

July 21, 2026

Good morning Mayor Meed Ward, Members of Council, City staff, and the Burlington community,

On behalf of BurlingtonGreen, thank you for the opportunity to provide feedback on:

18.1

Motion Memo Policy Framework for Municipal Decision-Making regarding the Deployment of Data Centres in Burlington (ADM-05-26)

18.2

Motion Memo Coordinated Federal, Provincial, Regional, and Municipal Response to Data Centre Infrastructure Capacity, Growth Readiness and Protecting Public Interest (ADM-06-26)

I previously shared with all of you an excellent and timely article stemming from “*Future of Data Centres in the GTHA and Ontario project*” carried out by MaRS Discovery District and Mantle Climate, funded by The Atmospheric Fund. The report indicates that Canada ranks 5th globally in data centre density, with the GTHA as the epicenter of this growth, and the authors emphasized a defining question:

Can we build this infrastructure to strengthen our energy system and communities—or will it work against them? The report indicated, Yes—but **only if we design for low-carbon outcomes and build trust from day one.**

Some relevant facts:

- Climate impact: Data centres could drive triple the emissions by 2035 (7.3% of Ontario’s electricity generation emissions), with the GTHA hit hardest (10% of regional emissions).

- Community costs: Strain on local grids, air quality, housing affordability, and energy bills for residents.
 - Backlash: Understandable growing scrutiny from communities
 - Potential negative impacts on vulnerable communities
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This is a moment (and opportunity) to get it right.

The analysis and outcomes captured in the comprehensive and timely report speak to how sustainable development should not be considered an add-on — instead, it serves as a practical governance and policy tool for prioritization, productivity and risk management in a capacity-constrained system. Decisions made in the next three to five years, well before major new clean generation comes online, will determine whether AI infrastructure growth strengthens or strains Ontario’s energy systems and communities.

On behalf of BurlingtonGreen, I’ve read the many thoughtful letters submitted to the City by various community members on this issue, as well as those authored by Burlington Hydro, the 3110 South Service Road project owner, Honourable MP Gould, the Mayor of Hamilton, and the Burlington Chamber of Commerce.

Citing just one community member reference “ *Burlington should not allow its first AI data centre application to become the **precedent** simply because the City has not yet created the rules required to regulate it.* “

Without (topic-specific municipal) “rules”/updated relevant policies and process framework, data centres could lock in fossil-fuel dependence and strain our grids, making it harder for Burlington to achieve its target of net-zero carbon neutrality by 2050.

I’ve also read the 2 Motion (memos) 18.1 and 18.2 and would like to offer a few specific comments on those.

WORDS MATTER.

For the 18.1 Motion calling for a September staff report on the option to pass an Interim Control By-law (ICB) motion imposing a one-year moratorium on **new** commercial data centre developments city-wide, it’s unclear **if** the motion pertains to the South Service project underway in the planning process for the South Service Road location. **Does it include this one? Will it be paused?**

Additionally, for the **outcomes sought** in the Motion Memo for the list of items for staff to report on, environmental IMPACT is missing. While it references “Infrastructure **considerations**, including servicing, energy, and water requirements.”, **considerations is not assessment IMPACT**.

Additionally, noting that the reference “*Prepare an impact assessment framework that weighs economic, social, and community implications;*” is missing the essential environmental/climate implications as well.

If the goal of the proposed fall staff report is to provide Council with a foundational understanding of data centre impacts, then BurlingtonGreen suggests it is **essential** you specify/include the projected impact to the City’s ability to meet the established Burlington Climate Plan goal to be a net carbon neutral community by 2050 applying accurate, reliable forecasting.

Regarding 18.2 Motion Memo Coordinated Federal, Provincial, Regional, and Municipal Response to Data Centre Infrastructure Capacity, Growth Readiness and Protecting Public Interest (ADM-06-26) again words matter - the reference that “ *IESO is working with the local distribution companies serving GTA West - Alectra, Burlington Hydro, Milton Hydro, Oakville Hydro, Halton Hills and Hydro One Networks to understand the energy demands of the area and what solutions are best suited to address them, and is expected to release options and draft recommendations in 2026;* “ - **where is this at, (other than the information provided via the Burlington Hydro email)?**

BurlingtonGreen concurs that Burlington cannot tackle this alone. The city must advocate for a coordinated regulatory framework from the federal and provincial governments that includes:

- Environmental safeguards (e.g., emissions limits, waste heat reuse).
- Human and community health protections (e.g., air quality, noise, equity).
- Infrastructure priority-setting (e.g., energy and water allocation).
- Public disclosure/transparency requirements for the data centre industry.

There are various actionables/ responsibilities the City of Burlington can advance while the City awaits response from the federal and provincial government. Other municipalities (like Toronto) are **already scrutinizing data centres for their climate and equity impacts while they develop associated municipal framework/policies.**

From:

- updating Burlington’s climate action plans and the 2021 Sustainable Building and Development Guidelines to include data centre-specific developments;
- to setting clear emissions reduction targets for data centres;
- to creating a pre-application checklist/rigorous proposal assessment;
- to requiring renewable energy sourcing, waste heat reuse, and energy efficiency standards in permits;
- to adopting a potential “ Municipal Data Centre Policy” and framework to define what types of data centres align with Burlington’s climate, economic, and community goals;
- to prioritizing projects that demonstrate clear value (e.g., co-location with clean energy, research partnerships, or grid resilience benefits);
- avoid projects that only seek cheap land/energy without broader benefits

....the list of essential areas to investigate and implement ahead of proposed data centre approvals in Burlington is extensive.

Data centres can be a catalyst for climate action—but only if municipalities actively shape their development with effective policies, innovation, and community engagement. Without proactive planning, they risk undermining critical climate goals. **Particularly given this is the first proposed data centre for Burlington, it is imperative that appropriate due diligence** be undertaken that honours the City’s commitment to its established Strategic Goals.

As with **all** proposed development projects for Burlington, profit cannot come at the expense of people and the planet. BurlingtonGreen continues to urge Council to adopt a triple bottom line lens—people, profit, planet—when evaluating these, and all proposed projects.

Respectfully,



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Executive Director

BurlingtonGreen Environmental Association

Key reference: *Sharing the load: How collaborative data centre expansion could lead to a better grid*

- By MaRS Staff | March 10, 2026