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Sent: January 14, 2022 7:59 AM
To: !!Regional Chair and Members of Regional Council
Cc: MacCaskill, Jane; Gray, Bob; Milne, Graham
Subject: Additional Information related to the Preferred Growth Concept

Good Morning Chair Carr and Members of Regional Council,

Over the past week there have been a series of emails sent from community interest groups to members of Regional Council that highlight concerns with the Preferred Growth Concept. Council will recall that information on the Preferred Growth Concept was initially shared by presentation and supporting materials at Council's [workshop meeting on November 17, 2021](#).

Some Members of Council have asked for clarification related to the content of some of the emails received. In effort to provide clear and accurate information related to the Preferred Growth Concept, staff have prepared a list of Frequently Asked Questions (FAQs) with responses, provided below, that addresses the questions related to the content of the emails. Should there be additional questions that arise staff will augment this list as necessary.

All of the information that is profiled below will be brought forward as part of the staff report on the Preferred Growth Concept, scheduled for Regional Council's February 9, 2022 meeting agenda.

Frequently Asked Questions and Responses related to the Preferred Growth Concept

1. What is driving the need to expand the Urban Boundary? Why can't the forecasted growth to 2051 fit within the existing approved urban boundary consistent with Concept 3A/3B?

Under the Places to Grow Act, Halton Region must conform to the [Provincial Growth Plan](#), which requires the Region to plan to accommodate 1.1 million people and 500,000 jobs by the year 2051. The Growth Plan contains several specific policies that direct how the Region must plan for and allocate this growth. These include, but are not limited to, the establishment of Strategic Growth Areas, the identification of minimum densities and intensification targets, as well as undertaking a prescribed assessment to determine the amount of land required for growth. The Growth Plan directs municipalities to use the [Land Needs Assessment Methodology approved by the Minister](#). The Land Needs Assessment Methodology requires the Region to ensure to the extent possible that sufficient land is designated to accommodate the full range of market housing types while adhering to the objectives of the Growth Plan.

The [Region's Draft Land Needs Assessment](#), prepared in 2021 consistent with the Provincial Land Needs Assessment Methodology, identified a shortfall of 15,500 ground-related units (singles/semis and rows) that could not be accommodated within the Delineated Built-Up Area (DBUA) or the current Designated Greenfield Area (DGA) of the Region.

Growth Concept 3A/3B was based on the assumption that the 15,500 households could instead be accommodated in apartment units, mainly within the Built Up Area. Concept 3A/3B does not provide a sufficient supply of ground-related housing in accordance with the Provincial Land Needs Assessment Methodology and would likely result in the following:

- Levels of intensification that are well beyond reasonable market expectations as it would rely on households that would otherwise live in ground-related housing choosing to live in apartment units;
- Failure to achieve the planned amount of housing, and, as a result, not achieving the mandated Growth Plan population forecasts;
- Ground-related housing not realized in the Halton market would occur elsewhere in southern Ontario – this dispersal would have the undesirable effect of redirecting growth to locations with considerably less capacity to manage growth and related impacts;
- Fewer options for ground-related housing would result increased costs for that housing type, contributing to the housing affordability challenge;
- Increased pressure on municipalities and public agencies to compromise existing standards related to parks, open space, schools, community services, and environmental protection to enable a higher degree of intensification;
- Growth being planned would be at odds with defined local municipal plans and priorities, where municipalities are supportive of new greenfield growth; and
- Challenges in accurately estimating timing and staging of growth and planning for and financing associated infrastructure and community services.

The Preferred Growth Concept directs 86% of housing unit growth to the Built-Up Area and the existing Designated Greenfield Area of the Region, while accommodating only 14% of the housing units through the proposed urban boundary expansion.

2. If the 15,000+ ground-related housing units (singles, semis, towns, rows) are not accommodated within the urban expansion area, how could these units be accommodated in a concept that freezes the urban boundary? What would this look like?

If the 15,500 households that would reside in ground related units in the expansion area described above, were to choose instead to purchase apartment units, these would be the equivalent of about **45** 30-storey towers of the size of each of [the two 30-storey towers currently being proposed at 3064 Trafalgar Road](#), just north of Dundas Street in North Oakville. These 45 towers would be in addition to the significant growth and densification already proposed through the Preferred Growth Concept and allocated to the existing approved Strategic Growth Areas in the Regional Urban Structure defined through ROPA 48, which will see the equivalent of **360** 30-storey towers between 2021 and 2051.

3. How long is the existing supply of current urban designated land expected to last before requiring new additional greenfield land to accommodate ground-related housing?

Based on the Region's Draft Land Needs Assessment prepared in 2021 in support of the Preferred Growth Concept, the current supply of designated urban greenfield land is expected to last up to 2036 for both community and employment land needs. According to the Land Needs Assessment Methodology and as confirmed by Provincial staff, however, municipalities must designate all land required to accommodate growth to 2051.

4. What proportion of planned growth between 2031-2051 will be accommodated in the existing urban area?

The Preferred Growth Concept directs **86% of housing unit growth** comprising of over **80% of population growth** and almost **80% of employment growth** to the Built-Up Area and the existing Designated Greenfield Area of the Region. Between 2031 and 2051, urban expansion will accommodate 14% of the housing unit growth 20% of population growth and 20% of jobs.

5. What analysis has been completed to assess the costs of the Preferred Growth Concept? How does this compare to an option to freeze the urban boundary?

A preliminary fiscal impact analysis of the different Growth Concepts was provided as part of Appendix F of the [Growth Concepts Discussion Paper released in February 2021](#). The general conclusions were that all growth concepts came with substantial costs in terms of provision of new physical and community infrastructure, and the differences in costs were marginal when compared to the overall magnitude of costs to accommodating growth.

