

August 11, 2021

The Hon. Minister Clarke  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 17th floor  
Toronto, Ontario  
M7A 2J3

*Via email: sclarke@ontario.ca*

Dear Minister Clarke:

**RE: ERO 019-4071 MINISTRY REFERENCE NUMBER 24-OP-217386  
HALTON REGIONAL OFFICIAL PLAN AMENDMENT NO. 48  
WRITTEN SUBMISSION – ALDERSHOT GREENHOUSES LTD.  
OUR FILE: 20379A**

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MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) are currently retained by Aldershot Greenhouses Ltd. (“Aldershot Greenhouses”) with respect to their lands located at 1097, 1107 and 1135 Gallagher Road in the City of Burlington (the ‘Subject Lands’). Over the past year, Aldershot Greenhouses has submitted requests to the Regional Municipality of Halton (“Region”) to have its lands included within the Aldershot Major Transit Station Area (“MTSA”) boundary.

The Region’s decision to not include the Subject Lands in the Aldershot MTSA as set out in ROPA 48 is, in our opinion, contrary to Provincial policy and does not consider and implement the Ministry’s comments that recommend they be included.

While our planning justification for the inclusion of the Subject Lands has been submitted to the Region and a copy for reference is attached hereto, the following are key considerations for their inclusion:

- In accelerating ROPA 48 in advance of a Preferred Growth Concept by Regional Council, it is unclear how the proposed MTSA boundaries will achieve the minimum density targets of 150 people and jobs per hectare to meet ROPA 38’s targets for 2031, not to mention 2051 targets without all appropriate lands, currently underutilized within the 800 metre radius being included;
- The Subject Lands are within the 15-minute neighbourhood of the Aldershot GO and would achieve the Growth Plan objectives of creating a complete community;
- The Region has inconsistently applied their MTSA criteria, such as “blocks should remain intact to facilitate the cohesive and comprehensive development of an MTSA” and did not apply this criterion to Aldershot Greenhouses’ request to include the Subject Lands within the Aldershot GO MTSA area. Grove Park and Aldershot Park on either side of the Subject Lands were removed citing these lands should be excluded as they are “already established and are not anticipated to change”. The exclusion of these areas does not only allow the MTSA to achieve complete

community elements, or provide an opportunity to implement walking paths directly connecting to the Aldershot GO Station.

- Ministry staff provided comments to the Region on the MTSA boundaries specifically noting the importance of including areas within the 800 metre radius that form part of the community and contribute to the MTSA as a complete community. As noted the Subject Lands are located within this 800 m radius of the MTSA and are underutilized. However they but have been excluded from the boundary without in our opinion any justification.
- The Subject Lands are located within the recently approved, albeit new City of Burlington Official Plan which was approved by the Region in November of 2020. It is unclear why or how the lands are now not considered appropriate by the City of the Region?.

We respectfully request that the Subject Lands, for the reasons outlined in our submission, be included within proposed MTSA boundaries for Aldershot GO Stations to ensure conformity with Provincial policy..

Sincerely,

**MHBC**

A handwritten signature in black ink, appearing to read 'Dana Anderson', written in a cursive style.

Dana Anderson, FCIP, RPP

cc: *Len Vander Lugt, Aldershot Greenhouses Ltd.*

*Attach.*

June 11, 2021

Regional Halton Council  
c/o Regional Clerk Graham Milne  
1151 Bronte Road  
Oakville, Ontario  
L6M 3L1

email: regionalclerk@halton.ca  
email: ropr@halton.ca

Dear Chair Carr and Members of Regional Council:

**RE: REGIONAL OFFICIAL PLAN AMENDMENT NO. 48 ("ROPA 48") STATUTORY PUBLIC MEETING  
MAJOR TRANSIT STATION AREA BOUNDARY ADJUSTMENT  
1097, 1107 AND 1135 GALLAGHER ROAD, BURLINGTON  
OUR FILE: 20379A**

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MacNaughton Hermsen Britton Clarkson Planning Limited ("MHBC") are currently retained by Aldershot Greenhouses Ltd. ("Aldershot Greenhouses") with respect to their lands located at 1097, 1107 and 1135 Gallagher Road in the City of Burlington (the 'Subject Lands'). Over the past year, Aldershot Greenhouses has made multiple requests to the Region to have its lands included within the Aldershot Major Transit Station Area ("MTSA") boundary including a detailed request and justification attached as **Appendix A** to this letter. To date Aldershot Greenhouses has not received any formal response to their written comments or their request for the Subject Lands to be included within the Aldershot GO MTSA.

#### Background

In June, 2020, Halton Region released an Integrated Growth Management Strategy Regional Urban Structure Discussion Paper, which was prepared as part of the Regional Official Plan Review Process (ROPR). The Discussion Paper addressed planning for growth in the Region, Settlement Areas, Community Areas and Employment Areas. The Paper provided an overview of the Region's Major Transit Station Areas (MTSAs) both existing and proposed. The Discussion Paper additionally set out a methodology for delineating the MTSA boundaries. The Discussion Paper stated that "the MTSA delineation exercise identifying the proposed boundaries has taken into account the local plans and

studies completed to date where appropriate.” Based on the methodology provided in Appendix B, there was no assessment, planning rationale or information to clarify why the Subject Lands were removed and not included in the proposed MTSA boundary whereas they were included by the City in its Official Plan Review study process specific to Aldershot GO MTSA.

Discussion question 4 from the Discussion Paper asked *“From the draft boundaries identified in Appendix B and the Major Transit Station Area (MTSA) boundary delineation methodology outlined, do you have any comments on the proposed boundaries? Is there anything else that should be considered when delineating the Major Transit Station Areas?”* On October 30, 2020, comments were provided in response to the Discussion Paper by Aldershot Greenhouses and a formal detailed justification and request was submitted to the Region of Halton to give consideration to include the Subject Lands within the revised Aldershot GO MTSA boundary. As noted, a copy of this request is attached as Appendix A.

In February of 2021, a draft of Regional Official Plan Amendment No. 48 (“ROPA 48”) was proposed as a first phase of the Region’s MCR work and was noted to reflect local plans and priorities. It included the MTSA boundaries but did not reflect the approved local Official Plan’s delineation of the Aldershot MTSA.

The proposed draft Aldershot GO Station MTSA boundary as provided in ROPA 48 continues to be significantly different than the MTSA boundary currently identified in the Council-adopted and Regionally approved City of Burlington Official Plan (currently under appeal). The Region’s proposed Draft Aldershot GO MTSA boundary is significantly reduced in size from the boundary identified in the new Official Plan which was reviewed and studied through the City’s Official Plan Review process which included the Aldershot GO Mobility Hub Study as one of the many studies to inform the City’s new Official Plan. It was through the work completed by the City that the boundary was identified and supported in accordance with the Growth Plan. The boundary was based on the inclusion of strategic lands within 800 metres of the GO Station. In the case of the Subject Lands, they are located within 400 metres of the GO Station.

As noted, the Subject Lands are located within the 800 metre radius of the Aldershot Go Major Transit Station Area, with the closest portion of the Subject Lands approximately 400 metres from the Aldershot Go Station. These lands represent a block of lands directly east and connected to the GO Station. The Subject Lands represent a unique opportunity, due to their size and redevelopment potential, to allow for strategic intensification within walking distance of the GO Station that can implement appropriate buffering and setbacks to the surrounding mature neighbourhoods. The inclusion of the lands conforms to the Growth Plan policy that requires the inclusion of a diverse mix of land uses (Section 2.2.1(a)).

