

# PLANNING JUSTIFICATION BRIEF

Bronte Creek Meadows Community

City of Burlington

Date:

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Prepared For:

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## 1.0 INTRODUCTION

MacNaughton Hermsen Britton Clarkson Planning Limited (“MHBC”) has been retained by Penta Properties Limited (“Penta”) to prepare a Planning Justification Brief in support of an employment conversion for the property municipally known as 5164, 5366, 5470 and 5900 Upper Middle Road as well as 5201 Mainway in the City of Burlington which are referred to as the Bronte Creek Meadows Lands (“BCM Lands”) and/or the Subject Lands throughout this report. The Subject Lands are approximately 135 hectares (333.6 acres) in size located west of Bronte Creek Provincial Park and north of the Queen Elizabeth Highway in the City of Burlington.

The Subject Lands, despite being designated for employment uses for over 40 years and marketed as such, have never been developed as employment lands. The term Employment Area in this Planning Justification Brief is a defined term under the Provincial Policy Statement (“PPS”) and the Growth Plan for the Greater Golden Horseshoe (“Growth Plan”) meaning “*areas designated in an official plan for clusters of business and economic activities including, but not limited to, manufacturing, warehousing, offices, and associated retail and ancillary facilities*”. Under the PPS and the Growth Plan, the conversion of lands within Employment Areas to non-employment uses may only be permitted through a Municipal Comprehensive Review and where criteria set out in both Provincial policies are met. The purpose of this Planning Justification Brief is to identify how those criteria are met to support a request for the conversion of the Subject Lands.

The BCM lands are essentially an isolated parcel of urban land with existing residential communities to the west and north, a Provincial Park to the east and employment uses to the south of Mainway. The adjacency of existing sensitive land uses is a significant factor in constraining the development of the Subject Lands for employment purposes.

In considering the conversion of the Subject Lands within the Employment Area, this Planning Justification Brief provides an evaluation of Section 1.3.2.4 of the PPS and Section 2.2.5.9 of the Growth Plan. These sections set out specific requirements for the conversion of lands and restrict such considerations to the Municipal Comprehensive Review process of a municipality.

Part of the justification for the employment land conversion request includes the assessment of the opportunity for the Subject Lands to deliver much needed housing together with suitable employment opportunities that can produce a significant number of jobs compared to the traditional industrial uses currently permitted on the lands. In fact, the BCM lands do not have the essential locational attributes needed to attract and retain general industrial users.

A Conceptual Master Plan for the Subject Lands was prepared for the purposes of illustrating the type of development that can be achieved on the BCM lands to optimize housing development and provide for a compatible development with the surrounding community. A vibrant, mixed-use community including residential, institutional, commercial and employment uses can be developed which will also protect the existing natural heritage features on the lands. The master-planned community would accommodate a total of approximately 2,857 new houses and 1,625 new jobs.

This Planning Justification Brief has been prepared to support the conversion request for the Subject Lands and includes the following:

- A general description of the Subject Lands and surrounding uses as well as the current physical conditions to provide an understanding of the locational context;
- A brief history regarding the Bronte Creek Meadows lands with a specific history on the

- marketing efforts by both the owners and the City of Burlington to develop employment uses;
- A description of the Conceptual Master Plan for the BCM Lands;
  - A review of the existing policy and regulatory framework that applies to the Subject Lands and an assessment of how the employment land conversion meets Provincial requirements; and,
  - A summary of key conclusions and recommendations related to the employment conversion request.

## 2.0 SITE DESCRIPTION AND SURROUNDING CONTEXT

### 2.1 Site Description

The Subject Lands represent a collection of parcels municipally addressed as 5164, 5366, 5470 and 5900 Upper Middle Road as well as 5201 Mainway in the City of Burlington. The lands are across from the entry to Bronte Creek Provincial Park on Burloak Drive to the east and north of Mainway located to the south.

The Subject Lands are approximately 135 hectares in size, relatively flat, and currently used for agricultural purposes, as an interim use. The lands have approximately 1,100 metres of frontage along Upper Middle Road to the north, 1,100 metres of frontage along Mainway to the south, and approximately 820 metres of frontage along Burloak Drive to the east. To the west, the lands are bound by Corpus Christi Catholic Secondary School, the Sheldon Creek woodlot and natural heritage areas Existing employment uses are located on the south side of Mainway. A location map of the Subject Lands is provided in **Figure 1** below.



Figure 1: Location Map

## 2.2 Surrounding Uses and Context

An aerial image showing the Subject Lands and the surrounding land uses is included in this report as **Figure 2**. The general surrounding context and surrounding uses are described as follows:

- NORTH:** Existing mixed use, mid-rise commercial residential uses and multi-unit residential townhouses abut Upper Middle Road directly opposite the Subject Lands. The low-density residential neighbourhood of Orchard is located further north.
- EAST:** Sheldon Creek, Bronte Provincial Park, with overnight camping facilities is located along the full extent of frontage along Burloak Drive to the east.
- SOUTH:** Mainway and low density offices and distribution facilities for CPC Pumps International, Frost Products Ltd., ABS Production, Millipore Sigma, DCL Supply and IRC Automation are located to the south in the QEW employment corridor. Extensive vacant land is also available for lease along Mainway.
- WEST:** Corpus Christi Secondary School is located immediately to the west. Existing low density residential dwellings within Creek Way Village are located to the west of Sheldon Creek. Further to the west, at the intersection of Upper Middle Road and Appleby Line, is an existing retail commercial complex called Millcroft Shopping Centre. Several properties to the east within the Uptown Core Growth Area are also the subject of mixed-use, higher density redevelopment applications.

The Subject Lands have access to, and are well serviced by, transit including Burlington Bus Routes No. 11 Sutton-Alton and No. 81 Harvester/North Service. These transit services provide connections to shopping centres along Dundas Street and residential neighbourhoods in the northeast of Burlington. The transit services also provide service to the 407 GO and Appleby GO Stations, providing greater connections to Oakville, Mississauga and Toronto, and to car-sharing programs that provide links to Mississauga, Brampton and Vaughan.

The BCM Lands are also well serviced by a number of surrounding parks, schools and community services as well as retail and service commercial uses. The Subject Lands are directly west of Bronte Creek Provincial Park that provides a unique recreational asset to residents and opportunities for active transportation as well as leisure activities. The Provincial Park is open year-round for day use and two season camping opportunities for tents and recreational vehicles. Day use facilities are provided and include facilities such as picnic shelters, a disc golf course, an outdoor pool, farm area and play barn. The park also offers five hiking trails that range in length from 0.5 km to 3.4 km. The park is also animal friendly and provides 'leash free' trails.

