there will be a mix of one-bedroom, two-bedroom and three-bedroom apartment units. This includes 10 two-storey, ground floor apartment units. As detailed, units in the development will range in size from 530 square feet for a one-bedroom unit to 982 square feet for a three-bedroom unit. The broad unit mix will contribute to the quantity and diversity of units in the built boundary of the City of Burlington. The large two-bedroom and three-bedroom apartment units will also provide opportunities to accommodate families in an area of the City that has existing amenities and is in proximity to transit along Plains Road East and the Aldershot GO Station MTSA.

The applicant has not yet determined if these units will be developed as purpose-built rental or condominium units, or how many units may qualify as affordable, based on the definition provided by Halton Region.

Figure 2-3: Overview of the Proposed Development

	# of Units	Size (SF)	
		Low	High
One-Bedroom	89	530	776
Two-Bedroom	25	636	884
Three-Bedroom	3	968	982
Total	**117**		

SOURCE: urbanMetrics inc., based on data provided by SRM Architects.

3.0 Halton Region Housing Context

This section of the report details the housing policies within applicable planning documents, including the *Region of Halton Official Plan*, the *City of Burlington Official Plan*, and the *Halton Region 2020 State of Housing Report*. It also details the various definitions of affordable and/or assisted housing, and low to moderate income households, as defined by each of the *Plans.* We also note that the policies included in the aforementioned regional and municipal planning documents are generally consistent with the definition of affordable in the 2020 *Provincial Policy Statement* ("PPS") and conform to *A Place to Growth – Growth Plan for the Greater Golden Horseshoe* (the "Growth Plan").

3.1 Halton Region Official Plan

The Halton Region Official Plan builds upon the policy direction and goals of the PPS and the Growth Plan. It provides clear direction about how development in Halton Region should take place, considering the current and future needs of residents.

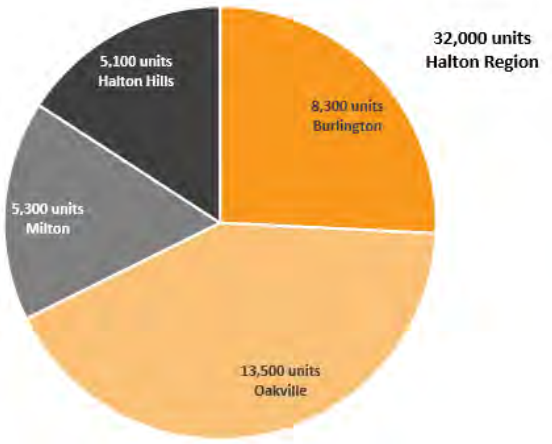
The subject site is located within the *Urban Area* of the Region and is within an *Intensification Area* because of its location along an *Intensification Corridor*. Specifically, the subject site will contribute to meeting the policy directives in Policy 77 (2.1), that states that:

> *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.*

Where Table 2 and Table 2a provide the number of residential units to be accommodated through intensification in the various municipalities, as well as the regional phasing of intensification. Table 2 of the Halton Region Official Plan—as summarized in Figure 3-1—details that the City of Burlington is to add a minimum of 8,300 housing units to the Built-Up Area between 2015 and 2031. The proposal for the subject site, which includes 117-units, will contribute towards the City and Region meeting the intensification target.

It is notable that the Growth Plan now requires that 50% of all development in Halton Region to be accommodated within the built boundary. Further, as part of the ongoing Municipal Comprehensive Review (MCR), the Region is testing concepts with 50% to 80% intensification. Therefore, it will be increasingly important to accommodate units through intensification, including on the subject site, if the City and Region are to meet these targets.

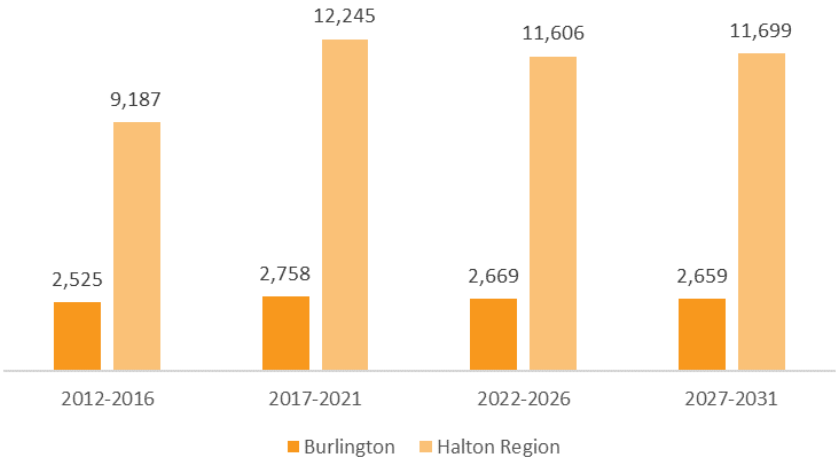
Figure 3-1: Minimum Number of New Housing Units in the Built-Up Area between 2015 and 2031



SOURCE: urbanMetrics inc., based on Table 2: Intensification and Density Targets in the Region of Halton Official Plan.
NOTE: Total new units for Halton Region represents 40% of the new housing occurring the Region between 2015 and 2031.