Allowing for the inclusion of Grove Park within the MTSA boundary would also implement an immediate connection from the Subject Lands to the Aldershot GO parcel to the immediate west of Grove Park, as originally envisioned in the Draft Precinct Plan for the Aldershot GO Mobility Hub Preferred Concept which planned for an active transportation connection along the southern limits of the rail corridor. The inclusion of existing parks within MTSA areas should be an important planning principle to achieve complete community elements within the MTSA’s. It is unclear why the Regional delineation would exclude such areas. In our opinion, this is contrary to the Growth Plan which states in Section 2.2.1(4): “Applying the policies of this Plan will support the achievement of *complete communities* that...(d) expand convenient access to: iii) an appropriate supply of safe, publicly-accessible open spaces, parks, trails and other recreational facilities.”

On April 12, 2021, a meeting was held with Regional Planning staff to discuss Aldershot Greenhouse's October 2020 submission, comments and request. It was raised at the meeting that there had been no formal response to the request and it was unclear how the comments provided had been considered in the preparation of ROPA 48. A question was also asked as to where and when the comments on the Discussion Paper and ROPA 48 would be made public as part of the public planning process. We believe it is important for Regional Council to have all available information before them to inform the decision making on critical growth issues. While the Phase 2 Initial Consultation Summary provided a high level overview of themed comment areas and on-line survey results, it did not identify key issues and concerns and illustrate how they had or were being addressed in the current recommended draft of ROPA 48. In fact, landowners and stakeholders who provided specific comments were not identified and their comments were not addressed as part of a public response document. Discussions with Regional staff regarding boundaries and impacts to specific properties took place after ROPA 48 was issued.

At the meeting on April 12, 2021, Regional staff advised that they removed the Subject Lands from the MTSA boundary as a result of removing Grove Park, and the lands to the south that included an existing place of worship and the additional Aldershot Park. The rationale provided was that these areas were part of an existing established neighbourhood and should not be part of the MTSA. This response, again in our opinion, is completely contrary to integrated planning principles as established by the Growth Plan for building complete communities. In fact, it sets a dangerous precedent to completely disconnect existing built up areas from strategic growth areas. It is also unclear why the Region did not remove the Subject Lands when they were included and approved by both the City and the Region within the City's new Official Plan in accordance with the Growth Plan.

The Subject Lands should be included together with Grove Park in the Aldershot GO MTSA boundary for several reasons:

- The lands are within 400 metre of the station;
- The lands are under utilized and represent an ideal location given their size and location to provide for much needed housing supply and redevelopment that can be appropriately designated and transitioned;
- The lands were included, supported and justified in the Preferred Draft Precinct Plan endorsed by the City of Burlington through the Aldershot Go Station Mobility Hub Study;
- The lands were included, supported and justified in the City's new Official Plan which envisions an active transportation connection along the southern limits of the rail corridor;
- The lands were included, supported and justified in the City's new Official Plan as part of the MTSA to accommodate growth to 2031. The growth targets are now required to be met to 2051 as provided in the Growth Plan (2020) and the removal of lands within walking distance of the MTSA reduces the ability to address the growth requirements;
- There is no support or justification provided based on the methodology for MTSA boundary delineation as to why the Subject Lands should not be included; and
- The inclusion of the Subject Lands is in conformity with the Growth Plan and advances the planning policies as noted.

For the reasons outlined above, we would recommend the Aldershot GO Station Area boundary be amended to include Grove Park and the Subject Lands to maintain elements of a complete community for the MTSA and the broader community and to ensure sufficient land is provided to meet the Region's growth targets and reflect the local plans.

Sincerely,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner

*Attach.*

CC: Curt Benson, Region of Halton  
Karyn Poad, Region of Halton  
Allison Enns, City of Burlington

# APPENDIX A

**Response Letter Submitted  
to Region, October 30, 2020**

October 30, 2020

Dan Tovey, RPP, MCIP  
Manager of Policy Planning  
Region of Halton  
1075 North Service Road West  
Oakville, Ontario  
L6M 2G2

Dear Mr. Tovey:

**RE: REGION OF HALTON OFFICIAL PLAN REVIEW  
MAJOR TRANSIT STATION AREA BOUNDARY ADJUSTMENT REQUEST  
1097, 1107 AND 1135 GALLAGHER ROAD, BURLINGTON  
OUR FILE: 20379A**

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## **OVERVIEW**

MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) are currently retained by Aldershot Greenhouses Ltd. with respect to their lands located at 1097, 1107 and 1135 Gallagher Road in the City of Burlington (the ‘Subject Lands’).

The Region recently released an Integrated Growth Management Strategy Regional Urban Structure Discussion Paper dated June 2020, which was prepared as part of the Regional Official Plan Review Process (ROPR). The Discussion Paper addresses planning for growth in the Region, Settlement Areas, Community Areas and Employment Areas. The Paper provides an overview of the Region’s Major Transit Station Areas (MTSAs) which are currently identified as eleven existing and proposed MTSA symbols on Map 1 of the ROP. The Growth Plan (2020) now requires Halton Region, in consultation with Local Municipalities to delineate the boundaries of MTSAs on Priority Transit Corridors, and identify a minimum density target. In the ROP, Mobility Hubs and MTSAs are currently defined and identified but were not required to be delineated and assigned a minimum density target under the previous Growth Plan (2006).

Building upon and complementing the Growth Scenarios Report (June 2019), the Discussion Paper presents further information on the development of a Regional Urban Structure as an integral foundation to the development of Growth Concepts, providing alternatives on how and where growth can be accommodated in Halton. To inform the Growth Concepts, technical work is being completed in accordance with provincial policies, including the delineation of the boundaries of the MTSAs. MTSA boundaries must be delineated by Halton Region in its Official Plan, in consultation with Local



Municipalities, and in a transit-supportive manner that maximizes the size of the area and the number of potential transit users that are within walking distance of the station.

MTSAs include GO Train stations on the Lakeshore West, Milton and Kitchener GO lines, currently identified by a symbol on Map 1 of the ROP. The MTSAs are also identified as Mobility Hubs in the Metrolinx Regional Transportation Plan. MTSAs are defined by the Growth Plan as the area including and around any existing or planned Higher Order Transit station within a Settlement Area; or the area including and around a major bus depot in an urban core. MTSAs generally are defined as the area within a 500 to an 800-metre radius of a transit station, representing a 10-minute walk. The Growth Plan does not define the term “major bus depot”.

The locations of MTSAs and proposed MTSAs are identified in the Discussion Paper, including the Aldershot Go Station MTSA. The proposed Draft Aldershot Go Station MTSA boundary has been significantly modified from the Mobility Hub boundary currently identified in the Council-adopted City of Burlington Grow Bold Official Plan which includes the Subject Lands. The Region’s proposed Draft Aldershot Go MTSA boundary has significantly reduced in size from the Mobility Hub boundary identified in the Grow Bold Plan and has resulted in the removal of the Subject Lands.

The City of Burlington’s formal response to the Region in Report PL-28-20 that was brought forward to the Community Planning, Regulation and Mobility Committee on September 22<sup>nd</sup>, 2020 and Council on September 28<sup>th</sup>, 2020 notes the following:

*“The proposed MTSA boundary for Aldershot GO has the most differences from the City’s Mobility Hub boundary for Aldershot GO. **The key changes in the Region’s proposed Aldershot GO MTSA boundary are the exclusion of Grove Park, Aldershot Park and the properties located at 1135 Gallagher Road and 1200 King Road.** Staff note that the lands at 1200 King Road are addressed in Minutes of Settlement between the City and the owner of those lands, Paletta International Corporation. The City agreed, through the Minutes of Settlement, to conduct a review to determine whether the portion of the 1200 King Road lands located west of Falcon Creek should be developed with MTSA land uses. That review, which includes a natural heritage component, has not yet been completed. City staff await a response from the Province respecting the natural heritage review that has been completed for these lands. Once received, the City will consider the Province’s comments and conclude its review. The Region has noted that the proposed Aldershot GO MTSA boundary as presented in the IGMS Discussion Paper is consistent with the Region’s delineation methodology to follow the Natural Heritage System (NHS) boundary.”*

This same comment is repeated in Appendix A to the Report. No formal comment from the City has been made on their support for the removal of the Subject Lands (noted here as 1135 Gallagher Road). It is not clear however why the City on October 7<sup>th</sup> finalized modifications to the Grow Bold Official Plan, including updates to the land use schedules, which maintained the Mobility Hub/MTSA boundary that includes the Subject Lands.

