



October 6, 2022

457-22

**Via Email**

Honourable Steve Clark,  
Minister of Municipal Affairs and Housing

Ms. Erika Ivanic  
Municipal Services Office – Central Ontario  
777 Bay Street, 16<sup>th</sup> Floor  
Toronto, ON M7A 2J3  
[erika.ivanic@ontario.ca](mailto:erika.ivanic@ontario.ca)  
c/o [minister.mah@ontario.ca](mailto:minister.mah@ontario.ca)

Dear Mr. Clark and Ms. Ivanic:

**RE: MTSA Designation - Request for Change to the Halton Region Official Plan  
ERO No. 019-5684**

UrbanSolutions Planning & Land Development Consultants Inc. (UrbanSolutions) provides expert land use planning advice and assists proponents secure the required municipal approvals for a variety of development projects throughout southern Ontario and with thank you for the opportunity to comment on the proposed amendment to the Halton Region Official Plan (ROPA 49) via ERO No. 019-5732. We represent the landowner of the property municipally known as 850 Brant Street and 831 Legion Road, Burlington, which is located approximately 525 metres from the Burlington GO Station at the southwest corner of Brant Street and Fairview Street.

In response to Provincial direction, Dillon Consulting was retained by the City of Burlington to complete three The Major Transit Station Areas – Area Specific Plans (MTSA ASP) to provide policy recommendations on height, intensification and other growth considerations for specific areas within the City. These areas of intensification include Aldershot GO MTSA, Burlington GO MTSA and Appleby GO MTSA. The MTSA ASP is based partially on the Mobility Hubs Study that was already being prepared by the City of Burlington from 2017-2018, with the final MTSA ASP Report being finalized in June of 2022. In July 2022, the City of Burlington Council directed staff to re-examine height permissions among other policies in the Official Plan based upon the MTSA ASP Final Report.

The above-noted Brant Street property is located in the Legion Node of the Burlington MTSA Area Specific Plan and is currently designated as Regional Intensification Corridor within a MTSA, as shown on the Regional Urban Structure Map 1h of the ROPA 49. The purpose of this submission is to provide comment and recommendations with regards to the Major Transit Station Area (MTSA) policies within the ROPA 49.

## Major Transit Station Areas

As depicted in Table 2b of the ROPA 49, Strategic Growth Area Targets are established for the various MTSAs of the Region. MTSAs are intended to act as Strategic Growth Areas in the Region, which will accommodate residential intensification for the various municipalities. Similarly, Regional Intensification Corridors consist of areas along Higher Order Transit Corridors and arterial roads which support achieving residential and employment densities to ensure the viability of existing and planned transit infrastructure.

To achieve the Region's projected population growth, Table 2b of the ROPA 49 sets out an intensification target of a minimum of 200 residents and jobs combined per hectare for the Burlington GO MTSA. In Section 2.2.4.3 of the Growth Plan, MTSAs are prescribed to accommodate a minimum of 150 residents and jobs per hectare for those that are served by the GO Transit rail network. These intensification targets are insufficient given the proposed maximum heights outlined for the lands contemplated by the Burlington MTSA ASP. Development concepts which surround a major regional transit station typically result in much high densities than what is currently considered by the ROPA 49 and Growth Plan. The maximum permitted heights proposed for the MTSAs within the MTSA ASP are justified in order to achieve complete transit-oriented communities. However, the corresponding densities prescribed by the applicable policy framework need to align with the proposed heights. As an example, we will evaluate a theoretical development concept for the 850 Brant Street property contained in Appendix A of this letter. As the Burlington MTSA ASP denotes a maximum height of 30-storeys for the property, the concept in Appendix A reaches a density of roughly 800 units per hectare when developed to the proposed as-of-right heights. Given the intensification target established by the ROPA 49 considers residents and jobs combined, it is also worth noting that the 800 units per hectare excludes the jobs that would be included as part of the mixed-use development.