Table 2A of the Halton Region Official Plan provides phasing for intensification units for five-year periods between 2012 and 2031, as shown in Figure 3-2. Table 2 and 2A are included in Appendix A of this report. As shown, Burlington is anticipated to accommodate 2,669 units through intensification between 2022 and 2026. If the units on the subject site are constructed during this period, they would account for approximately 4% of new intensification units in the City.

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



SOURCE: urbanMetrics inc. based on Table 2A: Regional Phasing in the Region of Halton Official Plan.

Subject Site

Located in the Built-Up Boundary of the City and Region, the subject site as proposed, will effectively densify a site in an Intensification Area. By increase the quantity of residential units on site, the proposed development will also directly support the Region's and City's ability to meet their housing targets through to 2031. More specifically the subject site will account for approximately 4% of new housing units required in the Built-Up Area between 2022 and 2026.

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

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

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

> *"86. It is the policy of the Region to:*
>
> *…*
>
> *(4) Define Affordable Housing for the Halton and local municipal markets based on the definition under Section 214.*
>
> *…*
>
> *(6) Adopt the following housing targets:*
>
> *a) that at least 50 per cent of new housing units produced annually in Halton be in the form of townhouses or multi-storey buildings; and,*

> b) *that at least 30 per cent of new housing units produced annually in Halton be Affordable or Assisted Housing.*
>
> *(6.1) Establish, in conjunction with the Local Municipalities, annual targets for the production of housing units by density type and affordability for each Local Municipality, based on the Regional targets under Section 86(6).*
>
> *(7) Provide annually a State of Housing report to Council that contains among other things:*
>
> a) *an update of the definitions of Assisted Housing and Affordable Housing;*
>
> b) *a review of housing supply, demand and need in Halton during the past year, covering the various housing segments of Assisted Housing, Affordable Housing, Market Housing, Special Needs Housing and housing with universal physical access;*
>
> c) *identification of the gaps between supply and demand of Assisted Housing and Affordable Housing;*
>
> d) *state of homelessness* in *Halton; and*
>
> e) *performance of the housing market towards meeting the housing targets under Sections 86(6) and 86(6.1).*
>
> *…*
>
> *(11) Permit intensification of land use for residential purposes such as infill, redevelopment, and conversion of existing structures provided that the physical character of existing neighbourhoods can be maintained.*
>
> *…*
>
> *(21) Require Local Official Plans to provide an appropriate mix of housing by density, type and affordability in each geographic area, consistent with current and projected demands reflecting socio-economic and demographic trends.*

As per **Policy 86 (4)**, affordable housing is defined in Section 214 of this *Plan*. It states that *Affordable* Housing is *"housing with a market price or rent that is affordable to households of low and moderate income spending no more than 30 percent of their gross household income."*

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

> *Affordable Rental Housing: "should meet the demand of households at the low end, as described in Halton's annual State of Housing Report, pursuant to Section 86(7). Such households would be able to afford at least three out of ten rental units on the market."*
>
> *Affordable Ownership Housing: "should meet the demand of households at the high end, as identified in Halton's annual State of Housing Report pursuant to Section 86(7). Such households would have sufficient income left, after housing expenses, to sustain the basic standard of living."*

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

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

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

Subject Site

The proposed development takes advantage of the site's location and surroundings to increase the supply of housing. It does not conflict with neighbouring development and effectively compliments more recent development trends, including a new condominium apartment development just east of the subject site, located at 320 Plains Road East.

By proposing to include apartment units, the subject site would increase the diversity of housing in the area, helping the Region achieve an appropriate mix of housing at the local level. Indirectly, the increased supply of housing on the subject site could support housing affordability by ensuring there is sufficient supply of units to accommodate forecast demand.

3.2 Halton Region State of Housing Report

The Halton Region State of Housing Report has been produced annually by Halton Region since 2006. It provides a review of housing supply and demand in Halton and monitors the Region's progress in implementing the vision and policies included in the PPS and the Halton Region Official Plan. The latest report for the Region was completed in 2020.