This letter outlines a request to modify the currently proposed Draft Aldershot Go Station MTSA boundary to consider the inclusion of the Subject Lands in accordance with the Aldershot Go Mobility Hub boundary identified in the Council-adopted Grow Bold Official Plan, as recently modified and forwarded to the Region for approval, in order to facilitate the future redevelopment of the Subject Lands for residential intensification. This request outlines the current physical and policy context of the Subject lands and provides justification for the MTSA boundary modification by way of an assessment of the Regional criteria as set out in the Discussion Paper.

## PHYSICAL CONTEXT

### Existing Conditions

As illustrated on **Figure 1**, the Subject Lands are located at 1097, 1107 and 1135 Gallagher Road northeast of where Gallagher Road intersects with Plains Road East in the City of Burlington. The properties collectively are rectangular in shape with an area of approximately 4.08 hectares (10.08 acres), with a frontage of approximately 150 metres of frontage on Gallagher Road and 20 metres of frontage on Enfield Road. The Subject Lands are currently occupied by the Aldershot Greenhouses at 1135 Gallagher Road, a single-detached residential house at 1097 Gallagher Road and a single-detached residential house at 1135 Gallagher Road.

### Adjacent Uses

The site is surrounded by the following uses:

**North:** Railway line

**East:** Single-detached residential on Dowland Crescent

**South:** Aldershot Tennis Club, Aldershot Park, Holy Rosary Catholic School and Holy Rosary Church

**West:** Grove Park and single-detached residential

### Transportation

The Subject Lands are located approximately 380 metres south of Highway 403, and approximately 400 metres from the Aldershot GO Station. Burlington Transit Route 1 serves the Subject Lands along Plains Road East and provides service to Appleby GO, Burlington GO, and Hamilton. The transit stops for this route are approximately 500 metres south of the Subject Lands. Burlington Transit Route 4 serves the Subject Lands along Waterdown Road and provides service to Aldershot GO, Joseph Brant Memorial Hospital, Burlington Downtown Transit Terminal, and Appleby GO. The transit stops for this route are approximately 600 metres south of the Subject Lands.

In terms of active transportation, Waterdown Road provides a protected bike lane which serves the Subject Lands. Waterdown Road is approximately 1.0 km southwest from the Subject Lands. Plains Road provides a protected bike lane from Gallagher Road to Walkers Line. Plains Road is located approximately 500 metres south of the Subject Lands. Masonry Court and St. Matthews Avenue provide Shared Use Lane (Sharrows) for bicycles. Masonry Court and St. Matthews Avenue is located approximately 500 metres southwest of the Subject Lands).

## POLICY CONTEXT

### Halton Region Official Plan

As shown on **Figure 2**, the Subject Lands are designated as Urban Area (Map 1, Urban Structure) under the ROP and are within close proximity to the Aldershot Go Major Transit Station Area.

### **City of Burlington Official Plan (Office Consolidation December 2019)**

As shown on **Figure 3**, the Subject Lands are designated as Residential - Medium Density (1135 Gallagher Road) and Residential – Low Density (1097 and 1107 Gallagher Road) in the in-effect City of Burlington Official Plan (Schedule B, Comprehensive Land Use Plan – Urban Planning Area).

In Residential-Low Density areas (**Policy 2.2.2.c and Policy 2.2.2.g.i**), single-detached and semi-detached housing units with a density to a maximum of 25 units per net hectare are permitted. Other forms of ground oriented housing units with a density to a maximum of 25 units per net hectare may be permitted, provided that these forms are compatible with the scale, urban design and community features of the neighbourhood.

In Residential-Medium Density areas (**Policy 2.2.2.d and Policy 2.2.2.g.ii**), detached and semi-detached homes, townhouses, street townhouses and stacked townhouses, back to back townhouses, attached housing and walk-up apartments with a density ranging between 26 and 50 units per net hectare are permitted.

### **City of Burlington Grow Bold Official Plan (Council Adopted on April 26, 2018)**

As shown on **Figure 4**, the Subject lands are designated as Residential Neighbourhood Areas within the Aldershot Mobility Hub in the Council-adopted City of Burlington Official Plan (Schedule B, Urban Structure).

Lands identified as Residential Neighbourhood Areas (**Section 8.3**) are intended to provide for housing and other residential supportive land uses. Housing may take many forms ranging from single detached homes to tall buildings and will occur primarily in the form of intensification within existing areas. The City's Residential Neighbourhood Area is comprised of three land use designations based on density and building types: Residential – Low Density, Residential – Medium Density and Residential – High Density, identified on Schedule C: Land Use - Urban Area, of this Plan as further discussed below.

The Subject Lands are identified as within the Aldershot Go Mobility Hub. Mobility Hubs (**Section 8.1.2**) are an important component of the City's Urban Structure, Growth Framework and transportation network. They are located in key areas served by the regional and local transit networks and are focal points for higher intensity and mixed use development that will accommodate a significant share of the City's future population and employment growth to 2031 and beyond. The Mobility Hub policies of the Official Plan are meant to guide new development applications that precede the development of area-specific plans for each hub. The objectives for Mobility Hubs (**Policy 8.1.2(1)**) include the following:

- a) To develop area-specific plans for each of Burlington's mobility hubs.*
- b) To develop the mobility hubs into compact, pedestrian, environmentally sustainable and transit-supportive places each with a distinct character.*
- c) To promote intensification in order to achieve transit-supportive residential and employment density targets.*
- d) To establish the mobility hubs as areas largely characterized by mixed use development that will strengthen the shop/live/work relationship and facilitate vibrancy day and night within the mobility hubs.*
- e) To provide a network of complete streets which provide for the efficient, accessible and safe movement of people and goods and which prioritize pedestrian, bicycle and transit activities.*

- f) To develop mobility hubs into effective multi-modal transit station areas that provide seamless connections between different modes of transportation, including frequent transit corridors.*
- g) To ensure mobility hubs have strong and integrated multi-modal connections with adjacent areas.*
- h) To prioritize the development of surface parking lots and the intensification of underutilized lands and buildings.*
- i) To maintain existing and encourage new employment functions and uses which are compatible with other uses and serve to make mobility hubs an employment destination within the city.*
- j) To provide low-rise, mid-rise and tall building forms, where appropriate, that support a variety of demographics in mobility hubs.*
- k) To provide opportunities for a range of small and medium-scale retail and service commercial uses that serve the needs of residents and employees in the mobility hub.*
- l) To encourage the accommodation of a diverse range of household sizes and incomes in mobility hubs.*
- m) To ensure the provision of a range of open spaces and connections.*
- n) To ensure that there is an appropriate transition in scale, intensity, height, massing and spacing of development in mobility hubs.*
- o) To enhance the existing physical character of Established Neighbourhood Areas, as identified on Schedule B-1: Growth Framework, of this Plan, within mobility hubs.*
- p) To achieve design excellence in mobility hubs that will encourage long-term investment and the creation of high quality and sustainable built forms in the public and private realm.*
- q) To prioritize and implement innovative sustainable energy, water, landscape and waste management practices.*
- r) To target carbon neutrality in mobility hubs through the use of district energy, sustainable building measures and other innovative approaches.*
- s) To plan for and provide public service facilities that support future population and job growth.”*

As shown on **Figure 5**, the Subject Lands are also designated as Primary Growth Area in the Council-adopted City of Burlington Official Plan (Schedule B-1, Growth Framework).