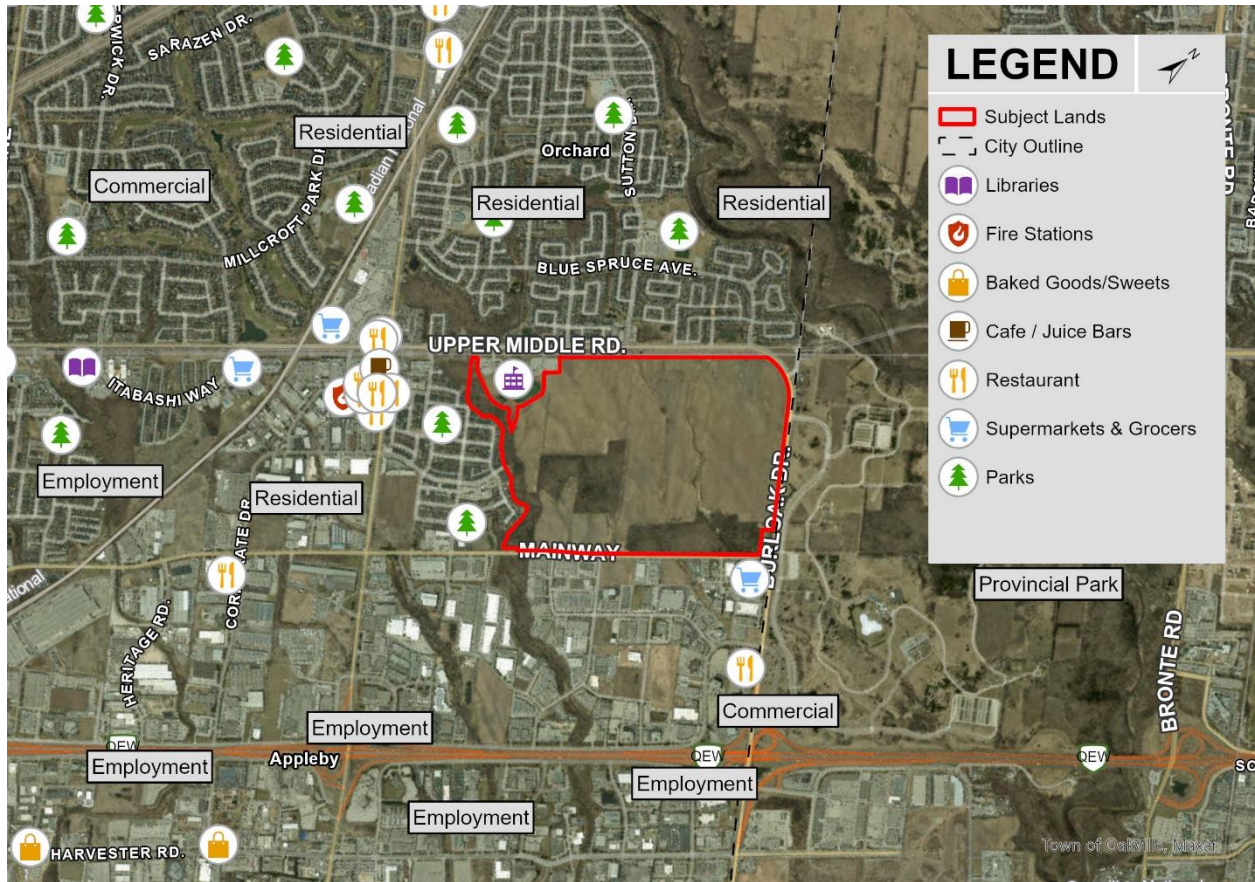


Figure 2 – Surrounding Context Map

## 2.3 Policy Context

The Subject Lands are centrally located within Halton Region in an *Urban Area* that provides benefits of having existing regional infrastructure, proximity to community assets and transportation connections. The Subject Lands while located between two 400 series highways, Highway 407 and the Queen Elizabeth Highway (“QEW”) are north of the QEW employment corridor south of Mainway

The Subject Lands are designated by Halton Region as “*Urban Area*” and “*Natural Heritage System*” (**Figure 3** and **Figure 4**) and are located adjacent to a Primary Regional Node at Upper Middle Road and Appleby Line to the west which is designated as a Higher Order Transit Corridor (**Figure 5**).