Further, Table 2a of the ROPA 49 sets out targets for the regional phasing of units within Designated Greenfield Areas and the Built-Up Areas. The City of Burlington is noted as accommodating 20,500 new residential units within the Built-Up Area by 2041, or 1,025 new residential units per year. Similar to the populations prescribed by Table 2b, this quantity of units fail to align with the proposed heights and densities proposed for MTSA areas. As discussed in the Brant Street example above, a single parcel developed to as-of-right heights equates to 1,389 units; more than 350 units above the target for the entire year. As it is anticipated that many other sites will be developed within a year and a majority of those sites located within the MTSA areas will contain high density development, it is clear that there is a disconnect between the regional phasing numbers outlined in Table 2a and those which will be constructed in reality.


## Recommended Changes to the ROPA 49

Burlington's MTSA's require a consistent policy framework for the vital role they play in realizing the City's Urban Structure and intensification targets and UrbanSolutions recommends the following two changes to the ROPA 49 to achieve the vision for transit-oriented communities that MTSA's emphasize, regional phasing of units and growth targets need to establish accurate unit predictions and regulations. More specifically:

1. Increase proposed density targets contained within Table 2b – Strategic Growth Area Targets to give consideration to realistic build-out of proposed MTSA areas.
2. Increase proposed quantity of units outlined within Table 2a - Regional Phasing of ROPA 49 to give consideration for realistic build-out of proposed MTSA areas and other Strategic Growth Areas.

As proposed, the aforementioned changes will strengthen the policy framework to provide clarity of implementation, align with realistic growth and development outcomes and ensure the goals and objectives of the MTAs are realized. The balance of the ROPA 49 contains the appropriate range of policies to protect the matters of provincial interest while also ensuring the sufficient transportation and infrastructure requirements of any residential intensification development are secured.

