



**Ontario**  
Home Builders'  
Association

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October 8, 2022

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RE: Regional Municipality of Halton  
ERO Number: 019-5684 / Ministry Reference Number: 21-OP-2150065-OP-229116

The Ontario Home Builders' Association (OHBA) is the voice of the land development, new housing and professional renovation industries in Hamilton. The OHBA represents nearly 4000 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. The residential construction industry employed over 554,000 people, paying \$37.7 billion in wages, and contributed over \$76 billion in investment value into Ontario in 2021. The OHBA is proudly affiliated with the West End Home Builders' Association (WEBA).

### **Environmental Registry Background**

On June 15, 2022, Halton Region adopted Official Plan Amendment 49 pursuant to sections 26 and 17 of the *Planning Act* by By-law 35-22. Regional Official Plan (ROPA) Amendment 49 is now before the Minister of Municipal Affairs and Housing for a decision under the *Planning Act*. Regional Official Plan Amendment 49 plans for growth in Halton to the year 2051. The Amendment introduces new policies related to settlement areas, strategic growth areas, employment areas, as well as forecasts and targets for population and employment growth and phasing of development, among other matters. If approved, this amendment would apply to all of the lands within Halton Region including the City of Burlington, the Town of Oakville, the Town of Halton Hills, and the Town of Milton.

### **OHBA Comments on Halton's Official Plan – Exclusive Focus on City of Burlington**

The OHBA comments in this Halton Region Official Plan ERO submission are exclusively focused on the City of Burlington and reflect OHBA's recommendations to support transit-oriented communities and to facilitate the construction of much needed new housing supply in the City of Burlington.

### **Previous Comments and Submissions on ROPA 48/49**

The OHBA is supportive of the provincial planning framework established by the Growth Plan for the Greater Golden Horseshoe and the Provincial Policy Statement. WEHBA articulated its comments to the Region of Halton in a May 2021 submission regarding ROPA 48 that articulated concerns regarding its stated purpose to advance strategic local municipal planning priorities above well-established minimum provincial planning policy requirements. Specifically, the WEHBA noted that while local priorities are an important component of the planning process, certain local municipal priorities and growth scenarios that were being explored do not align with the Growth Plan or the Provincial Policy Statement. Both



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OHBA and WEHBA continue to be concerned that the urban structure framework included in the new Official Plan for the City of Burlington (2020 – appealed and not approved) and ROPA 48 presents a significant risk to the Provincial government as they fail to provide the necessary framework to accommodate population growth to the year 2051.

**Context has Evolved: Rapid and Accelerating Population Growth**

OHBA notes that demographic changes, market demand and population growth will dramatically increase the need for new housing across Ontario and in the GTHA in particular. Significant action is needed to address challenges presented by impractical planning policies that fail to accommodate future population growth, immigration and the attractiveness of Ontario. This is a common and widespread concern and not one that is limited to Halton Region alone. However, within the local context, the OHBA refers to the new and appealed Official Plan for the City of Burlington (2020) in conjunction with the proposed ROPA 49. Neither of these documents adequately address the province's goal of building 1.5 million homes for Ontarians, as recommended by the provincial Housing Affordability Task Force. Both ROPA 49 and the City of Burlington Official Plan (2020) are based on housing forecasts prepared by Hemson Consulting, which are now incompatible with the provincial goal of 1.5 million new homes.<sup>1</sup>

There is broad consensus that Ontario needs to ramp up housing production to resolve our housing affordability crisis.<sup>2, 3, 4</sup> In the years since the Hemson Schedule #3 Population Forecasts were prepared, the Federal Government has significantly increased immigration targets and the quantum of international students (non-permanent residents) have significantly increased adding pressure to the housing system despite not being adequately captured in the Schedule #3 Forecasts. Furthermore, new forecasting that consider these emerging factors from the Ministry of Finance greatly exceeds the Schedule #3 Forecasts that are baked into the Growth Plan. Through its review of Halton's Official Plan, OHBA strongly recommends that the provincial government should seize this opportunity for bold action to increase opportunities for new housing supply.

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<sup>1</sup> "Ontario's Need for 1.5 million More Homes" Smart Prosperity Institute, August 2022.

<https://institute.smartprosperity.ca/1.5MillionMoreHomes>.