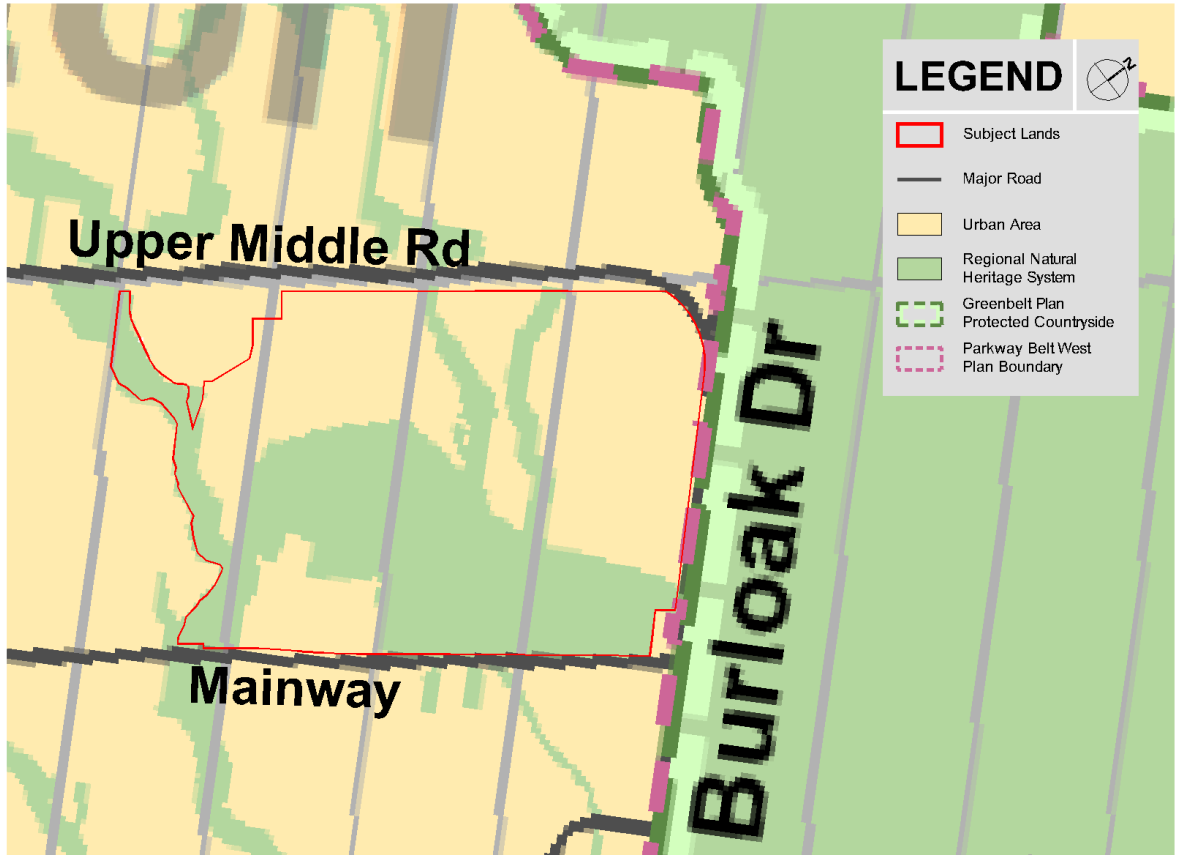


Figure 3 – Halton Region Official Plan – Map 1 Regional Structure

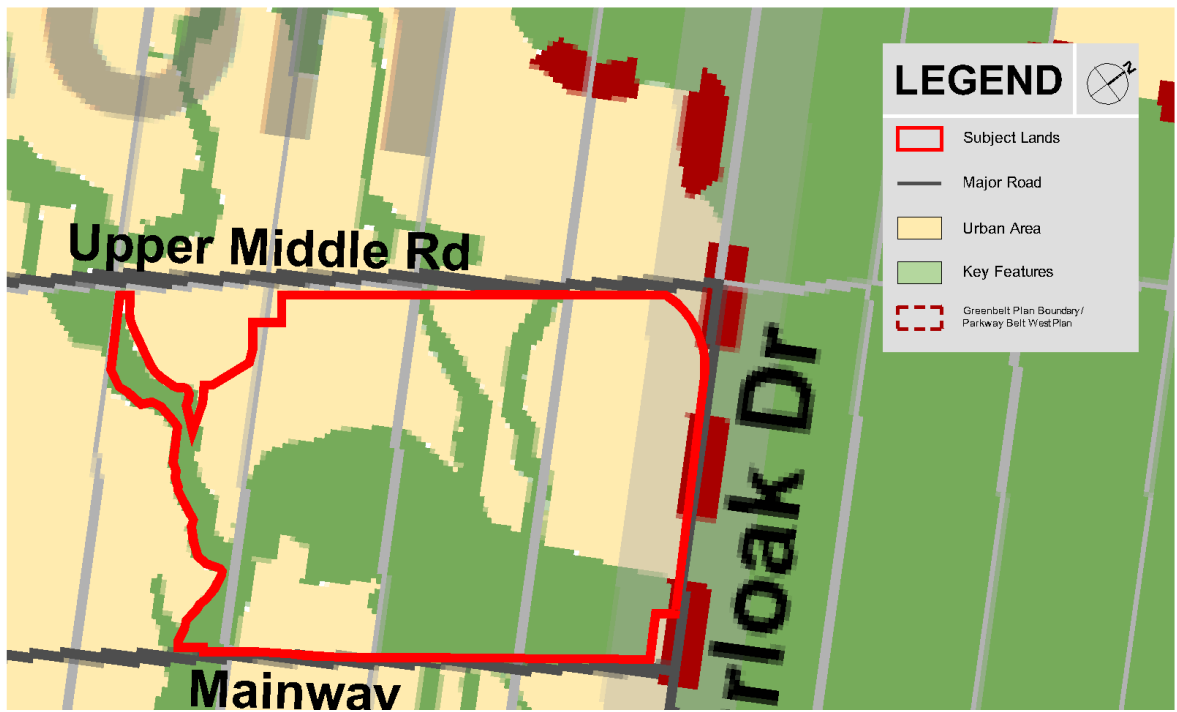


Figure 4 – Halton Region Official Plan – Map 1G Key Features within the Greenbelt and Regional Natural Heritage Systems



