



PLANNING OPINION REPORT

Official Plan Amendments
Bradford Highlands Golf Club Redevelopment
Bradford, ON

Prepared For:

ICG Golf Inc., Bayview-Wellington (Highlands) Inc.
& 2523951 Ontario Inc. (the “Bradford Highlands Joint Venture”)

March 2022

MGP

*Bradford Highlands Joint Venture
Official Plan Amendments*

Planning Opinion Report

**Bradford Highlands Golf Club Redevelopment
Bradford, Ontario**

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List of Supporting Reports

All supporting reports, including those associated with the Official Plan Amendment applications, are available in digital format on the USB memory stick included with this submission. Hard copies have been produced as per Town and County requirements; additional hard copies can be made available upon request.

| Report Topic | Report Author |
|---|---------------------------|
| Planning | |
| Planning Opinion Report | Malone Given Parson Ltd. |
| Draft Official Plan Amendments | Malone Given Parsons Ltd. |
| Environmental | |
| Environmental Impact Study | Beacon Environmental |
| Site Servicing | |
| Preliminary External Servicing Investigation and Financial Review | SCS Consulting Group |
| Preliminary Servicing Brief | Urban Ecosystems Ltd. |
| Other | |
| Archaeological Assessment | AMICK |
| Public Consultation Strategy | Malone Given Parsons Ltd. |

1.0 Background

Malone Given Parsons Ltd. has been retained by Bradford Highlands Joint Venture (BHJV) to assist in obtaining planning approvals for a proposed residential conceptual plan of approximately 950 residential units comprised of single-detached, semi-detached and a variety of townhouse units.

This report supports the following development applications:

- *Official Plan Amendment (OPA) to the in-force County of Simcoe Official Plan to redesignate the property from Rural to Settlements and to incorporate it in the settlement area boundary.*
- *OPA to the in-force Town of Bradford Official Plan to redesignate the property from Rural to Residential and to incorporate it into the urban boundary.*

To the extent that either of those Official Plans change prior to adoption and approval of these proposed Official Plan Amendments, then these amendments will be modified, as reflected, to respond to those new Official Plans.

1.1 Overview

Bradford Highlands Joint Venture (“BHJV”) is proposing a conceptual plan to develop approximately a 60-hectare (148 acre) property in the Town of Bradford for a residential subdivision comprised of approximately 950 dwelling units. The unit mix will consist of a variety of ground-oriented dwellings including single detached, semi-detached, street townhouse and back to back townhouse dwellings. It should be noted that the proposed development is conceptual at this time.

This Planning Opinion Report is being submitted as an update to the Planning Opinion Report submitted in July 2017 in the context of the updated 2020 Growth Plan, 2020 Provincial Policy Statement, the Town’s appealed Official Plan Amendments (“OPA”), specifically OPA 25: Growth and Population Review (of which BHJV is the only remaining appellant) and the ongoing County of Simcoe Municipal Comprehensive Review, specifically as it relates to the growth management analysis. Since the original application, an additional property has been added to the application (2848 Line 5), which is only being used to provide an additional road connection to an existing public road (Line 5). Accordingly, the geographic area of this Official Plan Amendment is hereby increased to add this additional property.

With regards to the appeal of OPA 25, it should be noted that BHJV, the Town and the County signed Minutes of Settlement, which state that following the final outcome of the County's MCR (which may be phased) and any subsequent Growth Plan exercise, the Town/County/BHJV will take appropriate steps to bring OPA 25 into conformity with the County Official Plan as it applies to the subject lands. It further states the following:

- *“the Ministry of Municipal Affairs and Housing has issued recent directives encouraging municipalities to conduct their MCRs in a phased manner in order to accommodate for growth in a more efficient and time-sensitive manner. Pursuant to this directive, County staff will be recommending to County Council that the County undertake a phased approach to their MCR and that Phase One should be an MCR of all currently designated primary settlement areas in the County's Official Plan. The Bradford Settlement Area within Bradford West Gwillimbury (“BWG”) is one such primary settlement area.”*
- *“the County and Town Staff accept that under current policies, and according to currently accepted assumptions, the Bradford Settlement Area would qualify for additional population allocation, and a settlement area expansion as part of the proposed Phased MCR is a potential outcome.”*
- *“...the Parties acknowledge and accept that the location of the Subject Lands and the nearby existing full municipal servicing, make the Subject Lands one area that would be seriously considered as a candidate for inclusion in any Settlement Area Expansion.”*
- *“...As part of the phased MCR, the County, in consultation with the Town, will consider including the Subject Lands within the Bradford Settlement Area utilizing the 2031 population projections if appropriate justification exists to do so, (otherwise the 2041 planning horizon and population projections as provided for through the Growth Plan would be used as the basis to consider bringing the subject lands into the Bradford Settlement Area). If it is determined through the MCR exercise that the Subject Lands should be included within the Bradford Settlement Area using the 2031 population, and if doing so would result in the Subject Lands being urbanized more efficiently than would otherwise be the case, then the County agrees to give serious consideration to such an approach.”*

The Minutes of Settlement indicate that the signatories (i.e. the County, the Town and BHJV) will act reasonably and in good faith when dealing with each other in these matters. As such, we understand the subject lands should be given particular and specific consideration in the County's MCR process as it undertakes its assessment where settlement area boundary expansions should occur. These Minutes of Settlement should be serious and important consideration as discussions are undertaken with Bradford staff and the County's consultant, Hemson, as they undertake their growth management work as part of the first phase of the MCR.

Through this first phase of the MCR, the County has undertaken a land needs assessment and

has forecasted 58,030 people will need to be accommodated within the Town of Bradford West Gwillimbury to 2031. This is an increase of ~7,500 people from a population originally projected by the Town of 50,500. The original projections were prepared by Hemson Consulting in 2013 (Schedule 7 of the Growth Plan, 2006 as amended by Amendment 1) and as such are outdated in the current context where the County, specifically Bradford West Gwillimbury, is experiencing significant growth pressures as land supply becomes increasingly constrained in neighbouring York Region and growth pressures move further north. Given that the Town's growth management analysis concluded that there could be a potential shortfall of land to 2031, which we believe overstates the amount of available land (as detailed in this report), the recent County growth management work further reinforces the significant growth pressures that the County of Simcoe is experiencing and underscores the need to accommodate growth within the 2031 horizon. The updated forecast recognizes that Provincial direction requires that one consider market demand. The provincial population forecasts form the basis for establishing a market-based supply of housing for municipalities to use as part of their land needs assessment, which includes the need for more ground-related housing.

As such, these OPA applications have been filed on the basis that there is proven insufficient land to accommodate the allocated population and that there is an opportunity for certain growth to be located within the subject site. The subject lands represents the most logical area for residential use and is required in order to achieve the 2031 population assigned by the County. The subject lands are no longer suited for agricultural uses. The subject lands can be fully serviced with minimal infrastructure investment and this provides an immediate opportunity to respond to the diverse housing needs of the Town and County.

To permit the proposed development, the following Official Plan Amendment applications are required:

- County of Simcoe Official Plan Amendment to redesignate the property from Rural to Settlements and to incorporate it in the settlement area boundary;
- Local Official Plan Amendment to redesignate the property from Rural to Residential and to incorporate it in the urban boundary

1.2 Property Description

The property measures approximately 60 hectares (148 acres) in size and is located west of Simcoe Road, south of Line 6 (municipal address: 23 Brownlee Drive, 2820 Line 5 and 2848 Line 5) in the Town of Bradford West Gwillimbury. The majority of the site is currently occupied by the Bradford Highlands Golf Course and Golf Club. Existing estate residential communities border the west and southeast side of the property along Brownlee Drive and Golfview Boulevard. The Green Valley Estates subdivision on full municipal services borders on the northeast. The full legal description is provided in Table 1.

Table 1: Legal Description

| # | PIN | Legal Description of Property | Municipal Address |
|---|-----------|---|-------------------|
| 1 | 580120174 | PT BLK 36 PL 51M221 PTS 1, 2, 3, 4, 5, 6 & 7 51R21792 EXCEPT PTS 1, 2,3, 4, 5 & 6 51R28655; S/T PT 6 51R21792 IN FAVOUR OF ALL PERSONS ENTITLED THERETO AS IN R0387188; S/T PT 7 51R21792 IN FAVOUR OF WILLIAM CLARENCE BAYNES AS IN LT74454; S/T LT71820, LT72113, R0153740,WG7797; BRADFORD-WGW | 23 Brownlee Drive |
| 2 | 580120052 | PT LT 13, CON 5 WEST GWILLIMBURY , AS IN R01177028 ; T/W R01177028 ; SURFACE RIGHTS ONLY, T/W EASEMENT LT419266, BRADFORD-WGW | 2820 Line 5 |
| 3 | 580120050 | PT LT 13, CON 5 WEST GWILLIMBURY , AS IN R0369673; BRADFORD-WGW | 2848 Line 5 |

Figure 1 identifies the location and the surrounding context of the property.

Figure 1.1: Property



Source: Google Earth

The following summarizes the surrounding uses:

To the North:

- Single and Semi-Detached Residential Dwellings

To the East:

- Existing and Under Construction Single and Semi-Detached and Townhouse Dwellings

To the South:

- Open Space/Wooded Area; Canal; Canal Road/Line 5; Rural Housing

To the West:

- Estate Residential; Agricultural Use

1.3 Proposed Conceptual Development Plan

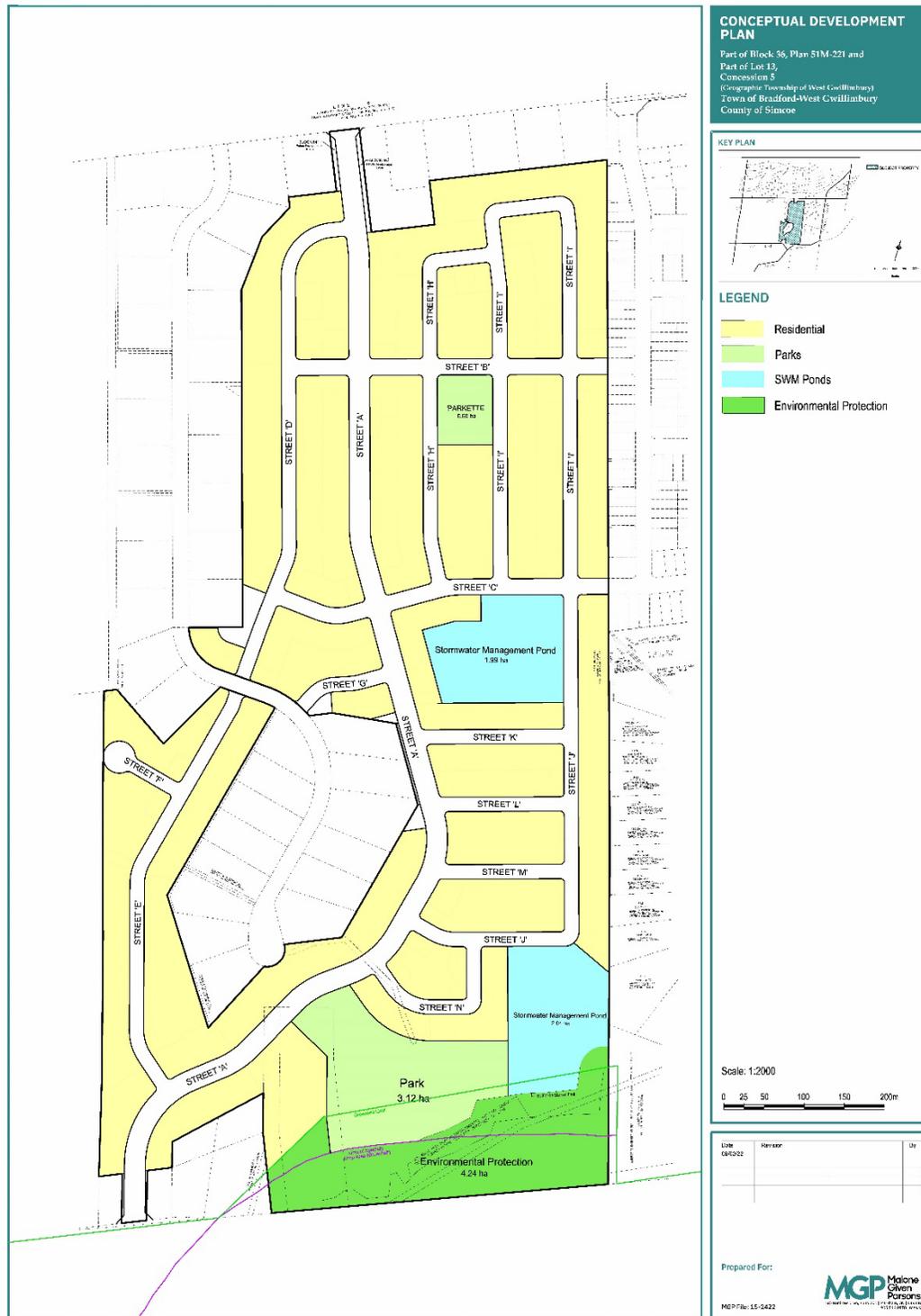
The preliminary development concept proposes an estimated unit yield of approximately 950 residential units with a mix of single-detached, semi-detached and variety of townhouse units. It is anticipated that the proposed development will achieve a minimum density of at least 55 people and jobs per hectare.

The proposed development aims to fulfil a market demand in the GTA housing market by providing a variety of ground-oriented housing. This aligns with the Provincial directive to consider a market-based supply of housing for municipalities when implementing the Growth Plan. As it relates to the County of Simcoe, Hemson estimates the County will need to plan for approximately 112,000 additional dwelling units to 2051, of which the vast majority will be ground related units (70% are singles and 17% are townhouses).

The subject lands require minimal capital infrastructure investment as it can utilize servicing works currently planned within the vicinity of the subject lands (including the Green Valley Estates subdivision immediately to the east). It should be noted that Town Council endorsed a change in the servicing of the lands to the east (Bradford Capital subdivision) on April 5, 2016 to permit extension of services from that subdivision to the subject lands.

The conceptual plan proposes a collector road network that connects to the existing residential subdivision to the east (Green Valley Estates subdivision), where a block is reserved in the Green Valley Estate subdivision for this potential future access. In addition, the collector road network provides access to the north and south connecting to Concession Road 6 and Line 5 respectively.

Figure 1.2: Proposed Concept Plan



Prepared by MGP Ltd.

2.0 Development Considerations

2.1 Preliminary Servicing Brief

A Preliminary Servicing Brief was prepared by Urban Ecosystems Ltd (UEL), dated February 2017. The report notes that existing servicing is provided through a 300mm diameter municipal watermain along the 6th Line road allowance, a 250mm diameter municipal watermain along the Inverness Way road allowance and a 300mm diameter municipal sanitary sewer along Inverness Way road allowance.

Servicing for the Bradford Highlands lands is proposed through an internal watermain system that will connect to the existing municipal water and sanitary gravity system. A pressure reducing valve at the 6th Line watermain connection will also be required in the design of the water distribution network system.

Stormwater will be designed to convey the 10-year minor design storm in an underground piped network system. Surface runoff will be conveyed via a roadside curb and gutter system that will be directed into an underground piped water system. External surface runoff along the west limit of the property will be conveyed via drainage side yard swales and captured by a series of rear yard catchbasins.

The servicing proposal achieves all required elements for the provision of sanitary service, water supply, and stormwater quality and quantity controls. As such, the proposal can be developed and adequately serviced in accordance with Town standards.

2.2 Environmental Impact Study

An Environmental Impact Study (EIS) was prepared by Beacon Environmental, dated May 2020. The purpose of the EIS is to identify and determine the potential impact of the proposed development on the natural heritage system. The study was completed through a review of background documents and seasonally appropriate field investigations and the results were used in an analysis of natural heritage functions and features.

The report concludes that the lowland woodland / swamp located at the south portion of the development site meets the criteria to be considered a key natural heritage feature or key heritage feature. This feature has been staked with the agencies and a 30m buffer has been provided. Therefore no negative impacts are anticipated to this feature as a result of the proposed development.

Five drainage features are located on the property and are proposed to be removed to accommodate the proposed residential development of the lands. Three of these features

have been removed downstream of the subject lands boundary through LSRCA approvals for the adjacent subdivision. Preliminary hydrogeological monitoring has been conducted and the overall findings of the surface water feature assessment indicate that recharge groundwater conditions occur at nearly all monitored locations throughout the majority of the year. Further details will be provided at the detailed design stage. The contributing functions of these drainage features will be replicated through stormwater management and mitigation measures subject to the findings of ongoing monitoring and agency consultation. The narrow bands of wetland vegetation present along the boundaries of these features will also be removed. These features do not constitute key natural heritage features, but a permit will be required from the LSRCA for their removal. Mitigation measures have been recommended to offset potential adverse effects.

2.3 Preliminary External Servicing Investigation and Financial Review

A Preliminary External Servicing Investigation and Financial Review was prepared by SCS Consulting Group, dated February 2017. The review concluded that the property can be developed with both sanitary and water servicing with modest improvements and with no significant infrastructure costs to the municipality. This has significant cash flow benefits to the Town.

Significant DC revenue will be provided to the Town as part of this proposed development to contribute to reducing the debt for infrastructure such as roads, water and wastewater infrastructure and other municipal wide services including EPA 3 debt obligations (as further detailed in Section 3.2).

2.4 Archaeological Assessment

Amick completed a Stage 1 Archaeological Assessment for the subject lands dated March 9, 2017. The report reviewed the property's geography, history, previous archaeological fieldwork and current land condition to evaluate in detail any archaeological potential.

The study area has been identified as a property that exhibits potential to yield archaeological deposits of Cultural Heritage Value or Interest (CHVI). As such, further archaeological assessment of the study area is warranted, and a Stage 2 Archaeological Assessment is recommended.

Section 2 of the Planning Act lists provincial interests to be addressed in the land use planning process. Section 2 (d) identifies the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest as a matter that must be addressed in the land use planning process. Part I of the Provincial Policy Statement (PPS) explains the role of the PPS and its relationship to other planning policy documents and its function to ensure that provincial interests are met within the land use planning context. Section 2.6 provides direction within the land use planning context with respect to Cultural Heritage and Archaeology: The PPS makes it clear that development or landscape alterations will only be

permitted in such cases where significant archaeological resources have been conserved. Conservation means that the site is protected and preserved in place, is fully excavated and documented or a combination of the two. The PPS only addresses archaeological resources deemed to be significant. Prior to appropriate measures being taken with respect to significant archaeological resources, an inventory of archaeological resources is necessary and sufficient analysis needs to be undertaken in order to determine levels of significance. The PPS does note that alterations to the land can only occur in areas of archaeological potential after archaeological resources have been conserved. This further suggests that at a minimum any proposed land use change must be preceded by a determination of archaeological potential.

The Archaeological Report was undertaken and prepared in conformity and in consistency with the relevant planning documents as noted above.

