



July 27, 2020

Ontario Growth Secretariat
Ministry of Municipal Affairs and Housing
777 Bay Street, Suite 2304
Toronto, ON M7A 2J8

Email: growthplanning@ontario.ca

RE: City of Brantford Comments on the Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe (ERO #019-1680) and Proposed Land Needs Assessment Methodology (ERO #019-1679)

The City of Brantford appreciates the opportunity to provide comments on Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe, and Proposed Land Needs Assessment Methodology, as discussed in Report 2020-302 appended to this letter, and submitted in accordance with Brantford City Council's direction.

Brantford City Council, at its meeting on July 14, 2020, approved recommendations A, B and C in Report 2020-302, as provided in the appended Council resolution and below:

- A. THAT Report 2020-302, regarding Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology – Impact on the Draft Official Plan BE RECEIVED; and
- B. THAT Council SUPPORTS the Province's proposed Growth Plan Amendment to use the Reference Forecast scenario for population and employment in Brantford to the year 2051; and
- C. THAT a copy of Report 2020-302 and Council's recommendation BE FORWARDED to the Ontario Growth Secretariat at the Ministry of Municipal Affairs and Housing, the Western Municipal Services Office in London, and MPP Will Bouma's office as the City's comments to the Province on the proposed Growth Plan amendment.

As outlined in Report 2020-302, the City of Brantford has been undertaking an Official Plan Review over the past 8 years and is nearing the completion of that process. A Draft Official Plan was issued on June 30 2020 for a public and agency commenting period. The Western Municipal Services Office of the Ministry of Municipal Affairs and Housing has advised us that they will circulate the June 2020 Draft Official Plan to other Provincial ministries for review and comment.

It is recognized that some revisions to the June 2020 Draft Official Plan will be required to achieve conformity with the future Growth Plan amendment, including the extension of the planning horizon to 2051. As per recommendation B to Report 2020-302, the City of Brantford supports the proposed Reference Forecast scenario for Brantford in the revised Growth Plan Schedule 3, Distribution of Population and Employment in the Greater Golden Horseshoe to 2051. The Reference Forecast would cause the least impact to the City's Official Plan Review process and other City-wide growth management plans including the Transportation Master Plan and Master Servicing Plan.

I hope Report 2020-302 is of assistance to the Province. Please let me know if you have any questions or would like to discuss this matter in more detail.

Yours Truly,



Paul Moore, MCIP, RPP
General Manager, Community Development Commission
City of Brantford

cc: Mayor Kevin Davis
Brian Hutchings, CAO
Tanya Daniels, City Clerk
Will Bouma, MPP, Brantford-Brant
Erick Boyd, Western Municipal Services Office
Michelle Knieriem, Western Municipal Services Office

Attachments:

City of Brantford Council resolution regarding Report 2020-302

City of Brantford Report 2020-302, Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology – Impact on the Draft Official Plan



July 27, 2020

To Whom It May Concern:

This letter will confirm that Brantford City Council at its Meeting held July 14, 2020 adopted the following resolution:

- 8.6 Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology – Impact on the Draft Official Plan [Financial Impact – None], 2020-302**
- A. THAT Report 2020-302, regarding Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology – Impact on the Draft Official Plan BE RECEIVED; and
 - B. THAT Council SUPPORTS the Province’s proposed Growth Plan Amendment to use the Reference Forecast scenario for population and employment in Brantford to the year 2051; and
 - C. THAT a copy of Report 2020-302 and Council’s recommendation BE FORWARDED to the Ontario Growth Secretariat at the Ministry of Municipal Affairs and Housing, the Western Municipal Services Office in London, and MPP Will Bouma’s office as the City’s comments to the Province on the proposed Growth Plan amendment.

Yours truly,

A handwritten signature in black ink, appearing to read "Tanya Daniels".

Tanya Daniels
City Clerk
tdaniels@brantford.ca



Alternative formats and communication supports available upon request. Please contact accessibility@brantford.ca or 519-759-4150 for assistance.

