

February 27, 2019

Charles O'Hara
Ontario Growth Secretariat, Ministry of Municipal Affairs
777 Bay Street
c/o Business Management Division, 17th floor
Toronto, ON M5G 2E5

Dear Mr. O'Hara,

**Re: *Amendment 1 to the 2017 Growth Plan for the Greater Golden Horseshoe ("Amendment 1");
Proposed framework for provincially significant employment zones;
ERO number - 013-4506***

We are the planning consultants for Burlington 71 Plains Inc., the owners of a 1.08 hectare (2.67 acre) site located at 53 and 71 Plains Road East and 1025 Cooke Boulevard (the "subject site") and within the Aldershot GO Mobility Hub, as shown on Attachment 1.

Amendment 1 to the 2017 Growth Plan proposes to include a portion (the west half) of the subject site (53 Plains Road East and 1025 Cooke Boulevard) and a large portion of the Aldershot GO Mobility Hub area within Provincially Significant Employment Zone 19 ("PSEZ 19"), as shown on Attachment 1.

The purpose of this letter is to provide comments with respect to the proposed Amendment 1 to 2017 Growth Plan for the Greater Golden Horseshoe and the Proposed Framework for Provincially Significant Employment Zones as it affects the subject site, and to request that the subject site be excluded from PSEZ19.

In our opinion, the existing development context, existing planning policy framework and evolving planning policy framework are fundamental to understanding the basis for the Owners' request.

The Existing Development Context

The subject site is currently occupied by two one-storey buildings occupied by a commercial entertainment and motel uses. The surrounding uses include single

detached residential dwellings to the south, east and north. Also, to the north are prestige industrial uses in low rise (1- and 2-storey) buildings that include office, warehouse, a lab and an electrical design and manufacturing facility. To the west are mid-rise residential apartment buildings with commercial uses at grade and commercial uses in low rise buildings.

Throughout the Aldershot GO Mobility Hub area there are a full range of residential and commercial uses with limited employment uses. East of Waterdown Road, the employment uses are generally restricted to approximately seven (7) properties along Cooke Boulevard and Masonry Court.

Existing Planning Policy Framework

Halton Region Official Plan

Under the Halton Region Official Plan, the subject site is located within the Urban Area and are not located within an *Employment Area* overlay on Map 1 (Regional Structure). One of the objectives of the Employment Areas are to ensure the availability of sufficient land for employment to accommodate forecasted growth. As the subject site is not located within an *Employment Area* overlay, the Halton Region Official Plan has determined that these lands (as well as the entire Aldershot GO Mobility Hub area) are not of Regional significance for employment purposes, do not form part of the *Employment Area* urban structure element, and are not required to meet employment growth forecasts.

In-force Burlington Official Plan

The subject site is identified as being within a “Mixed Use Activity Area” (Schedule A – Settlement Pattern) and are designated *Mixed Use Corridor – Employment* (53 Plains Road East and 1025 Cooke Boulevard) and *Mixed-Use Corridor – General* (71 Plains Road East) on Schedule B – Comprehensive Land Use Plan – Urban Planning Area. The subject site is not a designated *Employment* area.

Mixed Use Activity Areas are locations where employment, retail and residential uses will be developed in a compact urban form and at higher development intensities. Within the *Mixed-Use Corridor – Employment* land use designation, a variety of uses are permitted, including industrial uses, a broad range of office uses, a limited range of retail uses, service commercial and personal services uses, financial institutions, entertainment, recreation, and community facilities

such as libraries and day cares. The *Mixed-Use Corridor – General* land use designation permits a wide range of commercial, office and high-density residential uses.

As outlined above, the subject site does not fall within a regionally or locally significant *Employment* area, nor are they required to achieve either the Region's or City's employment growth forecasts. From a policy planning perspective, the subject site does not form part of an *Employment* area urban structure element and are instead reserved for a mix of uses centred around a *Major Transit Station Area* (the Aldershot GO Mobility Hub) that are intended to meet the Region and City's intensification and growth targets.

Existing Planning Policy Framework

Adopted New Official Plan (Grow Bold: Burlington Official Plan)

On April 26, 2018, Burlington City Council adopted a new Official Plan, titled "Grow Bold: Burlington Official Plan". Halton Region has reviewed the adopted Official Plan and, in response to the Region's comments, City staff is now reviewing modifications to the Official Plan to be brought forward to City Council for consideration.