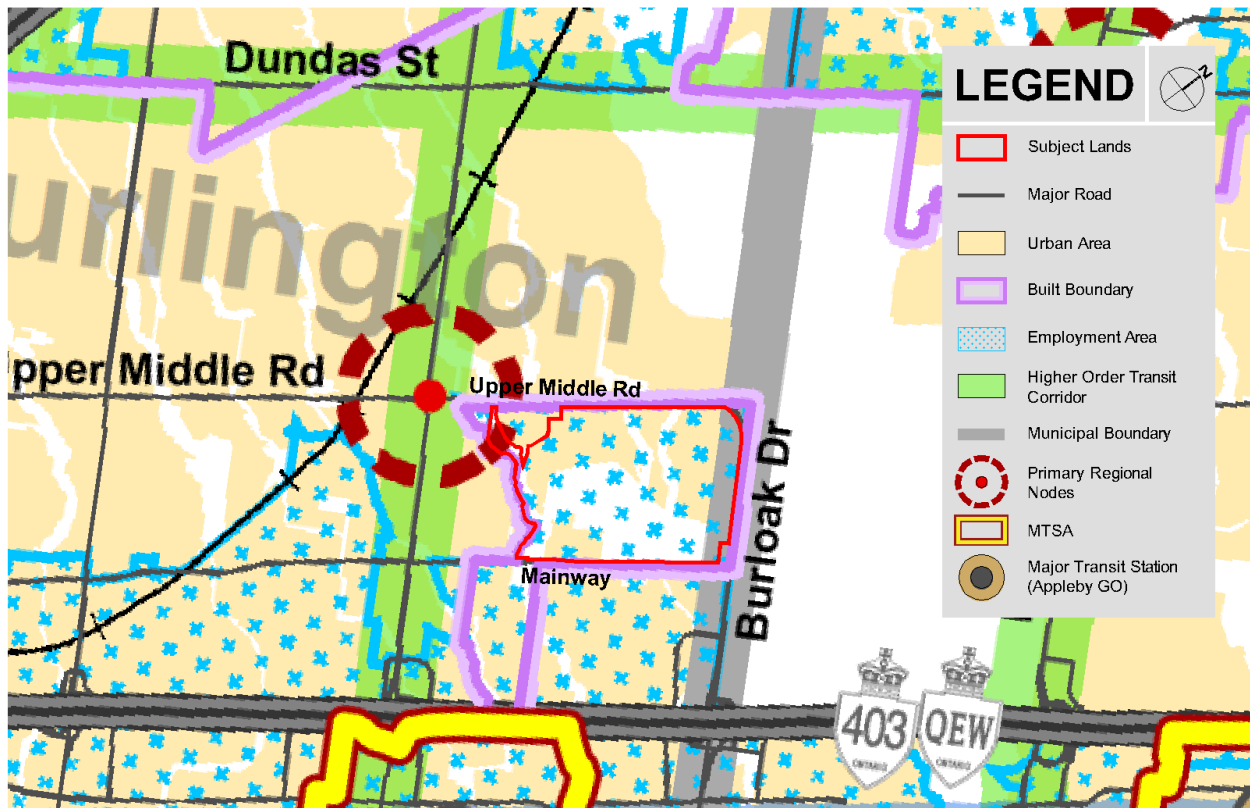


Figure 5 – Halton Region Official Plan – Map 1H Regional Urban Structure

The goal of the *Urban Area* is to manage growth in a manner that fosters complete communities, improves housing affordability and enhances mobility. The Subject Lands, are bound by two major arterial regional roads that, Halton Region states in its Official Plan, are designed for transit-supportive, high density, mixed use development along the right-of-way within urban areas, and provide pedestrian infrastructure, as well as on and/or off-road cycling facilities. The Official Plan also supports providing flexibility to address changes in the role and function of employment areas in relation to prevailing trends in the regional economy, such as achieving complete communities through the provision of convenient access to a mix of jobs, local services, a full range of housing, schools and recreation and open space for residents.

The current *Employment Area* overlay in the Region’s Official Plan that continues to apply to the Subject Lands restricts the opportunities for redevelopment of the lands to employment only uses and constrains the opportunity to optimize development of the BCM lands. The removal of the *Employment Area* overlay will allow for the implementation of the full range of uses to create a compatible, mixed use community achieving jobs and much needed housing in the short term.

## **3.0 HISTORY OF THE BRONTE CREEK MEADOWS LANDS**

The BCM Lands were purchased by Penta in 1998. Following the purchase of the lands, there have been ongoing efforts to market and develop the lands for employment uses.

### **3.1 Efforts to Market the Subject Lands**

The Subject Lands have been designated for employment uses within the City for over 40 years. Penta has actively marketed the lands as employment in partnership with the Burlington Economic Development Corporation for several years. A summary of some of the many efforts to market the Subject Lands for employment uses is set out as follows:

- November 1979 – The City of Burlington Business Services Division produced an Industrial Site Brochure to promote industrial sites and their availability within the City. The brochure includes the Subject Lands along with other sites.
- 2001 – The City requested that the BCM lands be considered as part of their bid to locate the Misel Vitelic Microchip Plant in the City. Penta agreed to be included as a potential site. The bid for the Misel Vitelic site was not successful. Prior to this bid, the City also pursued a bid for the Woolworth Head offices on the lands which also failed.
- June 2009 – As part of Minutes of Settlement related to an Ontario Municipal Board appeal on the Subject Lands, Penta agreed to actively market the BCM Lands, in co-operation with the Burlington Economic Development Corporation (“BEDC”), for employment purposes for a period of at least 5 years from the date of the execution of the Minutes of Settlement (which was June 14, 2009). Part of the marketing efforts required Penta to post signs on the lands indicating they were available for sale or lease and the lands were to be advertised in BEDC publications. All inquiries on the Subject Lands were to be disclosed by Penta to the BEDC and information was to be shared about such inquiries including Penta’s response to such inquiries. The marketing in accordance with the Minutes of Settlement was undertaken for the 5 year period which expired on June 14, 2014 but marketing by the BEDC and Penta continued.
- September 2011 – BEDC reached out to Penta to include the BCM lands as part of a site selection request from a multi-national drug manufacturer. Penta provided consent to be included as a pre-qualified potential site. The BCM lands did not meet the selection criteria.
- October 2017 – In October 2017 the BCM lands were the focus of the Mayor’s newsletter as part of Burlington’s inclusion of lands within Toronto’s Global bid for Amazon HQ2. This bid also failed.

Despite being designated and marketed for employment uses since at least 1979, the Subject Lands have not been developed for employment uses. In many cases the employment user site selection criteria cannot be met on the Subject Lands as the lands do not possess the required attributes to attract such uses.

### **3.2 Request to the Region for Conversion**

The Region extended the first two phases of its Municipal Comprehensive Review process from 2019 to 2022 and Penta submitted an employment conversion request for the BCM Lands to the Region. These requests were submitted with a comprehensive physical and policy context analysis of the BCM Lands and a justification for the conversion based on both Provincial and Regional criteria. These requests justified the inadequacy of an employment only land use designation on the BCM Lands given their size and context and location in the Regional and City’s urban structure and the lack of employment development over 40 years. The Region did not support the requests despite the evidence that the Subject Lands, for over 40 years, have not been developed for employment uses by Penta or previous owners.

Penta filed its submissions on the employment land conversion request to the Minister in August of 2021 including the request to remove the *Employment Land* overlay on the BCM Lands from the Regional Official Plan. Again the rationale for the requests included the following:

- Employment Areas are currently restricted by the Region to predominantly industrial only uses. Penta consistently submitted the need for the Region to consider a more permissible land use policy approach to allow for a wider range of opportunities to meet market demands that have significantly changed since the planning framework for employment in the Region was established decades ago;
- The Region's continued Employment Land overlay format in the Region Official Plan serves as a restriction and barrier to development opportunities and for much needed housing development; and,
- The Region applied its conversion criteria on a highly generic basis and without any consideration to context of the Subject Lands or the opportunities for jobs and new housing that can be achieved through the conversion.

Since 1998, Penta has exhausted its efforts to market and develop the Subject Lands for the planned employment only uses and is seeking the conversion of the lands to optimize the more appropriate and compatible development of the lands.

# 4.0 PROPOSED VISION FOR MIXED-USE DEVELOPMENT

## 4.1 Overview

The request for the conversion of the Subject Lands will enable the development of a mixed-use community that rethinks outdated policies for the BCM Lands and create a vibrant, mixed-use community that is compatible with and integrated into the surrounding community.