Date July 14, 2020 **Report No.** 2020-302
To Mayor and Members of Council
From Paul Moore
General Manager, Community Development

1.0 Type of Report

Consent Item
Item For Consideration

2.0 Topic **Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology – Impact on the Draft Official Plan [Financial Impact – none]**

3.0 Recommendation

- A. THAT Report 2020-302, regarding Proposed Amendment No. 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe and Proposed Land Needs Assessment Methodology – Impact on the Draft Official Plan BE RECEIVED;
- B. THAT Council SUPPORTS the Province’s proposed Growth Plan Amendment to use the Reference Forecast scenario for population and employment in Brantford to the year 2051; and
- C. THAT a copy of Report 2020-302 and Council’s recommendation BE FORWARDED to the Ontario Growth Secretariat at the Ministry of Municipal Affairs and Housing, the Western Municipal Services Office in London, and MPP Will Bouma’s office as the City’s comments to the Province on the proposed Growth Plan amendment.

4.0 Purpose and Overview

On June 16, 2020 the Province of Ontario released a proposed amendment to 'A Place to Grow: Growth Plan for the Greater Golden Horseshoe' (Growth Plan), as well as a proposed new Land Needs Assessment Methodology (Methodology) which supports implementation of the Growth Plan. The two proposals were posted on the Environmental Registry of Ontario for a 45 day commenting period ending July 31, 2020, and can be accessed online using the following links:

- Proposed Growth Plan Amendment (<https://ero.ontario.ca/notice/019-1680>); and,
- Proposed Land Needs Assessment Methodology. (<https://ero.ontario.ca/notice/019-1679>)

This report describes some of the key changes proposed through Amendment No. 1 to the Growth Plan, with a focus on the impact to the Official Plan Review process which is nearing completion. The report recommends a course of action to minimize further delay to the City's Official Plan Review and to facilitate the completion of the Official Plan in accordance with the current project schedule which would bring forward a new draft Official Plan to Council for consideration in November 2020, and which aligns with the work undertaken to complete the City-wide Transportation Master Plan and the Master Servicing Plan. The approval of these three growth management plans is necessary to provide input to the next Development Charges By-law Study and guide the development of a Fiscal Strategy currently being undertaken by the Finance Department and Hemson Consulting that will examine the implications of funding the City's share of related costs for critical infrastructure required to support the development of the settlement expansion area lands.

5.0 Background

The Official Plan is required to conform to the Growth Plan, which establishes population and employment growth forecasts for planning purposes in upper- and single-tier municipalities including Brantford. The June 2020 Draft Official Plan designates land to accommodate growth forecasts to the year 2041 in conformity with the current Growth Plan requirements. The proposed Growth Plan amendment would extend the planning horizon from 2041 to 2051 and introduce revised population and employment growth forecasts, which are key inputs to the Land Needs Assessment completed as part of the Municipal Comprehensive Review.

A draft City of Brantford Official Plan was issued at the end of June for a public and agency commenting period. The release of the June 2020 Draft Official Plan is a significant milestone in the Official Plan Review process and work continues to finalize the document for Council adoption prior to the end of 2020. The June 2020 Draft Official Plan expands the City's Settlement Area to accommodate the current Growth Plan forecast of 163,000 residents and 79,000 jobs in Brantford by the year 2041, based on intensification and density targets established through the Municipal Comprehensive Review. Council endorsed the proposed Settlement Area boundary expansion in April 2019 which helped to advance the Official Plan Review process.

The proposed Growth Plan amendment was issued 15 days before the release of the June 2020 Draft Official Plan which is now posted to the City's website for public consultation. To acknowledge the pending amendment, Planning Staff have included language in the Draft Official Plan to indicate that the 2041 planning horizon is to be extended to 2051 and, due to a relatively minor increase in the population and employment forecasts for Brantford, the proposed Settlement Area may be slightly expanded to accommodate the increase in growth. This change will also help to realize Council's added motion in April 2019 to direct Planning Staff "to continually seek out ways to take in more land" within the Settlement Area.

