



June 2, 2023

457-22

Via Email

Attn: Honourable Steve Clark,
Minister of Municipal Affairs and Housing

Provincial Land Use Plans Branch
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**RE: Proposed Changes to Provincial Policy Statement and Growth Plan
ERO No. 019-6813 - 850 Brant Street and 831 Legion Road, Burlington**

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 would like to thank you for the opportunity to comment on the proposed amendments to the Provincial Policy Statement and A Place to Grow; Growth Plan for the Greater Golden Horseshoe (Growth Plan) via ERO No. 019-6813. We represent the owner 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 December 2022, our office provided a letter in response to ERO No. 019-6177 regarding changes to the Growth Plan and this letter is intended to support and add to the recommendations contained within the previously submitted letter.

As the Province works to address the housing crisis currently facing Ontario, the structure and policies outlined within the Provincial Policy Statement (PPS) will become even more critical to achieve higher densities and intensification desired across the various regions of the Greater Golden Horseshoe. Accordingly, it is important that Major Transit Station Areas (MTSAs) achieve their role as strategic growth areas to be the focus of higher densities and intensification across the various regions of the Greater Golden Horseshoe. Given their connectivity within and across municipalities, MTSAs are strong candidates for high-density mixed-use development to facilitate the creation of complete, transit-oriented communities.

In response to Provincial direction, Dillon Consulting was retained by the City of Burlington to complete the Major Transit Station Areas – Area Specific Plans (MTSA ASP) to provide policy recommendations on height, intensification and other growth considerations for specific growth areas within the City. These areas of intensification include Aldershot GO MTSA, Burlington GO MTSA and Appleby GO MTSA. The MTSA ASP builds on the previously completed 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 wherein a building height of 30-storeys is recommended. 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 designated as 'Major Transit Station Area' in the Halton Region Official Plan and is designated as 'Primary Growth Area' within the 'MTSA Special Planning Area' in the City of Burlington Official Plan. Further, the 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. The purpose of this submission is to provide comment and recommendations with regards to the Major Transit Station Area (MTSA) population target policies within the Provincial Policy Statement as they relate to the City of Burlington and Greater Golden Horseshoe.

In response to the proposed Provincial changes to the Provincial Policy Statement and Growth Plan, our team has provided a list of recommendations to be considered during the Ministry's review of the legislative documents.

Major Transit Station Areas

As stated in Section 2.3 of the proposed PPS, growth is to be directed to settlement areas with prioritization of intensification within strategic growth areas, including Urban Growth Centres and MTSA's. Development in these areas provide a focus on investment in transit as well as other infrastructure to support forecasted growth and a diverse range and mix of housing options.

In Section 2.4.2 of the proposed PPS, MTSA's are prescribed to accommodate a minimum of 150 residents and jobs per hectare for those that are served by the GO Transit rail network. This intensification target is insufficient given that MTSA's are meant to act as key strategic growth areas. Development concepts which surround a major regional transit station typically result in much higher densities than what is currently considered by the proposed PPS. The maximum permitted heights proposed for MTSA's within the MTSA ASP are justified in order to achieve complete transit-oriented communities. However, the corresponding densities prescribed by the proposed Provincial Policy Statement need to align with the proposed heights. As an example, we will evaluate a development concept for the 850 Brant Street property contained in Appendix A of this letter. The Burlington MTSA ASP denotes a maximum height of 30-storeys for the property, as shown in Figure 1 below. While the concept in Appendix A reaches a density of roughly 800 units per hectare when developed to the recommended as-of-right heights. While the development concept represents the planned built form, it is well over the prescribed 150 residents and jobs per hectare in the proposed PPS.