Lands designated as Primary Growth Area (**Policy 2.4.2.(1)a**) shall be recognized as a distinct area within the City's Urban Area accommodating the majority of the city's forecasted growth over the planning horizon of this Plan and beyond, and consequently will experience the greatest degree of change. These areas shall be regarded as the most appropriate and predominant location for new tall buildings in accordance with the underlying land use designations, or the land use policies of an area-specific plan. Primary Growth Areas are identified as priority locations for City-initiated area-specific planning and for investments in transit as well as other types of infrastructure and public service facilities, including parks to support population and employment growth and shall support the frequent transit corridors and accommodate development that is compact, mixed use, and pedestrian-oriented in nature. Area-specific plans are to be developed for these areas. The City prepared a Draft Aldershot Go Mobility Hub Precinct Plan as further discussed below.

As shown on **Figure 6**, the Subject Lands remain designated as Residential – Medium Density and Residential – Low Density in Schedule C, Land Use- Urban Area.

Lands designated as Residential – Medium Density (**Policy 8.3.4(1)**) permit ground and non-ground-oriented dwellings including single-detached and semi-detached dwellings, townhouses, street townhouses, stacked townhouses, back-to-back townhouses and low-rise residential buildings at a density of 26 to 75 units per net hectare. Lands designated as Residential – Medium Density permit a maximum height of 3 storeys for ground-oriented dwellings or 4 storeys for non-ground-oriented dwellings with non-ground oriented buildings permitted only at the periphery of existing neighbourhoods.

Lands designated as Residential – Low Density (**Policy 8.3.3(1)**) permit single-detached and semi-detached dwellings and townhouses may be considered through way of Zoning By-law Amendment and subject to maintaining the planned density, compatibility, respecting physical character and providing functional amenity area at-grade. Lands designated Residential – Low Density permit a maximum density of 25 units per net hectare with maximum heights established through the Zoning By-law.

It is also noted that the Council-adopted modifications to the Official Plan on October 7<sup>th</sup>, 2020 maintain the Residential Neighbourhood Areas and Mobility Hub designations in the modified Schedule B, Urban Structure as well as the Primary Growth Area designation in the modified Schedule B-1, Growth Framework.

### **Aldershot Go Mobility Hub Precinct Plan**

In 2014, through the Official Plan Review process, the City completed the Mobility Hubs Opportunities and Constraints Study, which provided a high-level analysis of each of the City's Mobility Hubs and informed the development of the study areas for future Area Specific Planning work to be done in each of the Mobility Hubs.

The creation of Area Specific Plans (ASPs) for each of Burlington's four Mobility Hubs was identified as a key priority for City Council through the development of Burlington's 2015-2040 Strategic Plan.

In July 2016, Burlington City Council approved Staff Report PB-48-16 which outlined a work plan to develop four ASPs, one for each of Burlington's Mobility Hubs. The project was approved to commence by City Council. It then commenced in April 2017.

On December 4, 2017, staff brought forward Report PB-76-17, which presented preferred concepts and supporting technical memos for the GO Station Hubs (Aldershot, Burlington, and Appleby GO) for community and Council feedback and discussion. The preferred concepts outlined land uses and building heights within each of the three GO Station Hubs. These preferred concepts were based upon public and stakeholder feedback and were intended to prompt discussion regarding the emerging vision for each of the hubs.

At the July 12, 2018 Committee of the Whole Workshop Meeting, a Report was brought forward with Draft Precinct Plans presented for the Aldershot GO, Burlington GO and Appleby GO Mobility hubs.

Within the Aldershot GO Mobility Hub, the following were identified as unique objectives for the area:

- Recognizing the need to vary the maximum heights for new mid-rise development within the hub in order to achieve sensitive transitions to established residential neighbourhood areas outside of the hub;
- Concentrating higher intensity development on large brownfield/greyfield sites that contain existing employment uses in order to encourage mixed use development;
- Recognizing the existing employment function in the area and planning for future employment and commercial uses in the hub;
- Planning for flexible commercial and retail spaces that can respond to the changing commercial / retail landscape;
- Creating new streets and active transportation connections to enhance the existing transportation network, including the establishment of new east-west corridors which will improve permeability through the area for pedestrians and cyclists and mitigate traffic associated with future growth; and

- Focusing height away from Plains Road and towards the rail corridor to concentrate future residents in close proximity to the GO station and to maintain the mid-rise vision for Plains Road.

In the Draft Precinct Plan for the Aldershot Go Mobility Hub (**Figure 7**) the Subject Lands were identified as within the Grove Park/St. Matthew's Neighbourhood Precinct and planned for street-oriented townhouses along the southern, eastern and western limits. The interior of the site was identified as within the Mid-Rise Residential Precinct and planned for mid-rise built form with heights up to 11 storeys. The Precinct Plan also identifies a direct pedestrian connection proposed from the site along the northern property limits along the railway corridor and through Grove Park to the Aldershot Go Station as well as an east-west pedestrian connection through the site.

Following this meeting, the Mobility Hub Study, including further refinement to the Draft Precinct Plan and development of the Area Specific Plan (Secondary Plan), were put on hold following the completion of other City studies, including the re-examination of the new Official Plan.

## MTSA DELINEATION ASSESSMENT

The following table provides justification and rationale for the proposed inclusion of the Subject Lands within the Aldershot MTSA boundary (**Figure 8**) based on the criteria set out in the Discussion Paper.

### 1. Major Transit Station Area Boundary Delineation Methodology

Criteria	Criteria Explanation	Rationale/Justification
1	<p><b>Establish the Preliminary 800m Radius around the Major Transit Station</b></p> <p>According to the Growth Plan (2019) areas candidate to be within a MTSA boundary should be within a 500m to 800m radius of the transit station.</p> <p>These catchment areas provide a preliminary zone that will be refined by eliminating lands that do not permit transit supportive development and/or facilitate connectivity. Later refinements to the boundary may also require the inclusion of areas outside of the 800m radius to maximize development potentials and improve connectivity.</p>	<p>The Subject Lands are located within the 800 metre radius of the Aldershot Go Major Transit Station Area, with the closest portion of the Subject Lands approximately 400 metres from the Aldershot Go Station.</p>
2	<p><b>Exclude Undevelopable Lands within the Major Transit Station Area</b></p> <p>Refine the MTSA boundary to exclude undevelopable lands. These may include the substantial Regional Natural Heritage System areas (including regulated watercourses and valleylands and Natural Hazards) or areas protected by Provincial plans such as the</p>	<p>The Subject Lands do not include any natural heritage lands and are not separated by a physical barrier such as a highway or railway line.</p>

	Greenbelt Plan (2017), The Niagara Escarpment Plan (2017), and the Parkway Belt West Plan (1978). They may also include lands which create physical barriers to development and connectivity, such as highways, and railways.	
<b>3</b>	<p><b>Exclude established areas, Where Possible</b></p> <p>Refine the MTSA boundary to exclude established uses such as parks, educational institutions (that have not currently been declared surplus by the school boards or are not located in areas designated for future higher density development by Local Municipalities) and low-density mature residential neighbourhoods, which are not anticipated to accommodate growth and intensification. These areas are also not anticipated to change in order to increase permeability, accessibility and connectivity, and are often constrained due to existing block patterns (e.g. long blocks with few connections) and built form conditions (e.g. rear lotting).</p>	<p>The MTSA boundary has been refined to remove the Aldershot Park to the south of the site and Grove Park to the west site and also the low-density mature residential neighbourhood to the southwest of the site. Eliminating parks and schools from MTSA boundaries does not align with the provincial policy directions for creating complete communities and providing convenient access to the necessities for daily living.</p> <p>The Subject Lands represent a unique opportunity, due to their size, to allow for strategic intensification that can implement appropriate buffering and setbacks to the surrounding mature neighbourhoods. Allowing for the inclusion of Grove Park within the MTSA boundary would also implement an immediate connection from the Subject Lands to the Aldershot Go parcel to the immediate west of Grove Park as originally envisioned in the Draft Precinct Plan for the Aldershot Go Station Mobility Hub which envisions an active transportation connection along the southern limits of the rail corridor.</p>
<b>4</b>	<p><b>Include Whole Streets and Parcels, Where Possible</b></p> <p>Refine the MTSA boundary to include, whenever possible, properties which front onto both sides of a street to avoid potential land-use conflicts within properties and between adjacent areas, unless streets are used as boundaries between areas with different land use policy planning frameworks. Where possible, entire blocks should remain intact to facilitate the cohesive and comprehensive development of the MTSA.</p>	<p>The Subject Lands have frontage on the railway lands to the north, Gallagher Road to the west, Enfield Road to the east and the Aldershot Park to the south. The Subject Lands only abut low density residential on a small portion of the eastern property limits with the remainder of the property being secluded from the mature neighbourhoods area. Therefore, the Subject Lands represent a unique opportunity for intensification that would allow for</p>