A Conceptual Master Plan for the Subject Lands was prepared that includes 84.2 hectares of developable land area and is comprised of several specific land areas required for: residential, institutional, commercial and employment uses, new roads and road widenings, natural heritage areas and buffers, and, stormwater management lands. The Conceptual Master Plan envisions a total of 2,857 new residential units and 1,625 new jobs.

As shown in **Figure 6** below, MHBC completed some preliminary constraint mapping to identify the overall structure of the land use framework for the Master Plan, inclusive of natural heritage areas and associated buffers, developable areas, a supporting road network as well as a stormwater management facility. This preliminary constraint mapping informed the Conceptual Master Plan shown in **Figure 7**.

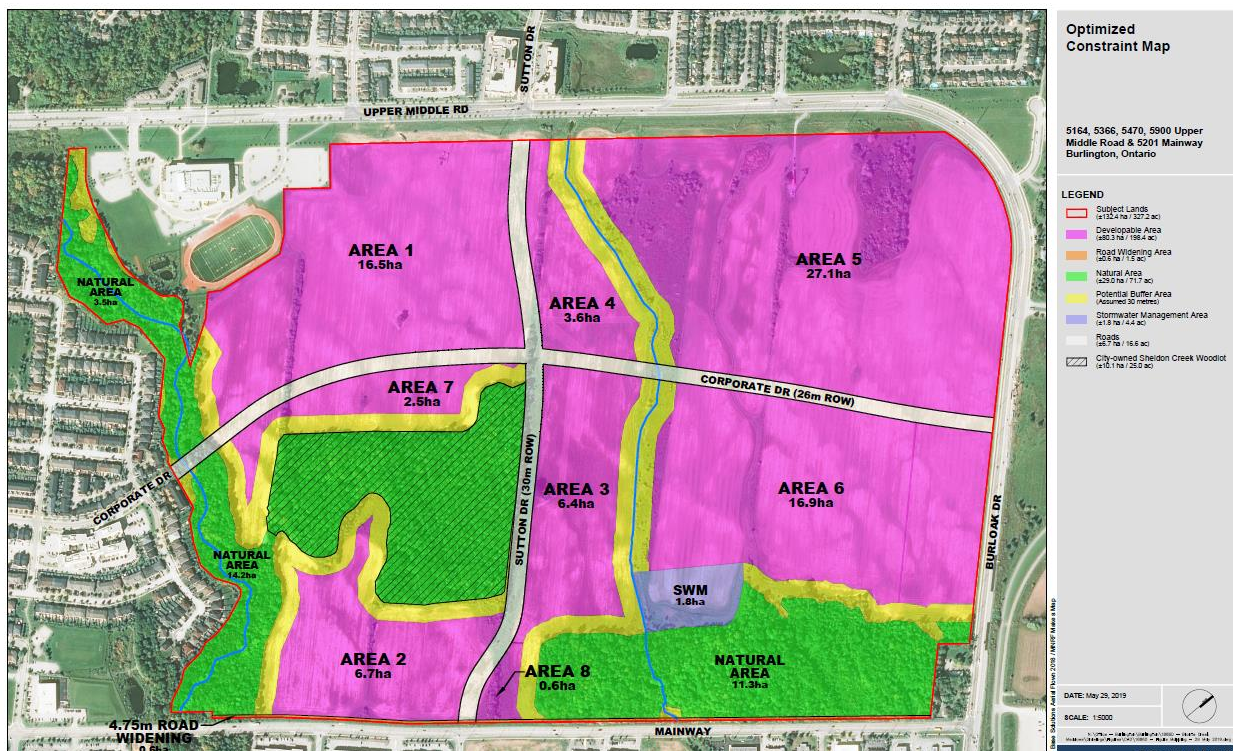


Figure 6 – Optimized Constraint Map

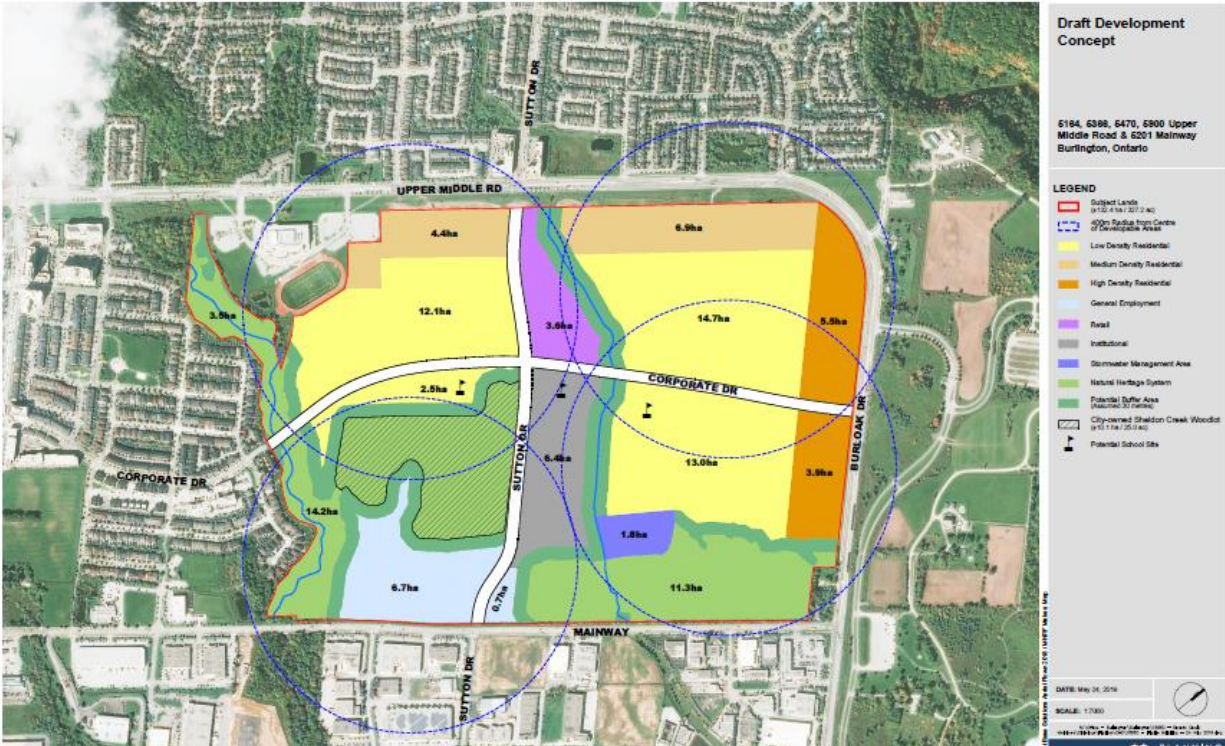


Figure 7 – Conceptual Development Concept

### 4.2 Buildable Area

The buildable area based on an optimized plan is described as having eight distinct areas that are delineated by new roadways and/or natural areas. There are Medium Density residential uses proposed along Upper Middle Road, with a total area of 11.3 hectares and high density residential uses proposed along Burloak Drive, with a total area of 9.4 hectares. Internal to the site are low density residential uses with a total of 39.8 hectares. At the northeast corner of the intersection of Corporate Drive and Sutton Drive within the site, a retail block sized at 3.6 hectares is proposed to serve the new community. At the southwest corner of the site is an employment block sized at 6.7 hectares on the west side of Sutton Drive and 0.7 hectares on the east side of Sutton Drive. This employment area will maintain the employment function on the Subject Lands and assist in the creation of jobs at a location with appropriate buffers and transition to the residential uses to the west and north. There is a potential school site location identified on the plan in a central location. The central location for a new school provides students with opportunities to walk or cycle to not only school, but open space fields that can provide after school recreational programs and activities. The land uses for the buildable areas are summarized below in **Table 1**.

Based on the land uses proposed there is a potential for approximately 899 low density residential units, 480 medium density residential units and 1,478 high density residential units, for a total of 2,857 new residential units as shown below in **Table 2**.

Based on the employment block and other uses proposed for the Subject Lands, there is a potential for 1.625 total jobs to be created consisting of 170 retail, 555 institutional and 900 general employment as shown below in **Table 3**.

<b>TABLE 1: LAND USE COMPOSITION</b>	
<b>LAND USE</b>	<b>AREA(ha)</b>
High Density Residential	9.4
Medium Density Residential	11.3
Low Density Residential	42.3
General Employment	7.4
Institutional	6.4
Retail	3.6
Natural Areas	39.1
Natural Area Buffers	13.96
<b>TOTAL</b>	<b>142.56</b>

<b>TABLE 2: RESIDENTIAL YIELD (Units)</b>	
<b>Density Type</b>	<b>Unit Count</b>
Residential – Low	899
Residential – Medium	480
Residential - High	1,478
<b>TOTAL</b>	<b>2,857</b>

<b>TABLE 3: EMPLOYMENT YIELD (Jobs)</b>	
<b>Employment Type</b>	<b>Job Count</b>
Retail	170
Institutional	555
General Employment	900
<b>TOTAL</b>	<b>1,625</b>

### 4.3 New Road Extensions and Road Widening

Two new internal roadways are proposed that are extensions of existing roadways in the adjacent established neighbourhoods. Corporate Drive, which begins within Crestway Village, and is currently 'dead ended' at its northern end in that neighbourhood, will be extended and link the existing Crestway Village residents to the Bronte Creek Provincial Park that is located at the northeast end of the roadway by Burloak Drive.

