

February 27, 2019

Charles O'Hara
Ontario Growth Secretariat
Ministry of Municipal Affairs
c/o Business Management Division
777 Bay Street
Toronto, Ontario
M5G 2E5

Dear Mr. O'Hara:

**RE: Comments on Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017- ERO Number: 013-4504
Emshih Developments Inc. 800 Burloak Drive, Burlington
OUR FILE: 15831**

MHBC is retained by Emshih Developments Inc. with respect to the lands located at 800 Burloak Drive in the City of Burlington (the "Subject Lands"). The Subject Lands are located within the Urban Area of the City of Burlington, are currently designated General Employment, in accordance with Schedule B of the City of Burlington Official Plan and are further identified within the Region of Halton's Employment Areas on Map 1- Regional Structure of the Halton Region Official Plan.

We have reviewed the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017, and we note that the Subject Lands are not identified as being within a Provincially Significant Employment Zone (PSEZ), in accordance with the proposed PSEZ Mapping that forms part of Amendment 1 to the Growth Plan. We would like to express our support for this as we agree that the Subject Lands do not warrant such a designation.

While we are supportive of the Provincial PSEZ mapping, as it pertains to the Subject Lands, we note that the City of Burlington has prepared comments to the province which recommend that the Subject Lands either be added or that policies be modified to acknowledge the primacy of a Regional Official Plan that identifies an employment area.

We do not agree with the City's recommendation with respect to the Subject Lands, and submitted a letter to Council indicating such. Based on prior review and analysis undertaken, it is our opinion that the Subject Lands are a very small and isolated parcel with limited ability to develop for employment uses due to adjacent sensitive uses and, therefore, are not appropriate for inclusion in the PSEZ. A copy of that submission is attached to this letter for your information. We kindly request that in reviewing the City's comments that you do not add the Subject Lands to the PSEZ boundary.

We appreciate the opportunity to comment on the Amendment 1 to the Growth Plan and request that Council consider making a motion to amend the submission to address our concerns contained herein.

Yours truly,

MHBC

A handwritten signature in black ink, appearing to read "Kelly Martel", with a period at the end.

Kelly Martel, M.Pl, MCIP, RPP
Associate

cc: Dr. Michael Shih, Emshih Developments
Jeffrey Kelly, Emshih Developments
Kristina Didiano, Emshih Developments

February 26, 2019

Mayor Marianne Meed Ward and Members of Council
City of Burlington
426 Brant Street, Box 5013
Burlington, ON
L7R 3Z6

Ms. Heather MacDonald, MCIP, RPP, CHRL
Director of City Building and Chief Planning Official
Planning and Building Department
City of Burlington
426 Brant Street, Box 5013
Burlington ON,
L7R 3Z6

Dear Mayor Meed Ward, Members of Council and Ms. MacDonald:

**RE: Comments on the City of Burlington Submission related to the Proposed Amendment 1 to the Growth Plan for the Greater Golden Horseshoe, 2017 (PB-18-19)
Emshih Developments Inc. 800 Burloak Drive, Burlington
OUR FILE: 15831**

MHBC is retained by Emshih Developments Inc. with respect to the lands located at 800 Burloak Drive in the City of Burlington (the "Subject Lands"). The Subject Lands are currently designated General Employment, in accordance with Schedule B of the City of Burlington Official Plan. They are further identified within the Region of Halton's Employment Areas on Map 1- Regional Structure of the Halton Region Official Plan.

We have reviewed Information Report PB-18-19, including the draft submission letter to the Province and associated appendices as they relate to the Subject Lands and note the following:

- The Subject Lands are not identified as being within a Provincially Significant Employment Zone (PSEZ), in accordance with the proposed PSEZ Mapping that forms part of Amendment 1 to the Growth Plan;
- The Subject Lands, in accordance with Appendix A-3 of the City's proposed comment submission are recommended by staff to be added to the PSEZ; or, modify policy to acknowledge the primacy of a Regional Official Plan that identifies an employment area;
- The City, through their Official Plan Review (OPR) process, retained Dillon Consulting to undertake a review and analysis of the City's Employment Lands and, through this review, it was determined that the Subject Lands be converted to a non-employment land use and be

removed from the City of Burlington Employment Lands Inventory and be removed from the Region of Halton Employment Areas Overlay on the Urban Area in Map 1;

- This recommendation was supported based on planning rationale outlined in Dillon's report, being that the parcel is small and isolated from the employment lands to the north and is constrained for development for employment uses due to its proximity to sensitive residential uses (see attached for a copy of the analysis and recommendations); and,
- On the basis of the above-noted justification, the City's Adopted (but not approved) Official Plan identified the Subject Lands as Mixed Use Nodes and Intensification Corridors on Appendix A-Urban Structure Vision.