The adopted New Official Plan designates the subject site as follows:

- *Primary Growth Area – Growth Framework*
- *Mixed Use Intensification Area – Urban Structure*
- *located within a Mobility Hub (Major Transit Station Area) – Urban Structure*
- *Mixed Use Node and Intensification Corridor – Land Use Designation*

Note: the subject site does not fall within a designated Employment Area

Policy 2.3.1(a) of the Adopted New Official Plan states that *Mixed Use Intensification Areas* provide locations where range and intensity of employment, shopping, public service facilities, residential uses and other complementary uses, such as open spaces, parks, institutional and cultural uses will be developed with transit supportive densities in compact built form.

The *Mobility Hub* designation in the adopted New Official Plan is intended to reinforce land use and transportation objectives in the Growth Plan for the Greater Golden Horseshoe and, in particular, the goal of focusing development growth

around major transit areas. A *mobility hub* is defined as “[a] *major transit station area*, as defined in the Provincial Growth Plan for the Greater Golden Horseshoe, that is particularly significant given the level of transit service that is planned for it and the *development* potential around it. They are places of connectivity where different *modes* of transportation come together seamlessly.

Policy 2.3.1(i) further describes a *mobility hub* as:

“...areas located within walking distance to *major transit station areas*, including the Downtown Bus Terminal or GO Rail Stations, which are either currently or planned to be serviced by the *frequent transit corridors* and GO Transit. The high level of existing or planned transit service within these areas provides an environment within which significant residential and employment growth can be supported. To further support the transit-oriented nature of these areas, growth *shall* occur in the form of compact, mixed-use and pedestrian-friendly areas with residential and *employment intensities* greater than which exist in the surrounding areas. These are emerging areas in the Urban Structure that represent opportunities to *intensify* and develop *complete communities* with a range of uses at transit supportive densities.”

Policy 2.3.1(o) provides that:

“Mixed Use Nodes and *Intensification Corridors* will be a focus of re-urbanization. These areas vary widely and will be guided by the underlying land use designations of this Plan. Some areas will be planned to evolve with higher residential *intensities* and a full mix of uses, while others *may* permit a more limited range of *employment-oriented* permitted uses, both designed to achieve their planned function. These areas will support the *frequent transit corridors* and provide focal points of activity and a vibrant pedestrian environment and facilitate *active transportation* through careful attention to urban design, enhancing the opportunities for the location of *public service facilities* and *institutional uses*.”

According to the adopted New Official Plan, *Primary Growth Areas* are areas intended to accommodate the majority of the City’s forecasted growth and will experience the greatest degree of change. The entire Aldershot GO Mobility Hub is identified as a Primary Growth Area. Policy 2.4.2.(1)(iii) provides that Primary Growth Areas shall be regarded as the most appropriate location for new tall

buildings in accordance with the underlying land use designations or the land use policies of an area-specific plan.

The Subject Properties are designated *Urban Corridor – Employment* (53 Plains Road East and 1025 Cooke Boulevard) and *Mixed-Use Corridor – General* (71 Plains Road East) pursuant to Schedule C – Land Use, Urban Area. Section 8.1.3(8.1) establishes *Urban Corridor – Employment Lands* as areas of higher intensity, transit-supportive, pedestrian-oriented development where compact built form is encouraged, while the *Mixed-Use Corridor – General* lands are intended to accommodate a full range of residential, commercial and office uses at transit supportive densities.

The *Urban Corridor – Employment Lands* land use designation does not currently reflect the long-term vision for the Aldershot GO Mobility Hub. The Council adopted New Official Plan requires the approval of an area-specific plan in order to update the land use policies for the Aldershot GO Mobility Hub prior to any development within the area. As discussed below, the City has begun an area-specific plan study for the Aldershot GO Mobility Hub.

As part of its New Official Plan (Grow Bold: Burlington Official Plan) program, Burlington City Council, through approval of report PB-04-18 and Council resolution, approved the employment conversion of the west half (53 Plains Road East and 1025 Cooke Boulevard) and *Mixed Use Corridor – General* (71 Plains Road East) of the subject site and the entire Aldershot GO Mobility Hub area noting specifically that these lands are outside of the Region’s Area of Employment.