		appropriate setbacks and buffering to minimize land use conflicts. The inclusion of Grove Park and the Subject Lands in the MTSA boundary, will allow for a continuous MTSA boundary along the limits of the railway line from the Aldershot Go Station, ending at the eastern limits of the property, approximately 630 metres from the Aldershot Go Station.
<b>5</b>	<p><b>Include Regional and Municipal Planning Boundaries, Where Possible</b></p> <p>Finally, whenever possible, refine the MTSA boundary to align with that of overlapping Regional and/or Municipal planning boundaries, with particular emphasis given to those which are designated for growth and Intensification (e.g. Urban Growth Centres). This will facilitate the complementary development of the MTSA and other Strategic Growth Areas.</p>	The inclusion of the Subject Lands is in keeping with the original delineated limits for the Mobility Hub in the Council-Adopted Burlington Official Plan (Grow Bold) and the Draft Precinct Plan for the Aldershot Go Mobility Hub.
<b>6</b>	<p><b>Finalize the Major Transit Station Area Proposed Boundary</b></p> <p>Steps 1 through 5 will guide the establishment of proposed MTSA boundaries to be further refined through public consultation and local municipal input. Once refined, the Region will undertake a density evaluation for the purpose of establishing density targets and will develop an appropriate ROP policy framework to guide and support more detailed local municipal policy development and area-specific planning for these areas.</p>	For the reasons discussed herein, we formally request that the Subject Lands be included within the Aldershot Go MTSA Boundary as the boundary is finalized.

## CONCLUSION

Based on our review of the currently policy and regulatory framework, it is our opinion that the Subject Lands should be considered for inclusion in the Aldershot Go Major Transit Station Area boundary during the Halton Region Official Plan Municipal Comprehensive Review process. The Subject Lands should also subsequently continue to be considered for inclusion within the Mobility Hub identified in the Council-Adopted Burlington Official Plan as well as the Aldershot Go Mobility Hub Precinct Plan. The Subject Lands are appropriate for inclusions as they:

- will assist the Region and City in achieving planned population growth and meeting intensification and density targets\*;
- are fully serviced and underutilized;
- are within 400 metres to the Aldershot Go Major Transit Station Area providing higher order transit;



- are a large site and can provide significant opportunities for comprehensive redevelopment to provide variety in housing type and built form within the area;
- offer an opportunity to provide increased housing options in the City;
- can provide a development that is compatible with the existing neighbourhood through implementing appropriate site design to ensure adequate setbacks and buffering from the existing low density residential areas; and,
- can assist in creating a complete community by increasing the range of housing options within immediate proximity to transit and services.

*\*The Regional minimal growth targets are not required to be met to 2051 as provided in the Growth Plan (2020) and as such retaining areas within the MTSA 500 to 800 metre boundary is critical to meet growth requirements.*

We trust the information contained herein is sufficient to assess this request. Should you have any questions or require additional information, please do not hesitate to contact us.

Yours truly,

**MHBC**



Dana Anderson, MA, FCIP, RPP  
Partner



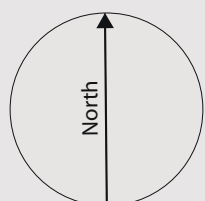
Melinda MacRory, M.Pl., MCIP, RPP  
Planner





**Figure 1**  
Location Map

**Legend**  
 Subject Lands

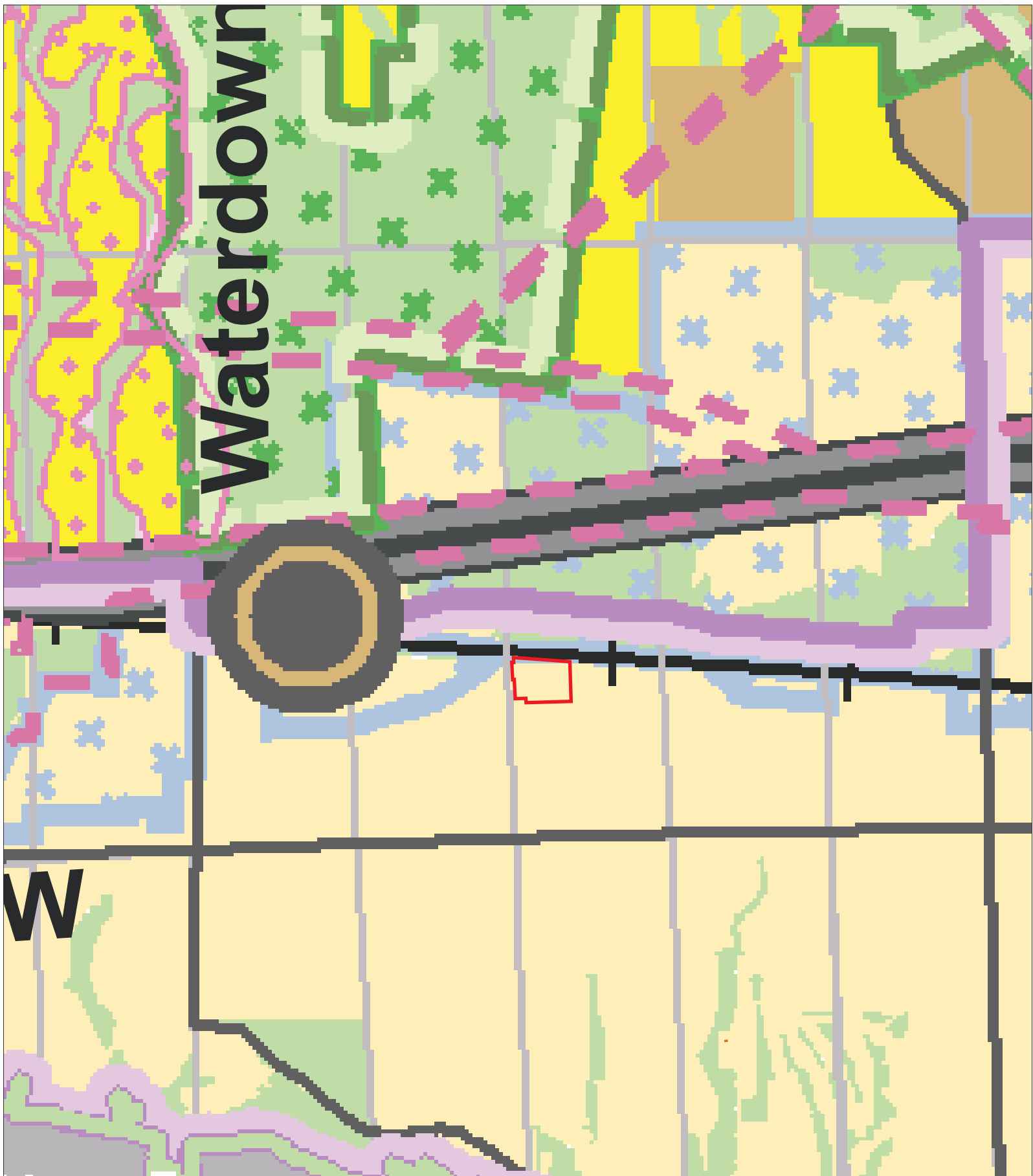


**DATE:** October 28, 2020  
**SCALE:** N.T.S.

1097, 1107 & 1135 Gallagher Road,  
**Burlington, Ontario**

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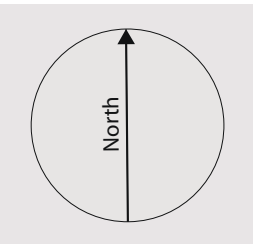




