

# Growth Plan Amendment 1 and Revised Land Needs Assessment Methodology – City of Hamilton Comments

August 18, 2020  
(PED19033(b))

# ERO Postings

On June 16, 2020, the Province released two postings on the Environmental Registry of Ontario for review and comment:

- #019-1680 – Proposed Amendment 1 to A Place to Grow: Growth Plan for the Greater Golden Horseshoe; and,
- #019-1679 – Proposed Land Needs Assessment Methodology for A Place to Grow.

The deadline for comments was July 31, 2020. Staff submitted comments to the Province by the deadline. Any revisions or modifications by Council will be forwarded to the Province as the City's formal comments on the ERO postings.

# Proposed Amendment 1 to a Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019

Key changes with impact on the City of Hamilton:

- Extended planning horizon to 2051; and,
- Updated population and employment forecasts.

# Proposed Amendment 1 to a Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019

Summary of concerns:

1. Revised forecasts
2. Extended planning horizon
3. Opportunity to plan for a higher forecast
4. Interim year forecasts
5. Housing by type forecast
6. Transition

# Revised Schedule 3 Forecasts

Revised Schedule 3 Forecasts:

Year	Population	Employment
2031 (Existing)	680,000	310,000
2041 (Existing)	780,000	350,000
2051 (Reference Scenario)	820,000	360,000
2051 (Low Scenario)	790,000	340,000
2051 (High Scenario)	850,000	370,000

The “Reference Scenario” is identified as being the most probable future growth forecast.

## Revised Schedule 3 Forecasts

Options to accommodate the additional growth include:

- intensification within the existing urban area;
- increasing the density of future development; and / or,
- urban expansion into the City's 'whitebelt' lands.

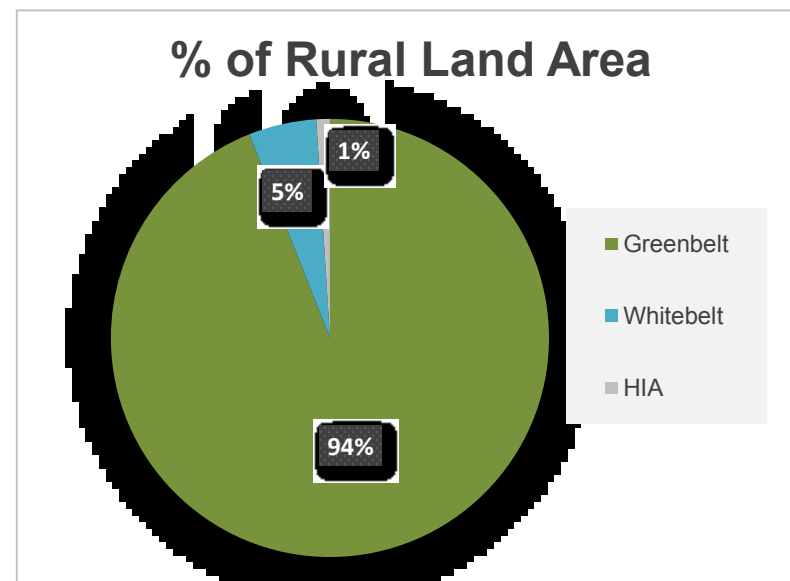
GRIDS 2 / MCR will examine how much of the growth can be accommodated through intensification and increased density of the City's greenfield lands.

## Revised Schedule 3 Forecasts

‘Whitebelt’ lands are Rural lands which are not located within the Greenbelt Plan area. Urban expansion can only take place within the ‘whitebelt’ area (with a small exception for Towns / Villages).

Within Rural Hamilton:

- 94% of the land area is within the Greenbelt Plan
- 5% of the land area is considered ‘whitebelt’
- 1% is occupied by the Hamilton International Airport



## Revised Schedule 3 Forecasts

Growth in the 'whitebelt' lands is constrained by many factors:

- Natural heritage features
- Rights – of – ways and corridors
- Airport Noise Exposure Forecast contours – lands that are located above the 28 NEF contour may not be developed for sensitive land uses.

After factoring in these constraints, roughly 1,600 ha of whitebelt lands are available to accommodate residential growth.



# Revised Schedule 3 Forecasts

Recommendation:

- (a)(i) The final Schedule 3 forecast should reflect either the Low or Reference scenario.

