

Wednesday, March 13, 2024

Ministry of Municipal Affairs and Housing

777 Bay Street, 17th Floor

Toronto, Ontario

M7A 2J3

RE: ERO File No. 019-8273

“Get It Done Act, 2024” - Amending the Official Plan Adjustments Act, 2023

We (Corbett Land Strategies Inc.) are writing on behalf of our client, Romano-Franco Georgetown Inc. (the ‘Client’), with respect to the proposed amendments to the Official Plan Adjustments Act, 2023 to retroactively reinstate municipally requested modifications to official plans for the cities and the regions including Halton. We have reviewed the proposed modifications as they relate to the lands located at 9258 10th Line in the Town of Halton Hills, Region of Halton (herein referred to as ‘Subject Lands’ (Appendix A).

It is our understanding that through the proposed “*Get it Done Act, 2024*”, it will address local priorities while continuing to support the government’s goal of building at least 1.5 million new homes by 2031. Through this formal submission, CLS would like to express its significant concerns with proposed amendments to ROPA 49, as outlined below. Specifically, the changes proposed to the Regional Urban Boundary, as we believe that the proposed amendments are of a scale and character that is not adequate to support the growth anticipated specifically for the Town of Halton Hills. It is the intent of this letter to request the Province to reconsider the direction for urban boundary expansion to accommodate for the specific long-range housing needs for the Town of Halton Hills; as noted below:

7. *“Official plan amendment 49 adopted by the Regional Municipality of Halton pursuant to By-law 35-22 is modified as follows:*
 - i. *Maps 1, 1B to 1H and 3 to 5 are modified by adding the following lands to the Regional Urban Boundary:*

- A. *The lands delineated as “New Community Area” and “New Employment Area” in Attachment 6, Preferred Growth Concept – Regional Urban Structure, to Halton Region Report No. LPS88-21 dated February 9, 2022.*
 - B. *The lands delineated in Appendices 5, 7 to 12, 14, 17 and 21 to 24, contained within the decision referred to in Column 2 of item 4 of the Table to section 1.*
 - C. *The lands shown in a map numbered 350 and filed at the Toronto office of the Ministry of Municipal Affairs and Housing located at 777 Bay Street.*
- ii. *Maps 1 and 1C to 1G are modified by redesignating the lands shown in Appendices 21 and 22 of the decision referred to in Column 2 of item 4 of the Table to section 1 from “North Aldershot Policy Area” to “Urban Area”.*
 - iii. *Maps 1C and 1H are modified by designating the following lands as “Employment Area”:*
 - A. *The lands delineated as “New Employment Area” in Attachment 6, Preferred Growth Concept – Regional Urban Structure to Halton Region Report No. LPS88-21 dated February 9, 2022.*
 - B. *The lands delineated in Appendices 5, 7, 9, 10, 11, 12, 14 and 17 contained within the decision referred to in Column 2 of item 4 of the Table to section 1.*
 - iv. *Maps 1C and 1H are modified by removing lands delineated in Appendices 3 and 4 of the decision referred to in Column 2 of item 4 of the Table to section 1 from the “Employment Area” designation.*
 - v. *Map 5, Regional Phasing, is modified by designating the lands referred to in subparagraph i as “Urban Area with Regional Phasing between 2021 and 2051”.*

Formal Comments

It is our understanding that the Preferred Growth Concept to the Regional Urban Structure presented on February 9, 2022 (Report No. LPS88-21) provides framework for growth to the year 2031 to 2051. This preferred framework provides an overall direction of more than 80 percent of the population growth and 80 per cent of employment growth between 2031 and 2051 to be located within Halton’s existing urban system. This growth direction establishes a great concern specifically for the Town of Halton Hills for the following reasons:

1. Insufficient Capacity in the Designated Greenfield Area to Meet Market Based Housing Demand:

The preferred growth concept presented on February 9, 2022, was based on a land supply that would only account to 2031 planning horizon. The approved

planned growth to 2031 has been extended to 2041 planning horizon. This proposes a concern given that it is highly unlikely that the existing Designated Greenfield Area will be able to accommodate the anticipated growth and rising community development needs, based on current and forecasted market conditions.

2. Increased Pressure on Municipal Infrastructure:

The Halton Region is allocated to grow to a total population of 1.1 million and 500,000 jobs by 2051. According to Report No. LPS88-21, it is the intent of the preferred growth concept to achieve an overall ambitious target of more than 85 per cent of new housing units to be located within the existing Urban Area and minimize expansion objectives.

The Preferred Growth Concept demonstrates a limited greenfield expansion and a highly focused intensification within the existing Urban Area, which suggests that the Designated Greenfield Area (DGA) would be planned for a density of at least 65 persons and jobs per hectare. This proposed intensification within the existing urban area will put significant pressure on municipal infrastructure capacity to service new development, and profoundly alter the character of the Town.

Therefore, we request that the Province reevaluate this Preferred Growth Concept and consider a modified approach utilizing the Growth Plan minimum intensification target of 50 percent that would yield a larger urban boundary expansion area, however, in a form that would reinforce the Town's distinct identity as a destination of choice to live.