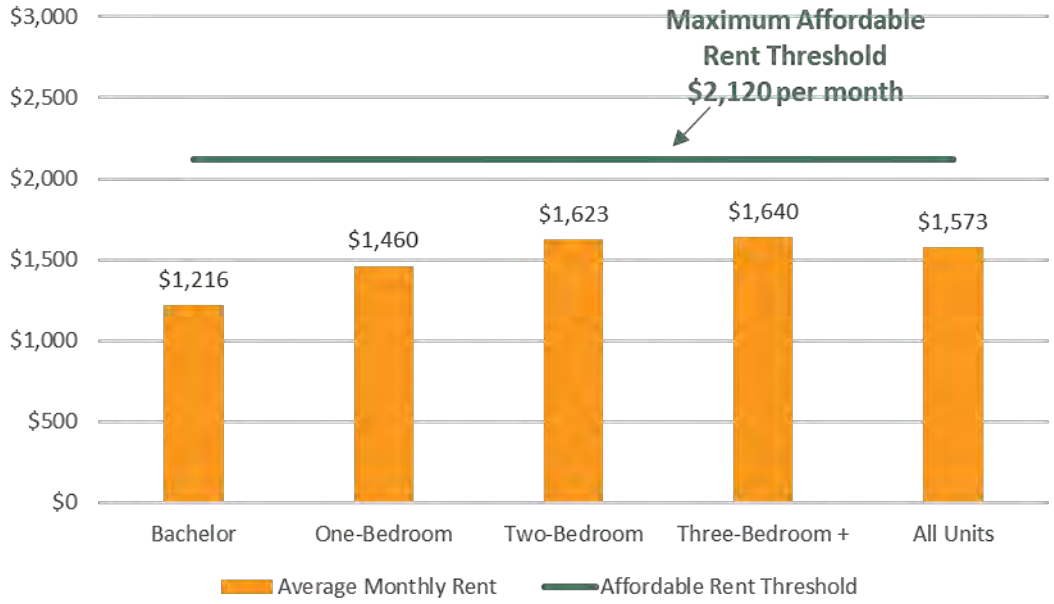
Calculated through the Halton Housing Model and based on the Halton Official Plan definitions for affordable housing costs, the 2020 State of Housing Report details the upper limit household incomes (i.e., maximum purchase price or monthly rent) that a household with that income could afford. In 2020, the affordable (non-assisted) threshold for **ownership housing was $409,500**. This number is used to determine if the Region is achieving Policy 86. (6) of the Halton Official Plan, that 30% of new annual housing units are affordable or assisted. To that end, the maximum affordable threshold for rental housing in the 2020 State of Housing Report **was $2,120 per month**.

As noted earlier in this *Housing Impact Statement*, the Landowners have not yet determined the tenure (i.e. ownership versus rental) for the proposed units on the subject site. If the units are developed as condominium apartment units, the ultimate sales prices for units will be based on the

market demand for units. Similarly, if the units are developed as purpose-built rental, the monthly rent will be based on the willingness to pay by potential renters.

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 (Figure 3-3). Therefore, if the subject site is ultimately developed with purpose-built rental apartment units, it is possible that a portion of these units could meet the regional definition of affordable if the monthly rent was below the applicable affordable rent threshold at the time of development.

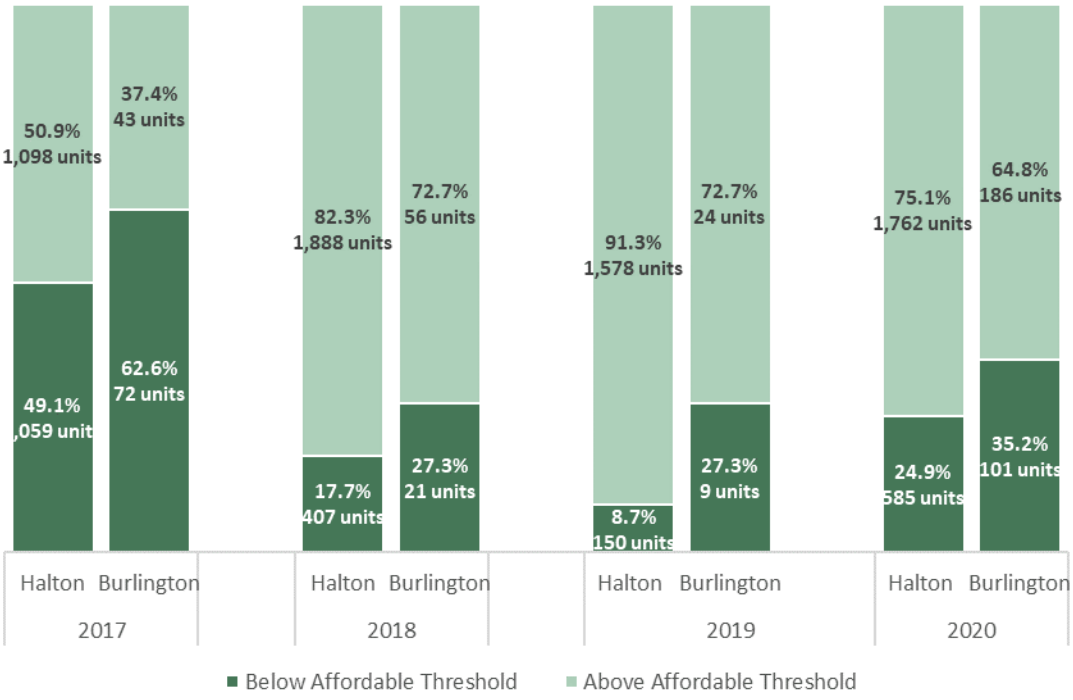
Figure 3-3: Purpose-Built Rental Apartment Average Monthly Rent by Unit Type, City of Burlington, 2020



