



December 23, 2022

457-22

**Via Email**

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

Provincial Land Use Plans Branch  
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**RE: MTSA Designation - Request for Changes to the Growth Plan  
ERO No. 019-6177**

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 amendment to A Place to Grow; Growth Plan for the Greater Golden Horseshoe (Growth Plan) via ERO No. 019-6177. 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.

As the Province works to address the housing crisis currently facing Ontario, it will become even more critical for Major Transit Station Areas (MTSAs) to 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 the 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 Growth Plan as they relate to the City of Burlington and Greater Golden Horseshoe.

### **Major Transit Station Areas**

As stated in Section 2.1 of the Growth Plan, growth is to be directed to settlement areas with prioritization of intensification within strategic growth areas including urban growth centres and MTSAs. 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 2.2.4.3 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. This intensification target is 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 higher densities than what is currently considered by the Growth Plan. The maximum permitted heights proposed for MTSAs within the MTSA ASP are justified in order to achieve complete transit-oriented communities. However, the corresponding densities prescribed by the Growth Plan 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. 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 recommended as-of-right heights. Given the population targets established by Schedule 3 of the Growth Plan consider 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, nor does it account for the number of persons per unit. While the development concept represents the planned built form, it is well over the prescribed 150 persons and jobs per hectare in the Growth Plan.

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 2.2.4.3 is in need of an increase to better represent the intensification needed to facilitate the expected growth. 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.


## Recommended Change to the Growth Plan

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

1. Modify Policy 2.2.4.3 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 to accurately reflect the planned built form envisioned by the MTSAs.

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

Kind Regards,  
**UrbanSolutions**



Matt Johnston, MCIP, RPP  
*Principal*



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*Planner*

cc. 850 Brant Properties Inc.

# Appendix A – 850 Brant Street Architectural Package