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3.0 Review and Comments on the Bradford Municipal Comprehensive Review

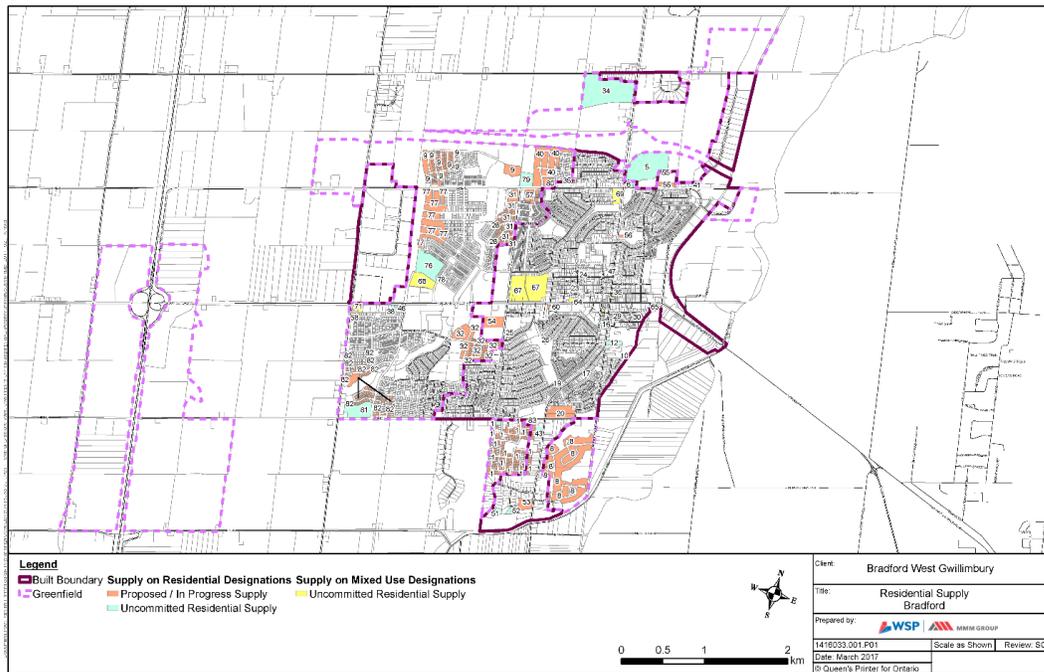
MMM Group was commissioned on behalf of the Town to undertake the Official Plan Review, with an assessment on how the Town will accommodate the growth allocated to them by the Province being a first phase critical update. It is our understanding that this exercise was intended to fulfill the Town's Growth Plan requirement for a MCR.

As part of this first phase, the Town has released for public consultation the *Background Paper: Land Need Analysis* dated December 2016 ("Land Need Analysis"). The *Land Needs Study Addendum* ("Addendum") was published in March 2017 in response to numerous questions and issues. This analysis was the basis for the approval of Official Plan Amendment 25 and the Town's new Official Plan, which BHJV is the only remaining appellant to.

The methodology for the land budget essentially compared the demand and supply of residential units to determine if the current supply was sufficient to accommodate future demand. The key elements of the analysis are described below:

- **Establish Supply:** A high-level GIS inventory of the Town's settlement area was undertaken to understand the current supply. The supply was parsed to separate areas within the built boundary and the designated greenfield areas. The supply was then further categorized into areas within active development applications (herein referred to as 'Proposed / In Progress') and areas that are vacant and have a residential official plan designation (herein referred to as 'Vacant'). Lots within these active development applications that have been developed are excluded. An estimate of the dwelling unit potential on Vacant lands is based on the Official Plan designation. The supply estimates exclude natural areas and features. A map of the residential supply in Bradford is shown below (as per the Addendum).

Figure 3.1: Bradford Residential Supply



Source: Land Needs Study Addendum, MMM Group

- **Establish Demand:** The 2016 Census population and dwelling count was used as the base year. The growth outlook is the Development Charges Background Study, which notes growth up to 2031. It should be noted that the original Land Need Analysis was prepared prior to the release of the 2016 Census data and an alternative method was used to estimate the 2016 population and unit count within the settlement area.
- **Allocate Growth Inside the Built Boundary:** In accordance with the Growth Plan, 40% of the post-2015 unit growth is allocated within the built-up area. Growth within the built-up area is redistributed to higher density unit types in order to accommodate demand over the period to 2031.
- **Determine Greenfield Unit Demand:** The remaining demand is allocated to the Greenfield Areas. Greenfield unit demand is then compared to the Greenfield supply and shortage/surplus of units are identified by unit type.

We note that both reports conclude that the Town has sufficient residential land supply to meet projected residential needs to 2031. The reports also note that there could be a potential shortfall to meet population growth to 2036 or 2041. Specifically, Section 5.1 of the Land Need Analysis notes (emphasis added):

“Preliminary analysis based on available data suggests that there could be an insufficient land supply to meet anticipated population growth to 2036 or 2041. While the Town can only designate lands to accommodate growth to the year 2031 under the Growth Plan at present, it is recommended that overall land needs be reviewed at least as frequently as every five years to ensure that sufficient lead-time is available to address long-term land needs requirement.”

Respectfully, we disagree that there is sufficient urban land within the Town to accommodate the 2031 population. We have previously provided that opinion through correspondence with the Town prior to the adoption of OPA 25. That correspondence formed the basis of BHJV's appeal of OPA 25. It remains our opinion that additional considerations need to be addressed that will result in an updated and revised conclusion as to how the Town will be achieving its growth targets to 2031. In our opinion, the subject lands should be included within the Town's urban area to accommodate not only the 2041 Growth Plan forecast but also the 2031 Growth Plan forecast. These considerations include:

- Highway 400-404 Link;
- Servicing Constraints;
- Updated Growth Management Work Undertaken by the County;
- Secondary Suites; and
- Meeting Intensification Targets.

3.1 Highway 400-404 Link

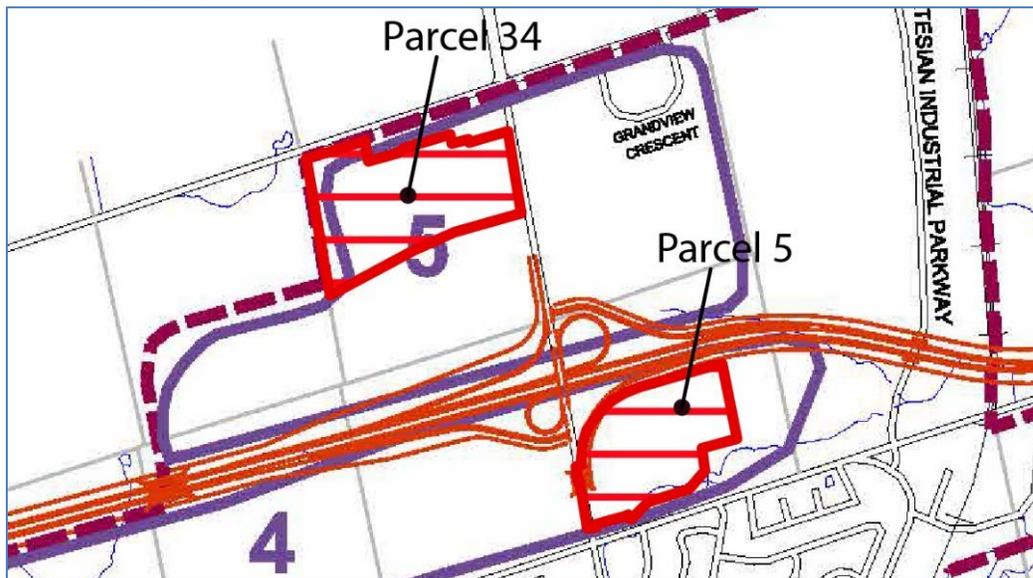
The updated Growth Plan designates the Highway 400-404 link as part of Schedule 2, which affords the link formal protection as a planned corridor. This link has been fully funded by the Provincial government as of November 2021 and as such, planning for this highway is underway. While the Land Need Analysis notes a potential shortfall in supply to accommodate potential growth to 2036 or 2041, it failed to address the implications of the proposed Highway 400-404 link on the Town's ability to achieve even its 2031 population and employment forecasts. This has not been addressed in the Addendum.

It is noted in Town Staff Report DES 2016 50, that (emphasis added):

"if the Highway 400-404 Link is not designated and constructed prior to 2031, the Town could be inhibited from achieving its 2031 population and employment forecasts as the Highway 400-404 Link bisects an entire Community Plan Area from the balance of the Bradford Urban Area."

The proposed Highway 400-404 link runs through Community Plan Area 5 (CPA). As shown in the figure below, two parcels that were included in the Vacant land supply are in the immediate vicinity of the link (ID 5 & 34).

Figure 3.2: Highway 400-404 Link Relative to Community Plan Areas and Vacant Residential Supply



This CPA is anticipated to contribute to the Town's achievement of its population growth forecast to 2031. Currently the development of CPA 5 has been delayed as it is the only CPA without a Secondary Plan.

With commitment from the Ontario government to advancing the Highway 400-404 Link, population and employment growth arising from the construction and completion of the Highway 400-404 Link will likely occur. A Preliminary Design and environmental assessment for the project is currently underway and is expected to be completed by December 2022.

As such, these lands cannot be relied upon to provide growth within the 2031 planning horizon. Specifically, it is our understanding that the Province has proceeded to expropriate lands shown in Figure 3.2 east and west of Yonge Street along the bypass route. Furthermore, any lands adjacent to the Bradford Bypass will be subject to a standard 14 metre building setback from MTO-owned lands. It is our opinion that additional lands are needed to accommodate future residential development.

3.2 Addressing Servicing Constraints

The Provincial Policy Statement (Section 1.1.3.8b), Growth Plan (Section 2.2.8.3a-e) and County of Simcoe Official Plan (3.5.17e) require that as part of a MCR, consideration should be given to infrastructure and public service facilities that are financially viable and suitable for development over the long term (excerpts of these policies are provided in Appendix C). The Land Need Analysis and Addendum do not take into account any servicing or timing constraints that sites within the urban boundary may face, specifically a portion of the CPA 4 and the CPA 5 lands. This was confirmed at the BILD Simcoe Chapter meeting on January 27, 2017 where it was noted that the MCR in its current form did not analyze whether designated lands could be developable and what the cost of servicing them would be. As long as the property had

development permissions, it was included in the land supply. In our opinion, understanding the servicing feasibility for sites within the urban boundary is integral to a proper MCR and if not considered could result in Bradford not being able to achieve the growth allocated to the Town in the Provincially approved Simcoe County Official Plan.

To better understand the cost and feasibility of servicing the property, SCS Consulting has prepared a Preliminary External Servicing Investigation and Financial Review (submitted concurrently). The SCS Report concludes the proposed development will generate **\$31.5 million (as of 2017)** in Development Charge funding to the Town of Bradford West Gwillimbury to allocate towards the Town's current infrastructure improvements as well as assist in alleviating the Town's financial obligations to these improvements. That amount will increase given the rise in Development Charge rates since the writing of the report. Furthermore, the Servicing Investigation and Financial Review notes that the lands within CPA 5, which are currently in the settlement area, have servicing constraints that limits the immediate development of these lands. Based on the Town's Development Charge Background Study, the projects to provide water and sanitary servicing for this area are scheduled for 2026, which is at the latter end of the planning horizon, however it is not accounted for in the 2017 10-Year Capital Plan. As a result, these lands may not be developable within the 2031 horizon. In addition, the timing for lands currently undeveloped in CPA 4 was not taken into account.

As detailed in the SCS Report, a number of landowners within the Bradford Urban Area and OPA 15/16 have entered into an Early Payment Agreement No. 3 ("EPA 3") with the Town. This agreement facilitates the upfront financing of key infrastructure projects required to service the balance of the Bradford Urban Area and OPA 15/16. As a result, the Town has significant financial obligations to satisfy. As of December 1, 2025, the Town is required to fully reimburse up to \$66 million for the entire non-residential share of works not recovered through development charges. Through our analysis of the approved 2016 Capital Plan for EPA 3, current cost estimates have increased by approximately \$50 million. We anticipate that the draft 2017 Capital Plan will increase the cost overrun. This puts a further strain on the financial obligations that the Town has to satisfy. It is also our understanding that the *Lands Needs Analysis* did not consider EPA 3. Factoring EPA 3 into the future growth pattern for the Town has a direct impact on ensuring the sustainability and prosperity of the Town now and in the future.

As noted above, the timing for development of the CPA 4 lands is uncertain and the CPA 5 lands are not realistically developable in the immediate term due to the servicing constraints. Accordingly, the population allocation previously assigned to those areas will need to be re-assigned in order to meet the 2031 growth forecasts.

The Bradford Highlands site requires minimal capital infrastructure investment as it can utilize servicing works currently planned within the vicinity of the property (including the Green Valley Estates subdivision immediately to the east). It is our opinion that the proposed development can be serviced with modest improvements, with no significant infrastructure costs while assisting in the cash-flow requirements of the Town, potentially providing an additional **\$31.5 million (as of 2017)** in development charge funding.

3.3 Updated Growth Management Work Through County of Simcoe MCR

Simcoe County is undergoing a Municipal Comprehensive Review (MCR), where the first phase consists of undertaking a growth management analysis to understand the quantity of land needed to accommodate population and employment growth to 2051. As part of this, the County released the Growth Management and Land Needs Assessment Memo (“Memo”), prepared by Hemson Consulting (dated October 1, 2021).

The Memo recognizes that Provincial direction reinforces the need to consider market demand and the forecasts form the basis for establishing a market-based supply of housing for municipalities to use as part of their land needs assessment, which includes the need for more ground-related housing as stated on page 11.

“...it is noted that a pillar of Growth Plan policy is to plan for a wider range and mix of housing in Simcoe. This policy direction must be balanced with the requirement of the prescribed LNA Methodology that “market demand” be considered in determining the Community Area land need.”

This is especially important given the shift in the housing market since the start of the COVID-19 pandemic and the underproduction of new housing, particularly of ground-related units. In a research note titled, *Ground-Related Housing Heats Up While the Apartment Market Lags* prepared by Ryerson University’s Centre for Urban Research & Land Development (September 11, 2020), it found that the demand for ground-related housing surged in August 2020 in the 905-region, whereas the apartment market lagged behind all other housing types across the GTA (attached as Appendix D). This is still continuing as we are seeing home price gains in other parts of the Greater Golden Horseshoe outpace Toronto. As Millennials enter into family forming years, they are moving out of apartments and into ground-related housing – a trend observed across generations. This trend is accelerating due to the COVID-19 pandemic with working from home arrangements affecting people’s tolerance for small living spaces and resulting in the search for more space.

A Globe and Mail Article (attached as Appendix E), it highlights that the pandemic has revealed flaws in the assumptions behind downtown living where two adults suddenly work from home. While a vaccine will reduce this strain, work from home will definitely become much more common and accepted, and as such, housing will have to adapt and ground-related housing offers a solution with more space and a backyard. All of this is playing out against a backdrop where the last decade has seen severe shortage of ground-related housing across the GTA including Simcoe.

We recognize that a balance needs to be achieved between providing sufficient land to accommodate a market-demand based housing supply, while still meeting the policies of the Growth Plan. Providing a one-sided approach, however without a settlement expansion would conflict with the Growth Plan’s objective to providing sufficient land to accommodate all market segments, given that it would be very difficult to provide land to accommodate forecasted growth in ground-related housing. This is clearly stated in the Province’s response to the City of Hamilton’s request to review its ‘No Urban Boundary Expansion’ scenario (attached as Appendix F). Not providing sufficient housing choice has larger regional

implications as noted in the page 3 of the letter:

“...the No Urban Boundary Expansion scenario may cause forecasted growth to be redirected away from the City of Hamilton into other areas that are less suited to accommodate growth. This may have broader regional impacts on prime agricultural areas, natural systems and planning for infrastructure given the lower intensification and density targets applicable to outer ring municipalities that would likely receive pressure to accommodate forecasted growth”

The Minister of Municipal Affairs and Housing, through an op-ed in the Hamilton Spectator on October 15, 2021 (attached as Appendix G) further reinforces that not allowing for an urban boundary expansion to accommodate forecasted growth is both unrealistic and irresponsible and would cause a significant shortage of homes.

Based on our review of the Draft Land Needs Assessment (“Draft LNA”) for Bradford, it is forecasted that a unit mix consisting of 47% low density, 13% medium density and 41% high density, will be required to accommodate the forecasted population growth to 2051. This includes a significant shortfall of low density units in the DGA that will require a settlement area expansion. We agree that a settlement area expansion will be required to accommodate growth to 2051 and the subject lands represents the most logical location for such an urban expansion. It should be noted that the Town’s Draft LNA assumes that the intensification and density forecasts exceed the Growth Plan requirements.

While we agree with the preliminary County Draft LNA for the Town of Bradford, as it relates to this application, we further note that the forecasted population to 2031 has been increased from 50,500 to 58,030 for the Town of Bradford West Gwillimbury. This update to the forecast reflects the significant growth pressures that the County of Simcoe is experiencing and underscores the need to accommodate growth within the 2031 horizon. Given that the Town’s land needs analysis previously recognized the potential to fail to meet the 2031 growth target, this additional population (~7,500 people) will further exacerbate this situation. As such, it is our opinion that a settlement boundary expansion is required and that the subject lands represents the most logical area for settlement area expansion. The subject lands are no longer suited for agricultural uses (it is formerly a golf course), it can be readily serviced with minimal infrastructure investment and it provides an opportunity to meet the diverse housing needs of the Town and County.

3.4 Land Needs Methodology

The Land Needs Assessment Methodology for assessing land needs was released on May 4, 2018. The Growth Plan requires upper- and single-tier municipalities to use the methodology to assess the quantity of land required to accommodate forecasted growth in their next MCR (Section 2.2.1.5). This policy is intended to standardize land supply calculations to ensure that all future Settlement Area boundary expansions are based on a consistent methodology. The release of the Land Needs Assessment Methodology fundamentally changed the planning framework, particularly in respect to calculating land needs with the expected release of the Province’s standardized methodology.

Bradford's OPA 25 is based on a methodology that varies from any practice that our firm has experienced. Based on our analysis, it is our opinion that Bradford's MCR understates the amount of land required to accommodate their assigned 2031 population of 50,500 in the County's approved Official Plan.

3.5 Secondary Suites

We note that Section 4.2 of the Land Need Analysis contains an assumption that 10% of all dwelling growth in the settlement areas will be accommodated in the form of secondary suites on low density lots.

Approved growth management documents for Springwater¹, Brooklin², Durham Region³, York Region⁴, and Peel Region⁵ do not account for secondary suite growth in their land supply methodology for projecting unit growth within designated greenfield areas and settlement boundary expansions. The Provincial Land Needs Assessment does not account for secondary suites in its methodology. It is our opinion that there is no precedent for the Town to account for secondary suite growth in their housing projections for their current OP Review, let alone a number as large as 10%.

Through our research, we have found that other municipalities are not accounting for second suites as part of their residential growth projections. However, in the one case that they were, they use a lower rate that is only being applied to low density residential growth. The City of Markham has assumed that 10% of only low density residential growth in the future urban area will occur through second suites as per the Future Urban Area Concept Plan Quantification (dated October 2016). In other areas, such as the City of Vaughan, they have found that only a marginal amount (0.9%) of ground-related dwellings contained second suites. Apartments cannot accommodate second suites and townhouses typically do not have the physical capability of building the required secondary access, in addition to not being able to provide sufficient parking. Detached units are the only type of dwelling units that are permitted to have secondary suites as per the updated Bradford Zoning Bylaw (2010-050).