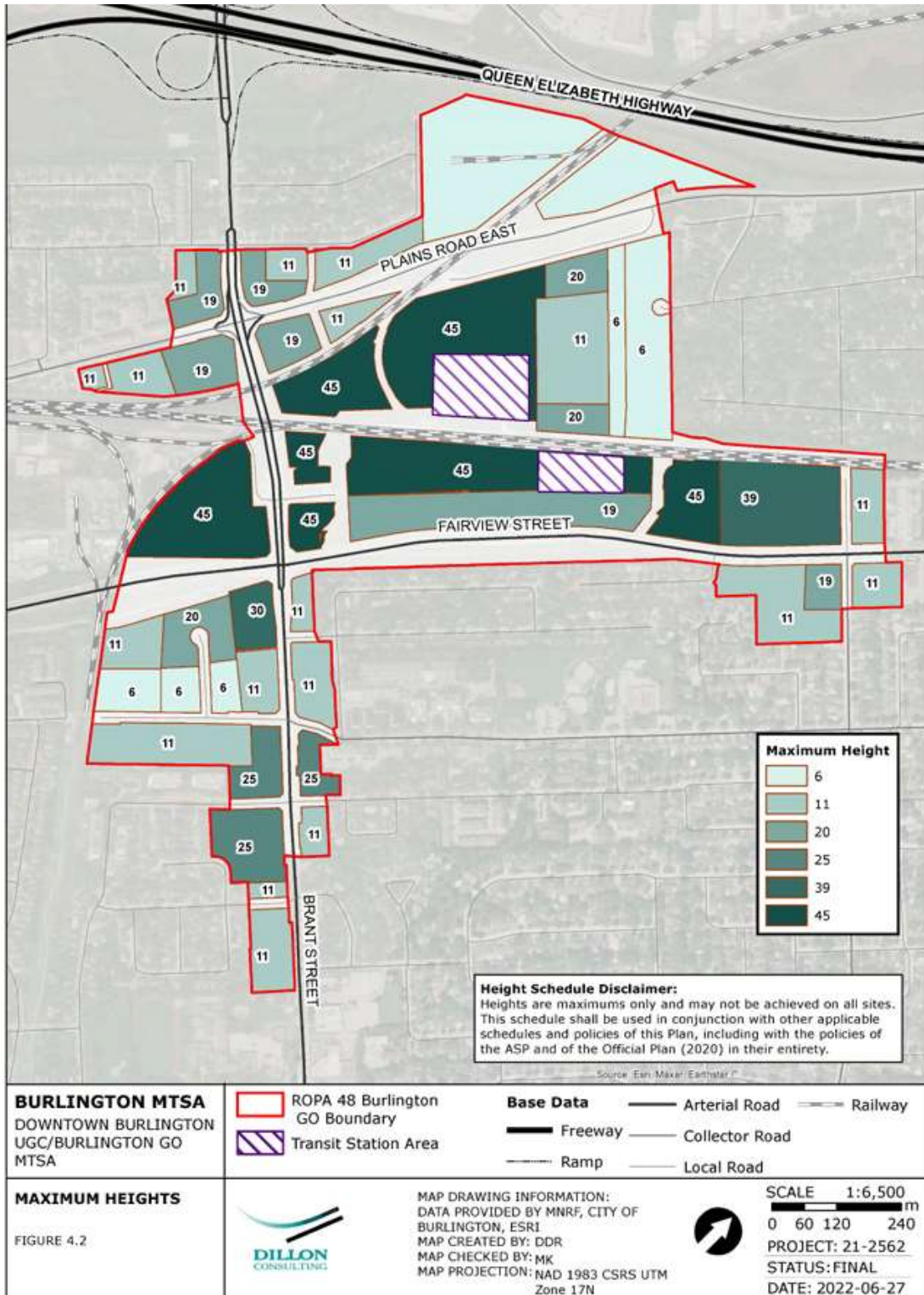


Figure 1: Proposed Maximum Heights - Burlington MTSA - Burlington GO MTSA ASP Study

Given that a majority of regional growth will need to be directed to strategic growth areas like MTSAs, the prescribed rate of 150 residents and jobs per hectare established by Section 2.4.2 is in need of an increase to better represent the intensification needed to facilitate the expected growth outlined by the Province. As it is anticipated that many other sites will be developed 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 provincial growth targets and those which will be constructed in reality. As such, we recommend that the prescribed densities under Section 2.4.2 are all increased to accurately reflect the planned built form envisioned by the MTSAs.

Population and Employment Targets

One of the proposed changes to the PPS is the removal of Provincially-established growth targets which were traditionally applied through Schedule 3. Instead, the Province is recommending that municipalities take on the responsibility of carrying out their own forecasting, using the 2051 targets as a minimum. Our concern with this approach is that a municipality's desire to reflect accurate growth forecasting will be dependent on their overall desire for development. While some municipal governments do understand the important need for housing at this time, there are still many which allow political agendas to influence housing decisions. Accordingly, we strongly encourage the Provincial government to maintain the responsibility of setting out the growth forecasts for municipalities to ensure the provincially-significant issue of housing is not dependent on individual municipalities.


Recommended Changes to the Provincial Policy Statement

MTSAs require a consistent, suitable policy framework for the vital role they play in realizing the Province's intensification targets. UrbanSolutions recommends the following changes to the proposed Provincial Policy Statement to achieve the vision for transit-oriented communities that MTSAs emphasize:

1. Modify Policy 2.4.2.2(c) to increase the proposed density target from 150 to 500 residents and jobs per hectare for Major Transit Station Areas served by the GO Transit rail network; and proportionately increase said targets for those served by subways, light rail, and bus rapid transit as outlined in Policies 2.4.2.2(a) and 2.4.2.2 (b), respectively; and,
2. Include the Population and Employment Targets and Forecasts formerly set out in Schedule 3 of the Growth Plan as part of the newly proposed Provincial Policy Statement.

As proposed, the aforementioned recommendations will strengthen the policy framework to provide clarity of implementation, ensure the goals and objectives of the Province are realized, and align with realistic growth and development outcomes. The balance of the proposed Provincial Policy Statement contains the appropriate range of policies to protect the matters of provincial interest while also ensuring sufficient residential intensification development is secured throughout the region.

Kind Regards,
UrbanSolutions



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cc. 850 Brant Properties Inc.

Appendix A – 850 Brant Street Architectural Package