Kind Regards,  
**UrbanSolutions**



Matt Johnstor, MCIP, RPP  
*Principal*

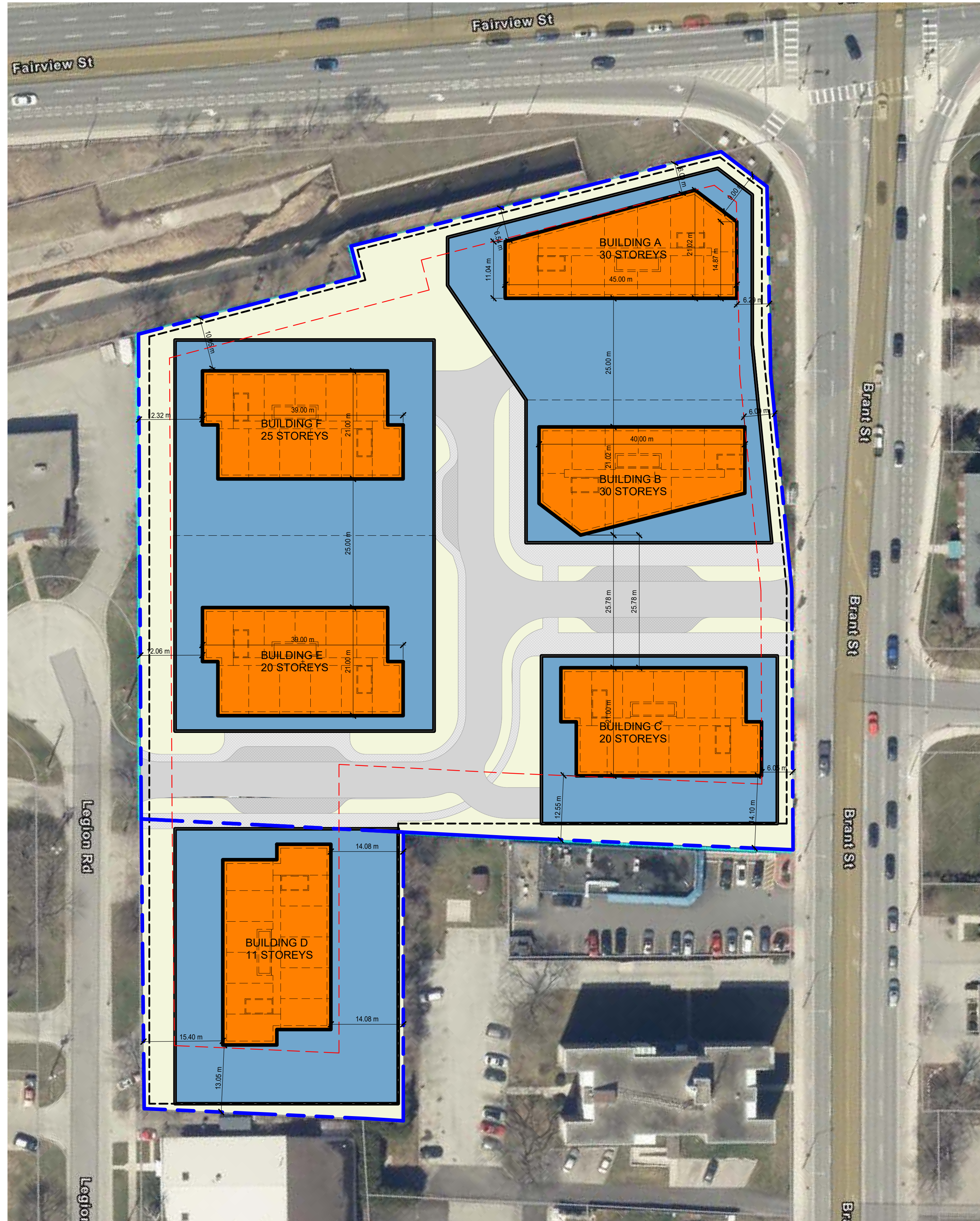


Scott Beedie, BURPI  
*Planner*

cc. 850 Brant Properties Inc.

## **Appendix A**

850 Brant Street Design Package  
Prepared by KNYMH Architects.



1 Site  
AA001 1:500

**PODIUM NOTES**  
PODIUM TO CONTAIN PARKING, AMENITY AREAS, TOWER LOBBY  
3 LEVELS U/G PARKING, 2 ABOVE GRADE

**SITE UNITS**

**BLDG A**  
TOWER FLOORS 27  
UNITS / FLOOR 12  
TOTAL UNITS 324

**BLDG B**  
TOWER FLOORS 27  
UNITS / FLOOR 11  
TOTAL UNITS 297

**BLDG C**  
TOWER FLOORS 17  
UNITS / FLOOR 12  
TOTAL UNITS 204

**BLDG D**  
TOWER FLOORS 8  
UNITS / FLOOR 12  
TOTAL UNITS 96

**BLDG E**  
TOWER FLOORS 17  
UNITS / FLOOR 12  
TOTAL UNITS 204

**BLDG F**  
TOWER FLOORS 22  
UNITS / FLOOR 12  
TOTAL UNITS 264

**SITE TOTAL UNIT COUNT**  
= BLDG A + BLDG B + BLDG C + BLDG D + BLDG E + BLDG F  
= 324 + 297 + 204 + 96 + 204 + 264  
= 1,389