As a complete street, residents will be able to walk or cycle to the Provincial Park on a daily basis. Similar to Corporate Drive, Sutton Drive will link the two pre-existing Sutton Drives, northwest of Upper Middle Road and southeast of Mainway Road. This new road link will then connect the existing Orchard low density residential area, not only to the established industrial office complex on the southeast side of Mainway, but to the proposed school site that is situated centrally to the new complete community.

The new complete community also contemplates an integrated trail network through complete street design that will support active modes of transportation across, and through, the neighbourhood.

#### **4.4 Natural Area and Buffers**

The natural areas contain small creeks, a remnant woodland along Mainway Road, as well as the Sheldon Creek woodland. The creeks represent linkages to up and downstream creek pathways that represent natural overland drainage channels and provide continued habitat linkages for local wildlife.

These woodlands and conservation authority regulated creek areas within the BCM Lands will be protected. These lands will provide recreational and open spaces for residents and visitors as well as visual amenity areas. Each area will be appropriately buffered from developable lands.

#### **4.5 Stormwater Management**

A stormwater management pond is planned near the existing natural heritage area along Mainway Road in the southeastern area of the Subject Lands. This pond area will allow for the natural collection of stormwater runoff for the lands.

#### **4.6 Connection to the Surrounding Communities**

The established neighbourhoods of Orchard and Creekway Village will benefit from the development of compatible land uses, namely residential uses. These are proposed throughout the northwestern half of the 135 hectares (333.6 acres) site. Reflecting the existing residential uses on the northwest side of Upper Middle Road, the southeast side will have medium density housing lining the street. Similarly, higher density residential uses are proposed along Burloak Drive, directly across from Bronte Creek Provincial Park. This provides direct access to a Provincial asset that supports a high quality of life for residents. Higher density development also supports the policies of the Region that require increased densities along major arterial roadways such as Upper Middle Road and Burloak Drive.

While residential uses will be provided along Upper Middle Road, the extension of retail commercial uses from the medium density mixed use buildings on the northwest side of Upper Middle will also mirror existing uses. New retail and service commercial uses will support the daily living needs of residents not only within Bronte Creek Meadows, but also for residents of Orchard and Creekway Village.

In the context of compatibility, employment lands are proposed adjacent to Mainway Road that also reflects the established and existing industrial office complexes along the southeast side of Mainway Road. Providing new jobs along existing public transit routes assists in supporting active transportation with links to the regional Metrolinx rail corridor for workers who may not live within the community.

## 5.0 POLICY ANALYSIS

The following section of the Planning Justification Brief provides a review and assessment of the land use policy and regulatory framework related to the Subject Lands and the proposed employment conversion.

### 5.1 Planning Act, R.S.O. 1990, c.P. 13

The Ontario Planning Act, R.S.O. 1990 (the *Planning Act*) is the primary legislation governing land use planning in the Province of Ontario. The *Planning Act* provides the basis for consideration of provincial interests in managing land and natural resources, preparing official plans and planning policies, establishing planning processes, regulating land uses through zoning by-laws and other measures, ensuring public notice and appeal rights, and other matters of provincial interest. Several other Provincial policies are created from the authority of the *Planning Act*, including the Provincial Policy Statement.