# Extended Planning Horizon

- Extended planning horizon to 2051 is significant.
- Difficult at present to anticipate future social, economic, and market changes, including intensification potential, employment trends etc.
- Planning for growth that does not occur can create financial challenges.

# Extended Planning Horizon

## Recommendation:

- (a)(ii) Revise Growth Plan policies to provide flexibility to municipalities in planning for growth from 2041 to 2051 by not requiring municipalities to designate land to accommodate the growth, but rather to identify a strategy for how the growth will be accommodated.

# Opportunity to Plan for a Higher Forecast

- Proposed revisions would allow a municipality to plan for higher population and / or job forecasts than the Schedule 3 forecasts.
- There is no opportunity to plan for a lower forecast.
- Not clear how or why an increased forecast could be justified.
- MCR process could be delayed over debates about the appropriate forecast to plan toward.
- Potential regional planning implications if certain municipalities plan for higher growth which may impact the growth of other municipalities.

# Opportunity to Plan for a Higher Forecast

## Recommendations:

- (a)(iii) The City does not support the proposed revisions to allow municipalities to plan for higher forecasts. The existing policy wording of the Growth Plan 2019 should be maintained which requires municipalities to plan for the forecasts in Schedule 3, and do not provide any opportunity for municipalities to consider higher forecasts.
- (a)(iv) As an alternative to (iii), if the Province maintains the revision to the policies, the Policy should be revised to state that only Councils may request an increased Schedule 3 forecast with appropriate justification, which would require approval from the Minister.

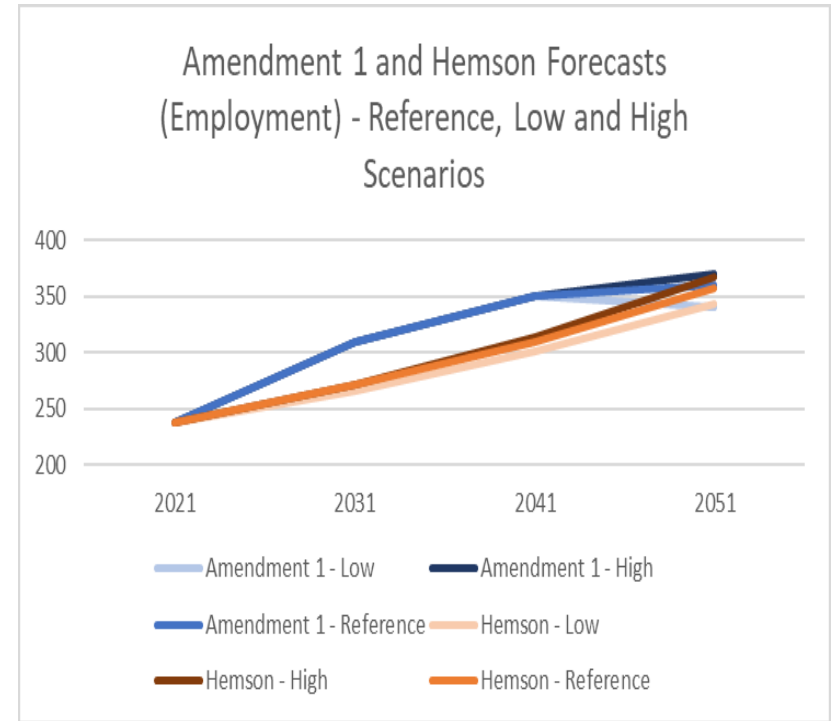
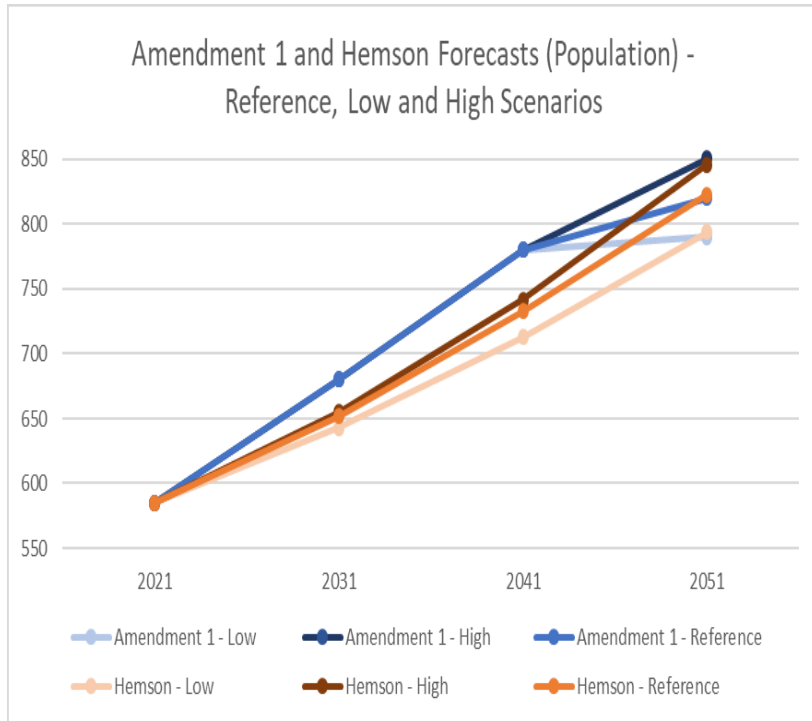
# Interim Year Forecasts