6. Urban expansion lands from the previous Regional Official Plan Review – Sustainable Halton (ROPA 38) have not been developed yet, so why do we need to expand the urban boundary now?

A total of 2800 hectares (6900 acres) of land was brought into the urban area from the previous Regional Official Plan Review – Sustainable Halton (ROPA 38) to accommodate growth between 2021 and 2031. As a result development has been planned to only be realized on these lands post-2021 and will continue on these lands over the next 10+ years. The Growth Plan requires municipalities to plan for growth between 2031-2051. The Preferred Growth Concept addresses this requirement.

7. Is it accurate to say that the Preferred Growth Concept results in the loss of 5,000 acres of farm land?

The Preferred Growth Concept proposes to remove approximately 2100 hectares (5190 acres) of land currently designated as Prime Agricultural Lands in accordance with the in-force Regional Official Plan for urban (community and employment) purposes. There are many non-agricultural land uses contained within the Prime Agricultural Area proposed to be removed. For example, there are existing non-farm uses such as golf courses, rural residential, commercial and industrial uses, etc. as classified by the Municipal Property Assessment Corporation (MPAC). Based on an initial assessment netting out these non-agricultural uses, the Preferred Growth Concept would remove approximately 1670 hectares (4130 acres) of land that is classified as agriculture or agricultural-related by MPAC. Some of the specific numbers have been rounded and are subject to be refined as we confirm a logical boundary through the corresponding ROPA.

8. Who has the final say on how Halton Region plans for growth through its Official Plan?

The Minister is the approval authority for the Regional Official Plan Amendment implementing the Integrated Growth Management Strategy and Preferred Growth Concept, and may substitute his/her decision for any decision that Regional Council makes. The Regional Official Plan Amendment submitted to the Province must be supported by a Land Needs Assessment prepared according to the Provincial Land Needs Assessment Methodology, and therefore the Minister must be satisfied that the Region's LNA meets Provincial requirements. The Land Needs Assessment that accompanies the Preferred Growth Concept conforms to the Methodology and has identified the need for an urban boundary expansion.

9. Does the Minister consider requests by landowners in making its decision? What is the nature of the requests received to date?

The Minister, either through formal or informal channels, will receive and consider requests from Halton landowners. At this time a total of 41 requests for urban boundary expansion have been received by the Region from landowners. Of these 41 requests, many include multiple parcels. The subject lands identified within the requests represent a total of approximately 2,000 ha with lands falling outside of what is being proposed as part of the Preferred Growth Concept. In addition to the 41 requests for urban boundary expansion from landowners, there were several comments received from landowners that supported expansion in general areas, without identifying specific parcels. These have not been included in the calculations provided above. All submissions will be available to Council as part of the February staff report.

10. How does the Preferred Growth Concept address climate change objectives?

In 2019, Regional Council unanimously approved a Notice of Motion that declared a climate emergency for the purposes of deepening the Region's commitment to protecting and improving resiliency of the economy,

environment and community from climate change. The Regional Official Plan Review has long-held objectives related to sustainability and climate change that serves as a strong foundation for defining future growth and development.

The Preferred Growth Concept builds on the existing Regional Official Plan policies and objectives related to climate change. For example, over 80% of population, housing unit and employment growth is being directed to the existing approved urban areas in line with the approved Regional Urban Structure. This represents an ambitious shift when compared to standards included in the current Regional Official Plan. There is a greater reliance on accommodating growth in apartment buildings as a means to optimize the use of land in the existing urban area. It directs growth to strategic growth areas where public services, infrastructure and transit exist. It allocates significant growth around existing GO stations and other planned higher order transit nodes and corridors to optimize transit investment and operations while mobility objectives. It continues to protect the Natural Heritage System such that 50% of the Region will be protected for natural heritage. It continues to protect considerable prime agricultural areas for farming and food security. All of these components of the Preferred Growth Concept support Council's climate objectives and the motion declaring a climate emergency.

In addition, in concert with the preferred growth concept, there are a series of policy directions being recommended to be implemented by way of amendment to the Regional Official Plan that identify additional policies and actions to address greenhouse gas emissions and climate resiliency.

While Concept 3A/3B was evaluated as the concept that generates the least amount of community GHG emissions, as part of its evaluation it did not score well in addressing many other important community planning and housing objectives, some of which are identified in the response to Question #1 above.

11. What are the implications of not making a decision on the Preferred Growth Concept in February 2022?

Through [Report No. LPS51-21](#), Regional Council directed staff to implement the work plan for the completion of the Regional Official Plan Review, which includes meeting the statutory deadline identified by the Minister as July 1, 2022, for Growth Plan conformity. In Report No. LPS51-21, staff outlined a series of compounding challenges that will result if the Integrated Growth Management Strategy and implementing ROPA is not advanced. Any delay in approval will result in delays to the following:

- Approval of the New Best Planning Estimates;
- Approval of the Water, Wastewater, Transportation Master Plans;
- Approval of the Development Charge By-Law Update to reflect up to date costs to service growth;
- Approval of Infrastructure Staging and Financing (Allocation) Programs;
- Approval of Local Municipal Plan Updates;
- Development and approval of Area Specific Plans for New Growth and Intensification Areas;
- Other Local Municipal Plans for Community Services, Capital Infrastructure and Development Charges.

In addition to the above, an updated Official Plan is most effective in articulating and defending the public interest through the development application review and approval process. Without an updated official plan, development proponents may be able to more easily demonstrate to the Ontario Land Tribunal how the current Regional Official Plan fails to conform to updated Provincial directives and result in a lack of cohesion if the Plan is not in conformity. Based on the forgoing it remains staffs recommendation to proceed in a fashion that adheres to the deadline established by the Minister.

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