¹ *Springwater Growth Management Strategy Update (2004)*

² *Brooklin Study – Background Report: Population, Housing and Employment Analysis, Hemson Consulting (January 2015)*

³ *Growing Durham: Recommended Growth Scenario and Policy Directions*

⁴ *2041 York Region Draft Growth Scenarios and Land Budget*

⁵ *Places to Prosper: Background Report to ROPA 24*

Furthermore, there are numerous issues with building secondary suites that municipalities are facing and it is unrealistic to rely on secondary suites to meet any significant portion of the housing projections. The following are some of the key issues and challenges in constructing secondary suites on low density units:

- There needs to be a separate entrance to the secondary suite, otherwise insurance cannot be provided; and,
- There is an additional parking requirement to accommodate secondary suites, which is typically handled through off-street parking that was not initially designed to handle these types of units.

The impact of a high ratio assumption for secondary suites, let alone including these types of units as part of the projected housing demand, will result in the Town not achieving its population targets to 2031.

We are pleased to note that the inclusion of secondary suites has been excluded in the sixth scenario as per the Addendum. While we support this, it remains our opinion that a 10% secondary suite assumption is high, that there is no basis for it and that it should not be relied upon to meet the growth forecasts.

3.6 Meeting the Intensification Target

The County of Simcoe has assigned an intensification target to Bradford West Gwillimbury of 40% or 1,896 units. A portion of this growth will be within the Downtown Bradford area (1,500 units). MGP's experience throughout the GTHA has indicated that the intensification targets of the Growth Plan are not being achieved by most municipalities.

Market conditions vary drastically through the GTHA and the same intensification targets that are being applied to Toronto cannot be equally applied to places further away from the core where high-order transit service is not available, intensification opportunities are more limited and market rates generally do not justify the additional building cost per square foot for higher density development. This type of high density development is exactly the type of development that will need to be accommodated in the Downtown Bradford area in order to meet the intensification target, however it is our opinion that there will not be a market to support it. This will be further constrained with the increase in development charges required to pay for the exponentially increasing debt that is accumulating in order to build the infrastructure projects needed to service land within the settlement boundary. Moreover, from our experience, the timeframe for obtaining approvals for higher-density projects is taking an increasingly longer period of time due to the complex nature of the approvals process.

A softer market for high-density development, increasing development charges and a longer and more complex approvals process will cumulatively put pressure on developers and will impact the financial viability of future residential projects. As a result, the growth targets may not be achievable and alternative solutions to accommodate the residential growth targets

may be needed in the form of a settlement boundary expansion.

3.7 Conclusion

Collectively, for the above-noted reasons, it is our opinion that there is an overestimation of the residential land supply in the MCR due to the following reasons:

- The timeline for servicing is uncertain for a portion of the CPA 4 lands;
- The uncertainty of the timeline for the construction of the Highway 400-404 link has caused delayed in the planning and development of CPA 5. Furthermore, the infrastructure projects to service the CPA 5 lands are not scheduled in the 2017 10-year capital plan and therefore may not be developable within the 2031 horizon;
- Secondary suite growth should continue to not be included in the growth projections; and,
- The intensification projections are high and will not be achievable within the 2031 horizon.

While the Town's MCR was completed prior to the County's ongoing MCR, the growth management work that is being undertaken by the County reflects the most up to date forecasts, that take into account the growth pressures occurring in the County. These forecasts, especially as it relates to this application, should be used in order to assess the lands to 2031.

In combination with the Town's MCR overestimating the number of units that can be accommodated on the remaining greenfield residential land within the Town's urban boundary and the updated population forecasts that estimate an additional 7,500 people in 2031, it is our opinion that a boundary expansion will be required in order to meet the growth targets.

4.0 Planning Policy Framework

Provincial, county and municipal policies and regulations provide a framework for a settlement boundary expansion and subsequently, development on the property. This proposal has been submitted concurrently with the Town's process of a MCR of their Official Plan, specifically as it relates to Official Plan Amendment 25 ("OPA 25"), which was the Town's growth management exercise to understand their land needs to 2031. This process culminated in the adoption of their new Official Plan, which incorporates the policies of OPA 25 and has been appealed to the Local Planning Appeal Tribunal (PL 171255), which BHJV is an appellant to. These policies do not recommend a settlement area boundary expansion. The applications have also been submitted concurrently with the ongoing County of Simcoe Municipal Comprehensive Review, specifically as it relates to the growth management analysis. Based on our analysis, and consistent with the multiple submissions we have made, it is our opinion that the Town will not meet its growth targets with its current land supply and will require additional community area land to accommodate growth to 2031. Given the growth management work that the County has undertaken as part of its MCR, it is even more necessary to include the subject lands within the settlement area. It is our opinion that the subject lands represents a logical area for settlement area expansion.

The proposed development is consistent with the Provincial Policy Statement, 2020 and conforms to A Place to Grow, 2020, the Greenbelt Plan, the Lake Simcoe Protection Plan, the County of Simcoe Official Plan and the Town of Bradford Official Plan, as proposed to be amended.

This section of the report provides an analysis of the proposed development in the context of the following Provincial and Municipal documents:

- Provincial Policy Statement (2020);
- A Place to Grow: Growth Plan for the Greater Golden Horseshoe (2020);
- Greenbelt Plan (2017);
- Lake Simcoe Protection Plan;
- County of Simcoe Official Plan (2016); and,
- Town of Bradford West Gwillimbury Official Plan (2000).

4.1 Provincial Policy Statement, 2020

The Provincial Policy Statement, 2020 (PPS) which came into effect on May 1, 2020, provides high level policy direction on matters of provincial interest related to land use planning and development. As it sets the policy foundation for regulating the development and use of land in Ontario, all planning decisions made in the Province "shall be consistent with" it.

The PPS directs that a settlement area boundary expansion can only occur at the time of a “Comprehensive Review”. A Comprehensive Review is defined as an official plan review or amendment, initiated by a planning authority which (among other things) is based on a review of population and employment projections and allocations from upper tier municipalities and or the Province. The PPS further states that settlement area boundary expansions may only occur if it can be demonstrated that:

- there are insufficient opportunities to accommodate projected growth needs and market demand through intensification, redevelopment or through designated growth areas
- the infrastructure and public service facilities which are planned or available are suitable for the development over the long term and are financially viable;
- the expansion will not compromise specialty crops and that alternative locations have been explored in prime agricultural areas;
- the new or expanding settlement area is in compliance with the minimum distance separation formulae; and,
- impacts from new or expanding settlement areas on agricultural operations which are adjacent or close to the settlement area are mitigated to the extent feasible (policy 1.1.3.8).

As demonstrated in Section 3.0, it is our opinion that there are insufficient opportunities to accommodate the projected growth to 2031. The proposed development proposes growth that makes economical use of existing infrastructure and services (with confirmation of availability and capacity to occur through the development review process), and that will not have an adverse impact on the Town’s financial situation as per the submitted Preliminary External Servicing Investigation and Financial Review. The expansion directs new growth to an area that is not considered prime agricultural land, preserving the high quality agricultural land, which makes up the bulk of the land area within the Town. As such, the proposed expansion is consistent with the policies of the PPS, 2020.

4.2 A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020

The 2020 Growth Plan contains a set of policies for managing growth and development, which are intended to implement the Province’s vision of stronger, prosperous communities and guide decisions on a range of issues including land use planning and urban form in the Greater Golden Horseshoe (GGH).

Consistent with the PPS, under the updated Growth Plan, a settlement area boundary expansion may occur through a municipal comprehensive review, subject to the criteria provided in policy 2.2.8.2. A municipal comprehensive review is defined as:

“A new official plan, or an official plan amendment, initiated by an upper-or single-tier municipality under Section 26 of the Planning Act that comprehensively applies the policies and schedules of this Plan”

Section 2.2.8.2 states:

“A settlement area boundary expansion may only occur through a municipal comprehensive review where it is demonstrated that:

- a) based on the minimum intensification and density targets in this Plan and a land needs assessment undertaken in accordance with policy 2.2.1.5, sufficient opportunities to accommodate forecasted growth to the horizon of this Plan are not available through intensification and in the designated greenfield area:
 - i. within the upper- or single-tier municipality, and*
 - ii. within the applicable lower-tier municipality;**
- b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan, based on the analysis provided for in policy 2.2.8.2 a), while minimizing land consumption; and*
- c) the timing of the proposed expansion and the phasing of development within the designated greenfield area will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.”*

As demonstrated in Section 3.0, it is our opinion that there are insufficient opportunities to accommodate the projected growth to 2031. The proposed expansion will contribute to making available sufficient lands to accommodate growth to 2031 and the expansion will not adversely affect the achievement of the intensification and density targets.

Section 2.2.8.3 outlines the locational criteria to aid in determination of where the most appropriate location for an expansion is.

The southern portion of the subject lands are located within the Protected Countryside and Natural Heritage System in the Greenbelt Area. The proposal does not request a settlement area boundary expansion into the Protected Countryside and Natural Heritage System identified on the southern portion of the property for residential lands (2.2.8.3 k). The expansion is instead proposed to occur for the lands located outside the Greenbelt. While the proposed development includes portions of the stormwater management pond and park, these are permitted uses within the Greenbelt as per Sections 4.1 and 4.2.

The proposed expansion can utilize servicing works planned within the vicinity of the subject lands. The servicing works will be financially viable over its full life cycle, and the proposed development will not have an adverse impact on the Town’s financial situation (as per the submitted Preliminary External Servicing Investigation and Financial Review prepared by SCS Consulting (2.2.8.3 a-b)).

The proposed expansion is informed by and meets the applicable requirements of water and wastewater master plans, stormwater master plans, the PPS, Greenbelt Plan, and the Lake Simcoe Protection Plan, as detailed in this report (2.2.8.3 c, i-j). The proposed expansion also has no negative impacts on significant natural heritage features, including watercourses,

groundwater recharge/discharge areas or wetlands, on site or on the surrounding lands, as per the EIS prepared by Beacon (2.2.8.3 d-e).

The subject lands was, until the end of 2021 golf season, operating as a golf course and are therefore not considered prime agricultural land. Should however an Agricultural Impact Assessment be required by the Town, urban expansion onto these lands would result in minimal impact on the agricultural system as these lands are now non-agricultural in nature (2.2.8.3 f, h). The subject lands are adjacent to farms. Requirements for compliance to the minimum distance formulae will be determined by the Town (2.2.8.3 g).

As such, the proposed expansion conforms to the policies of the Growth Plan, 2020.

4.3 Greenbelt Plan, 2017

The Greenbelt Plan, which came into effect on July 1, 2017, “identifies where urbanization should not occur in order to provide permanent protection to the agricultural land base and the ecological and hydrological features, areas and functions occurring on this landscape” (Section 1.1).

The purpose of the Greenbelt Plan is to enhance and protect agriculturally and environmentally significant lands and improve the linkages of major natural heritage systems.

A small portion of the southern half of the property is located within the Greenbelt Area. The Greenbelt Plan identifies the property within the Protected Countryside, Holland Marsh Speciality Crop Area and the Natural Heritage System (Schedule 1, 3 and 4 of the Greenbelt Plan) as shown in the figure below.

Figure 4.1: Greenbelt Plan Designations Excerpt



Lands within speciality crop areas are permitted to be used for a full range of agricultural related uses and may not be redesignated in municipal official plans for non-agricultural uses (Section 3.1.2). It should be noted that the property is already designated for Rural uses in the Bradford Official Plan as described in Section 3.6 of this report.

New development within the Natural Heritage System shall demonstrate that:

- There will be no negative effects on key natural heritage features or key hydrological features or their functions;
- Connectivity between key natural heritage features and key hydrological features is maintained, or where possible, enhanced for the movement of native plants and animals across the landscape;
- The removal of other natural features not identified as key natural heritage features and key hydrological features should be avoided. Such features should be incorporated into the planning and design of the proposed use wherever possible; and,
- The disturbed area of any site does not exceed 25%, and the impervious surface does not exceed 10%, of the total developable area.

For lands within a key natural heritage feature or a key hydrologic feature in the Protected Countryside, the following policies shall apply (Section 3.2.4):

- Development or site alteration is not permitted in the key hydrologic features and key natural heritage features within the Natural Heritage System, including any associated vegetation protection zones, with the exception of:
 - Forest, fish and wildlife management;
 - conservation and flood or erosion control projects
 - infrastructure, aggregate, recreational, shoreline and existing uses

The Simcoe Official Plan additionally identifies the southern portion as Protected Countryside – Rural. The rural areas of the Protected Countryside are intended to continue to accommodate a range of commercial, industrial and institutional uses serving the rural resource and agricultural sectors. They are also intended to support a range of recreation and tourism uses such as trails, parks, golf courses, bed and breakfasts and other tourism based accommodation, serviced playing fields and campgrounds, ski hills and resorts. No new multiple units for residential dwellings are permitted in rural areas.

Although the Greenbelt Plan does not contemplate MCRs, it does state that settlement areas outside the Greenbelt are not permitted to expand into the Greenbelt although modest settlement area expansions may be possible for Towns/Villages, subject to various requirements as part of the 10-year Greenbelt review (policies 3.4.2.3 & 3.4.2.5).

The proposal does not include residential development on the lands within the Greenbelt and thus does not expand into the provincial greenbelt. The lowland woodland/swamp in the southern portion of the property has been provided a 30m buffer (as per Greenbelt policies) and will be restored with native vegetation in accordance with the Greenbelt Plan. It should

be noted that the proposal does not request a settlement boundary expansion for this portion of the land.

The proposal does include a park and stormwater management pond, which are both permitted uses within the Greenbelt lands. Per Section 4.1 of the Greenbelt Plan, the rural lands of the Protected Countryside are intended to support recreational uses such as trails, parks, golf courses, serviced playing fields, etc. Per Section 4.2 of the Greenbelt Plan, new infrastructure, including stormwater management facilities are permitted within the Protected Countryside, as long as it is located outside any significant natural heritage features and their associated buffers. The proposal conforms to these policies.

4.4 Lake Simcoe Protection Plan

The Lake Simcoe Protection Plan (“LSPP”) is a watershed based plan approved under the authority of the Lake Simcoe Protection Act. It establishes policies aimed at improving the water quality of Lake Simcoe, protecting the watershed’s natural heritage services, and managing the effects of climate change and the impacts of invasive species. The Urban Centres are traversed by the Holland River and its tributaries. The Lake Simcoe Protection Plan, coupled with the East Holland River Subwatershed Plan establishes policies, strategies and actions toward the protection and enhancement of the overall watershed health.

Decisions under the *Planning Act* are required to conform to the designated policies in the Lake Simcoe Protection Plan.

4.4.1 Major Development within the Regulated Area

The subject lands are located within the regulated area of the Lake Simcoe Protection Plan 2009 (LSPP). The proposed development constitutes *major development* under the Lake Simcoe Protection Plan. This Plan states that applications for *major developments* shall be accompanied by a Stormwater Management Plan (Section 4.8-DP), and that the proposed stormwater management design must satisfy the Enhanced Protection level in the Ministry of the Environment’s (MOE) “Stormwater Management Planning and Design Manual 2003”.

As it relates to property that has been incorporated within a Settlement Area after the effective date of the Plan, the LSPP contains specific policies regarding the improvement of riparian areas, mitigation of stormwater run-off impacts and the mitigation of impacts associated with water quality / quantity.

Submitted in support of the development applications is a Preliminary Servicing Brief prepared by Urban Ecosystems Ltd. The stormwater design proposed in this Report addresses the above noted policy requirements.

The remainder of the Plan has been reviewed and it has been determined that the proposed development has regard to and conforms to the relevant policies as there will be no negative impact on significant natural heritage features, including watercourses or wetlands, on site or on the surrounding lands, as per the EIS (prepared by Beacon).

4.5 County of Simcoe Official Plan (2008)

The County of Simcoe Official Plan was adopted on November 25, 2008 and the OMB granted partial approval of the Plan on December 29, 2016. The policies that are relied upon in this report are in-force and are not under appeal.

The County of Simcoe began their MCR process in late 2017 however due to the changes in the Provincial policy, the MCR process is still ongoing however it is anticipated to conclude in the Summer of 2022 to bring their 2008 Official Plan into conformity with the 2020 Growth Plan. Draft policies have not yet been released however the draft land needs assessment have been released.

4.5.1 Settlement Area Boundary Expansion Policies

Under the current County Official Plan, settlement area boundary expansions are only permitted as part of a MCR. Furthermore, they may only occur if sufficient opportunities for intensification do not exist, the necessary planned infrastructure can be provided in a financially feasible manner, and the proposed expansion will meet the requirements of the Greenbelt Plan, Niagara Escarpment Plan, and the Oak Ridges Moraine Conservation Plan (s.3.5.17).

The County Official Plan also requires agricultural operations adjacent or close to settlement areas to be protected to the greatest extent possible. Environmental and resource protection and enhancement, including the identification of a natural heritage system, are also to be conducted in accordance with the policies of this Plan.

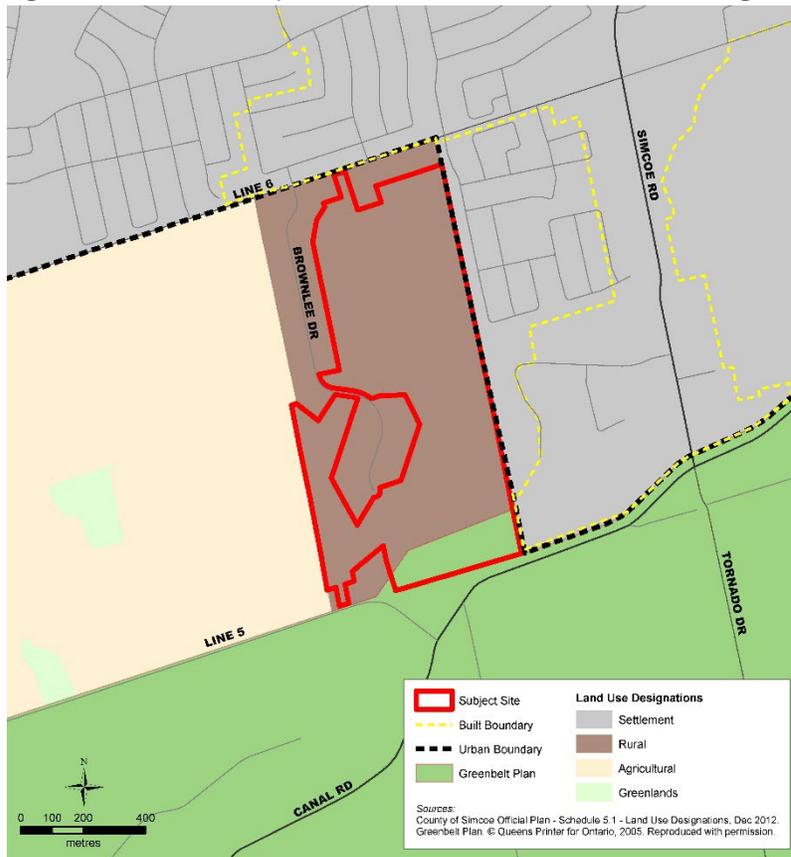
These policies are very similar to the PPS and Growth Plan and as demonstrated in Sections 4.1 and 4.2, the proposed development conforms to these policies.