Proposed Aldershot GO Mobility Hub Precinct Plan

The City of Burlington is currently undertaking an area-specific planning exercise, as required by the Council adopted New Official Plan, for the Aldershot GO, Burlington GO, and Appleby GO Mobility Hubs to implement the long-term vision for these lands established in the recently adopted Official Plan. On July 16, 2018, City Council considered a staff report presenting draft precinct plans and draft policy directions for these Mobility Hubs. A copy of the draft precinct plans for the Aldershot GO Mobility Hub is attached as Appendix B.

According to the draft precinct plans for the Aldershot GO Mobility Hub, the site is located within the proposed Aldershot Main Street Precinct and is intended to accommodate a significant concentration of residential, retail, and commercial

uses, with development in the form of mid-rise mixed-use buildings with a maximum height of 11 storeys.

It is anticipated that the City-Initiated official plan amendment (area-specific plan) will be brought forward to replace the land use designations and related policies in the recently adopted New Official Plan shortly after the Council adopted official plan is finalized.

As described above, the subject site is not designated as an *Employment Area* in the adopted New Official Plan and was removed from the City's Employment Inventory through Council resolution. In line with provincial planning policy (namely the Provincial Policy Statement and Growth Plan for the Greater Golden Horseshoe) regarding *Major Transit Station Areas*, the evolving planning framework envisions a transit supportive mixed-use node for the subject site and Aldershot GO Mobility Hub area.

Proposed Amendment 1 to the 2017 Growth Plan

The proposed framework for PSEZs, as set out in the ERO posting 013-4506 by the Ministry of Municipal Affairs dated January 15, 2019, states that:

"To ensure employment areas that are crucial to province's economy are not converted without a more comprehensive assessment of employment land need, and the implications for economic development, the Ministry of Municipal Affairs and Housing is also proposing to identify provincially significant employment zones. Employment areas within these zones would require provincial approval in order to be converted, and therefore would not be eligible for conversion during the proposed transitional period outlined above..."

Identifying provincially significant employment zones would also serve a longer-term purpose for the province and municipalities in the Greater Golden Horseshoe by providing a regional picture of some of the key employment areas that make up the region's economic land base. This would help coordinate planning and economic development efforts and drive economic growth in the region." (our emphasis).

The provincial criteria for inclusion as a PSEZ identify lands that:

- *May be vulnerable to conversion pressures (e.g. to residential conversion);*
- *May be facing encroachment by sensitive land uses that could threaten the existing employment uses; or*
- *Are needed in the region to attract new investment and retain existing industries.*

Additional criteria may include lands that are:

- *Located near highways, railways, intermodal facilities, transit and/or other major transportation infrastructure to support the movement of people and goods;*
- *High concentration of employment and/or economic output, and play an economically strategic role to the region;*
- *Support industrial uses, which are sensitive to encroachment; or*
- *Contiguous zones and contain large continuous developable, constraint-free lands (e.g. >10 acres).*

While it is recognized that the subject site is located near a railway and has access to Highway 403 via Waterdown Road, in no other way does it meet any of the criteria set out above.

a) With respect to supporting or protecting industrial uses:

The subject site is not designated *Employment* in either the Regional or Local Official Plans.

b) With respect to protecting employment uses from sensitive land uses that could threaten existing employment uses:

Sensitive land uses are found on the subject site and surrounding area.

c) With respect to provide large, continuous constraint free lands for large industries:

The existing and evolving planning framework plans for the subject site and the greater Aldershot Mobility Hub area to be a transit supportive mixed-use area.

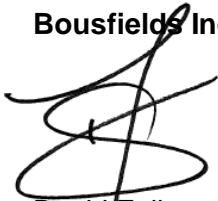
d) High concentration of employment and/or economic output

The subject site and remainder of the Aldershot GO Mobility Hub area is not an intensively developed employment area and the existing planning policy framework does not provide for one.

We note that PSEZ 19 is a very large zone which extends from Kerr Street in Oakville to west of Waterdown Road in Burlington along the Lakeshore West rail corridor. In our opinion, the subject site and the Aldershot GO Mobility Hub Area should be excluded, as this would not in any way affect the overall integrity of the PSEZ 19.