**Figure 2**  
 Map 1  
 Regional Structure  
 1097, 1107 & 1135 Gallagher Road.  
**Burlington, Ontario**

**Legend**

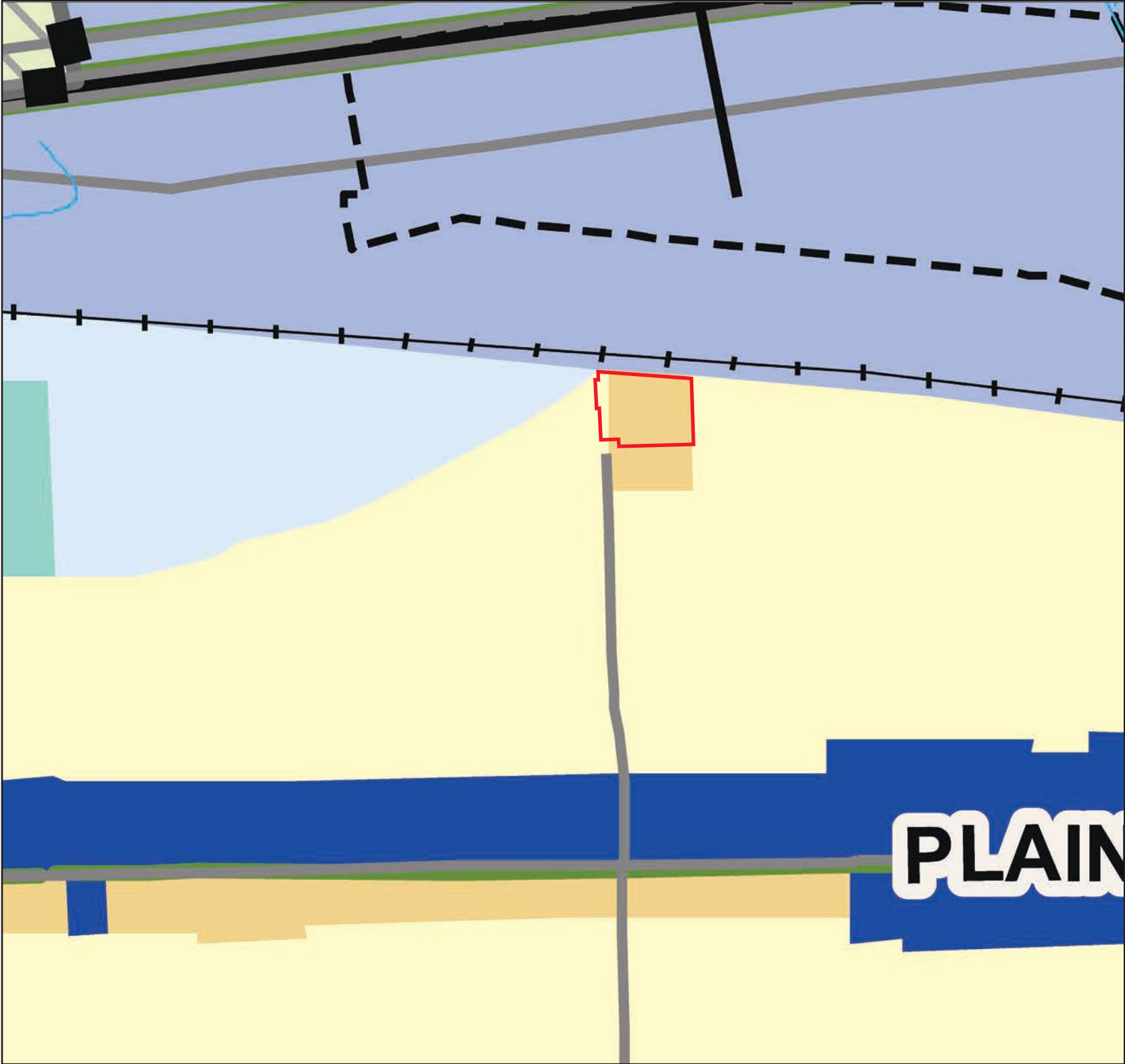
- Subject Lands
- Urban Area
- Regional Natural Heritage System
- Agricultural Area
- Major Transit Station



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**Figure 3**

In-Effect City of Burlington  
Official Plan Schedule B

Comprehensive Land Use Plan –  
Urban Planning Area

1097, 1107 & 1135 Gallagher Road.