4.5.2 Land Use Designation

The Simcoe Official Plan designates the subject lands as Rural and Greenbelt Plan - Protected Countryside within the Greenbelt Plan as shown in the figure below.

The policies of the Greenbelt Plan must be read in conjunction with the Simcoe Official Plan. This report relies on the in-force and effect policies contained in the consolidated Simcoe Official Plan.

Figure 4.2: Simcoe County Official Plan - Schedule 5.1 Land Use Designations



The Rural designation shall be the focus of rural and agricultural uses. Permitted uses include agricultural, resource based recreational activities, limited residential development, home occupations and home industries.

It is noted that as per Policy 3.5.7, where lands are designated Rural within one kilometre of a primary settlement area, the land use policies for Prime Agricultural Areas shall apply. The intent of this policy is to enable the efficient expansion of settlement areas. Prime Agricultural Areas are areas where prime agricultural lands dominate and development should wherever possible be designed and sited on a property to minimize the adverse impacts on agriculture and the natural heritage system. The subject lands was, until the end of 2021 golf season, operating as a golf course and is not considered prime agricultural land.

The southern portion of the subject lands that is within the Greenbelt Plan is required to conform to the policies of the Greenbelt Act as per Section 3.12.2. These policies are addressed in Section 4.3 of this Report and it is our opinion that the proposed development conforms with the Greenbelt Plan.

4.6 Town of Bradford West Gwillimbury Official Plan (2002)

The Town of Bradford West Gwillimbury Official Plan, which came into effect in February 2002,

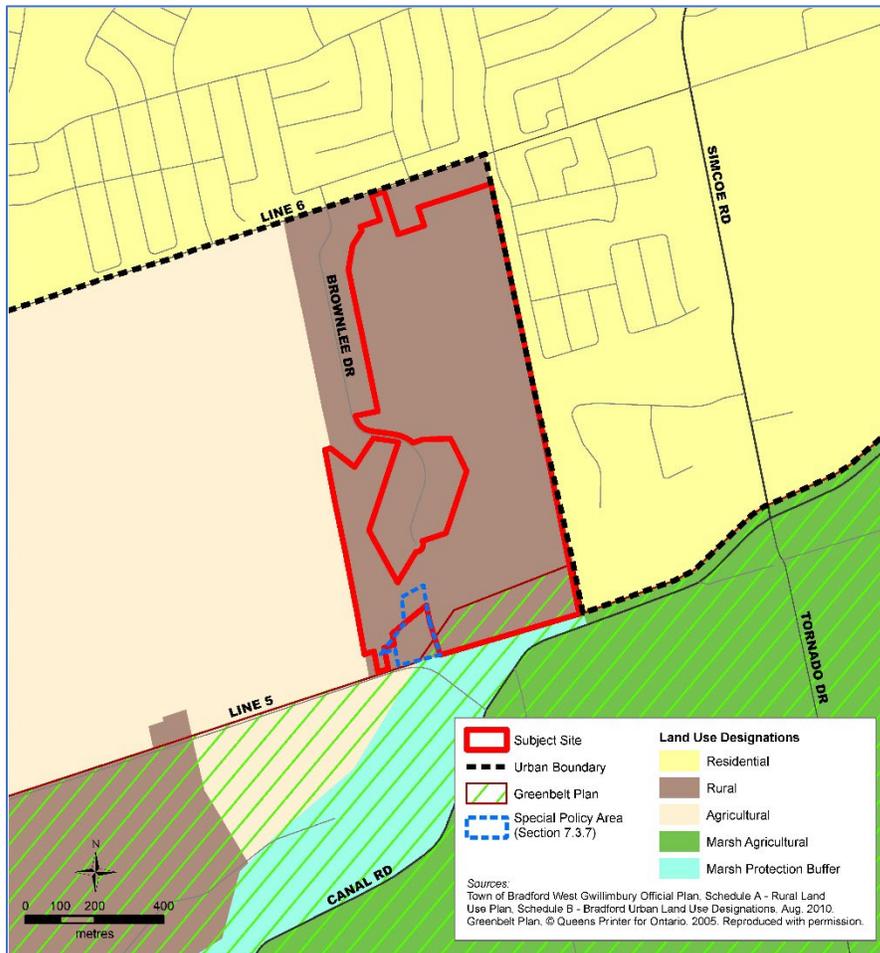
has been subject to a number of subsequent consolidations and amendments. The purpose of the Official Plan is to provide goals, objectives, and policies to guide future land use development and demographic and economic change within Bradford.

The Town of Bradford West Gwillimbury has released a new Official Plan, however as noted earlier, BHJV has an active appeal and as such, for the purposes of this report, the 2002 Official Plan is relied upon.

4.6.1 Land Use Designation

The property is designated Rural and is subject to Special Policy Area – Section 7.3.7 on Schedule A of the Official Plan, as shown in Figure 7.

Figure 4.3: Bradford Official Plan – Schedule A Rural Land Use Plan



Lands designated Rural do not form part of a prime agricultural area and they are located in an area that is characterized by intensive non-agricultural development that precludes the long-term maintenance of viable agricultural operations. Permitted uses include agricultural uses, a single detached dwelling on an existing lot or through consent, small scale commercial businesses and bed and breakfast establishments. Certain other uses may be permitted on a site-specific basis including golf courses, such as the property, as per policy 7.3.2.2.

A small portion of the property is subject to Special Policy Area – Section 7.3.7, which states:

“The following policies apply to those lands designated “Special Policies Area, Section 7.3.7” in Part of Lot 13, Concession 5, West Gwillimbury. The objective is to permit the creation of a maximum of two rural residential lots on the site, provided site specific serving and impact assessment policies can be satisfied:

- *The lands may be used for the creation of a maximum of two rural residential lots by consent.*
- *In view of the presence of a small watercourse and associated low area on the site, the provision of a drainage report shall be a requirement of any severance approval on these lands. The report shall be completed to the satisfaction of the Town, and any other agency having jurisdiction, prior to final approval and registration of any lots. The applicant may also be required to complete construction works prior to completing the severance.*
- *The lands may be developed on the basis of individual wells. A condition of any consent for a severance on these lands shall be the provision of a hydrogeologist’s report confirming that an adequate well has been constructed and tested for water quantity, water quality and potential well interference. Such testing shall be completed to the satisfaction of the Town and any other agency having jurisdiction.*
- *In view of the site’s natural features, the lands are hereby designated as an area of site plan control. The intent of this policy is to provide a method of implementing the recommendations of the drainage study and to control the siting of development on the proposed lots with regard to such natural features as the watercourse and sloped areas.*
- *The implementing zoning by-law may utilize the same minimum yard requirements as those applicable to the residential lots along Brownlee Drive to the north of the subject lands. (OPA 34, WG)*

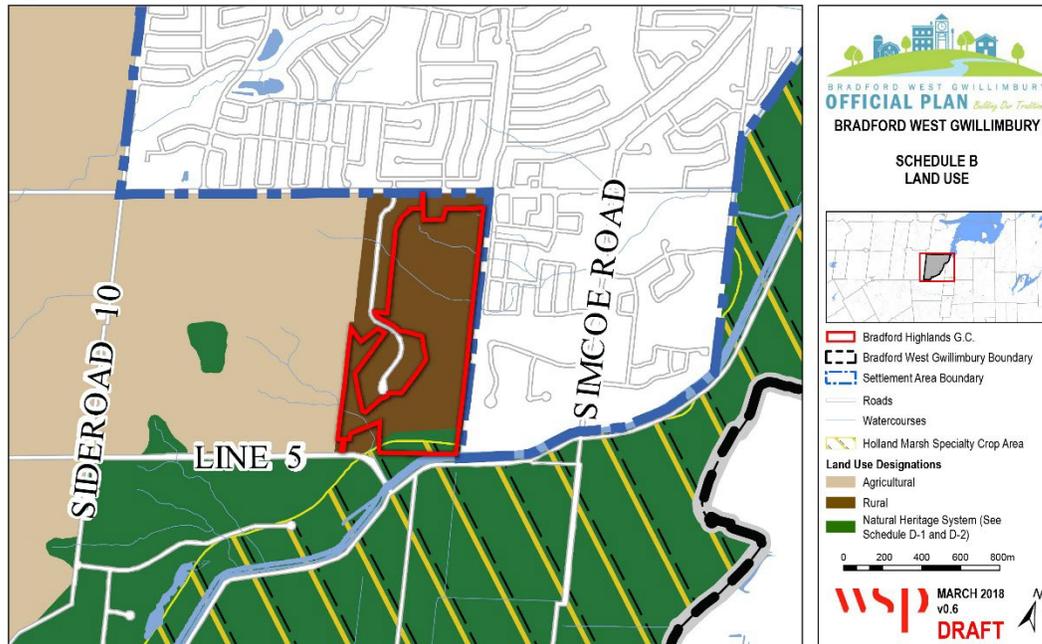
4.7 Adopted Town of Bradford West Gwillimbury Official Plan (2021)

The Town of Bradford West Gwillimbury, recently adopted a new Official Plan following the completion of their MCR, on March 2, 2021, and is subject to an appeal by BHJV. As it is not in full force and effect, this section is for reference purposes only. The purpose of the Official Plan is to provide goals, objectives, and policies to guide future land use development and demographic and economic change within Bradford.

4.7.1 Land Use Designation

The property is designated Rural on Schedule B of the Official Plan, as shown in Figure 8.

Figure 4.4: Adopted Bradford Official Plan – Schedule B Land Use Plan



Lands designated Rural do not form part of a prime agricultural area and are intended to protect the rural character and promote long-term diversity and viability of rural economic activities. Permitted uses include agriculture, agriculture-related uses (subject to Section 4.6 c), processing of agricultural products, on-farm diversified uses (subject to Section 4.6 d), natural heritage conservation and forestry, agriculture produce sales outlets, resource-based recreational activities, limited residential development (per Section 3.7.11 of the County Official Plan), cemeteries, and other rural land uses. Proposals to redesignate lands from the Rural designation may only be considered as part of a settlement area expansion through a municipal comprehensive review undertaken by the County

4.8 Proposed Official Plan Amendments

The proposed redevelopment requires both an amendment to the County of Simcoe Official Plan (from Rural to Settlements) and an amendment to the Local Official Plan Amendment (Rural to Residential) and to remove the site-specific policy (7.3.7). In both cases, the subject lands are being added to the urban area. A draft of the amendments is provided in this report in Appendix A and B. The development proposal provides the necessary supporting material to consider the site’s development for residential purposes.

The redevelopment of the golf course is not specifically anticipated by the Bradford Official Plan, however settlement boundary expansions, such as this application, are permitted, subject to a municipal comprehensive review, which the Town is currently undertaking.

It is our opinion that additional lands are needed to accommodate future residential development in order to ensure that the Town Official Plan remains current and relevant. An amendment to reconsider the future use of the subject lands is therefore appropriate and contemplated by Provincial and Regional policies.

Policy 10.13.2 of the Town Official Plan provides criteria for the review of all Official Plan Amendment applications, and is quoted in the table below:

| Policy No. | Policy | Conformity |
|---|--|---|
| <i>Requests for site specific changes to the Official Plan may be considered by Council upon application, and will be evaluated on the basis of the following criteria:</i> | | |
| 10.13.2 | Conformity with the overall intent, philosophy, goals, principles and policies of the Official Plan. | <p>The proposed development conforms to the overall intent, philosophy, goals, principles and policies of the Official Plan by:</p> <ul style="list-style-type: none"> • proposing growth that makes economical use of existing infrastructure and services (with confirmation of availability and capacity to occur through the development review process), and that will not have an adverse impact on the Town’s financial situation as per the submitted Preliminary External Servicing Investigation and Financial Review; • preserving and protecting the natural features on the property including the woodlot in the southern portion; • directing new growth to an area that is not considered prime agricultural land, preserving the high quality agricultural land, which makes up the bulk of the |

| | | |
|---------|--|--|
| | | <p>land area within the Town; and,</p> <ul style="list-style-type: none"> proposing growth that is sensitive to surrounding development in terms of frontages and lot areas, to be developed with adequate services that are in close proximity to the site. An appropriate range of housing is provided in context with the surrounding development, and the proposed townhome units will introduce an alternative form of family-oriented housing where the majority of dwellings are single-detached. |
| 10.13.2 | Suitability of the location of the site for the proposed land use. | The re-use of the site for residential development is suitable with the addition of housing to the adjacent neighbourhood. |
| 10.13.2 | Compatibility of the proposed land use with surrounding uses. | The proposed housing is compatible with existing housing by proposing single detached housing adjacent to the existing single detached units. The interior lots are planned to reflect a modern lot type similar to the existing subdivision to the north and the subdivision to the east. |
| 10.13.2 | The need for and feasibility of the use, where considered appropriate. | There is a need to reconsider the use of the site given the need for residential land to accommodate the population target. |
| 10.13.2 | The impact of the proposal on municipal services and infrastructure. | The property would require minimal capital infrastructure investment as it has the potential to utilize servicing works currently planned for within the vicinity of the property. |
| 10.13.2 | The economic benefits and financial implications to the Town. | There is a positive fiscal impact from the development as demonstrated in the submitted Preliminary External Servicing Investigation and Financial Review (submitted concurrently with this application). |
| 10.13.2 | Regard for the County of Simcoe Official Plan and the Provincial Policy Statement. | See Section 4.1 and 4.5 of this report. |

This report and the other supporting documents address the items in the above list in order to consider the Official Plan Amendment applications.

It is our opinion that Council should endorse the Official Plan Amendment application on the basis that it conforms to the items in Policies 10.13.2.

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5.0 Overall Planning Opinion

The proposed settlement boundary expansion is consistent with and conforms to (as the case may be), relevant provincial, county and local policies for the following reasons:

- It is being submitted concurrent to the municipal comprehensive review of the Town Official Plan and County Official Plan;
- It is our opinion that additional lands are needed to accommodate future residential development;
- The subject lands represents the most logical area of urban expansion compared to other sites as it has the following characteristics:
 - The lands are no longer suited for agricultural uses;
 - The lands can be serviced with minimal infrastructure investment and will generate an estimated **\$31.5 million (as of 2017)** in Development Charge funding to the Town of Bradford-West Gwillimbury;
 - Frontage and access on major transportation infrastructure as well as convenient access to the new 5th line interchange at Highway 400;
 - The lands would not require an employment conversion to accommodate residential development and therefore will not deplete the employment base; and,
 - Development on the lands produces minimal interface between urban and agricultural uses.

Subject Lands Not Suitable for Agricultural Uses

In the early 1980s, the property was redesignated to “Rural” to permit the golf course and the surrounding estate subdivision in its current form. The combination of recreational golfing uses and housing over the past 25+ years have rendered the lands not suitable for agricultural uses and therefore not requiring an Agricultural Impact Assessment. As stated by Mr. Dale Toombs, an agricultural land use specialist providing evidence on the property in the OMB Decision 0708 dated May 30, 2002:

“In the case of the ICG property (subject lands), the block of land in which it is located has been converted to a combination of housing and recreational golfing uses, which together have supplanted agricultural uses and make any return to agriculture on any portion of the block, including the golf course, extremely unlikely”

Should an Agricultural Impact Assessment be required by the Town, as per the proposed Growth Plan requirements for settlement boundary expansions, we believe that these lands

are now non-agricultural in nature and expansion onto these lands would result in minimal impact on the agricultural system.

Subject Lands Can Utilize Existing Servicing

As mentioned earlier, the subject lands requires minimal capital infrastructure investment as it can utilize servicing works currently planned for the vicinity (including the Green Valley Estates subdivision immediately to the east). It is our opinion that the proposed development can be serviced with modest improvements, with no significant infrastructure costs while assisting in the cash-flow requirements of the Town, potentially providing **an additional \$31.5 million (as of 2017)** in development charge funding.

Settlement Area Expansion to Include Subject Lands Creates Minimal Land Use Conflicts

Lastly, an effective urban boundary follows identifiable features and minimizes the interface between urban and agricultural uses. The adjacent estate housing along Brownlee Drive west of the property already functions as an urban boundary to the agricultural lands to the west. A settlement boundary expansion to include the subject lands would not create a new interface – and as such, no conflict – between urban and agricultural uses and would have no practical effect on the character of the urban boundary.

5.1 Conclusion

It is our opinion that the Town will not meet its growth targets with its current land supply and will require additional residential land to accommodate growth. It is our opinion that the subject lands represents the most logical area for settlement area expansion.

Appendix A

Draft County Official Plan Amendment

AMENDMENT NO. XX
TO THE COUNTY OF SIMCOE OFFICIAL PLAN

This Amendment applies to:

BRADFORD HIGHLANDS JOINT VENTURE
BLOCK 36, PLAN 51M-221; PART LOT 13, CONCESSION 5, TOWN OF BRADFORD
WEST GWILLIMBURY

XXXXX XX, 2022

CONSTITUTIONAL STATEMENT

The following Amendment to the Official Plan of the County of Simcoe consists of three parts.

Part A - The Preamble, consisting of the purpose, location and basis of the amendment, does not constitute part of this Amendment.

Part B – The amendment consisting of the noted text constitutes Amendment No. XX to the Official Plan for the County of Simcoe.

Part C - The Appendices, consisting of the technical reports associated with this Amendment, do not constitute part of this Amendment

PART A - THE PREAMBLE PURPOSE

The purpose of this Amendment is to incorporate the subject site into the urban boundary and redesignate it from Rural to Settlements in the County of Simcoe.

The Amendment is privately initiated by the Owner together with a related Town Official Plan Amendment. The Amendment is supported by technical studies submitted by the applicant as reviewed by the County which establish that the property can be developed for urban uses.

LOCATION

The Amendment affects Block 36, Plan 51M-221; Part Lot 13, Concession 5 in the Town of Bradford West Gwillimbury. The Key Map below identifies the location of the lands.

Key Map



BASIS

Bradford Highlands Joint Venture, to amend the County of Simcoe Official Plan to permit residential uses. The application proposes a conceptual development plan of approximately 950 residential lots.

The subject lands are approximately 60 hectares (148 acres) in size.

A range of technical studies have been submitted in support of the proposed development, including:

- Planning Opinion (Malone Given Parsons Ltd., 2022);
- Environmental Impact Study (Beacon Environmental, 2020);
- Preliminary External Servicing Investigation and Financial Review (SCS Consulting Group, 2017);
- Archaeological Assessment (AMICK, 2020); and,
- Preliminary Servicing Brief (UEL, 2017).

The proposed Amendment is consistent with the Provincial Policy Statement, conforms to the Greenbelt Plan, the A Place to Grow: Growth Plan for the Greater Golden Horseshoe, Lake Simcoe Protection Plan, the County of Simcoe Official Plan (as amended), and the Bradford West Gwillimbury Official Plan (as amended).

PART B - THE AMENDMENT

This part of the document entitled Part B - The Amendment. It consists of the following text which constitutes Amendment No. XX to the Official Plan of the County of Simcoe.