3. Significant Shift in the Patterns of Housing Choice and Locations:

The Town of Halton Hills is forecasted to grow approximately 125,000 people by 2051, which suggests a population growth of 43,200 between 2031 and 2051. According to the Land Needs Assessment, it was identified that a short fall of 8,700 single and semi-detached housing units and 6,700 row housing units cannot be accommodated within the existing Urban Area between 2021 and 2051. In addition to the 1,300 apartment units, this resulted in a land need of 1,120 hectares for Community Area. According to Report No. LPS88-21, an ambitious target of more than 85 per cent of new housing will be located within the existing Urban Area, which we identify is overly ambitious given the nature and infrastructure capacity of the intended host community.

If the intention is to direct ambitious growth within the existing urban area, there is a great risk that there will be a significant shift in the patterns of housing choice and new forms of housing. This significant shift poses a great concern as this will significantly change the existing built form of the Town of Halton Hills, which will potentially diminish the unique and distinct characteristics of the Town as a prestige residential community.

The following are identified concerns with the shift of housing choice:

- Will the new forms of housing appropriately address market demands? With the intended densification within the existing urban area, it is safe to assume that housing will be mostly in the form of apartment units in various sizes and small residential dwellings. This concern is based on the 2019 Intensification Opportunities Study where it was found that families with 3 or more persons per household account for only 8% of current apartment dwellings. Furthermore, it was concluded in the 2016 Hemson Assessment that 74% of the total households are dominated by families drawn to Halton Hills for affordable, ground-related forms of housing.
The housing patterns within the Town have not indicated the increasing need for apartments or small dwelling sizes. Since the pandemic began in 2020, the Province has experienced a significant shift to how people live, work and play, specifically with an increase in household sizes and occupation and work from home rates demanding greater housing sizes. It is our submission that the current and forecasted housing market demand within Halton Hills has not and will not shift to apartment unit types of housing, and a greater allocation of Community Land Area will be required to accommodate preferred housing types.
- More intense development within existing community areas is required. It was reported in the Land Needs Assessment Methodology that in order to appropriately deliver the intensification goal, the Town will be required to complete approximately 220 to 300 apartment units per year from 2021 to 2051. This is significantly higher than the Town's current average contribution of 11 apartment units per year.
- How will the Town of Halton Hills ensure to deliver community facilities such as parkland to service existing and new residents in a densified area? This preferred growth concept will potentially result in overcrowding, degradation of quality of life and potential out-migration of population, especially families with 3 or more persons per household. The existing built urban area in Halton Hills is small compared to other urban areas in GTA. The densification will potentially have significant impacts on mature and stable neighborhoods which will in turn significantly alter the quality of life within these existing neighborhoods.
- There is no doubt that the area south of the existing Georgetown urban limits to the Gateway Employment Area will continue to experience pressure for development given its unique attributes.
- More extensive accommodation of a wider range of housing forms would also support the growth of the adjacent Premier Gateway area catering to a diverse range of employees.
- As noted previously, lower density housing forms also support the continued

growth of “digital commuting” (working from home) where larger housing forms are required.

- With the removal of ground-oriented development options, the Province should ensure through this legislative change that the existing approved Designated Greenfield Areas (DGA) can meet the current market demand.

Recommendation

Given the above concerns, we respectfully request the Province to reconsider the overall growth direction for Halton Region and not restrict its greenfield expansion to ensure flexibility and opportunities for future development. We request that the following be considered:

1. That the Province enforce a softer approach to intensification through the application of the Growth Plan’s minimum density target of 50 people and jobs in the newly Designated Greenfield Area.
2. That the Province investigate further for growth expansion options that will facilitate the following:
 - Support the development of the new hospital in Halton Hills. The additional infrastructure and real estate assessment revenue garnered through an enhanced expansion will provide further support for the construction of the new hospital.
 - Facilitate a key north-south road connection between the southerly portions of the existing settlement area and the inter-regional transportation infrastructure within the Premier Gateway employment area including Highway 401 and 407.
 - Encourages a connection between Halton Hills to the existing Employment Area and future Strategic Employment Area as well as the future planned corridor.
3. Please see Appendix B for our recommendation for an enhanced urban boundary expansion.

We also strongly recommend that the Province consider further amendments to Provincial Planning Policy and land use planning legislation to allow greater opportunities for privately initiated urban boundary expansion applications outside the Municipal Comprehensive Review process now established in the *Provincial Policy Statement, Growth Plan and the Planning Act*. This would include the elimination of the current 40-hectare limitation and the ability to appeal such application to the Ontario Land Tribunal. These measures would ensure that municipalities and the development industry can more quickly respond to housing requirements given the persistence of the affordability crisis which is caused by chronic land supply shortages.

Conclusion

We respectfully request that the Province consider the above to further enhance the Town of Halton Hills request for urban expansion to the Georgetown Urban Area. The proposed enhanced expansion to the 'Community Area' will assist the Province to close the housing gap and will ensure flexibility and opportunities for future development. A softer approach to intensification through the application of the Growth Plan's minimum density target of 50 people and jobs in the newly Designated Greenfield Area should be pursued to provide for appropriate housing types ideal for all socio-economic needs.

We appreciate your attention to this matter, and we hope that our request is strongly considered as we aim to support the Province's vision to deliver housing for all Ontarians.

Sincerely,

John B. Corbett

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