**PARKING NOTES**  
FOR PURPOSES OF PRELIMINARY ESTIMATING,  
APPROX. 400 S.F. / PARKING SPACE UNIT

533,582 S.F. U/G PARKING AREA  
237,888 S.F. PODIUM PARKING AREA  
771,471 S.F. TOTAL PARKING AREA

771,471 S.F. / 400 S.F. = **1,928 PARKING SPACES (PRELIMINARY ESTIMATE)**

PRELIMINARY PARKING RATIO **1 : 1.4 (1,389 : 1,928)**

**GFA - FSI - ALL BUILDINGS**

Mass	Floor Area	Area (m <sup>2</sup> )	FSI
<b>BLDG A</b>			
PODIUM	22,933 SF	2,131 m <sup>2</sup>	0.12
TOWER	214,194 SF	19,899 m <sup>2</sup>	1.14
TOTAL	237,127 SF	22,030 m <sup>2</sup>	1.26
<b>BLDG B</b>			
PODIUM	13,853 SF	1,287 m <sup>2</sup>	0.07
TOWER	199,400 SF	18,525 m <sup>2</sup>	1.06
TOTAL	213,253 SF	19,812 m <sup>2</sup>	1.13
<b>BLDG C</b>			
PODIUM	16,066 SF	1,493 m <sup>2</sup>	0.09
TOWER	138,338 SF	12,852 m <sup>2</sup>	0.74
TOTAL	154,404 SF	14,345 m <sup>2</sup>	0.82
<b>BLDG D</b>			
PODIUM	24,928 SF	2,316 m <sup>2</sup>	0.13
TOWER	65,100 SF	6,048 m <sup>2</sup>	0.35
TOTAL	90,028 SF	8,364 m <sup>2</sup>	0.48
<b>BLDG E</b>			
PODIUM	20,582 SF	1,912 m <sup>2</sup>	0.11
TOWER	138,338 SF	12,852 m <sup>2</sup>	0.74
TOTAL	158,920 SF	14,764 m <sup>2</sup>	0.85
<b>BLDG F</b>			
PODIUM	20,582 SF	1,912 m <sup>2</sup>	0.11
TOWER	179,025 SF	16,632 m <sup>2</sup>	0.95
TOTAL	199,607 SF	18,544 m <sup>2</sup>	1.06
<b>TOTAL</b>	1,053,339 SF	97,858 m <sup>2</sup>	5.60

**SITE AREAS**

Name	Area
Parcel North	14619 m <sup>2</sup>
Parcel South	17461 m <sup>2</sup>

**GFA - U/G PARKING**

Level	Floor Area	Area (m <sup>2</sup> )
2nd FLOOR	118,944 SF	11,050 m <sup>2</sup>
3rd FLOOR	118,944 SF	11,050 m <sup>2</sup>
U/G LEVEL 1	177,861 SF	16,524 m <sup>2</sup>
U/G LEVEL 2	177,861 SF	16,524 m <sup>2</sup>
U/G LEVEL 3	177,861 SF	16,524 m <sup>2</sup>
<b>TOTAL</b>	771,471 SF	71,672 m <sup>2</sup>

**GFA - FSI - ALL BUILDINGS - BY LEVEL**

Level	Floor Area	Area (m <sup>2</sup> )	FSI
<b>BLDG A</b>			
1st FLOOR	22,933 SF	2,131 m <sup>2</sup>	0.12
2nd FLOOR	22,933 SF	2,131 m <sup>2</sup>	0.12
3rd FLOOR	22,933 SF	2,131 m <sup>2</sup>	0.12
4th FLOOR	7,933 SF	737 m <sup>2</sup>	0.04
5th FLOOR	7,933 SF	737 m <sup>2</sup>	0.04
6th FLOOR	7,933 SF	737 m <sup>2</sup>	0.04
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27th FLOOR	7,933 SF	737 m <sup>2</sup>	0.04
28th FLOOR	7,933 SF	737 m <sup>2</sup>	0.04
29th FLOOR	7,933 SF	737 m <sup>2</sup>	0.04
30th FLOOR	7,933 SF	737 m <sup>2</sup>	0.04
<b>TOTAL</b>	282,993 SF	26,291 m <sup>2</sup>	1.51