DETAILS OF THE AMENDMENT

The Official Plan of the County of Simcoe is amended as follows:

1. Schedule '5.1' of the Official Plan is hereby amended by designating certain lands from the "Rural" designation and replacing it with the "Settlements" designation and including these same lands into the urban boundary, as shown in Schedule 1 of this Amendment.

PART C THE APPENDICES

Other support documentation to be included as appropriate following the approval of the Amendment by the County of Simcoe Council

Schedule 5.1
 Land Use Designations
 County of Simcoe Official Plan

Schedule "1"
 to Amendment
 XXX



- LEGEND**
- Subject Site**
 - Settlements
 - Greenlands
 - Agricultural

- Rural
- Settlement Area Boundary
- Revised Settlement Area Boundary

- Greenbelt Plan - Protected Countryside
- (Refer to Schedule 5.3.3 For Details)
 - Built Boundaries

Appendix B

Draft Local Official Plan Amendment

AMENDMENT NO. XX
TO THE TOWN OF BRADFORD WEST GWILLIMBURY OFFICIAL PLAN

This Amendment applies to:

BRADFORD HIGHLANDS JOINT VENTURE
BLOCK 36, PLAN 51M-221; PART LOT 13, CONCESSION 5, TOWN OF BRADFORD
WEST GWILLIMBURY

XXXXX XX, 2022

CONSTITUTIONAL STATEMENT

The following Amendment to the Official Plan of Town of Bradford West Gwillimbury consists of three parts.

Part A - The Preamble, consisting of the purpose, location and basis of the amendment, does not constitute part of this Amendment.

Part B – The amendment consisting of the noted text constitutes Amendment No. XX to the Official Plan for the Town of Bradford West Gwillimbury.

Part C - The Appendices, consisting of the technical reports associated with this Amendment, do not constitute part of this Amendment

PART A - THE PREAMBLE PURPOSE

The purpose of this Amendment is to incorporate the subject site into the urban boundary and redesignate it from Rural to Residential in the Town of Bradford West Gwillimbury Official Plan.

The Amendment is privately initiated by the Owner together with a related County Official Plan Amendment. The Amendment is supported by technical studies submitted by the applicant as reviewed by the Town which establish that the property can be developed for residential use.

LOCATION

The Amendment affects Block 36, Plan 51M-221; Part Lot 13, Concession 5 in the Town of Bradford West Gwillimbury. The Key Map below identifies the location of the lands.

Key Map



BASIS

Bradford Highlands Joint Venture, to amend the Town of Bradford West Gwillimbury Official Plan to permit residential uses. The application proposes a conceptual development plan of approximately 950 residential lots.

The subject lands are approximately 60 hectares (148 acres) in size.

A range of technical studies have been submitted in support of the proposed development, including:

- Planning Opinion (Malone Given Parsons Ltd., 2022);
- Environmental Impact Study (Beacon Environmental, 2020);
- Preliminary External Servicing Investigation and Financial Review (SCS Consulting Group, 2017);
- Archaeological Assessment (AMICK, 2020); and,
- Preliminary Servicing Brief (UEL, 2017).

The proposed Amendment is consistent with the Provincial Policy Statement, conforms to the Greenbelt Plan, the A Place to Grow: Growth Plan for the Greater Golden Horseshoe, Lake Simcoe Protection Plan, the County of Simcoe Official Plan (as amended), and the Bradford West Gwillimbury Official Plan (as amended).

PART B - THE AMENDMENT

This part of the document entitled Part B - The Amendment. It consists of the following text which constitutes Amendment No. XX to the Official Plan of the Town of Bradford West Gwillimbury.

DETAILS OF THE AMENDMENT

The Official Plan of the Town of Bradford West Gwillimbury is amended as follows:

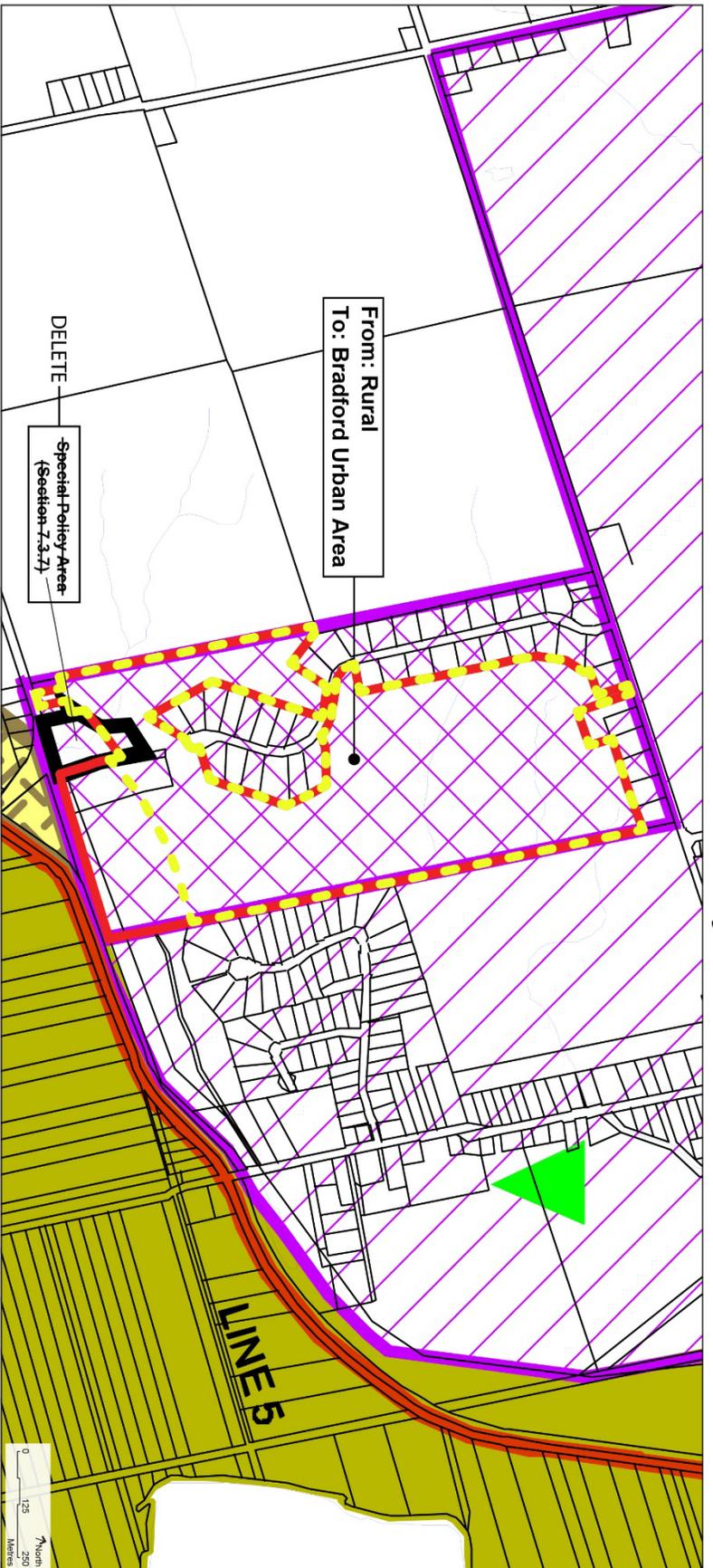
1. Schedule 'A' of the Official Plan is hereby amended by redesignating certain lands from the "Rural" designation and replacing it with the "Bradford Urban Area" designation, as shown in Schedule 1 of this Amendment.
2. Schedule 'A' of the Official Plan is hereby amended by deleting Special Policy Area (Section 7.3.7), as shown in Schedule 1 of this Amendment.
3. Schedule 'B' of the Official Plan is hereby amended by designating certain lands to the "Residential" designation and including these same lands into the urban boundary, as shown in Schedule 2 of this Amendment.
4. Section 7.3.7 is hereby deleted.

PART C THE APPENDICES

Other support documentation to be included as appropriate following the approval of the Amendment by the Town of Bradford West Gwillimbury Council

Schedule 'A'
 Rural Land Use Plan
Town of Bradford West Gwillimbury Official Plan

Schedule "1"
 to Amendment
 XXX



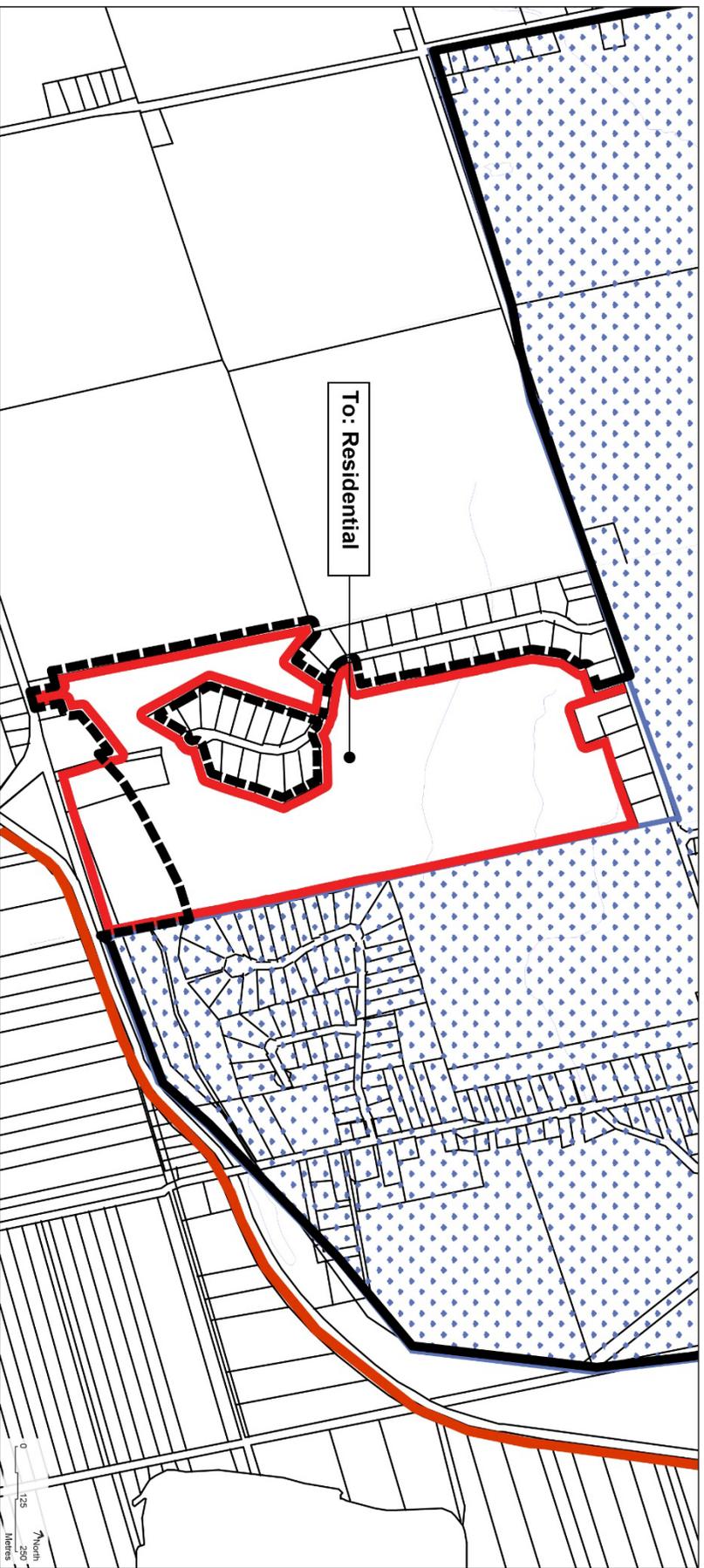
LEGEND

| | | | | | |
|--|--------------------------------------|--|-------------|--|---|
| | Subject Site | | Road | | Highway 400/404 Link |
| | Agricultural | | County Road | | Watershed Boundary |
| | Rural | | Highway | | Trans Canada Pipeline |
| | Marsh Agricultural | | Railway | | Lands to be Redesignated to Settlement Area |
| | Bradford Urban Area | | Water | | |
| | Settlement Area | | | | |
| | Marsh Protection Buffer | | | | |
| | Inactive Private Waste Disposal Site | | | | |



Schedule 'B'
Bradford Urban Area Land Use Designations
Town of Bradford West Gwillimbury Official Plan

Schedule "2"
to Amendment
XXX



LEGEND

-  Subject Site
-  Residential
-  Urban Boundary
-  Revised Urban Boundary
-  Road
-  Highway
-  Water

Appendix C

Settlement Expansion Policy Excerpts

Land use patterns within *settlement areas* shall also be based on a range of uses and opportunities for *intensification* and *redevelopment* in accordance with the criteria in policy 1.1.3.3, where this can be accommodated.

- 1.1.3.3 Planning authorities shall identify appropriate locations and promote opportunities for *transit-supportive* development, accommodating a significant supply and range of *housing options* through *intensification* and *redevelopment* where this can be accommodated taking into account existing building stock or areas, including *brownfield sites*, and the availability of suitable existing or planned *infrastructure* and *public service facilities* required to accommodate projected needs.
- 1.1.3.4 Appropriate development standards should be promoted which facilitate *intensification*, *redevelopment* and compact form, while avoiding or mitigating risks to public health and safety.
- 1.1.3.5 Planning authorities shall establish and implement minimum targets for *intensification* and *redevelopment* within built-up areas, based on local conditions. However, where provincial targets are established through *provincial plans*, the provincial target shall represent the minimum target for affected areas.
- 1.1.3.6 New development taking place in *designated growth areas* should occur adjacent to the existing built-up area and should have a compact form, mix of uses and densities that allow for the efficient use of land, *infrastructure* and *public service facilities*.
- 1.1.3.7 Planning authorities should establish and implement phasing policies to ensure:
 - a) that specified targets for *intensification* and *redevelopment* are achieved prior to, or concurrent with, new development within *designated growth areas*; and
 - b) the orderly progression of development within *designated growth areas* and the timely provision of the *infrastructure* and *public service facilities* required to meet current and projected needs.
- 1.1.3.8 A planning authority may identify a *settlement area* or allow the expansion of a *settlement area* boundary only at the time of a *comprehensive review* and only where it has been demonstrated that:
 - a) sufficient opportunities to accommodate growth and to satisfy market demand are not available through *intensification*, *redevelopment* and *designated growth areas* to accommodate the projected needs over the identified planning horizon;
 - b) the *infrastructure* and *public service facilities* which are planned or available are suitable for the development over the long term, are financially viable over their life cycle, and protect public health and safety and the natural environment;
 - c) in *prime agricultural areas*:
 - 1. the lands do not comprise *specialty crop areas*;
 - 2. alternative locations have been evaluated, and

- i. there are no reasonable alternatives which avoid *prime agricultural areas*; and
 - ii. there are no reasonable alternatives on lower priority agricultural lands in *prime agricultural areas*;
- d) the new or expanding *settlement area* is in compliance with the *minimum distance separation formulae*; and
- e) impacts from new or expanding *settlement areas* on agricultural operations which are adjacent or close to the *settlement area* are mitigated to the extent feasible.

In undertaking a *comprehensive review*, the level of detail of the assessment should correspond with the complexity and scale of the settlement boundary expansion or development proposal.

1.1.3.9 Notwithstanding policy 1.1.3.8, municipalities may permit adjustments of *settlement area* boundaries outside a *comprehensive review* provided:

- a) there would be no net increase in land within the *settlement areas*;
- b) the adjustment would support the municipality's ability to meet *intensification* and *redevelopment* targets established by the municipality;
- c) *prime agricultural areas* are addressed in accordance with 1.1.3.8 (c), (d) and (e); and
- d) the *settlement area* to which lands would be added is appropriately serviced and there is sufficient reserve *infrastructure* capacity to service the lands.

1.1.4 Rural Areas in Municipalities

Rural areas are important to the economic success of the Province and our quality of life. Rural areas are a system of lands that may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and other resource areas. Rural areas and urban areas are interdependent in terms of markets, resources and amenities. It is important to leverage rural assets and amenities and protect the environment as a foundation for a sustainable economy.

Ontario's rural areas have diverse population levels, natural resources, geographies and physical characteristics, and economies. Across rural Ontario, local circumstances vary by region. For example, northern Ontario's natural environment and vast geography offer different opportunities than the predominately agricultural areas of southern regions of the Province.

1.1.4.1 Healthy, integrated and viable *rural areas* should be supported by:

- a) building upon rural character, and leveraging rural amenities and assets;
- b) promoting regeneration, including the redevelopment of *brownfield sites*;
- c) accommodating an appropriate range and mix of housing in rural *settlement areas*;
- d) encouraging the conservation and *redevelopment* of existing rural housing stock on *rural lands*;
- e) using rural *infrastructure* and *public service facilities* efficiently;

- ii. within the applicable lower-tier municipality;
 - b) the proposed expansion will make available sufficient lands not exceeding the horizon of this Plan, based on the analysis provided for in policy 2.2.8.2 a), while minimizing land consumption; and
 - c) the timing of the proposed expansion and the phasing of development within the *designated greenfield area* will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.
3. Where the need for a *settlement area* boundary expansion has been justified in accordance with policy 2.2.8.2, the feasibility of the proposed expansion will be determined and the most appropriate location for the proposed expansion will be identified based on the comprehensive application of all of the policies in this Plan, including the following:
- a) there is sufficient capacity in existing or planned *infrastructure* and *public service facilities*;
 - b) the *infrastructure* and *public service facilities* needed would be financially viable over the full life cycle of these assets;
 - c) the proposed expansion would be informed by applicable water and wastewater master plans or equivalent and *stormwater master plans* or equivalent, as appropriate;
 - d) the proposed expansion, including the associated water, wastewater and stormwater servicing, would be planned and demonstrated to avoid, or if avoidance is not possible, minimize and mitigate any potential negative impacts on watershed conditions and the *water resource system*, including the *quality and quantity of water*;
 - e) *key hydrologic areas* and the *Natural Heritage System for the Growth Plan* should be avoided where possible;
 - f) *prime agricultural areas* should be avoided where possible. To support the *Agricultural System*, alternative locations across the upper- or single-tier municipality will be evaluated, prioritized and determined based on avoiding, minimizing and mitigating the impact on the *Agricultural System* and in accordance with the following:
 - i. expansion into *specialty crop areas* is prohibited;
 - ii. reasonable alternatives that avoid *prime agricultural areas* are evaluated; and
 - iii. where *prime agricultural areas* cannot be avoided, lower priority agricultural lands are used;
 - g) the *settlement area* to be expanded is in compliance with the *minimum distance separation formulae*;

- h) any adverse impacts on the *agri-food network*, including agricultural operations, from expanding *settlement areas* would be avoided, or if avoidance is not possible, minimized and mitigated as determined through an *agricultural impact assessment*;
 - i) the policies of Sections 2 (Wise Use and Management of Resources) and 3 (Protecting Public Health and Safety) of the PPS are applied;
 - j) the proposed expansion would meet any applicable requirements of the Greenbelt, Oak Ridges Moraine Conservation, Niagara Escarpment, and Lake Simcoe Protection Plans and any applicable source protection plan; and
 - k) within the Protected Countryside in the *Greenbelt Area*:
 - i. the *settlement area* to be expanded is identified in the Greenbelt Plan as a Town/Village;
 - ii. the proposed expansion would be modest in size, representing no more than a 5 per cent increase in the geographic size of the *settlement area* based on the *settlement area* boundary delineated in the applicable official plan as of July 1, 2017, up to a maximum size of 10 hectares, and residential *development* would not be permitted on more than 50 per cent of the lands that would be added to the *settlement area*;
 - iii. the proposed expansion would support the achievement of *complete communities* or the local agricultural economy;
 - iv. the proposed uses cannot be reasonably accommodated within the existing *settlement area* boundary;
 - v. the proposed expansion would be serviced by existing *municipal water and wastewater systems* without impacting future *intensification* opportunities in the existing *settlement area*; and
 - vi. expansion into the Natural Heritage System that has been identified in the Greenbelt Plan is prohibited.
4. Notwithstanding policy 2.2.8.2, municipalities may adjust *settlement area* boundaries outside of a *municipal comprehensive review*, provided:
- a) there would be no net increase in land within *settlement areas*;
 - b) the adjustment would support the municipality's ability to meet the intensification and density targets established pursuant to this Plan;
 - c) the location of any lands added to a *settlement area* will satisfy the applicable requirements of policy 2.2.8.3;

- d) the affected *settlement areas* are not *rural settlements* or in the *Greenbelt Area*; and
 - e) the *settlement area* to which lands would be added is serviced by *municipal water and wastewater systems* and there is sufficient reserve *infrastructure* capacity to service the lands.
5. Notwithstanding policies 2.2.8.2 and 5.2.4.3, a *settlement area* boundary expansion may occur in advance of a *municipal comprehensive review*, provided:
- a) the lands that are added will be planned to achieve at least the minimum density target in policy 2.2.7.2 or 2.2.5.13, as appropriate;
 - b) the location of any lands added to a *settlement area* will satisfy the applicable requirements of policy 2.2.8.3;
 - c) the affected *settlement area* is not a *rural settlement* or in the *Greenbelt Area*;
 - d) the *settlement area* is serviced by *municipal water and wastewater systems* and there is sufficient reserve *infrastructure* capacity to service the lands; and
 - e) the additional lands and associated forecasted growth will be fully accounted for in the land needs assessment associated with the next *municipal comprehensive review*.
6. For a *settlement area* boundary expansion undertaken in accordance with policy 2.2.8.5, the amount of land to be added to the *settlement area* will be no larger than 40 hectares.