We thank you for your consideration of this request. If you have any questions or would like to meet to discuss our clients concerns, please contact the undersigned. Yours truly,

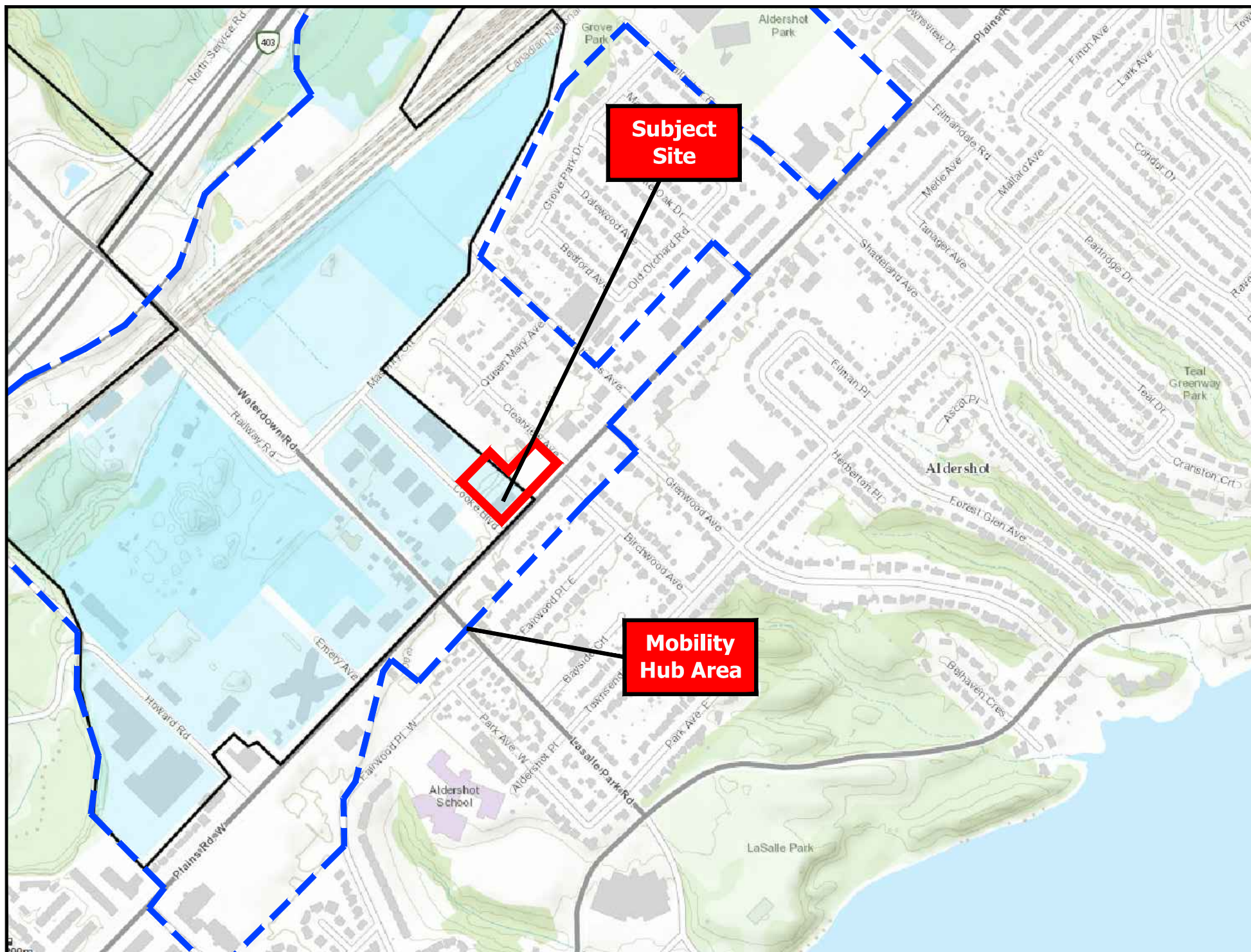
Bousfields Inc.



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c.c. *Marko Juricic, Brooklyn Contracting*
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City Clerk's Office, City of Burlington



ALDRESHOT GO MOBILITY HUB

DRAFT PRECINCT PLAN - MAY 2018