With respect to the above-noted points, it is our opinion that the recommendations contained within PB-18-19 and the City's comment letter to the Province, as they pertain to the Subject Lands, are contrary to the Council approved position with respect to employment land conversions. Further, the recommendation is contrary to the position of staff and the consultants and the analysis undertaken through the Employment Lands Review which recommended the Subject Lands be converted. We are not aware of any updated analysis undertaken by staff or the consultants that would alter this opinion and recommendation to permit the conversion of the Subject Lands to a non-employment land use. As a result, we respectfully request that the City's submission to the province be amended to correct this error by removing the unjustified recommendation to include the Subject Lands within the PSEZ.

We appreciate the opportunity to comment on the City's proposed comments on Amendment 1 to the Growth Plan and request that Council consider making a motion to amend the submission to address our concerns contained herein.

Yours truly,

MHBC



Kelly Martel, M.Pl, MCIP, RPP
Planner

cc: Dr. Michael Shih, Emshih Developments
Jeffrey Kelly, Emshih Developments
Kristina Didiano, Emshih Developments

PROPOSAL TO CONVERT EMPLOYMENT LANDS: Proposal 19

PROPOSAL # 19 - Summary	
ADDRESS 800 Burloak Drive (Ward 5)	
OWNER Emshih Developments Inc.	
PROPONENT (if different from owner) City Initiated	
LAND AREA 2.02 ha	
REQUEST DETAILS	
<p>City staff included this property for review after consideration of the entire vacant employment land inventory. Relatively small, very isolated site which is difficult to develop due to significant transportation access issues. Staff recommends consideration of neighbourhood commercial uses.</p> <p>No planning justification report was submitted.</p>	
EXISTING LAND USE	
Vacant	
ADJACENT LAND USES	
<p>North: Railway Line, employment uses beyond. South: Utility corridor and trail, commercial plaza, residential uses beyond. East: Burloak Drive, various employment uses beyond. West: Sherwood Forest Park</p>	
ON REGION'S EMPLOYMENT AREA OVERLAY? Yes—subject to the Region's Municipal Comprehensive Review.	
EXISTING CITY OP DESIGNATION:	

General Employment

2008 INTENSIFICATION STRATEGY AND EMERGING POLICY DIRECTIONS:

The subject parcel is not located within the Urban Growth Corridor, Urban Growth Centre or Arterial Cores/Regional Malls identified in the 2008 Intensification Strategy.

The subject parcel is not located within a Mobility Hub Zone, generally described in the Mobility Hubs Opportunities and Constraints Study (May 2014).

The subject parcel has been identified as Employment Area in the July 2016 draft Urban Structure outlined in Staff Report PB-29-16.

EXISTING ZONING: GE2-48

INCLUDED IN CITY'S VACANT EMPLOYMENT LAND INVENTORY? Yes

CONVERSION ASSESSMENT – REQUEST 19

(800 Burloak Drive)

ANALYSIS AND RECOMMENDATION

It is recommended that the subject site be converted to a non-employment land use and be removed from the City of Burlington Employment Lands inventory. It is also recommended that the Region of Halton be advised that the lands being recommended for removal from the Burlington Employment Lands inventory may be also removed from the Region of Halton Employment Areas overlay on the Urban Area in Map 1. Support for the conversion is based on the following rationale:

1. The subject parcel is relatively small and isolated from the employment lands to the north by the rail corridor. Its conversion will not have a significant detrimental effect on the overall employment land inventory.
2. The lands to the south are designated Neighbourhood Commercial and Residential - Medium Density. Development of the site for employment uses is constrained by its proximity to sensitive residential land uses.

Notwithstanding this recommendation, only non-sensitive uses should be considered on the subject site so as to not introduce any uses that might impact the long term viability of the employment lands to the north.