<sup>2</sup> "Housing Shortages in Canada: Solving the Affordability Crisis" Cmhc-schl.gc.ca, June 23, 2022. <https://www.cmhc-schl.gc.ca/en/professionals/housingmarkets-data-and-research/housing-research/research-reports/accelerate-supply/housing-shortages-canada-solving-affordability-crisis>.

<sup>3</sup> "Making Housing More Affordable" Government of Canada Budget 2022, April 7, 2022. <https://budget.gc.ca/2022/report-rapport/chap1-en.html>.

<sup>4</sup> "Report of the Ontario Housing Affordability Task Force" Ministry of Municipal Affairs and Housing, February 8, 2022. <https://files.ontario.ca/mmahhousing-affordability-task-force-report-en-2022-02-07-v2.pdf>.



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**OHBA Recommends Expanded Urban Growth Centre: Downtown and Burlington GO**

The OHBA specifically recommends one key amendment to Halton's Official Plan and urban structure that would support increased intensification and transit-oriented communities in the City of Burlington to assist the achievement of the province's goal of building 1.5 million homes over the next decade. The Ministry of Municipal Affairs and Housing (MMAH) should expand the Burlington Urban Growth Centre to encompass both the Burlington GO Major Transit Station Area (MTSA) as identified in ROPA 48 and the Downtown Urban Growth Centre (UGC) as originally approved in the Growth Plan in 2006. Such a bold move by the provincial government would facilitate and encourage intensification across a broader area that would encompass the exact locations that growth should be planned for.

Our association strongly supports intensification and transit-oriented communities as a mechanism to support a significant proportion of our future population growth. OHBA believes that the City of Burlington is well positioned through the provincial planning framework to accommodate a range of new housing supply opportunities through intensification at the MTSA's located along the GO corridor, as well as along a comprehensively planned urban corridor system and through its secondary growth nodes. Furthermore, there should be an end to exclusionary zoning in Burlington.

Over the last 15 years, OHBA's members have been strong contributors to building a thriving community in downtown Burlington that now functions as a successful force for economic growth in Burlington and the Region of Halton. As a result of investments made by our members, downtown Burlington is a walkable community where residents can live, work, and play in an area that is supported by a diverse mix of amenities within walking distance that is supported by local public transit.

The original downtown UGC promoted and encouraged transit supportive connectivity between the downtown and the rest of Burlington and is important to further advance the existing, established and growing community. Existing development investments made in downtown Burlington focused on concentrating new development in this area as it is well served by local transit, existing infrastructure and public service facilities that are available to support and accommodate growth. OHBA recommends that MMAH maintain and expand the existing Downtown UGC designation to encompass both downtown and the Burlington GO Station MTSA.

**Conclusion**

The OHBA strongly believes that a healthy housing system will only exist when all levels of government work together with the private sector to ensure that future growth areas and not only available but well planned to provide the right mix of housing choices and supply that provides all residents' shelter needs through their full life cycle. A properly functioning housing system should provide stability to both renters and owners, at prices people can afford and in the choice that meets their needs. The housing system must also be able to respond to and accommodate projected demographic and market requirements for current and future residents. The Greater Golden Horseshoe is forecast to welcome at least 4.6 million new people over the in the next three decades. Without assertive provincial



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intervention, municipalities do not appear to have the policies in place required to address this matter. As a result of that lack of action at the local level, there will continue to be an exodus of young families out of Burlington and other inner ring municipalities, leapfrogging the greenbelt and moving even further, in search of more attainable housing. This is causing population displacement and pressures on housing and infrastructure in those communities that are least prepared to accommodate growth.

Burlington has a responsibility to facilitate housing intensification and accommodate its fair share of Ontario's target of 1.5 million additional homes. Local political considerations have clouded rational decision making to accommodate long-term growth. OHBA strongly recommends amendments be made to Halton's Official Plan to expand the Burlington Urban Growth Centre to encompass both downtown Burlington and the entire Burlington GO MTSA. Such a bold policy amendment will support a much higher levels of intensification and transit-oriented communities in Burlington's primary growth areas, its downtown and its most significant MTSA, the Burlington GO Station area. Our members are up to the challenge to provide more housing, but bold action by the province is necessary.