Over the past 8 years, Planning Staff have continued to work with the assistance of the consultant team and other City Staff to advance the Draft Official Plan, taking into account an expansion of the municipal boundary in 2017 and respond to repeated changes to the Growth Plan and other policies to which the Official Plan and the review process must conform. These changes are summarized below:

- The first draft of the new Official Plan was released in July 2016; however, the process was put on hold at the Province's request due to changes to the Growth Plan proposed in May 2016 as part of the Provincial Co-ordinated Land Use Planning Review. A new, updated Growth Plan took effect on July 1, 2017.
- During this time, the Province approved the Restructuring Order which transferred lands to the City for future growth on January 1, 2017, based on the Municipal Boundary Adjustment Agreement between the City of Brantford and County of Brant.

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- On May 4, 2018, the Province issued a finalized Land Needs Assessment Methodology, to be followed by the City's Municipal Comprehensive Review process.
 - Due to a change in Provincial government, the Growth Plan was amended again in 2019, with the current version taking effect on May 16, 2019.
 - The Provincial Policy Statement (PPS) was also amended, effective May 1, 2020. All decisions under the Planning Act or that affect a planning matter are now required to be consistent with the new PPS (2020).
 - The latest proposed Growth Plan amendment and a revised Land Needs Assessment Methodology were released by the Province on June 16 2020 for a 45 day commenting period.

The latest Growth Plan amendment and the revised methodology represent the sixth significant policy change to impact the City's Official Plan Review. The implications of proposed Growth Plan amendment on the Official Plan Review are discussed in Section 8.0 of this report.

6.0 Corporate Policy Context

Completing the Official Plan and related City-wide growth management plans (e.g. Transportation Master Plan and Master Servicing Plan) are corporate priorities. In addition to facilitating intensification within the Built-up Area, the new Official Plan, once approved, will bring additional land into the City's Settlement Area to accommodate future growth in greenfield areas. The Settlement Area expansion would address the limited supply of development ready land remaining in the current Designated Greenfield Area. The Official Plan will also provide input to the next Development Charges By-law Study.

7.0 Input From Other Sources

The Draft Official Plan was released on June 30, 2020, for a public and agency commenting period lasting to the end of August 2020. It was indicated that the 2041 planning horizon established in the June 2020 Draft Official Plan is going to change to 2051 given the pending Growth Plan amendment. Nonetheless, many of the draft land use policies are not affected by the amendment so comments received on the June 2020 Draft Official Plan will likely remain relevant. Revisions will be made to the June 2020 Draft Official Plan to address the pending Growth Plan amendment and comments received. The revised

version will be released prior to presentation at an Open House in the fall, before finalization of the Draft Official Plan for Council adoption at a Public Meeting, currently scheduled for November 17, 2020.

Planning Staff discussed the proposed Growth Plan amendment on June 19, 2020 via teleconference with Provincial Staff from the Western Municipal Services Office of the Ministry of Municipal Affairs and Housing. In light of the timing associated with the release of proposed Amendment No. 1 to the Growth Plan and the City's anticipated release date of the Draft Official Plan, Ministry Staff were supportive of the City's approach to release the Draft Official Plan at the end of June for a public and agency review and commenting period.

8.0 Analysis

8.1 Proposed Growth Plan Amendment

The following summarizes the key aspects of the proposed Growth Plan amendment which impact the current Official Plan Review.

The Growth Plan amendment extends the planning horizon from the year 2041 to 2051 and includes revised population and employment forecasts to 2051, presented in reference forecast, low and high scenarios. The revised forecasts are based on a Technical Report prepared by Hemson Consulting for the Ministry of Municipal Affairs and Housing. Hemson prepared the previous Growth Plan forecasts as well. The Technical Report, entitled "Greater Golden Horseshoe: Growth Forecasts to 2051" is available with the documents regarding the proposed Growth Plan amendment that were posted on the Environmental Registry of Ontario website (<https://ero.ontario.ca/notice/019-1680>).

The three forecast scenarios (reference forecast, low and high) are shown in Tables 1 and 2 below. The proposed Growth Plan amendment includes the same 2051 figures from the Technical Report, but maintains the 2031 and 2041 figures from the current Growth Plan. The Growth Plan amendment proposal document notes that this is "to ensure continuity of the work that municipalities have undertaken to bring their official plans into conformity with these forecasts."