**BLDG B**

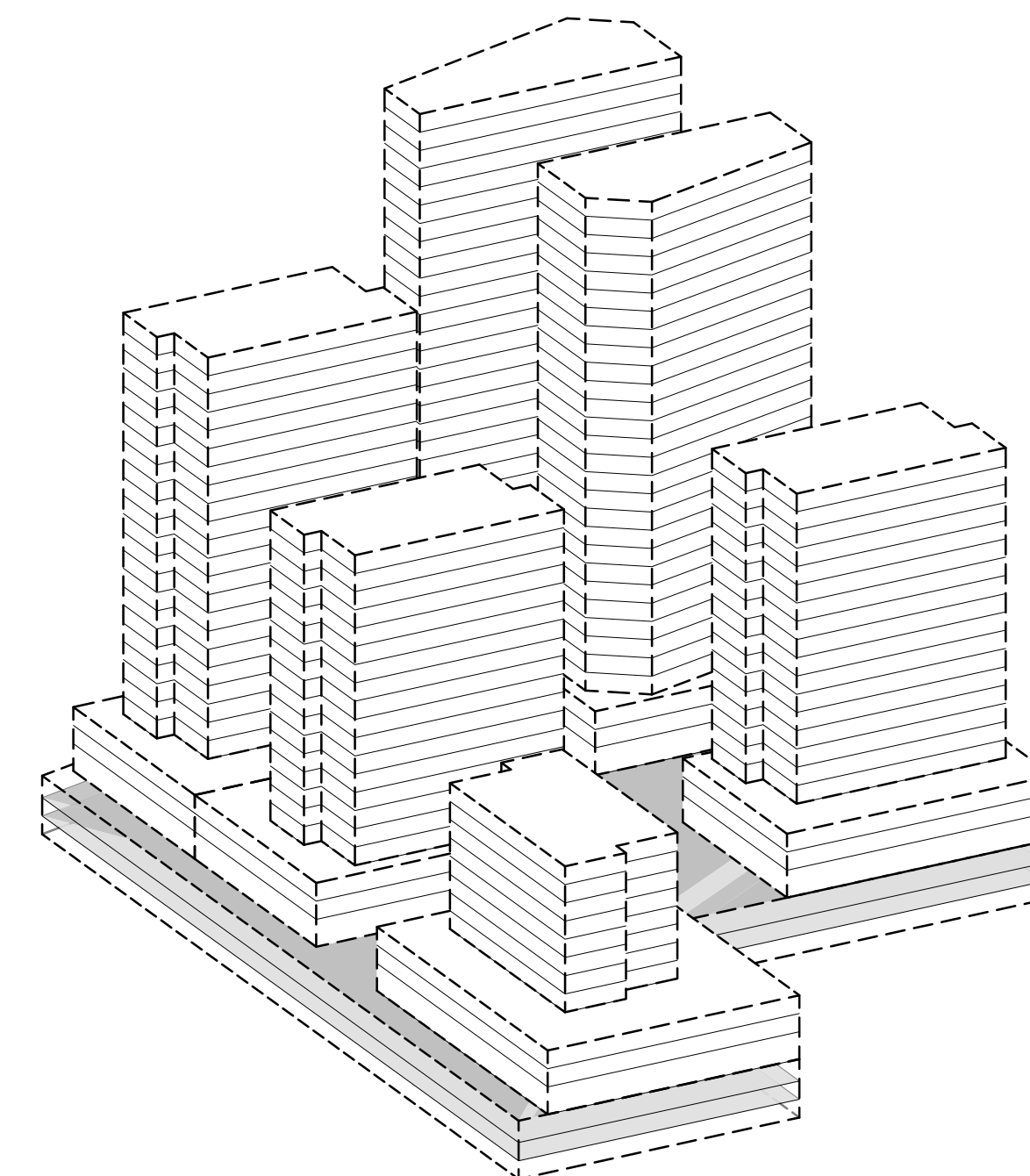
1st FLOOR	13,853 SF	1,287 m <sup>2</sup>	0.07
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3rd FLOOR	13,853 SF	1,287 m <sup>2</sup>	0.07
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30th FLOOR	7,385 SF	686 m <sup>2</sup>	0.04
<b>TOTAL</b>	240,959 SF	22,386 m <sup>2</sup>	1.28