SOURCE: urbanMetrics inc. based on 2020 Halton Region State of Housing Report.

The 2020 State of Housing Report also found that the percentage of new housing sales that meet the definition of affordable in the Region and the City of Burlington increased in 2020 after declining in previous years. In fact, Figure 3-4 shows that in 2020, nearly 25% of all new market housing units in the Region were considered affordable. This is up from only 8.7% in 2019. Similarly, in 2017 in the City of Burlington approximately 62.6% of new housing units sold were considered affordable. This has dropped to 27.3% of new housing unit in 2019, or only nine units. However, in 2020, the share of market units considered to be affordable rose to 35.2%, or 101 units.

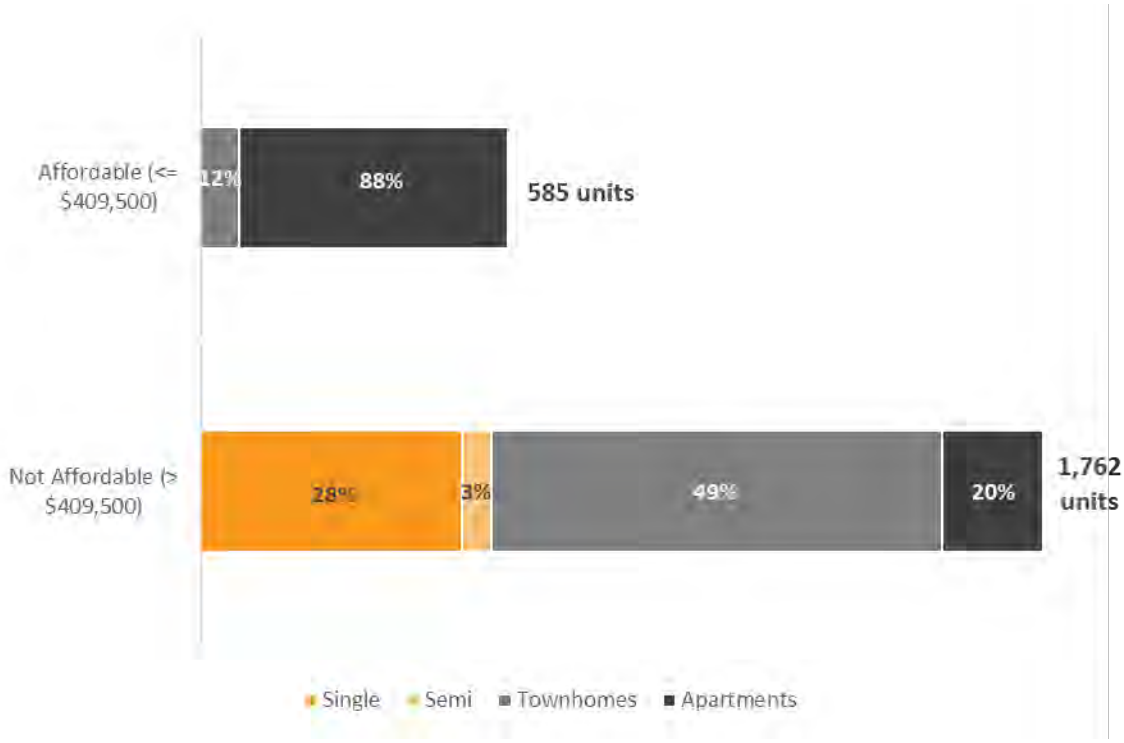
Figure 3-4: New Affordable Housing Sales based on Affordability, Halton Region and Burlington



SOURCE: urbanMetrics inc. based on 2017, 2018, 2019 and 2020 Halton Region State of Housing Report(s).