The Technical Report extends the Brantford forecasts with relatively minor additional growth through to the new planning horizon in 2051. As indicated in the tables below, instead of a population of 163,000 residents and employment of 79,000 jobs in 2041, the Technical Report now

forecasts 165,000 residents and employment of 80,000 jobs in 2051 in the Reference Forecast scenario.

Table 1: Population Forecasts

<i>Year</i>	<i>2031</i>	<i>2041</i>	<i>2051</i>
Current Growth Plan	139,000	163,000	
Hemson Technical Report			
<i>Reference forecast</i>	<i>124,000</i>	<i>144,000</i>	<i>165,000</i>
Low scenario	123,000	142,000	161,000
High scenario	125,000	146,000	170,000
Proposed Growth Plan Amendment			
<i>Reference forecast</i>	<i>139,000</i>	<i>163,000</i>	<i>165,000</i>
Low scenario	139,000	163,000	161,000
High scenario	139,000	163,000	170,000

Table 2: Employment Forecasts

<i>Year</i>	<i>2031</i>	<i>2041</i>	<i>2051</i>
Current Growth Plan	67,000	79,000	
Hemson Technical Report			
<i>Reference forecast</i>	<i>54,000</i>	<i>66,000</i>	<i>80,000</i>
Low scenario	54,000	66,000	79,000
High scenario	55,000	67,000	80,000
Proposed Growth Plan Amendment			
<i>Reference forecast</i>	<i>67,000</i>	<i>79,000</i>	<i>80,000</i>
Low scenario	67,000	79,000	79,000
High scenario	67,000	79,000	80,000

The Province has also noted in the Growth Plan amendment proposal document that the Reference Forecast scenario represents the most likely future growth outlook and is the result of extensive modelling and analysis. The low and high scenarios are variations for comparative purposes based on different assumptions about the future economic and migration outlook. In addition to revising the growth forecasts, the proposed Growth Plan amendment also proposes to establish the forecasts to be minimum figures, and would enable upper- and single-tier municipalities including Brantford to propose higher forecasts through the Municipal Comprehensive Review process. However, Planning Staff support the use of the Reference Forecast scenario as it will have the least impact on the current schedule for finalizing the Official Plan.

It is anticipated that the Growth Plan amendment will come into effect in the fall of this year after the Province considers input submitted during the 45 day commenting period. The Province has proposed that once the

Growth Plan amendment is in effect, municipalities would be required to use the revised growth forecasts when bringing their Official Plans into conformity with the Growth Plan. As noted previously, the City has had to respond to repeated changes in policy at the provincial level since the Official Plan Review commenced in 2012. To avoid further delay and stay on track to bring forward the Official Plan for adoption this year, Planning Staff recommend that the Official Plan Review process continue by applying the Brantford Reference Forecast scenario that has been included in proposed Amendment No. 1 to the Growth Plan. This requires planning for a population of 165,000 residents and employment of 80,000 jobs in 2051. The reasons are noted below:

- The proposed Reference Forecast scenario growth forecasts an increase in the current Growth Plan forecasts (upon which the Draft Official Plan is currently based) by 2,000 residents and 1,000 jobs. The additional population (2,000 residents) and employment (1,000 jobs) beyond what is accommodated within the Draft Official Plan can be included through modest revisions to the proposed Settlement Area boundary without impact to the project schedule. This would also not have a significant impact on the other City-wide master plans (Transportation Master Plan (TMP) and Master Servicing Plan (MSP)) that are also scheduled to be completed in the fall. The potential Settlement Area boundary revision would provide for some additional land to be added as desired by Council in April 2019.
- The Reference Forecast scenario would enable the Official Plan to be approved in alignment with the TMP and MSP, providing new and updated policies to facilitate new development through the intensification of the Built-up Area, focused on identified Strategic Growth Areas, as well as a Settlement Area boundary expansion. This will enable growth to occur in new greenfield areas and employment areas in the Settlement Area expansion lands.
- Consideration of other forecast scenarios will require a significant amount of additional work and add additional costs to update the Official Plan, Transportation Master Plan and Master Servicing plans and will delay the completion of these studies until 2021 or beyond. Ultimately this will delay the City's ability to update the Development Charges By-law Study.