**Burlington, Ontario**

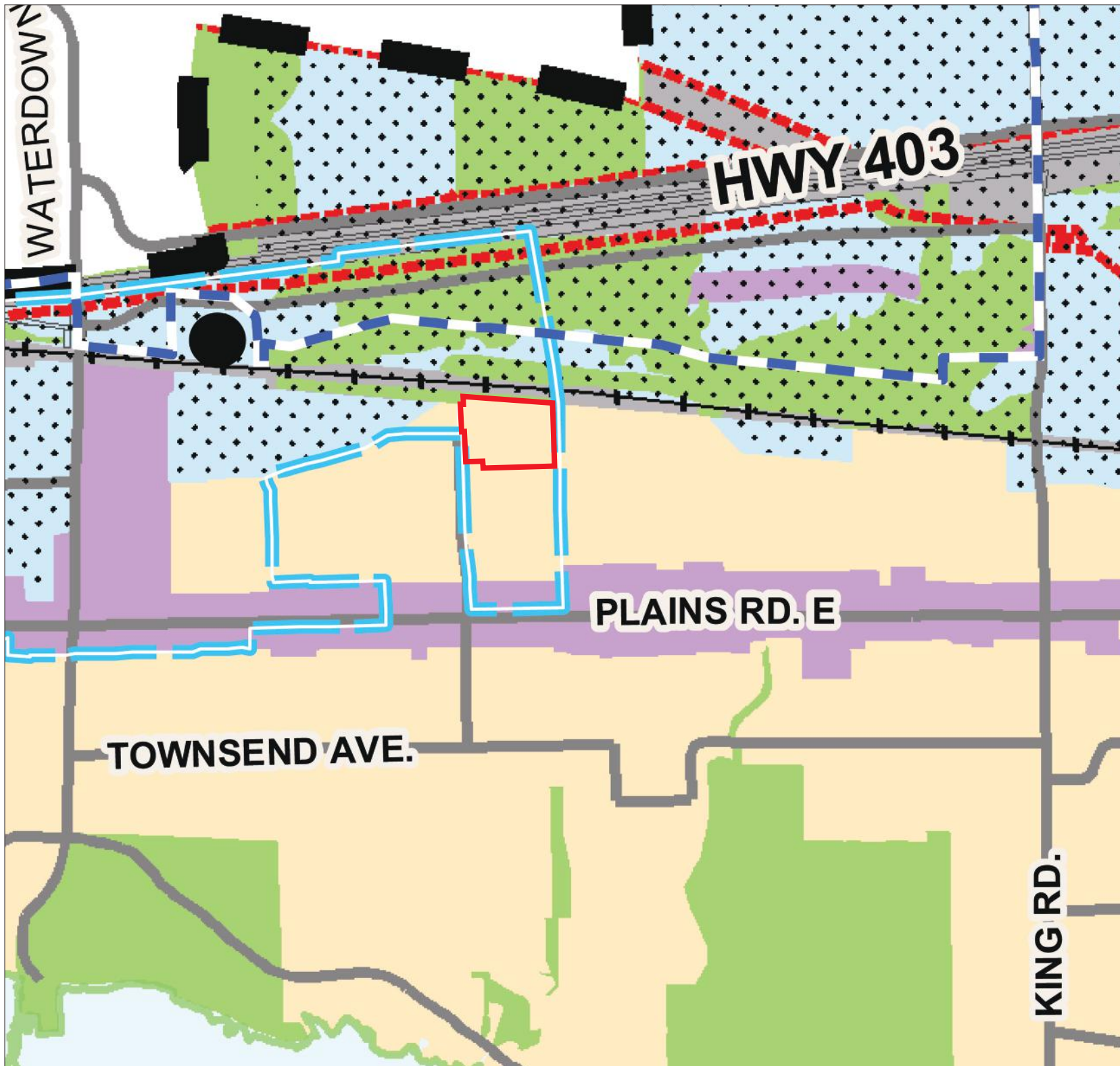
**Legend**

- Subject Lands
- Residential - Low Density
- Residential - Medium Density
- Mixed Use Corridor - General
- Business Corridor
- General Employment

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**Figure 4**

Council-Adopted City of Burlington Official Plan  
 Schedule B - Urban Structure

1097, 1107 & 1135 Gallagher Road.  
**Burlington, Ontario**

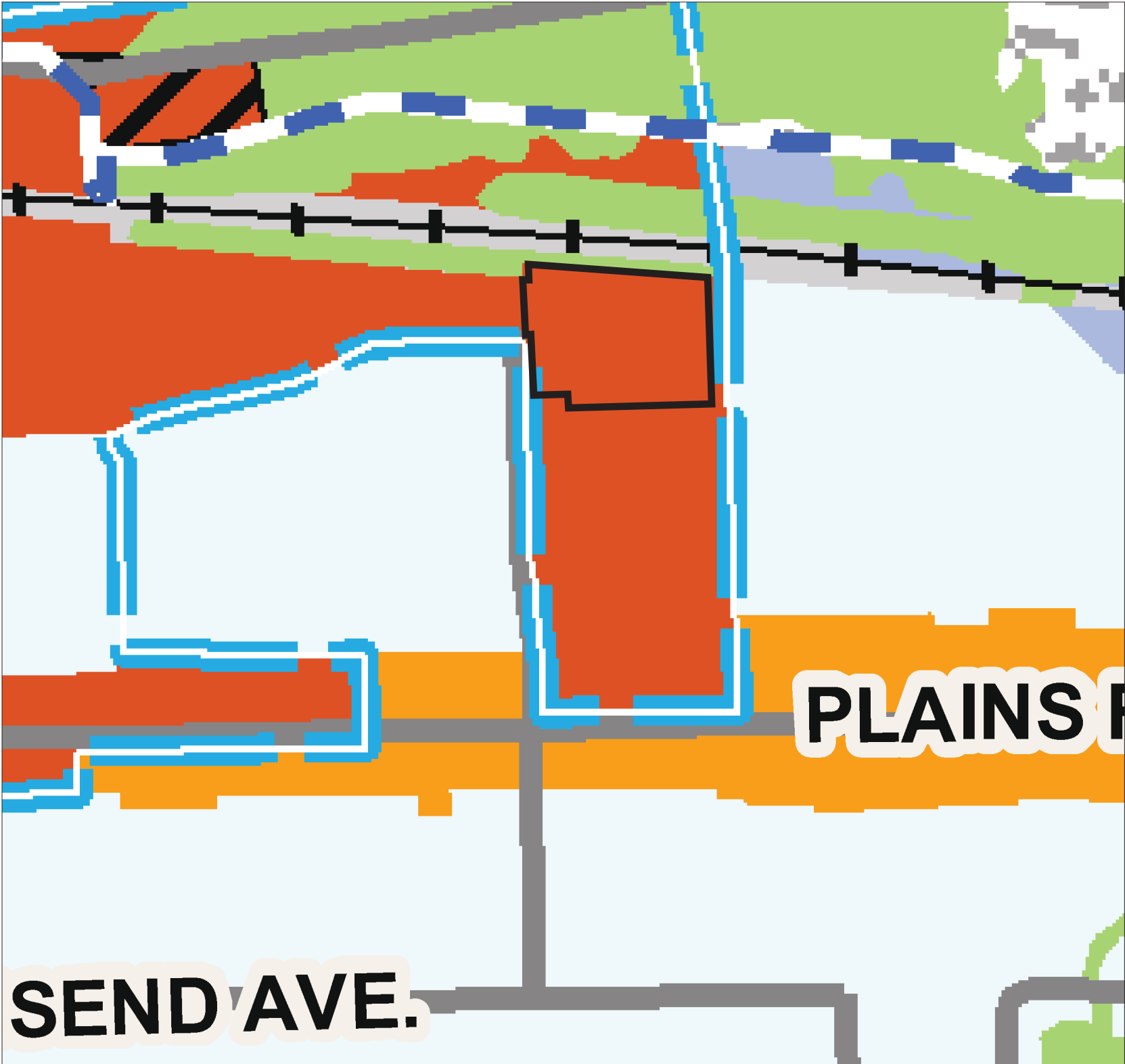
**Legend**

- Subject Lands
- Mixed Use Intensification Areas**
  - Urban Centres
  - Mobility Hubs
  - Mixed Use Nodes and Intensification Corridors
- Employment Lands**
  -
- Region of Halton Employment Area**
  - To be added to Region of Halton Employment Area
  - 
  -
- Residential Neighbourhood Areas**
  -
- Natural Heritage System, Major Parks and Open Space**
  -
- Mineral Resource Extraction Area**
  -
- Infrastructure and Transportation Corridors**
  -

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**Figure 5**

Council-Adopted City of Burlington Official Plan  
 Schedule B1 - Growth Framework

1097, 1107 & 1135 Gallagher Road.  
**Burlington, Ontario**

**Legend**

Subject Lands

**Growth Areas**

- Primary Growth Area
- Secondary Growth Area
- Employment Growth Area
- Established Neighbourhood Area