**Section 2** of the Planning Act sets out the matters of provincial interest which the Minister, the council of a municipality, a local board, a planning board, and the Tribunal shall have regard to when carrying out their responsibilities under the Act. Matters of provincial interest relevant to the proposed conversion include:

- (a) the protection of ecological systems, including natural areas, features and functions;*
- (f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- (h) the orderly development of safe and healthy communities;*
- (i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;*
- (j) the adequate provision of a full range of housing, including affordable housing;*
- (k) the adequate provision of employment opportunities;*
- (l) the protection of the financial and economic well-being of the Province and its municipalities;*
- (p) the appropriate location of growth and development;*
- (q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;*
- (r) the promotion of built form that,*
  - (i) is well-designed,*
  - (ii) encourages a sense of place, and*
  - (iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;*
- (s) the mitigation of greenhouse gas emissions and adaptation to a changing climate. 1994, c. 23, s. 5; 1996, c. 4, s. 2; 2001, c. 32, s. 31 (1); 2006, c. 23, s. 3; 2011, c. 6, Sched. 2, s. 1; 2015, c. 26, s. 12; 2017, c. 10, Sched. 4, s. 11 (1); 2017, c. 23, Sched. 5, s. 80.*



## **Justification**

The proposed employment conversion has regard for all applicable matters of provincial interest as outlined in Section 2 of the Planning Act as follows:

1. The proposed development will be subject to future Official Plan Amendment and Zoning By-law Amendment applications to define and confirm the limits of the natural heritage lands on the Subject Lands to ensure the long-term protection of these environmental features.
2. The proposed employment conversion will allow for the development of lands within the urban area of the City of Burlington and will make efficient use of the existing services and public transit infrastructure in the area. This will contribute to the financial and economic well-being of the municipality.
3. The proposed development of the converted lands will provide for orderly development of a new mixed-use neighbourhood in the City and will provide much needed housing through a range of unit sizes to diversify the housing options and allow opportunities for affordable housing available in the area while also providing adequate provision of employment opportunities and employment uses to create additional jobs.
4. The proposed Concept Master Plan considers the need for recreational facilities in the area, including schools, and the employment conversion will therefore provide opportunities to improve access to recreational facilities in east Burlington.
5. The Subject Lands represent an appropriate location for residential growth and development being within the urban area of the City of Burlington where growth is directed.
6. The Concept Master Plan is envisioned as a walkable mixed-use neighbourhood that is a safe and accessible neighbourhood for future residents and employees.

## **5.2 Provincial Policy Statement (2020)**

The Provincial Policy Statement (2020) (the “PPS”) was issued under Section 3 of the *Planning Act* and came into effect on May 1, 2020. The PPS establishes the policy foundation for regulating the development and use of land in Ontario and provides policy direction on matters of provincial interest related to land use planning and development. It provides a vision for land use planning in Ontario that encourages an efficient use of land, resources and public investment in infrastructure.

The PPS strongly encourages development that will provide long term prosperity, environmental health and social well-being. These directives depend on the efficient use of land and development patterns that support strong, livable and healthy communities that protect the environment and public health and facilitate economic growth. Land use planning decisions must be consistent with the PPS.

**Section 1.0** of the PPS, Building Strong Healthy Communities, provides direction for the management and promotion of efficient development and land use patterns for accommodating an appropriate mix of

residential, employment, institutional, recreation, park and open space uses and improving accessibility by removing land use barriers in order to create livable communities.

**Section 1.1**, Managing and Directing Land Use to Achieve Efficient Development and Land Use Patterns, includes policies that support the promotion of healthy, livable and safe communities through such matters as, intensification, land use compatibility, provision of housing, and the efficient use of public services and infrastructure.

**Policy 1.3.2.4** provides that planning authorities may permit conversion of lands within employment areas to non-employment uses through a comprehensive review, only where it has been demonstrated that the land is not required for employment purposes over the long term and that there is a need for the conversion.

### **Justification**

**The proposed conversion of the Subject Lands specifically addresses Section 1.3.2.4 of the PPS as follows:**

- 1. The identified need for the conversion of the lands is clearly demonstrated by the lack of any development of the lands within the urban area for over 40 years despite being designated for employment uses.**
- 2. The proposed uses that would be facilitated by the conversion through the Concept Master Plan would not adversely affect the overall viability of the employment area but would complement it and create a more compatible and vibrant community which would in fact provide for more jobs than the planned industrial uses.**
- 3. The surrounding community's existing and planned infrastructure and public service facilities are planned to better accommodate a new housing community as the lands are within walking distance to several existing services and facilities and supported by transit.**
- 4. The Subject Lands are an isolated pocket of land without visibility or direct frontage along a major transportation corridor. They are not required to be protected for major goods movement facilities or as part of a corridor for employment uses that require such locations.**

**The conversion and Concept Master Plan development is consistent with other applicable policies of the PPS as follows:**

- 1. The proposed employment conversion will allow for the efficient development of underutilized lands within the existing urban area with access to existing services in the City of Burlington.**
- 2. The proposed employment conversion will provide an opportunity for development and growth within the urban area and will allow for the addition of a significant amount of residential units to the City's housing stock and will assist the City and Region in providing a mixture of housing types and unit sizes. It will also assist in the creation of jobs through providing a portion of the site for employment uses.**

3. **With respect to need for the employment conversion, there is a clearly demonstrated need for additional housing in the Province given the current housing supply crisis. The Subject Lands are a logical extension to the surrounding residential neighbourhoods to the north and west and are ideally located to contribute to satisfying the need for housing.**
4. **The proposed employment conversion will allow for the development of the Subject Lands through use of existing municipal infrastructure and will ensure the efficient use of existing water, storm water, sanitary sewer, and transportation infrastructure.**

### **5.3 Growth Plan for the Greater Golden Horseshoe (2020)**

*A Place to Grow: Growth Plan for the Greater Golden Horseshoe* (the 'Growth Plan') was prepared and approved under the *Places to Grow Act, 2005* and updated on August 28, 2020. The Growth Plan establishes a long-term framework for growth and development in the Greater Golden Horseshoe ('GGH') region which encourages the efficient use of land through the development of complete communities that are compact, transit supportive, and provide a range of housing and employment opportunities. The Growth Plan utilizes a land use planning horizon to 2051.

The Growth Plan builds upon the policy foundations of the PPS, and previous plans and responds to key challenges in the GGH region by providing enhanced policy directions designed to achieve complete communities that are compact, transit-supportive and make efficient use of investments in infrastructure and public service facilities while ensuring the protection of agricultural and natural areas and supporting climate change mitigation and adaptation. Guiding principles of the Growth Plan are established to support the achievement of complete communities; prioritize intensification and higher densities to make efficient use of land and infrastructure; provide flexibility to capitalize on economic and employment opportunities; support a mix of housing options; improve the integration of land use planning with planning and investment in infrastructure; protect and enhance the natural environment; conserve and promote cultural heritage; and, integrate climate change considerations into planning and growth management.