**GFA - FSI - ALL BUILDINGS - BY LEVEL**

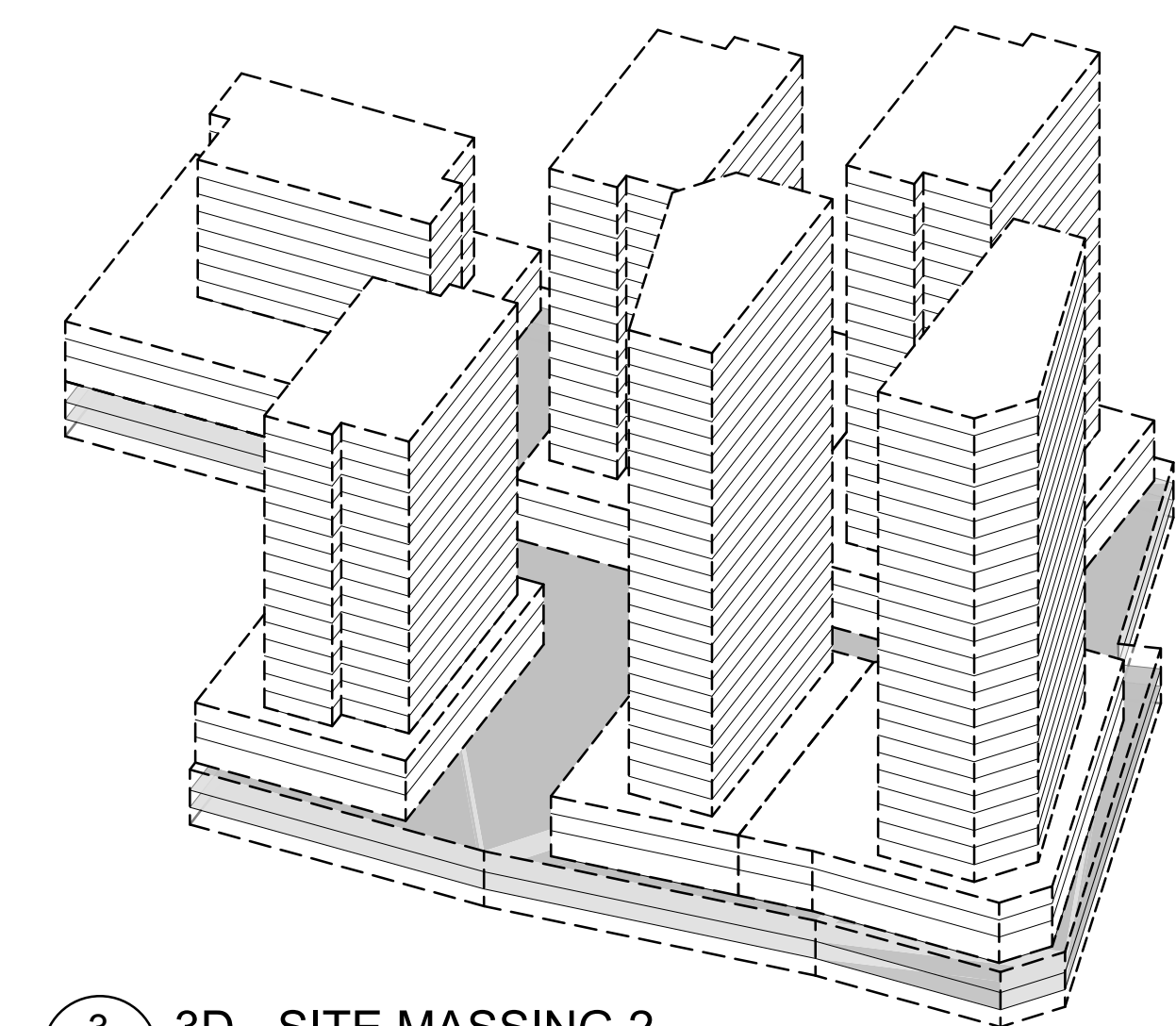
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2 3D - SITE MASSING  
AA001