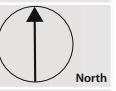
**Mobility Hubs**

**PLAINS**

**SEND AVE.**

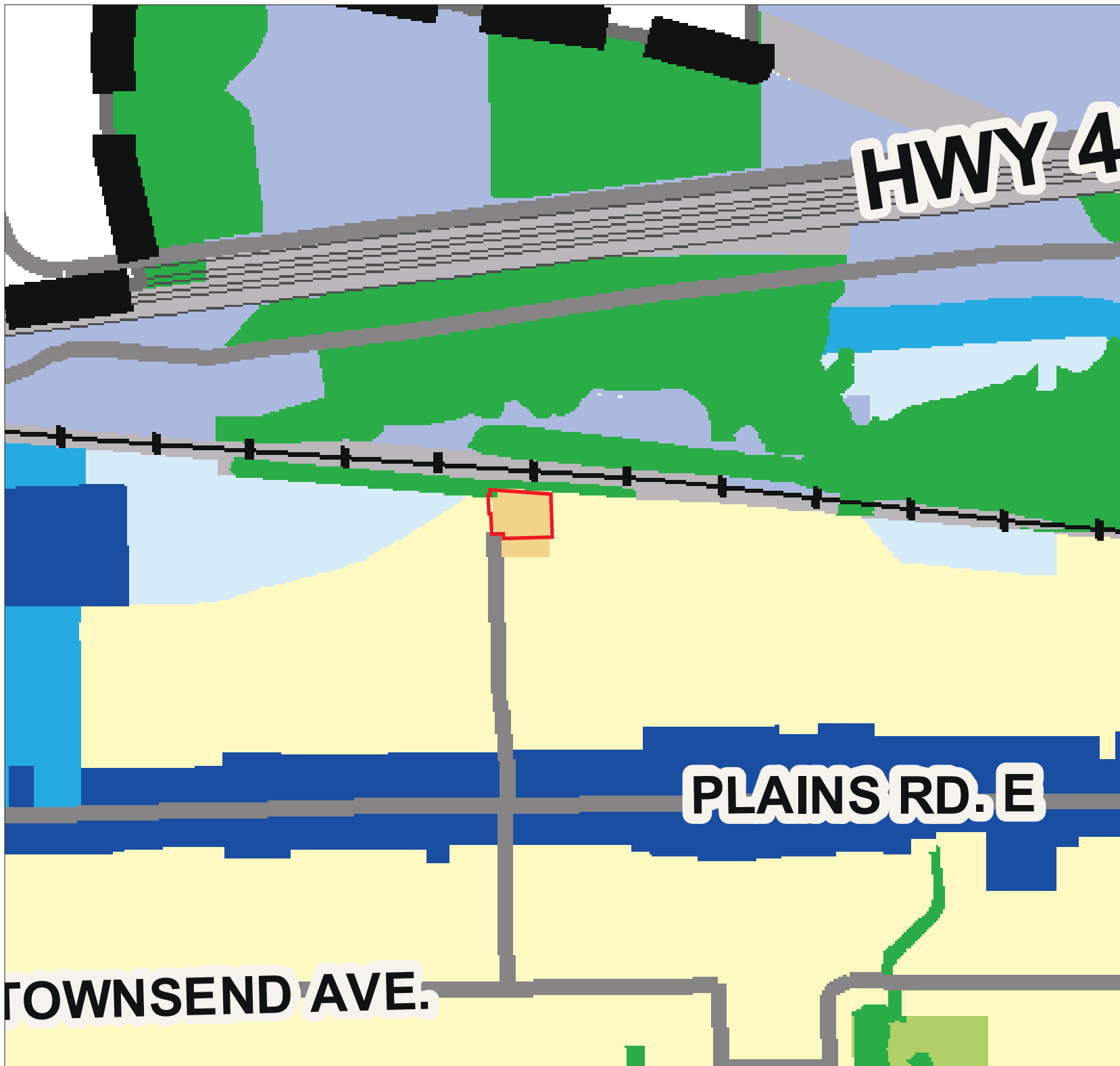
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**Figure 6**

Council-Adopted City of Burlington Official Plan

Schedule C - Land Use- Urban Area

1097, 1107 & 1135 Gallagher Road.  
**Burlington, Ontario**

**Legend**

Subject Lands

**MIXED USE INTENSIFICATION AREAS**

- Urban Centres**
- Mixed Use Nodes and Intensification Corridors**
- Mixed Use Commercial Centre
- Neighbourhood Centre
- Local Centre
- Employment Commercial Centre
- Urban Corridor
- Urban Corridor - Employment Lands

**RESIDENTIAL NEIGHBOURHOOD AREAS**

- Residential - Low Density
- Residential - Medium Density
- Residential - High Density

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**TOWNSEND AVE.**

**PLAINS RD. E**

**HWY 403**






**Figure 7**

Aldershot Go Mobility Hub Draft  
Precinct Plan

1097, 1107 & 1135 Gallagher Road.  
**Burlington, Ontario**

**Legend**

 Subject Lands

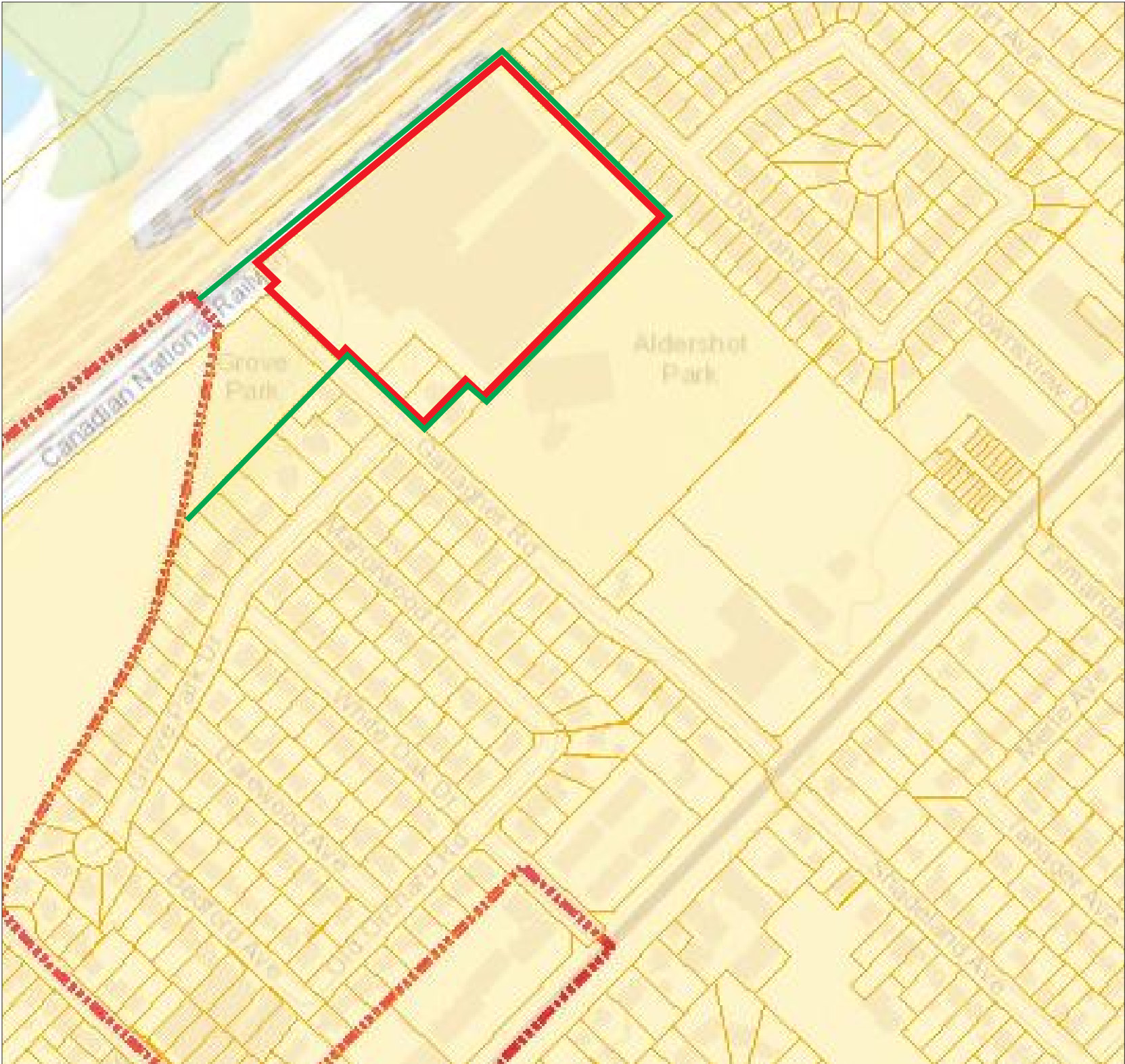
- PRECINCTS**
-  Parks and Open Space
  -  Public Service
  -  Grove Park/St. Matthew's Neighbourhood
  -  Aldershot Main Street
  -  Mid-Rise Residential
  -  Emery/Cooke Commons
  -  Aldershot GO Central

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**Figure 8**

Halton Region Draft Aldershot  
MTSA Boundary

1097, 1107 & 1135 Gallagher Road.  
**Burlington, Ontario**

**Legend**

- Subject Lands
- Proposed Modification to Draft MTSA Boundary to Include Subject Lands
- Ownership Parcel (Teranet)
- Proposed Draft MTSA Boundaries
- ROPA 38 - Urban Area

DATE: October 28, 2020

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