

October 16, 2020

Curt Benson, MCIP, RPP  
Chief Planner and Director of Planning  
Halton Region  
1151 Bronte Road W.  
Oakville, ON  
L6M 3L1

Heather MacDonald, MCIP, RPP  
Executive Director, Community Planning Regulation and Mobility  
City of Burlington  
426 Brant Street  
Burlington, ON  
L7R 3Z6

Dear Mr. Benson and Ms. MacDonald:

**RE: MEETING REQUEST TO DISCUSS THE CITY OF BURLINGTON URBAN GROWTH CENTRE**

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We currently represent 13 professional planners from 10 leading urban planning firms in Ontario who are engaged in planning and development projects for both the public and private sector throughout Ontario. As professional planners (Registered Professional Planners in Ontario), we provide objective, professional planning advice and work with communities and our development clients to plan for and develop communities in conformity with Provincial policy, all of which is done in the public interest.

Each of us have been or are currently engaged in planning matters in the City of Burlington. It is in that capacity that we are requesting a meeting as soon as possible with you to express our serious concerns in relation to a request by the City of Burlington Council to remove the Urban Growth Centre (Downtown Burlington) from local and Regional Official Plans. We understand this change would require an amendment to A Place to Grow. We believe such a change would set a precedent for local municipalities facing growth pressures and local opposition to simply state that such provincially identified and planned centres have "done their job" as a rationale for what would be a decision contrary to Provincial and Regional policies, Provincial interests as well as the greater public interest.

There is considerable history to the planning and development of Burlington's Urban Growth Centre. Since its identification in the 2006 Growth Plan, Downtown Burlington has seen significant investment in its infrastructure, parks, schools, hospitals and community facilities. The Downtown remains well located and structured to accommodate new growth with existing and planned infrastructure. It is clearly reflected and supported as an Urban Growth Centre and has been since ROPA 38 was approved. The Region's response to the City's adopted Official Plan in 2018 through its statement of non-conformity did not raise any issue with the Downtown as the Urban Growth Centre or with any urban structure issues related to the Downtown in its planning context.

As professional planners in this Province, we believe any decision to now remove and relocate or even alter the boundary of the Urban Growth Centre would have a detrimental effect to the following, given the level of investment and detailed planning to date:

- the available supply of housing in Downtown Burlington;
- the sustainability and viability of businesses and employment in Downtown Burlington;
- the supply of market and affordable ownership units as well as market and affordable purpose built rental units;
- the ability to achieve sustainability objectives;
- the ability to achieve increased transit use and transit oriented development;
- the minimization of costs for housing in Downtown Burlington; and,
- the ability to secure continued investment in future housing, employment and transit.

The current planning status in the City of Burlington's Downtown is also of concern due to the delays with current planning projects that remain without approvals or certainty. Currently there are a significant number of units (over 1,700) that are either frozen in the City's recent Interim Control By-law, or under appeal at the LPAT. A complete shift in planning policy could impact certainty around these applications and continued investment in the Downtown.

The removal of the Downtown as the Urban Growth Centre in Burlington is not consistent with Provincial policy. As planners we are very concerned that the removal of the Urban Growth Centre will, in effect, close off the Downtown to many socio-economic groups due to the inability to develop more accessible and affordable units. Further limitation of choice, reduction in transit service and further restrictions on housing supply are not in the public interest especially in a walkable and accessible part of the City that is reflected by the Downtown. The request was not supported by any land use planning rationale, nor has there been any consultation or "collaboration" with the development community or planning consultants, prior to the request. Planning in the public interest should always remain objective and seek to inform political decisions. In response to political direction, it should remain objective to ensure the public interest is upheld.

Any decision to remove, relocate or alter the boundary of an Urban Growth Centre without planning evidence and rationale would set an unprecedented reversal of Provincial policy. Such a decision would also reflect mixed messages to investors in Downtown Burlington as well as other Urban Growth Centres and create economic instability at a time when economic certainty must be at the forefront of government decisions.

We look forward to an opportunity to meet with you both to have an honest and informed discussion through which we can present our concerns and information

We appreciate your timely consideration of our request.

Sincerely,



Dana Anderson, MA, FCIP, RPP, Partner, MHBC Planning Limited



Glenn Wellings, MCIP, RPP, Wellings Planning Consultants Inc.



Cyndi Rottenberg-Walker, FCIP, RPP, MScPI, Partner, Urban Strategies Inc.



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for



David Falletta, MCIP, RPP, Partner, Bousfields Inc.



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