2.2.9 Rural Areas

1. Municipalities are encouraged to plan for a variety of cultural and economic opportunities within *rural settlements* to serve the needs of rural residents and area businesses.
2. *Public service facilities* in *rural settlements* should be co-located and integrated in community hubs, and priority should be given to maintaining and adapting existing *public service facilities* in community hubs to meet the needs of the community, where feasible.
3. Subject to the policies in Section 4, *development* outside of *settlement areas* may be permitted on *rural lands* for:
 - a) the management or use of resources;
 - b) resource-based recreational uses; and
 - c) other rural land uses that are not appropriate in *settlement areas* provided they:

3.5.16 No final approvals such as registration of plans of subdivision, will be given until the Environmental Assessment process is finalized which deals with the provision of water and sewage treatment services and confirmation that capacity exists within the approved Environmental Compliance Approvals or agreements are in place for the expansion of such facilities to service the lands.

Settlement Expansion

3.5.17 *Settlement area* boundary expansions may occur only in accordance with an approved *municipal comprehensive review* that is consistent with the growth management study in 3.5.8 and where it has been demonstrated that:

- a) Sufficient opportunities to accommodate forecasted growth contained in Table 1, through *intensification* and in *designated Greenfield areas*, using the *intensification* target and *density targets*, are not available within the applicable *local municipality* to accommodate the growth allocated to the *municipality* pursuant to this *Plan*;
- b) The expansion makes available sufficient lands for a time horizon not exceeding 20 years, based on the analysis provided for in subsection (a) above;
- c) The timing of the expansion and the phasing of *development* within the *designated Greenfield area* will not adversely affect the achievement of the *intensification* target and *density targets*, and the other policies of this *Plan*;
- d) Where applicable, the proposed expansion will meet the requirements of the Greenbelt, Niagara Escarpment and Oak Ridges Moraine Conservation Plans;
- e) The existing or planned *infrastructure* and services required to accommodate the proposed expansion can be provided in a financially and environmentally sustainable manner;
- f) In *prime agricultural areas*:
 - i. The lands do not comprise *specialty crop areas*
 - ii. There are no reasonable alternatives that avoid *prime agricultural areas*
 - iii. There are no reasonable alternatives on lower priority agricultural lands in *prime agricultural areas*;
- g) Impacts from expanding *settlement areas* on agricultural operations which are adjacent or close to the *settlement areas* are mitigated to the extent feasible;
- h) Compliance with the *minimum distance separation formulae*; and
- i) In determining the most appropriate location for expansions to the boundaries of *settlement areas*, the other policies of this *Plan* are applied.

**** Party G1 reserves the right to request additional policy language/clarification in a subsequent paragraph to sub-section a) of this policy.**

3.5.18 Where *settlement area* boundary expansion is needed to meet projected *development* needs as outlined in Section 3.5.17 above, the decision on direction or location of *settlement area* expansions shall be based on:

- an analysis of servicing and transportation facilities, ensuring the efficient use and expansion of servicing *infrastructure* including sidewalks, trails and transit;

Appendix D

Ground-Related Housing Heats Up While the Apartment Market Lags

GTA HOUSING PULSE

Issue # 8: September 11, 2020

GROUND-RELATED HOUSING HEATS UP WHILE THE APARTMENT MARKET LAGS

- The Greater Toronto Area (GTA) MLS sales activity reached record levels again in August as pent-up demand that accumulated over the March to May period continued to be unleashed.
- The 905 area led the way in record total sales as buyers showed a higher preference for ground-related housing. Ground-related home resale activity boomed in the 416 as well, but slower sales in the relatively larger apartment market dampened the total sales increase.

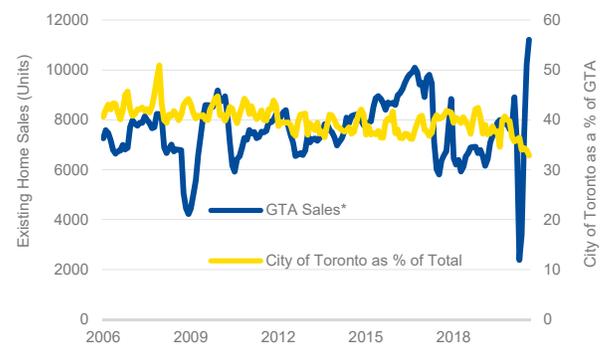
Overall GTA sales boomed and inventory followed

- On a seasonally adjusted basis, existing home sales hit record levels (+40% y/y), while the average sales price is estimated to have reached \$1 million on a seasonally adjusted basis (up 21% from year-ago levels) (Figure 1 and 2).
- The GTA market became more balanced and the 21% year-over-year gain in the average sales price was higher than would be expected given supply-demand fundamentals (Figure 3). New listings were up 57%, also hitting a record level for August. The sales-to-listings ratio fell to 54 from 62 in the prior month. Months of inventory also ticked up, but remain very low.

Demand for ground-related housing surged in both the 416 and 905 area

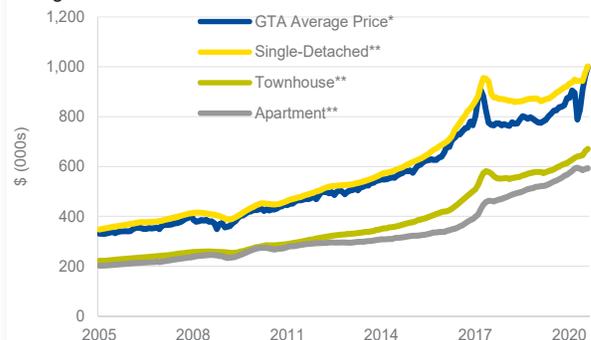
- Record activity occurred in the 905 area, which saw the strongest August since 1996. It was only the second best August on record for the 416, still not bad for a pandemic. As such, the share of resale activity that occurred in the 416 area fell to 33%, down from 36% a year ago (Figure 1).
- The 416 area underperformed the 905 because it has a larger apartment market, otherwise demand for ground-related housing increased faster in the 416 than in the 905 (Figure 4). The apartment market lagged all other housing types across the GTA.

Figure 1: MLS Residential Sales, GTA, January 2006-August 2020



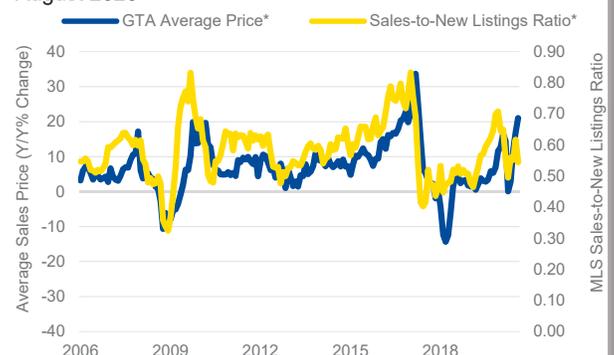
Source: CUR, based on CREA and TRREB data. *Seasonally Adjusted

Figure 2: MLS Residential Sales Price, GTA, January 2005-August 2020



Source: CUR, based on CREA and TRREB data. *Seasonally Adjusted. **Quality-Adjusted Measure

Figure 3: MLS Residential Market, GTA, January 2006-August 2020



Source: CUR, based on CREA and TRREB data. *Seasonally Adjusted

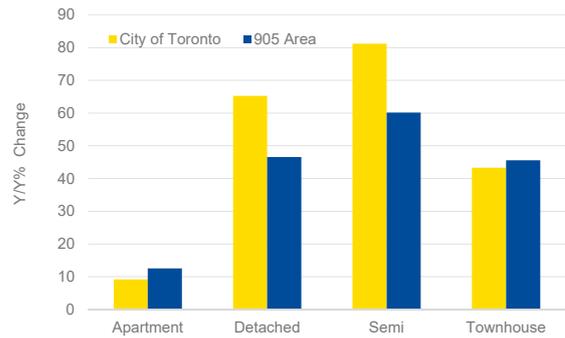
Prices rose strongly even as supply grew

- The average sales price rose faster in the 416 area compared to the 905 area for most housing types (Figure 5), but inventory also increased at a higher rate.
- Inventory of homes for sale were up more than resales in the city of Toronto for most housing types with the exception of detached homes. This contrasts to the 905 area where the condo market was the only segment to experience a faster increase in active listings than in sales (Figure 8).
- Active listings of apartments jumped 116% y/y in the 416 and 65% y/y in the 905 area, but fell for all other housing types. Months of inventory rose to 3.0 for apartments in the 416, more than double that of all other housing types in the city (Figure 6).

Millennials unleashed demand for ground-related housing at the expense of the condo market

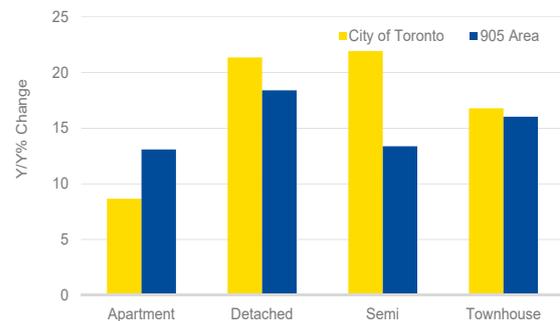
- The real estate market still has not fully made up for the lost activity between March and April, so we do expect some of this strength to continue into September.
- Never underestimate the power of Millennials to continue driving upside surprises in resale market activity, especially as very low interest rates have helped improve affordability.
- As this generation moves out of apartments into ground-related housing, apartments are likely to remain a lagging segment of the real estate market.
- Add to this the fact that there are an estimated 8K to 10k Airbnb units that would not be compliant with new City of Toronto short-term rental bylaws coming into effect this week. Some of these units may end up on the ong-term rental market, while many might end up for sale.

Figure 4: GTA MLS Residential Sales, City of Toronto and 905 Area, Year-over-Year % Change, August 2020



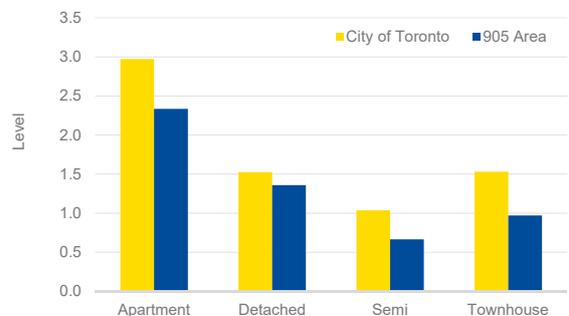
Source: CUR, based on TRREB data.

Figure 5: GTA MLS Residential Sales Price, City of Toronto and 905 Area, Year-over-Year % Change, August 2020



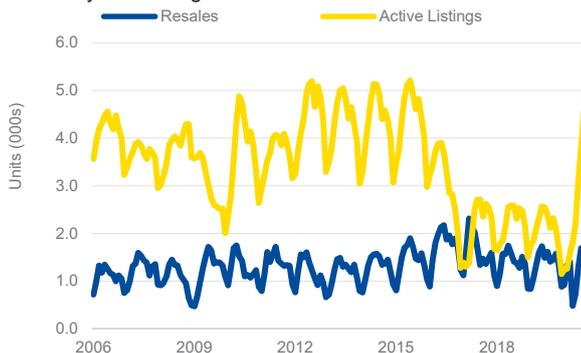
Source: CUR, based on TRREB data.

Figure 6: GTA MLS Months of Inventory, City of Toronto and 905 Area, August 2020



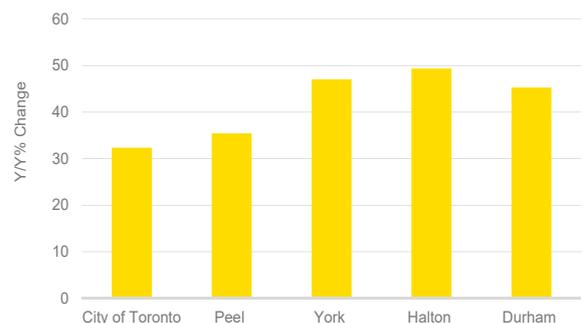
Source: CUR, based on TRREB data.

Figure 7: MLS Residential Condo Market, City of Toronto, January 2006- August 2020



Source: CUR, based on TRREB data.

Figure 8: GTA MLS Residential Sales by Municipality, Year-over-Year % Change, August 2020



Source: CUR, based on TRREB data.

Appendix E

Globe and Mail Article Regarding COVID-19 Housing Trends

Rather than seeking to change life in the 'burbs, city dwellers need their own plan for the future

JOHN
IBBITSON

OPINION



Canada is not an urban society. It is a suburban society. More than two-thirds of Canadians live in suburbs; in our largest cities the figure is over 80 per cent. Fifty-five per cent of Canadians live in detached homes. Four of the five bestselling vehicles in Canada are pickup trucks. (The fifth is an SUV.)

The COVID-19 pandemic is likely to hasten the flight from downtown to suburb, from the condo tower to a house with a garage and a backyard, from public transit to owning a car.

To understand the future of cities, understand the suburban family living on a curvy street in a house with the garage sticking out and a Ford F-150 in the driveway.

What does this family need or desire? How, other than relying on market forces and keeping out of their way, can we make their lives better? These are the questions that matter when we talk about the future of cities.

The pandemic has revealed flaws in the assumptions behind downtown living. Many millennials, unable to afford the stratospheric prices of houses in the core, live in high-rises. This is not an ideal environment when two adults suddenly have to work from home and there isn't even a balcony, let alone a backyard.

Some of this will go away once everyone is vaccinated. But working from home is likely to become much more common, which is why in my city, Ottawa, Shopify wants to sublet its downtown

headquarters.

Suddenly, the idea of thousands upon thousands of people wasting hours each day funnelling into city centres in the morning and then back home at night seems faintly ridiculous. Who wants to go back to doing that five days a week?

If the future of the city involves more people working at least part of the time from home, housing will have to adapt. As it turns out, the detached suburban house is quite well suited to the task.

People downtown grapple with issues such as congestion, homelessness, affordability. They assign a high priority to combatting global warming. They seek redistributive solutions: social services, subsidized housing, anti-racism initiatives, bike lanes, a carbon tax.

But the priorities of many suburbanites – including the 51 per cent of immigrants in Greater Toronto who live in suburbs – are aspirational rather than redistributive; they are more interested in getting ahead than in giving back. They don't ride bikes between November and April, and they don't seek to defund the police. As for global warming: pickup trucks.

If your response is that we must get suburbanites to change their way of living and thinking, how do you plan to win their votes?

People in city centres should be thinking less about compelling suburbs to change, and more about what they're going to do with all those empty downtown office towers and the shuttered stores in the malls beneath them, now that suburban workers are spending at least part of their workweek at home.

They might ask how they're going to get suburbanites to come downtown to shop and eat and see a movie or a play if they don't work there much any more, cool new restaurants are opening in their own neighbourhood and everything they want to see is streamed.

That doesn't mean many suburban dwellers don't want changes. Looser zoning and fewer regulations might encourage the return of the corner store and other shops within walking distance.

Public transit may be reshaped to serve each community rather than acting as a hub-and-spoke commuter system.

The pandemic has revealed that retirement homes can be life-threatening. In our aging society, houses need to be redesigned to accommodate multiple generations of one family. Actually, they already do. Drive around any suburban neighbourhood with detached homes. Note how many jam three or four cars into the driveway. That may well be a multigenerational family, including grandparents and adult children who can't afford to move out.

People thinking about the future of the city need to show suburban dwellers more respect. Stop telling them what their values and priorities should be, what future you envision for them.

They are most of us. They will decide their own future. And just in case you haven't noticed, they like big trucks.

Join The Globe and Mail and Tortoise Media for the Future of Cities Summit, a live virtual event on Nov. 19. To register for this free event, visit tgam.ca/futureofcities and use promo code GlobeSub.

Appendix F

Province's response to the City of
Hamilton's request to review it's
'No Urban Boundary Expansion

**Ministry of Municipal Affairs
and Housing**

Municipal Services Office
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777 Bay Street, 13th Floor
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**Ministère des Affaires municipales
et Logement**

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Télec. : 416 585-6882



September 17, 2021

Steve Robichaud
Chief Planner and Director of Planning
Planning Division
Planning and Economic Development
City of Hamilton

Sent via email

Re: City of Hamilton Land Needs Assessment Technical Update

Dear Steve Robichaud:

Thank you for circulating the City of Hamilton Land Needs Assessment Technical Update (“technical update”). The Ministry of Municipal Affairs and Housing (“the Ministry”) wishes to acknowledge the significant amount of work that has gone into preparing the City’s draft land needs assessment materials to date.

The comments below are intended to assist the City in its Municipal Comprehensive Review (MCR) and conformity with A Place to Grow: The Growth Plan for the Greater Golden Horseshoe (“A Place to Grow”) and the Land Needs Assessment Methodology for the Greater Golden Horseshoe, 2020 (“LNA Methodology”).