The 2020 State of Housing Report also notes that most affordable new housing sales were in the form of townhomes or apartment units. As shown in Figure 3-5, new townhome and apartment units comprised 100% of affordable new housing sales in the Region in 2020. This emphasizes the link between higher density housing and affordability in the Region. Therefore, if the subject site is developed with condominium apartment units, it will increase the supply of units that have a more attainable price, even if they do not meet the regional definition of affordable.

Figure 3-5: New Affordable Housing Sales, Halton Region, 2020



SOURCE: urbanMetrics inc., based on data from MPAC as included in the Halton Region 2020 State of Housing Report.

Subject Site

The subject site would increase the overall supply of new housing units in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand.

The proposed development also includes apartment units. Given that recent affordable new home sales in the Region have largely been these unit types, new units on the subject site will increase the supply of units in the City and Region that have an attainable purchase price or monthly rent.

3.3 City of Burlington Official Plan

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

> ***"3.1.1(2) Policies***
>
> *a) To the extent to which land is available in the Urban Area, the City shall maintain the ability to accommodate its share of residential growth within the regional market area. The City will assist the Region of Halton in the establishment and monitoring of annual minimum targets for the production of housing units by density type, and for the production of assisted and affordable housing, based on targets established in the Regional Official Plan.*
>
> *b) The City will work with the Region of Halton to provide opportunities for housing for a wide array of socio-economic groups and those with differing physical needs and household compositions, using all available planning mechanisms and tools."*
>
> *…*
>
> *g) The City will develop a city-wide housing strategy that will support the Region of Halton's Housing Strategy and will:*
>
> *…*
>
> *(v) develop:*
>
> *a. minimum targets in support of achieving the Region of Halton's housing mix and affordable and assisted housing targets;*
>
> *b. minimum targets within mid-rise and tall buildings for affordable, assisted and/or special needs housing;*
>
> *c. minimum targets for two (2) and three (3) bedroom units for residential development applications; including minimum targets for 3 or more bedroom units;*
>
> *(vi) consider financial and other incentives, including grants, property tax reductions, infrastructure improvements and Community Improvement Plans to facilitate the provision of affordable housing and/or assisted and special needs housing.*

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

Subject Site

The proposed development will assist the City in meeting its minimum housing unit targets by density type. It will also diversify the existing housing stock by providing a range of unit sizes and formats, including two and three-bedroom units.

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

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

1. *Affordable rental housing should meet the demand of households at the low end, as described in the Region of Halton's annual State of Housing Report. Such households would be able to afford at least three out of ten rental units on the market.*
2. *Affordable ownership housing should meet the demand of households at the high end, as identified in the Region of Halton's annual State of Housing Report. Such households would have sufficient income left, after housing expenses, to sustain the basic standard of living."*