3 3D - SITE MASSING 2  
AA001

**850 BRANT STREET**  
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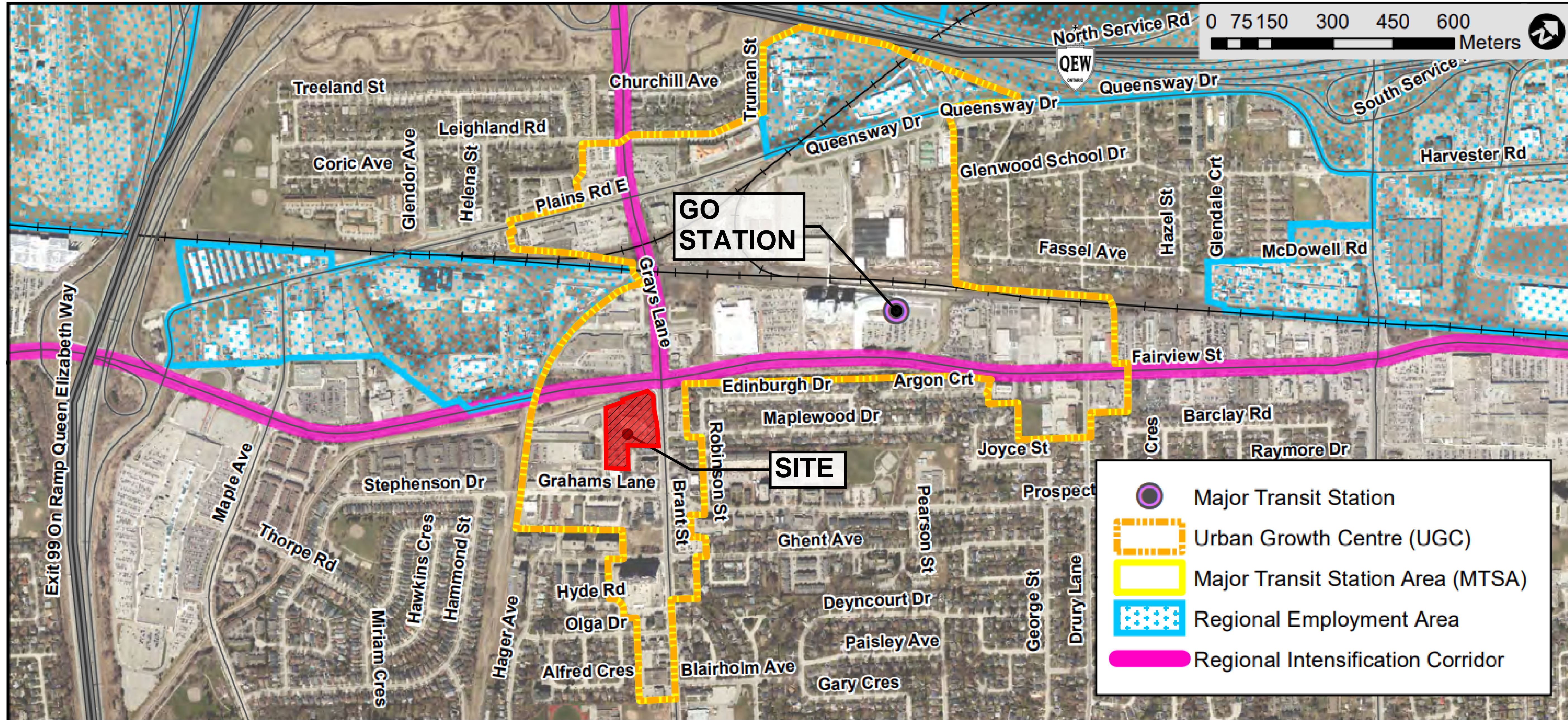
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**Amendment No. 49**  
**to THE REGIONAL PLAN**  
*Official Plan for the Halton Planning Area*  
*Regional Municipality of Halton*

**Map 6b - Downtown Burlington UGC / Burlington GO MTSA**

Attachment #12 to ROPA 49



**850 BRANT STREET**

Leggat Ford / Neatt Communities

850 Brant Street, Burlington, ON

An Amendment to Implement  
the Integrated Growth  
Management Strategy

June 2022

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