The Growth Plan provides policies for where and how to grow, stating that population and employment growth is to be directed to urban areas and rural settlement areas. Within these areas, the Growth Plan distinguishes between two different areas of growth: the Built-Up Area, where growth is to be directed and accommodated through intensification; and, Designated Greenfield Areas, which are generally undeveloped, vacant land, where growth and development should achieve a compact urban form. The Growth Plan also promotes intensification in strategic growth areas (including MTSAs), transit-supportive densities, a diverse mix of land uses, a range and mix of employment and housing types, affordable housing, high quality public open space and easy access to local stores and services. Changes to local Official Plans which better conform to these objectives and policies by providing large sites which contribute to complete communities also meet the Growth Plan's goal of optimizing the use of the existing urban land supply.

**Policy 2.2.5.9** provides that the conversion of lands within employment areas to non-employment uses may be permitted only through a municipal comprehensive review where it is demonstrated that:

- there is a need for the conversion;
- the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;
- the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;

- the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan; and
- there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.

### **Justification**

**As required under Section 2.2.5.9 of the Growth Plan, the conversion of lands within the employment area to non-employment uses is fully justified as the following has been demonstrated:**

- **there is a need for the conversion;**

**The need for the conversion is driven by the demonstrated need for additional housing. The current housing crisis in Ontario is exemplified in the City of Burlington through the constraints to deliver supply and the increase to prices. The location of the site also necessitates the need for a compatible urban land use given its proximity to an existing residential and mixed use community with a school site immediately adjacent to the Subject Lands to the west. The Subject Lands as proposed to be developed through the Concept Master Plan will support a full range of residential uses as well as employment uses on a portion of the lands to better achieve a complete community within the City's and Region's urban structure.**

- **the lands are not required over the horizon of this Plan for the employment purposes for which they are designated;**

**For over more than 40 years the lands have been designated for employment uses yet no employment land uses have developed despite ongoing efforts to market and develop the Subject Lands. Through the Concept Master Plan, the lands can be converted to a vibrant new community and can retain employment functions through additional mixed use development and employment land uses along Mainway. The Subject Land are not required in whole to be protected solely for long term traditional industrial purposes given their location, environmental constraints, adjacency to sensitive land uses, lack of access and lack of visibility to a 400-series highway, and the current supply of pure employment lands to the south and further west, much of which is vacant and for lease.**

**It should also be noted that if the conversion is approved, there will not be a single business that will close and there are no existing jobs in employment operations on the Subject Lands that will be lost.**

- **the municipality will maintain sufficient employment lands to accommodate forecasted employment growth to the horizon of this Plan;**

**The conversion will not compromise the Region's ability to meet its employment forecasts. The Subject Lands have been vacant for decades despite efforts to market them for pure employment uses. The lands can continue to provide for jobs through the conversion to a higher density than the planned employment land use designation. Given the extent of employment lands available in other areas including Future Employment Areas, the**

proposed intensification of employment areas required under the Region's Official Plan directions, as well as the changing nature of employment and the absorption rates, the Subject Lands are not required to meet the Region's employment forecasts to 2051.

- the proposed uses would not adversely affect the overall viability of the employment area or the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan;

The proposed transition within the Subject lands to mixed uses and employment uses along Mainway will ensure that the existing built employment area along Mainway is not adversely affected. The minimum density targets for the area in relation to jobs and persons will actually be better achieved through the proposed Concept Master Plan.

It should be further noted that the Region's and City's urban structure clearly focuses its employment uses along the QEW corridor. Maintaining an isolated pocket of land, north of the corridor as part of the Employment Area for employment only uses, that in fact encroaches into the surrounding residential community to the west and the north and the Bronte Provincial Park to the east, is not an appropriate or compatible land use or urban structure.

- there are existing or planned infrastructure and public service facilities to accommodate the proposed uses.

The lands are currently within an urban area with existing infrastructure and are well serviced by surrounding parks, schools and services. The Concept Master Plan identifies how new access roads and infrastructure can be extended into the lands in an efficient way in order to efficiently utilize existing services.

## 6.0 SUMMARY AND RECOMMENDATION

The Concept Master Plan envisioned on the Subject Lands is one that will contribute to an overall mixed-use neighbourhood in the City of Burlington and bring much needed new housing supply to the Province. The conversion of the Subject Lands from employment lands will facilitate the development of a complete community structured around existing community amenities and municipal infrastructure. The proposed mix of residential, institutional, retail and employment uses will further strengthen the existing community fabric and promote compact, integrated, compatible development.

The requested conversion of the employment lands demonstrates how the requirements under the policies with respect to employment land conversions as outlined in the PPS, the Growth Plan and the Region of Halton Official Plan are met as follows:

- There is a clearly demonstrated need for additional housing in the Province given the current housing supply crisis. The Subject Lands are a logical extension to the surrounding residential areas to the north and west and are ideally located to contribute to satisfying the need for housing by creating over 2,800 new housing units.
- The Subject Lands have been designated as an Employment Area for several decades and have been continuously marketed for employment purposes. However there has been no interest in developing the site for pure employment purposes for over 40 years and the lands have remained vacant and underutilized. Given the sheer size of the lands, the existing adjacent community, and the existing woodlots and environmental features on site, there is an opportunity for the lands to be developed into a unique master planned, mixed-use community.
- The lands can retain employment functions. They are not required or justified to be protected solely for long term employment purposes given their location, environmental constraints, adjacent sensitive land uses, lack of access and visibility to 400-series highway, and the current supply of pure employment lands to the south and west. The lands can continue to provide employment functions through the conversion and at higher densities through mixed use redevelopment of the area. The conversion will not compromise the Region's or City's ability to meet their employment forecasts.
- The proposed uses will not adversely affect the overall viability of the Employment Area to the south as it is retained in its clearly defined corridor along the QEW.
- The proposed development of the Subject Lands will assist in the creation of 1,625 new jobs, therefore, still serving an employment land purpose in Halton Region and the City of Burlington.
- The Subject Lands have access to existing municipal services for water, wastewater and stormwater services which will be subject to further review at the time of future applications.

This Planning Justification Brief demonstrates that the request to convert the Subject Lands from employment land to permit a full range of uses including much needed housing, non-employment uses is consistent with the PPS), conforms to the Growth Plan and meets the criteria and requirements for conversion as set out in the PPS and the Growth Plan. As such, it is our professional planning opinion that the request for conversion should be approved.

Respectfully submitted,

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

Dana Anderson, FCIP, RPP