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

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

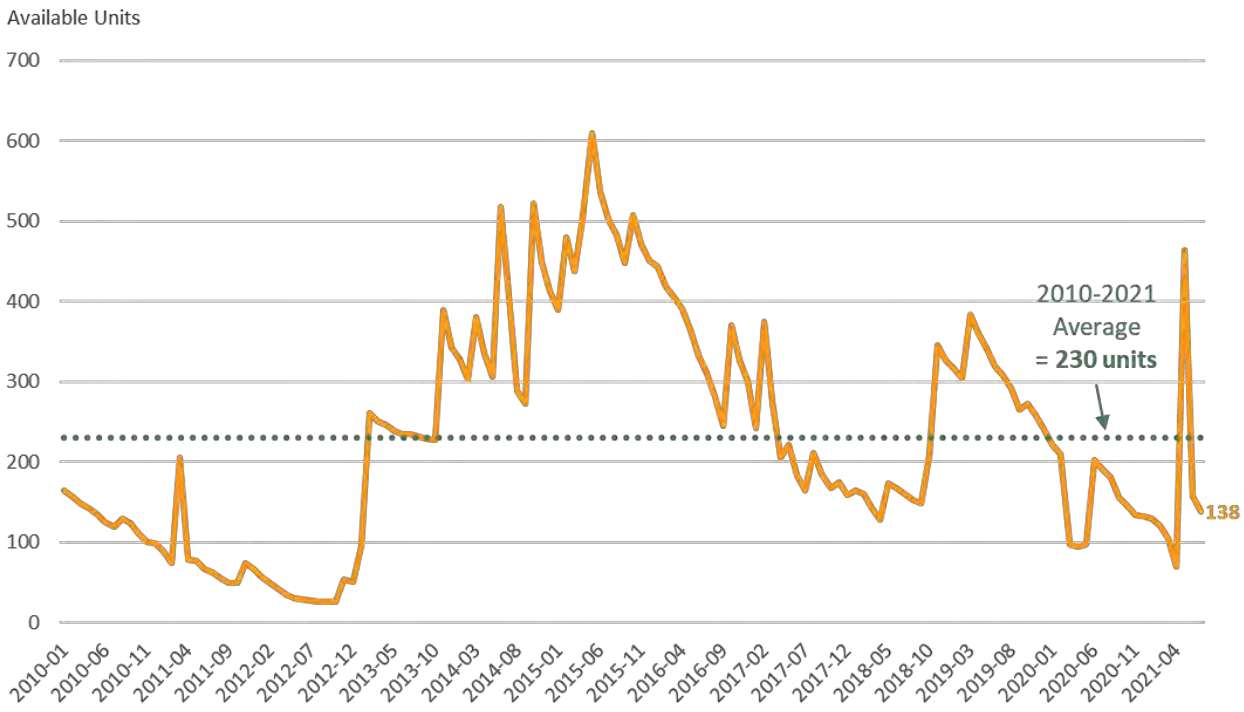
4.0 Halton Region Housing Targets

4.1 Unit Mix Targets

As noted earlier, Policy 86. (6) a) of the Halton Region Official Plan identifies a housing target that at lease 50% of new housing produced annually in the Region be in the form of townhouse or multi-storey buildings. The 117 units proposed on the subject site will assist the Region in achieving this target, as all units will be apartment units.

Further, the units proposed on the subject site will help increase the supply of housing in Burlington. By accommodating new apartment units on the subject site, it will indirectly support housing affordability City-wide by ensuring there is a sufficient supply of apartment units to meet forecast demand. As shown in Figure 4-1, the supply of new condominium apartment units available for sale in Burlington in mid-2021 (138 units), was well below the average number available between 2010 and 2021. If the units proposed on the subject site are ultimately developed as condominium apartment units, it will increase the supply of units available for sale.

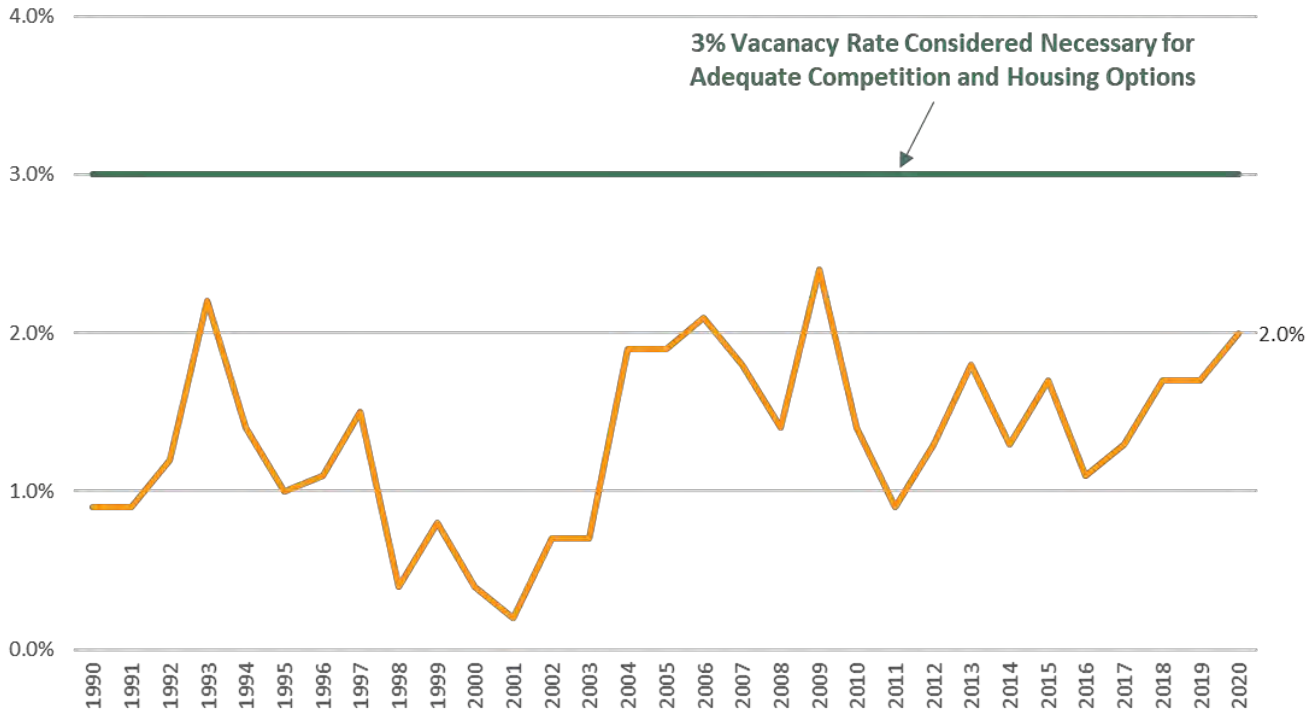
Figure 4-1: City of Burlington, Inventory of Available New Condominium Apartment Units



SOURCE: urbanMetrics inc. based on Altus Data Studio.