In November 2020, the City of Hamilton shared the Draft Land Needs Assessment to 2051 with Ministry staff for preliminary review. The draft included three scenarios (*Growth Plan Minimums*, *Increased Targets*, *Ambitious Density*) based on varying intensification and density targets. In a letter to the City dated December 15, 2020, the Ministry’s Ontario Growth Secretariat noted that each of the three scenarios included in the draft appeared to conform to the LNA Methodology.

In March 2021, City staff recommended that Council adopt the *Ambitious Density* scenario which implements a 60 per cent annual intensification target and a designated greenfield area density target of 77 residents and jobs combined per hectare. The *Ambitious Density* scenario creates a total land need of 1,310 gross hectares to 2051. Council deferred their decision on the City’s Draft Land Needs Assessment to 2051 and

directed staff to undertake additional analysis on a *No Urban Boundary Expansion* scenario (no new land need to 2051).

In July 2021, the technical update was issued to City staff. In summary, the technical update outlines preliminary findings that, if adopted, the *No Urban Boundary Expansion* scenario would produce a shortfall of approximately 59,300 ground-related units.

The Ministry understands that the City is seeking input on whether the *No Urban Boundary Expansion* scenario, as described in the technical update, would conform to A Place to Grow and the LNA Methodology. Ministry staff have evaluated the technical update and wish to provide the following comments.

Municipalities are required to determine the need to expand their settlement area boundaries using the LNA Methodology issued by the Minister in accordance with policy 2.2.1.5 of A Place to Grow. The LNA Methodology requires municipalities to ensure that sufficient land is available to accommodate market demand for all housing types including ground-related housing (single/semi-detached houses), row houses, and apartments. This requirement is consistent with direction in the *Provincial Policy Statement, 2020* and Section 2.1 of A Place to Grow. Ministry staff acknowledge that the *No Urban Boundary Expansion* scenario is likely to bring about a shortage in land available to accommodate forecasted growth in ground-related housing. Ministry staff further acknowledge that the City's residential intensification analysis (included in the Residential Intensification Market Demand Report) has found that the City is unlikely to achieve the necessary level of apartment unit construction from a market demand perspective. As such, the *No Urban Boundary Expansion* scenario appears to conflict with the objective of the LNA methodology to "provide sufficient land to accommodate all market segments so as to avoid shortages" (pg. 6).

The *No Urban Boundary Expansion* scenario may cause a misalignment with forecasts in Schedule 3 of A Place to Grow as residents seek ground-related housing in municipalities where there may be sufficient supply. Schedule 3 forecasts, or higher forecasts established by municipalities, are to be the basis for planning and growth management to the Plan horizon. The City is required to demonstrate that it is planning to accommodate all forecasted growth to the horizon, including satisfying the direction in A Place to Grow to support housing choice through the provision of a range and mix of housing, as per policies 2.2.1.4 and 2.2.6.1. The LNA Methodology also prohibits planning for population or employment in a manner that would produce growth that is lower than Schedule 3 of A Place to Grow.

Further to the above, the Ministry has additional concerns regarding potential regional implications of the *No Urban Boundary Expansion* scenario, if adopted. The shortfall of

available land and ground-related units that could be created as a result of the *No Urban Boundary Expansion* scenario may cause forecasted growth to be redirected away from the City of Hamilton into other areas that are less suited to accommodate growth. This may have broader regional impacts on prime agricultural areas, natural systems and planning for infrastructure given the lower intensification and density targets applicable to outer ring municipalities that would likely receive pressure to accommodate forecasted growth. As noted in the technical update, the City of Hamilton is well suited to accommodate growth due to its urban structure, strategic location and multi-modal transportation connections.

Ministry staff also wish to acknowledge the strong growth management principles that underpin the City's *Ambitious Density* scenario. The *Ambitious Density* scenario appears to balance market-demand for different housing types while also implementing an intensification target (60 per cent) and a designated greenfield area density target (77 residents and jobs combined per hectare) which exceed the targets set out in policy 2.2.2.1 and 2.2.7.2 of A Place to Grow.

Based on Ministry staff review and analysis of the City's draft Land Needs Assessment and the technical update, it appears that the *No Urban Boundary Expansion* scenario poses a risk that the City would not conform with provincial requirements.

The Ministry looks forward to receiving the City's draft Official Plan as the July 1, 2022 conformity deadline approaches. In the meantime, please contact me by email at: (heather.watt@ontario.ca), or by phone at: 437-232-9474, should you have any further questions.

Best regards,



Heather Watt
Manager, Community Planning and Development, Central Region Municipal Services
Office
Ministry of Municipal Affairs and Housing

c. Ontario Growth Secretariat, MMAH



Hamilton

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71 Main Street West, 4th Floor
Hamilton, Ontario L8P 4Y5

Planning and Economic Development Department
Planning Division
Phone: 905-546-2424 Ext. 4281 Fax: 905-643-7250

August 13, 2021

Heather Watt
Manager, Community Planning and Development
Ministry of Municipal Affairs and Housing
777 Bay Street, 13th floor
Toronto, ON M7A 2J3

Dear Madam,

Re: City of Hamilton Land Needs Assessment and No Urban Boundary Expansion Growth Option

Further to the meeting held on August 9, 2021 between City of Hamilton and MMAH / OGS staff, the City is requesting Provincial input on matters related to the City's Draft Land Needs Assessment to 2051 (dated March 2021) and Technical Update (dated July 21, 2021) completed by Lorus & Associates.

The City's December 2020 (updated in March 2021) [Draft Land Needs Assessment \(LNA\)](#) modelled three scenarios: Growth Plan Minimum (50% intensification, new DGA density of 65 pjh); Increased Targets (55% intensification, new DGA density of 75 pjh); and the Ambitious Density Scenario (60% intensification, new DGA density: 77 pjh). The No Urban Boundary Expansion (NUBE) Scenario was not modelled in either the December 2020 or March 2021 LNA.

The three land needs scenarios were reviewed by the Ministry in December 2020. The Ministry confirmed, in a letter dated December 15, 2020, that the draft LNA conformed to the Provincial Land Needs Assessment Methodology. In particular, it was noted that the draft LNA conformed to the Provincial method by considering market demand across a range of housing types, implementing the Schedule 3 forecasts, and that all three scenarios supported the minimum density and intensification targets established in A Place to Grow for the City of Hamilton.

Within this context, however, it is important to stress that the amongst the three scenarios under consideration, the Ambitious Density scenario represents a particularly aggressive approach to conformity to the *Growth Plan* in terms of the high amount of intensification and density of new DGA development anticipated, as well as the level of population-related employment and community area (non-residential) lands to be accommodated in new communities.

Similarly, for Employment Area land needs, the March 2021 LNA also envisions a very efficient pattern of land use including a much more optimistic outlook for major office growth, specific intensification expectations including 5,000 net new jobs in the Bayfront industrial area and 100% development of the existing land supply.

Taken together, the Ambitious Density inputs represent a plan to achieve a much more intense and compact urban form compared to the past, in accordance with *Growth Plan* objectives to optimize the use of the existing urban land supply and avoid over-designating land for future urban development while still planning to achieve the Schedule 3 Growth Plan forecasts. As such, the Ambitious Density Scenario has been recommended by staff as a basis for the City’s conformity work.

A NUBE Scenario is now also being considered as a potential growth option in accordance with City Council direction arising out of the March 2021 GIC meeting. Lorius & Associates has provided a Technical Update to the draft LNA, attached to this letter, which provides a high-level discussion of the NUBE Scenario, including the housing market shifts required and other growth management implications.

Preliminary modelling of the NUBE Scenario indicates a shortfall of nearly 60,000 ground-related units that would need to be ‘shifted’ into family-sized apartment units in order to achieve the Schedule 3 forecasts, as shown in the Table below. According to Lorius and Associates, and for reasons explained in more detail in the March 2021 *Residential Intensification Market Demand Analysis* Report, this magnitude of market shift is unlikely to occur. A copy of this report can be accessed at the City’s [webpage](#).

| Ground-Related Housing “Shifts” Into Apartments Required by LNA Scenario | | | |
|---|------------------------|--|--------------------------------|
| Unit shifts and share of net new housing growth to 2051 (110,320 units) | | | |
| LNA Scenario | Intensification target | Ground-related units shifted to apartments | Ground-related share of growth |
| Market-Based | n/a | 0 | 75% |
| Growth Plan Minimum | 50% | 20,730 | 57% |
| Increased Targets | 55% | 24,800 | 53% |
| Ambitious Density | 60% | 28,900 | 50% |
| No Urban Expansion | n/a | 59,300 | 22% |

Source: Lorius and Associates based on March 2021 LNA report, forecasts and other information from Hemson Consulting Ltd. and City of Hamilton Staff, 2021.

It is also our understanding that the purpose of the LNA methodology is to provide a specific quantum of lands to accommodate all market segments through the provision of a ‘market-based’ supply of housing “to the extent possible”. While there is some latitude in the specific inputs to be used, the LNA inputs must be based on the Schedule 3 forecasts at a minimum. According to the mandated LNA method, lower forecasts are not permitted as they may lead to land supply shortages.

Under a NUBE Scenario, based on demographic and economic considerations as noted in the *Residential Intensification Market Demand Analysis* Report there is a real risk that the population growth to 2051 that would otherwise have been accommodated in the associated ground-related housing units will simply be 'redirected' away from Hamilton, most likely to other locations within the southwest GGH. Such a redirection would result in a regional misalignment of the Schedule 3 forecasts that are intended to be the basis for planning and growth management at the single- and upper-tier level.

For the City of Hamilton, therefore, the NUBE Scenario would likely have the effect of 'under planning' for growth relative to the Schedule 3 forecasts which is not permitted under the mandated LNA method. The no expansion scenario also represents a significant change from the *Ambitious Density* Scenario, which already represents quite an aggressive approach to planning within a *Growth Plan* context from both a Community and Employment Area perspective.

In consideration of the above points and the information on the NUBE Scenario contained in the attached Technical Update memorandum, the City is requesting Provincial input on the conformity of the four modelled LNA scenarios (Growth Plan Minimum, Increased Targets, Ambitious Density and No Urban Boundary Expansion) with the Land Needs Assessment Methodology.

We would appreciate input on this matter by **September 17, 2021**.

If you have any questions or comments, please feel free to contact Heather Travis at (905) 546-2424, ext. 4168, or by email at Heather.Travis@hamilton.ca, or myself at (905) 546-2424, ext. 4281.

Yours truly,

Heather Travis for

Steve Robichaud
Director of Planning and Chief Planner
Planning Division
Planning and Economic Development Department
City of Hamilton

Memorandum

| | |
|-----------------|---|
| Date: | July 21, 2021 |
| To: | Heather Travis, Senior Project Manager Growth Management Strategy Policy Planning & Zoning By-Law Reform Section, Planning Division |
| Cc: | Steve Robichaud, Chief Planner and Director of Planning |
| From: | Antony Lorius |
| Subject: | City of Hamilton Land Needs Assessment (LNA) Technical Update |

Purpose

The purpose of this memorandum is to provide an update to the City of Hamilton Land Needs Assessment (LNA) to 2051 in regards to two matters: the forecast for detached Secondary Dwelling Units such as “Laneway Houses” and “Garden Suites”; and the “No Urban Boundary Expansion” Scenario. These two matters have implications for the results of the March 2021 LNA and the City’s ongoing growth management process.

Background and Context

December 2020 Draft Land Need Scenarios

As you know, the LNA is being undertaken to support the update of the Growth-Related Integrated Development Strategy (the GRIDS 2 update) and the Municipal Comprehensive Review (MCR) over the period to 2051. The draft results were presented to the City’s General Issues Committee (GIC) on December 14th, 2020. Three main scenarios were identified based on varying residential intensification (RI) targets and greenfield density inputs:

- The *Growth Plan Minimum* Scenario, which is based on an average of 50% of new units inside the built boundary and a density of 65 residents and jobs combined in new greenfield areas; which resulted in a land need of **2,200 gross ha**;
- The *Increased Targets* Scenario; which is based on an average of 55% of new units inside the built boundary and a density of 75 residents and jobs combined in new greenfield areas; which lowers the land need to **1,640 gross ha**; and

- The *Ambitious Density* Scenario, which is based on still higher rates of RI (an average of 60% of new units inside the built boundary) and density in new greenfield areas (77 residents and jobs combined per ha), which lowers land need further to **1,340 gross ha**.

An illustrative *Current Trends* scenario was also prepared to show the results of a lower intensification target (40% of new units). However, this scenario is not considered suitable given the potential for Hamilton to shift the pattern of development towards denser urban forms. Similarly, the no urban expansion option was not modelled at the time. In our view, a no expansion option does not meet Provincial planning policy requirements and is not considered good planning.

The Ministry of Municipal Affairs and Housing has reviewed the draft LNA and provided preliminary comments in a letter dated December 15, 2020. Among other matters, Provincial staff confirm that the draft LNA conforms to the requirements of the mandated method for completing the analysis, in particular the need to consider market demand across the range of housing types. Provincial staff also notes that the three draft scenarios support the minimum density and intensification targets established in *A Place to Grow* (2020) for the City of Hamilton.

March 2021 *Ambitious Density* Scenario Recommendation

Following the December 2020 GIC meeting, data updates and other minor revisions were made to the draft LNA. Final results were presented to the City’s GIC on March 29th, 2021. City staff recommended that Council adopt the *Ambitious Density* Scenario, which represents an aggressive approach to growth management from a planning perspective. In particular:

- The *Ambitious Density* Scenario is based on a substantial increase in the total amount of RI that occurs over the period to 2051. This expectation has the effect of substantially reducing the amount of urban expansion lands required to accommodate growth;
- Similarly, the density factors for new greenfield housing are also very high: on average 35 units per net ha for Single and Semi-detached units and 70 units per net ha for Row houses. While there may be some site-specific examples of such units at higher densities, on a community-wide basis the *Ambitious Density* factors represent an extremely compact urban form; and
- The expectation for population-related employment is optimistic – estimated at 1 job for every 8.0 new residents in new greenfield areas. This ratio is slightly lower than the existing greenfield area (meaning proportionately more population-related jobs) to take into account the potential for increased levels of remote working that have already begun to occur as a result of the abrupt changes brought about by the COVID Pandemic.

The *Ambitious Density* Scenario is therefore **not a pure “market-based” approach** to the LNA, but rather embodies deliberate policy intervention to optimize the use of the existing urban land supply and avoid over-designating land for future urban development while still planning to achieve the Schedule 3 *Growth Plan* forecasts. Given the level of policy intervention involved, the *Ambitious Density* Scenario requires careful monitoring and reporting on progress to ensure a balanced supply of housing types to 2051, in accordance with the mandated LNA method.

Council Decision and the GRIDS 2/MCR Urban Growth Survey

Rather than adopt the *Ambitious Density* Scenario, Council deferred the decision and instead directed staff to undertake additional public consultation on the question of urban boundary expansion. A City-wide consultation survey was mailed out to all residents in June, 2021, seeking input on the *Ambitious Density* Scenario, a No Urban Boundary Expansion Scenario and that also allows residents to submit their own alternative scenario. The survey results are to be compiled and presented as part of the GRIDS2 report back at the GIC meeting in October 2021. Council also directed staff to model and evaluate the No Urban Boundary Expansion Scenario and report back on the results in October.

A number of other changes have occurred since the March 29th GIC meeting, particularly in regards to the treatment of Secondary Dwelling Units (SDUs). Zoning by-law amendments have been adopted to permit SDUs as of right in all residential zones, including detached SDUs such as “Laneway Houses” and “Garden Suites” in the City’s urban area. City staff has also undertaken more detailed analysis in regards to the anticipated breakdown of intensification units (by type) within the “Built-up Area” as input to future growth and infrastructure modelling exercises.

These changes have implications for the March 2021 LNA results, which are described below to assist the City and Provincial planning staff in their consideration of the matter. The required housing market shifts and growth management implications of the no boundary expansion option is also described, in accordance with the March 2021 Council direction.

Forecast of Detached Secondary Dwelling Units (SDU)

Secondary Dwelling Units (SDUs) will play an important role in meeting the City’s future housing needs, including “Laneway Houses”, “Garden Suites”, “Coach Houses”, “Carriage Houses” and other stand-alone secondary housing forms. For detached SDUs in particular, the overall growth outlook is expected to be limited: approximately 80 units per year to 2051.

Clarification and Definition of “Accessory Units”

As part of the ongoing GRIDS 2 and MCR process, staff have received a number of questions on the definition of housing by type in the *Growth Plan* forecasts, especially the distinction between “Accessory Units” and detached SDUs such as Laneway Houses or Garden Suites.

For clarification: **Accessory Units are not detached SDUs.** The “Accessory Unit” category in the 2020 *Growth Plan* forecasts and March 2021 LNA are apartments added to an existing single-detached or semi-detached house (e.g., basement suites) and do not include detached SDUs such as Laneway Houses or Garden Suites. The City’s new zoning by-law also permits SDUs in towns (rowhouses). For convenience, these accessory units are included as apartments in the March 2021 LNA because ground-related units rather than apartments generate land need. Detached SDUs are entirely separate from the main house on the property so would likely be counted in the Census as a second single detached unit on the property. Since detached SDUs are physically separate from the main dwelling they are considered to be single detached units for the purposes of the growth forecasts and LNA to 2051, in accordance with current Census definitions by dwelling type. This distinction will be clarified for the report back to the October 2021 GIC meeting.

The Role of Detached SDUs in Accommodating Growth

Detached accessory units will play an important role in accommodating the City’s housing needs over the period to 2051. There are many well-documented benefits, especially as part of the “Missing Middle”¹ housing market discussion and the need to address affordability challenges. To date, the experience has been that most new detached SDUs are occupied by younger single and two-person households rather than families with children.²

Part of the community feedback received on the LNA results also included reference to the potential for detached SDUs within the City’s Built-up Area that is likely to be created by the new Zoning regulations. It has been suggested that this change will create such a large potential supply of single-detached units in existing residential zones – well in excess of the approximately 44,000 units allocated to the Designated Greenfield Area (DGA) under the *Ambitious Density* Scenario – that no urban expansion is therefore required.

There is no question that a large supply potential exists. However, while detached SDUs may be built physically as a detached unit, they function mainly as a more attractive rental option for new residents seeking amenity-rich downtown neighbourhoods. From a LNA perspective, therefore, detached SDUs within existing areas are generally not a direct substitute for ground-related, ownership housing in greenfield areas. These types of units also tend to be expensive for private homeowners to build and maintain, which compounds the supply challenge.

Anticipated Distribution Within the City

Similar to residential intensification in general, the outlook for detached SDUs in the City of Hamilton is likely quite positive. However, it should be noted that predicting the level of future development can be a challenge since it is an emerging market with relatively little in the way of historic development patterns to provide a basis for the future growth outlook.

That said, a recent report prepared by CMHC provides some helpful context in terms of understanding the key factors underlying the distribution of secondary units in Ontario. Two of the key findings most relevant to the outlook for detached SDUs in Hamilton are that:

- Secondary units are more prevalent in older established areas, especially in close proximity to the downtown core and amenities, such as transit hubs; and
- Municipalities with newer homes (built 2010-2019) have a lower prevalence of secondary units, due, in part, to their pattern of dispersed essential amenities that require car travel that has traditionally been less appealing to renters.³

¹ The Missing Middle refers to the range of housing types between traditional single-detached homes and high-rise apartments that have gone ‘missing’ from many large cities, including the City of Hamilton.