- The growth forecasts can be reconsidered in the future well before the 2051 planning horizon, as the Growth Plan forecasts are to be updated by the Province every 5 years. The Official Plan can be amended with updated forecasts based on new information (2021 census data, growth monitoring), that could justify further expansion of the Settlement Area through a future amendment to the new Official Plan. Provincial policy now enables the various components of a Municipal Comprehensive Review, such as Settlement Area expansion, to be undertaken individually, not all at once. This change is noted in the proposal document regarding the proposed Land Needs Assessment Methodology that was posted on the Environmental Registry of Ontario website (<https://ero.ontario.ca/notice/019-1679>): “Municipalities have the choice of phasing their municipal comprehensive review or achieving conformity as part of one single new official plan or a plan amendment.”

In addition to the proposed amendments to the Growth Plan outlined above, there are other proposed changes regarding mineral aggregates, and employment area conversions within Major Transit Station Areas (MTSA) located within Provincially Significant Employment Zones that do not affect the Official Plan Review. The Growth Plan does not identify an MTSA within the City of Brantford. The Growth Plan amendment also changes the definition of various terms to make them consistent with the definitions in the updated Provincial Policy Statement (2020).

The proposed changes to the Land Needs Assessment Methodology would enable housing demand analysis to consider additional housing needs for post-secondary students. This is a change that Planning Staff has previously suggested to the Province to account for the increasing role of students in Brantford’s Downtown Urban Growth Centre due to the expansion of Wilfrid Laurier University and Conestoga College. Planning Staff continue to assess the proposed changes to the Land Needs Assessment Methodology and will update Council as necessary.

8.2 Next Steps in the Official Plan Review Process

Over the summer months, the Draft Official Plan will be revised in response to comments received on the document issued on June 30, 2020. It was anticipated that a revised document would be prepared for presentation at a Statutory Open House in the fall, followed by Council

adoption at a Statutory Public Meeting on November 17, 2020. As part of the revision process, Planning Staff intend to issue an Addendum Report to the Municipal Comprehensive Review to account for changes to the Official Plan's planning horizon and population and employment forecasts to the year 2051, based on the Reference Forecast scenario, and to support any minor modification to the proposed Settlement Area boundary. The changes would be reflected in the revised Draft Official Plan to be re-issued in the fall.

The project schedule will be dependent on the timing of the Growth Plan amendment and revision to the Land Needs Assessment Methodology. Planning Staff will continue to update Council regarding any future impact to the project schedule.

9.0 Financial Implications

There are no financial implications associated with the recommendations of this Report, to complete the Official Plan Review using the proposed Growth Plan Schedule 3 reference scenario forecast to the year 2051. However, further delay and additional cost to the Official Plan Review and related City-wide master plan programs will be incurred if other forecast scenarios are to be considered at this time.

10.0 Conclusion

Completion of the Official Plan and related City-wide growth management plans (e.g. Transportation Master Plan and Master Servicing Plan) are corporate priorities. The revised population and employment forecasts to the year 2051, in the proposed Growth Plan amendment, impact the Official Plan. Planning Staff support the use of the proposed Reference Forecast scenario to 2051, which proposes a modest increase to the City's population and employment forecasts, as it will minimize further delay to the City's Official Plan Review and facilitate the completion of the Official Plan in accordance with the current project schedule, and in alignment with the work undertaken to complete the City-wide Transportation Master Plan and the Master Servicing Plan.

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Senior Planner, Long Range Planning
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Director of Planning
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Community Development

In adopting this report, is a by-law or agreement required? If so, it should be referenced in the recommendation section.

By-law required yes no

Agreement(s) or other documents to be signed by Mayor and/or City Clerk yes no

Is the necessary by-law or agreement being sent concurrently to Council? yes no