Similarly, the vacancy rate of 2.0% in Burlington in 2020 was below the 3% vacancy rate identified by CMHC to ensure adequate competition and housing options. Therefore, if the units on the subject site are ultimately developed as rental apartment units, it will add to the supply of rental units in the City and increase housing choice.

Figure 4-2: City of Burlington Purpose-Built Rental Apartment and Townhouse Vacancy Rate



SOURCE: urbanMetrics inc. based on data from CMHC.

4.2 Intensification Targets

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

The proposal for the subject site will directly support the City's and Region's ability to meet their intensification target through to 2031. Furthermore, as part of the ongoing MCR, the Region is testing growth concepts with 50% to 80% intensification. Therefore, it will be increasingly important to accommodate units through intensification, including on the subject site, if the City and Region are to meet these targets.

4.3 Affordable Housing Targets

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

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

Current Opportunities to Provide Affordable Housing

Currently, Halton Region utilizes various programs to support affordable housing opportunity and delivery. Programs exist that convert condominium or apartment units from market priced units to assisted units. One program is **Halton Region's Assisted Housing Program**, which centers on reducing the cost of housing for individuals and families who cannot afford their rent. The program is grounded on **Rent-Geared-to-Income** assistance, and provides rent supports to individuals and households who cannot afford their existing rental rates. The program relies on landlords contributing a number of units to the program. Halton Region, based on individual or household eligibility, then places applicants in these units. The housing subsidy for the required rental fees—which is determined based on each individual's household income—is paid directly to the landlord. At the time of the 2020 State of Housing Report, there were 781 households in Halton Region utilizing these rent supports.

Halton Region also offers the **Halton In-Situ Program** ("HIP") that offers an ongoing housing allowance to residents who qualify for assisted housing. This program provides residents with a monthly rental allowance with the goal of keeping people in the communities where they live. At the time of the 2020 State of Housing Report, there were over 290 families in Halton Region supported by the HIP program.

Furthermore, social housing development is supported through **Regional Development Charges.** Halton Region has a social housing development charge included in the development charges by-law. Based on current development charge rates, the 117 units proposed on the subject site will contribute approximately $45,000 in development charges for social housing.

Emerging Opportunities to Provide Affordable Housing

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

Inclusionary Zoning

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

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

In January 2021, the City of Burlington prepared a staff report outlining a proposed Terms of Reference to complete a Housing Strategy. A component of this Housing Strategy is the completion of an inclusionary zoning municipal assessment report. The results of this inclusionary zoning municipal assessment report will provide direction on the viability of adopting an inclusionary zoning by-law in the City. An inclusionary zoning by-law will allow the City to secure affordable units within Protected Major Transit Station Areas (PMTSAs).

Depending on the direction of the Housing Strategy, if the City of Burlington implemented a development permit system, it could allow the City to also secure affordable units outside of PMTSAs, which would include the subject site.

Community Benefits Charge

Community Benefits Charges ("CBCs") are paid to lower and single-tier municipalities for high-density developments with 5 or more storeys and 10 or more units. Under the revised Section 37 of the Planning Act, municipalities will need to adopted 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 but not limited to—services, facilities, and other matters identified by each municipality.

Assuming the City of Burlington adopts a CBC By-law (and related CBC strategy), the CBC would enhance flexibility for which to fund growth-related costs in Burlington. This could include funds to support affordable housing.

5.0 Conclusions

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

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);	
(v) How the proposal contributes to achieving the Region of Halton housing targets, including identification of any proposed new affordable or assisted housing units.	The proposed development of 117 apartment units on the subject site would contribute towards the Region's achievement of two housing targets: 3) **Policy 86 (6) a)** – As all units in the proposed development will be apartment units, the development will contribute towards the Region's achievement of the target that 50% of new units be in the form townhouse and apartment units. 4) **Policy 86 (6) b)** – As the proposed development is located within the built-up area, all units will contribute towards the Region and City meeting the intensification target. At this time, the Landowners have not identified if any of the new units in the proposed development will meet the regional definition of affordable or assisted housing units. However, the increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand. Also, by introducing a mix of unit formats and types, the proposed development would appeal to a range of current and future residents.
(vi) How the estimated rents and/or initial sales prices of the development are at or below the affordable housing thresholds by type;	The estimated potential rent or sale price for units in the proposed development have not been determined. If the development was to be constructed as condominium apartment units, it is not expected that the units will meet the Region's definition of affordable housing.
(vii) Where construction of the units is expected to occur in phases, information regarding the number of	As this development includes only one building, it is not expected that the development will occur in phases.