² Based on the findings of the City of Vancouver *Laneway Housing Survey Summary* (2018) prepared as part of the *Housing Vancouver Strategy 2018-2027* and *3-Year Action Plan 2018-2020*

³ For the complete findings see the Canada Mortgage and Housing Corporation (CMHC) report: *Housing Market Insight Ontario, Secondary Units in Ontario*, June 2021.

Although the CMHC report does not specifically address the growth outlook for detached SDUs, the findings suggest that development is likely to be focussed more within the Built-up Area as opposed to the DGA. This finding echoes the results of the City of Vancouver survey noted previously, with respondents reporting that a key attraction of laneway housing was the option to live in a newer unit close to jobs, schools, transit and other urban amenities.

Growth Forecast to 2051

To provide an indication of overall unit potential, in the City of Vancouver approximately 420 laneway housing units have been completed annually since 2010, as shown in Table 1 below. It is understood anecdotally that in the City of Toronto approximately 100 detached SDUs are being completed per year but that unit production is expected to catch up to Vancouver levels quickly.

| Table 1 | | | | |
|--|--------------------------|-------|---------------|-------------|
| City of Vancouver Laneway Housing Building Activity | | | | |
| Building Permits Issued 2010-May 2021 | | | | |
| Year | <i>Laneway Dwellings</i> | | \$ Value | \$ Per Unit |
| | Permits | Units | | |
| 2021 | 104 | 104 | \$20,209,989 | \$194,327 |
| 2020 | 384 | 384 | \$74,346,119 | \$193,610 |
| 2019 | 470 | 470 | \$90,744,031 | \$193,072 |
| 2018 | 734 | 734 | \$143,733,479 | \$195,822 |
| 2017 | 589 | 589 | \$112,048,474 | \$190,235 |
| 2016 | 500 | 500 | \$91,758,618 | \$183,517 |
| 2015 | 523 | 523 | \$92,818,870 | \$177,474 |
| 2014 | 377 | 377 | \$60,116,337 | \$159,460 |
| 2013 | 352 | 352 | \$51,696,739 | \$146,866 |
| 2012 | 354 | 354 | \$43,349,376 | \$122,456 |
| 2011 | 232 | 232 | \$28,038,904 | \$120,857 |
| 2010 | 192 | 192 | \$19,004,019 | \$98,979 |
| Average Annual Permits | | 421 | | |

Source: City of Vancouver Statistics on Construction Activity, 2010-2021 ytd

It is unlikely that the City of Hamilton will achieve such high levels of development activity for detached SDUs, in particular for new Laneway Housing units:

- Virtually everywhere in Vancouver has lanes and they are all generally much wider and better-maintained than in Hamilton or Toronto;
- Based on a desktop review, it is estimated that Vancouver has more than 10 times the area of neighbourhoods with laneways compared to the City of Hamilton. Accordingly, a rate of 420 units per year might translate into **roughly 30 units per year**, which is likely optimistic given that not all laneways in Hamilton are public meaning that primary access to the unit may not be maintained as a public right of way throughout the City.

A similar number of “Garden Suites”, “Coach Houses” and other stand-alone secondary housing forms can be expected. Accordingly, for the purposes of the LNA and, again, recognizing the inherent challenges in predicting the future of such a new and emerging market segment, we would estimate roughly **40 additional units per year**. Most of these units are expected to be located within the Built-up Area (30 units per year) reflecting the attraction of urban locations for this type of development and limits on their development potential within the DGA.⁴

It is also understood that there is considerable interest in detached SDUs in the rural area. However, from a LNA perspective a conservative approach is warranted given the lack of any historical basis to judge future uptake and *Growth Plan* and City planning policies to direct growth to urban settlement areas with full municipal services. The City also has yet to determine the specific conditions under which detached SDUs will be permitted in the Rural area. Within this context, it is appropriate to allocate a relatively limited **10 units per year** to the Rural area.

These allocations result in a forecast of approximately **80 detached SDUs annually**, as shown below in Table 2, and focussed largely inside the Built-up Area. The allocation to the DGA and Rural areas is limited, however this situation would need to be monitored as part of the City’s growth management efforts over the planning horizon to 2051. Accounting for these 600 units (300 DGA and 300 Rural) has the effect of reducing overall land need, as discussed in the next section.

| Forecast of Detached Secondary Dwelling Unit (SDU) | | | | |
|---|-------------------------|--------------------------|-------------------|--------------------|
| Forecast annual and total units, City of Hamilton to 2051 | | | | |
| Policy Area | Annual Laneway House | Annual Garden Suite + | Total Annually | Total 2021-2051 |
| Built-Up Area | 30 | 30 | 60 | 1,800 |
| DGA | - | 10 | 10 | 300 |
| Rural | - | 10 | 10 | 300 |
| Total | 30 | 50 | 80 | 2,400 |

*Source: Lorus and Associates Based on Information from the City of Vancouver Statistics and Hemson Consulting Ltd.
Forecast includes Laneway Housing, Garden Suites and other stand-alone secondary housing forms*

Implications for the March 2021 LNA

The issue of detached SDUs is not explicitly addressed in the March 2021 LNA. However, these units were generally anticipated to form part of the ground-related intensification that will need to occur within the Built-up Area to achieve the policy-based targets in the *Ambitious Density* Scenario. Detached SDUs will form part of the “missing middle” intensification forms since the redevelopment economics of older urban areas favours higher-density row houses and apartment buildings in most circumstances. The provision of single-detached units through intensification tends to be limited and mostly takes place as replacements of existing houses.

⁴ For example, many ‘contemporary’ suburban lots may not be able to accommodate detached SDUs because of the minimum separation requirements that may eliminate many lots less than 100 ft. in depth. Only a portion of other types of housing lots such as street towns would be eligible (likely limited to ‘end’ lots, depending on lot depth and other factors) and other dwelling types such as duplex, triplex and other multiple forms are not eligible.

However, detached SDUs were not incorporated into the forecast for the DGA and Rural areas in the March 2021 LNA. The adjustment is undertaken in two steps:

- An additional 300 units (treated as single and semi-detached units) are allocated to the Rural Area, which reduces forecast DGA demand by this amount; and
- Similarly, an additional 300 units are included in the current DGA housing unit potential, which increases the available supply to accommodate growth.

The combined effect is to remove the land need associated with 600 single and semi-detached units (shown in Table 2) estimated at a density of 35 units per net ha and a net-to-gross factor of 50%, or approximately 30 gross ha. Accordingly, under the *Ambitious Density Scenario*, overall **land need is reduced from approximately 1,340 ha to 1,310 ha**

As noted previously, more detailed analysis of the intensification supply (by type) has been undertaken by City staff as input to growth and infrastructure modelling exercises. Updates have been made that shift the unit distribution inside the Built-up Area (particularly for rowhouse supply) but do not change DGA land need. City staff is also currently modelling the No Urban Boundary Expansion Scenario as part of the evaluation of growth options and preparation of Traffic Zone forecasts.

Implications of the No Urban Boundary Expansion Scenario

Provided below is a high-level discussion of the implications of the No Urban Boundary Expansion Scenario. The required housing market shifts and associated growth management implications are described, in accordance with the March 2021 Council direction, to assist the City and Provincial staff in their consideration of the matter.

Supply-Based Approach Taken

A supply-based approach is taken to the analysis, which is different than the March 2021 LNA that is based on increasing rates of intensification over time, for the various scenarios, which results in varying degrees of market shifts required to achieve *Growth Plan* policy goals: in particular the shift of ground-related forms into high density apartment units.

Under the approach taken here, forecast demand is compared to the available supply and unit shortfalls identified. Forecast demand is the “market-based” housing demand by type shown in the March 2021 LNA, adjusted for the additional 300 detached SDUs allocated to the Rural Area. The available supply is the estimated Vacant Residential Land Inventory (VRLI) supply as well as the updated intensification opportunities noted previously, including the detached SDUs that are expected to form part of the ground-related intensification inside the Built-up Area.

The results indicate a shortfall in market-based demand of **approximately 59,300 ground-related households** that would need to shift into apartments, as discussed in the next section.

Results Indicate Significant Shortfall in Market-based Demand

The results are set out in the series of technical tables below. Table 3 shows the market-based urban housing unit demand over the period to 2051 and the market-based mix of growth. Table 4 shows the unit supply potential, including detached SDUs and the updated intensification supply inside the Built-up Area. Table 5 reconciles supply and demand to show the shortage in ground-related households that would need to be 'shifted' into apartments.

| Table 3 | | | | |
|---|---------------|---------------|-----------------|----------------|
| Market-Based Housing Demand | | | | |
| Component of estimate | Single & Semi | Row House | Apartment (all) | Total |
| City-wide Housing Unit Need 2021-2051 | 56,020 | 27,600 | 26,700 | 110,320 |
| Allocation to Rural infill (RSA) | 135 | | | 135 |
| Allocation to Rural Detached SDU | 300 | | | 300 |
| Total City-wide Urban Demand 2021-2051 | 55,585 | 27,600 | 26,700 | 109,885 |
| Market-based Mix of Growth | 51% | 25% | 24% | 100% |

Source: Lorus and Associates based on March 2021 LNA Ambitious Density Scenario, forecast for Detached SDUs and updated information from City of Hamilton Staff 2021

| Table 4 | | | | |
|---|---------------|---------------|-----------------|---------------|
| Housing Unit Supply Potential | | | | |
| Component of estimate | Single & Semi | Row House | Apartment (all) | Total |
| Estimated DGA Supply Mid-Year 2021 | 5,570 | 7,120 | 8,090 | 20,780 |
| Adjustment for detached SDU | 300 | 0 | 0 | 300 |
| Residential Intensification Supply | 3,280 | 7,630 | 55,160 | 66,070 |
| Total City-wide Urban Unit Potential | 9,150 | 14,750 | 63,250 | 87,150 |
| Total Ground Related Unit Potential | 23,900 | | | |

Source: Lorus and Associates based on March 2021 LNA Ambitious Density Scenario, forecast for Detached SDUs and updated information from City of Hamilton Staff 2021

| Table 5 | | | | |
|--|-----------------|-----------------|-----------------|-----------------|
| Market-Based Housing Shortfall | | | | |
| Component of estimate | Single & Semi | Row House | Apartment (all) | Total |
| Total City-wide Urban Demand 2021-2051 | 55,585 | 27,600 | 26,700 | 109,885 |
| Total City-wide Urban Unit Potential | 9,150 | 14,750 | 63,250 | 87,150 |
| Market-Based Unit (Shortfall)/Surplus | (46,435) | (12,850) | 36,550 | (22,735) |
| Total Ground Related Unit Shortfall | (59,285) | | | |

Source: Lorus and Associates based on March 2021 LNA Ambitious Density Scenario, forecast for Detached SDUs and updated information from City of Hamilton Staff 2021

As shown above, the results indicate a total ground-related housing unit **shortfall of 59,285 units** that would need to shift into apartments. The shift to apartments under the no expansion scenario is so significant that it exceeds the identified supply potential, including intensification within the Built-up Area. For apartment units in particular, approximately **22,735 units** would need to be accommodated in unidentified locations beyond those already determined by City staff.

Required Market Shifts Have Significant Implications

Under a no expansion scenario, nearly 80% of all new households would need to be accommodated within apartment units, including families. As illustrated in Table 6 below, this compares to 50% under the *Ambitious Density* Scenario and 25% under a market-based outlook for growth.

| Housing Mix of Growth Comparison | | | | |
|---|---------------|-----------|-----------------|-------|
| Growth 2021-2051 | Single & Semi | Row House | Apartment (all) | Total |
| Market-Based Mix of Growth | 51% | 25% | 24% | 100% |
| <i>Ambitious Density</i> Scenario | 25% | 25% | 50% | 100% |
| <i>No Urban Expansion</i> Scenario | 9% | 13% | 78% | 100% |
| No Expansion Scenario shift from market | -42% | -12% | 54% | 0% |

Source: Lorus and Associates based on March 2021 LNA *Ambitious Density* Scenario, forecast for Detached SDUs and updated information from City of Hamilton Staff 2021

Achieving this share of apartment unit construction is unlikely from a market demand perspective, as explained in the Residential Intensification Market Demand Report prepared as input to the March 2021 LNA. It should also be noted that the housing shifts required under either the *Ambitious Density* or no urban expansion scenarios are not a simple “1 for 1” transfer because ground-related units are typically occupied at higher Person Per Unit (PPU) factors than apartments.

Household formation and occupancy patterns are a social construct. Accordingly, the shift in growth patterns that must occur is not a simple increase in the number of apartment units. The shift that must occur is an **increase in the number of larger family-sized households** that would otherwise occupy ground-related housing, but that now must choose to occupy apartment units instead. From a planning perspective, therefore, the challenge is to maximize the tolerance of the market to be influenced by policy without jeopardizing the Schedule 3 forecasts.

Planning for a level of intensification that is well beyond reasonable market expectations carries the risk that the amount and mix of housing does not occur as planned and the *Growth Plan* Schedule 3 forecasts are not achieved. A highly restricted land supply would likely also have other unintended consequences and negative planning and growth management implications:

- As explained in the City’s March 2021 DGA Density Analysis report, a significant portion of the existing DGA is either already developed or subject to approved development applications. As a result, there is little opportunity to achieve further density increases without sacrificing public standards for parks, schools, institutions or environmental protection or undertaking a wholesale review of existing secondary plans in regards to housing mix;
- On the demand side, it is important to note that the *Growth Plan* and March 2021 LNA housing forecasts are for **net new units**. Because the forecasts are based on age structure, they take into account demographically-driven trends in household formation and unit type preferences, including the turnover of single-family dwellings “freed up” by an ageing population and taken up by younger households coming into the market. However, this type of housing turnover is not anticipated to happen until later in the forecast period (around 2040) and will not generate enough units to satisfy all of the demand for ground-related housing to 2051.

- Within this context, and after the total available DGA unit supply is consumed at some point prior to 2031, the lack of new growth areas would lead to speculation at the urban fringe and, more than likely, poorly-planned incremental expansions into the rural area;
- Maintaining public park and open space standards would become a major challenge over time. Schools, community services and other types of recreation would need to be provided in the urban area where significant sites are costly to acquire; and
- Rather than ‘shifting’ into apartments, the ground-related housing market would likely seek – and find – other locations outside of Hamilton in the southwest GGH. Such a dispersal would solve many of Hamilton’s growth management challenges but would have the undesirable effect of redirecting growth to locations less able to manage it.

In our view, the No Urban Boundary Expansion Scenario would likely have the effect of redirecting growth away from the City of Hamilton which is not in accordance with the *Growth Plan* and is not considered to be good planning. The City of Hamilton is very well-suited to accommodate growth because of its urban structure, strategic location and well-developed multi-modal transportation connections within the broader metropolitan region.

We remain of the view that a balanced approach is required to manage growth, including intensification and carefully planned expansion areas. However, a third-party Peer Review is being undertaken to confirm that this approach and method meets applicable Provincial planning policy requirements. **It is also not clear if the No Urban Boundary Expansion Scenario would be acceptable to the Province based on the requirements of the *Growth Plan* and mandated LNA methodology.**

It would be very helpful for the province to provide guidance on this matter prior to the updated LNA and Peer Review findings being presented as part of the GRIIDS2 report back at the GIC meeting in October 2021. We trust this memorandum is of assistance. Please do not hesitate to let me know if you have any questions or require any additional information

Appendix G

Ministry of Municipal Affairs & Housing Op-Ed

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OPINION

No boundary expansion option for Hamilton is unrealistic and irresponsible

By **Steve Clark**

Fri., Oct. 15, 2021 | 3 min. read

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Ontario has a [housing crisis](#). Driven by a severe shortage of supply, rental housing and affordable home ownership are even further out of reach for hardworking Ontarians.

Hamilton is seeing this firsthand. According to Oxford Economics, it is the [third least affordable city in North America](#) and is projected to grow by 236,000 new residents and 122,000 new jobs by 2051.

That is why, as minister of municipal affairs and housing, I introduced changes to A Place to Grow: Growth Plan for the Greater Golden Horseshoe, the long-term plan for where and how growth should occur for one of the fastest-growing regions in North America, which is projected to grow by 4.6 million people over the next 30 years.

One of the most critical measures I implemented to increase housing supply is [extending the planning horizon](#) for which municipalities must plan for growth until 2051, as well as updating the population and employment forecasts for all 21 upper- and single-tier municipalities in the Greater Golden Horseshoe. I also introduced a new land needs assessment methodology which helps municipalities base their planning decisions on future demand.

Together, these measures provide local governments with flexibility and foresight when updating their official plans to accommodate future growth in areas where it is best suited, with a range of housing options to ensure every resident can find the home that is right for them.

These tools are designed to put people before politics, and enable municipalities to prepare for the growth that we all know is coming.

As all single- and upper-tier municipalities are reviewing and updating their official plans to be in conformity by the July 1, 2022, deadline, my ministry has continued to be a partner, providing support and resources to help them plan for long-term growth. Before any official plan can be adopted, it must be shared with the province for review and approval.

As a former mayor, I understand the vital role that our local governments play in addressing housing affordability by taking a people-first approach when planning for the long-term, and value this collaborative partnership between the province and our

municipalities.

That is why it is so disappointing to see the City of Hamilton propose a “[no urban boundary expansion](#)” in its city-wide survey. It is not only unrealistic, it is irresponsible. This [option would cause a shortfall](#) of nearly 60,000 homes that are critical to Hamilton and Ontario’s continued prosperity because, according to the city’s own planners, Hamilton’s existing urban boundaries do not have enough land where these homes can be built.

The survey conducted by the City of Hamilton does not appear to be aligned with [more robust research conducted by Nanos](#) for the Ontario Real Estate Association (OREA) and the West End Home Builders Association (WEHBA). They found that [80 per cent of residents](#) said they do not recall receiving an official survey from the City of Hamilton on the topic of growth, and in fact found that 38 per cent of residents say the approach to handling growth in Hamilton is to allow for an expansion of the urban boundary to accommodate new residents. Fifty per cent of respondents in the 18-34 age category were twice as likely to prefer boundary expansion.

A “no urban boundary expansion” option would also cause growth and development to be redirected into other areas within their existing urban boundaries that are less suited to accommodate growth, such as open green spaces.

That is why the most important tool municipalities have to address housing supply and affordability is through updating their official plans to plan for and meet the provincial growth targets, and allow for the right mix of homes that responds to actual market demand — and not just planning for highrise buildings — that residents need and deserve.

If city council continues to bury their heads in the sand and restrict where the right mix of homes can be built, I am deeply concerned this will further drive housing prices up in Hamilton and across the Greater Golden Horseshoe, putting affordable home ownership even more out of reach of hardworking families. And according to Nanos, over eight in 10 residents of Hamilton are already concerned about the affordability of the cost housing in Hamilton today

We know that Ontario is the best place to live, grow and prosper. We must all do our part to protect this and pass it on to the next generation of Ontarians who hope to call Hamilton home.

Steve Clark is Ontario’s minister of municipal affairs and housing.

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