affordable housing units to be provided per phase, where applicable.	
(viii) The proposed legal and/or financial mechanisms to ensure the delivery of any proposed new affordable housing commitments, and mechanisms to retain the long term affordability of units, where applicable.	While the Landowners are currently not committing to the development of affordable housing units on the subject site, the provision and inclusion of affordable housing City-wide could be supported by existing and potential future policies and mechanisms. These mechanisms include rent-geared-to-income assistance, the Halton In-Situ Program, inclusionary zoning and Community Benefits Charges.
6) Comprehensive review of the proposal from an existing use and a proposed use perspective with a focus on affordability, unit/bedroom count, etc.	The subject site is currently occupied by two residential dwellings that were previously used for commercial purposes. The 117 units that are proposed will result in the denser form of development that will help the City and Region meet their housing needs. Based on the current concept plan for the subject site, 76% of units will contain one-bedroom, with the remaining 24% of units containing two or more bedrooms.
7) Identify and discuss the proposed development in the context of Halton Region's Housing policies, and the Region's most recent State of Housing Report (note: the Region issues a State of Housing Report annually and any justification should reflect the current year report); and	As noted previously, by proposing to include apartment units at a location within the built-up area, the subject site would help achieve Policy 86(6) in the Regional Official Plan. The subject site would increase the overall supply of new housing units in the City of Burlington and in Halton Region. The increased supply of housing would indirectly support housing affordability by ensuring there is sufficient supply to accommodate forecast demand.
8) Should identify and discuss other relevant and current housing information available.	If the City of Burlington develops an Inclusionary Zoning by-law, it will provide an opportunity to secure affordable units in new developments within PMTSAs. Furthermore, if the City were to implement a development permit system, it would provide an

	opportunity to also secure affordable units outside of PMTSAs, including on the subject site.

Appendix A Halton Region Official Plan

Figure 5-1: Halton Region Housing Targets and Phasing

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	Minimum Overall *Development Density* in *Designated Greenfield Area* (Residents and Jobs Combined Per Gross Hectare)[1]
Burlington	8,300	45
Oakville	13,500	46
Milton	5,300	58
Halton Hills	5,100	39
Halton Region[2]	32,200[2]	50

[1] *In the measurement of these densities, the area of the Regional Natural Heritage System is excluded.*

[2] *This number represents 40 per cent of the new housing units occurring within Halton Region between 2015 and 2031.*

TABLE 2A REGIONAL PHASING

Municipality	2012-2016	2017-2021	2022-2026	2027-2031
Halton Region				
Units in *Designated Greenfield Area*	**17,899**	**16,606**	**16,350**	**14,371**
Low Density Units	11,322	11,398	9,855	10,622
Medium & High Density Units	6,577	5,208	6,495	3,749
Units inside the *Built Boundary*	**9,187**	**12,245**	**11,606**	**11,699**
Employment	**37,460**	**39,191**	**28,026**	**34,290**

Municipality	2012-2016	2017-2021	2022-2026	2027-2031
Oakville				
Units in *Designated Greenfield Area*	**6,155**	**5,152**	**2,206**	**1,251**
Low Density Units	3,382	3,354	477	699
Medium & High Density Units	2,773	1,798	1,729	552
Units inside the *Built Boundary*	**4,235**	**5,068**	**4,323**	**4,189**
Employment	**15,516**	**14,311**	**1,782**	**5,781**
Burlington				
Units in *Designated Greenfield Area*	**428**	**432**	**133**	**221**
Low Density Units	287	302	106	123
Medium & High Density Units	141	130	27	98
Units inside the *Built Boundary*	**2,525**	**2,758**	**2,669**	**2,659**
Employment	**3,055**	**4,136**	**1,299**	**1,204**
Milton				
Units in *Designated Greenfield Area*	**10,644**	**10,175**	**10,075**	**9,126**
Low Density Units	7,030	6,991	7,067	7,398
Medium & High Density Units	3,614	3,184	3,008	1,728
Units inside the *Built Boundary*	**1,910**	**3,502**	**2,558**	**2,764**
Employment	**18,102**	**18,552**	**15,525**	**17,699**
Halton Hills				
Units in *Designated Greenfield Area*	**672**	**847**	**3,936**	**3,773**
Low Density Units	623	751	2,205	2,402
Medium & High Density Units	49	96	1,731	1,371
Units inside the *Built Boundary*	**517**	**917**	**2,056**	**2,087**
Employment	**787**	**2,192**	**9,420**	**9,606**

SOURCE: Halton Region Official Plan.