- Two versions of Schedule 3 were included with the draft Amendment 1: Mock A and Mock B.
  - Mock A: includes forecasts for 2031, 2041 and 2051.
  - Mock B: includes forecasts only for 2051.
- The 2031 and 2041 forecasts in Mock A have been carried forward from the previous version of Schedule 3 in the Growth Plan 2019 and have not been updated.

## Interim Year Forecasts

- A technical background document was released with Amendment 1 prepared by Hemson Consulting.
- Appendix B to the Hemson report identifies updated 2031 and 2041 forecasts for all municipalities in addition to the 2051 numbers.
- For all scenarios (reference, low and high), the Hemson 2031 and 2041 population and job forecasts are lower for Hamilton than the Schedule 3 numbers.

# Interim Year Forecasts



The Hemson forecasts result in a more gradual and consistent rate of growth from 2021 to 2041.



# Interim Year Forecasts

- Concern that the Schedule 3 interim year forecasts are artificially inflating the rate of growth to 2041.
- Staff have previously identified concerns with the rate of growth in the Schedule 3 forecasts to 2041.
- Concern over planning for growth in the early years that does not materialize.

# Interim Year Forecasts

## Recommendations:

- (a)(v) The 'Mock B' format in Amendment 1 which contains the 2051 population and employment forecasts, with no interim year forecasts, is the preferred option for the Schedule 3 format.
  
- (a)(vi) As an alternative to (v), if the 'Mock A' format of Schedule 3 is approved, then the Hemson population and employment forecasts for the 2031 and 2041 time periods be incorporated into Schedule 3 rather than maintaining the current 2019 Schedule 3 numbers.

## Hemson Housing by Type Forecast

- Appendix B to the Hemson report includes a housing by unit type breakdown:

Time Period	Ground-Related	%	Apartments	%	Total
2021 – 2051	89,000	82	20,000	18	109,000

- The Growth Plan requires that a minimum of 50% of the City's new units be in the form of intensification, which is anticipated to be primarily apartment units.

## Hemson Housing by Type Forecast

- City's unit breakdown over past 5 years:

Year	Ground – related (%)		Apartments (%)
	Singles / Semis	Towns	
2015 – 2019	29	33	<b>38</b>
	<b>62</b>		

- The Hemson unit breakdown is misrepresenting the number of future apartment units anticipated to be constructed going forward.

# Hemson Housing by Type Forecast

## Recommendations:

- (a)(vii) The Housing by Type forecast included in the “Hemson Greater Golden Horseshoe: Growth Forecasts to 2051” report be revised to reflect the minimum Growth Plan policy requirements that provide a more realistic housing unit breakdown for municipalities to reference.
- (a)(viii) As an alternative to (vii), the Hemson Housing by Type forecast could be removed from the Technical Report to avoid confusion.

# Transition

## Recommendation:

- (ix) The Local Planning Appeal Tribunal proceedings regarding the 2011 Ministry modifications to the Urban Hamilton Official Plan and the 2009 Ministry modifications to the Rural Hamilton Official Plan shall be continued and disposed of in accordance with the 2019 Growth Plan, as amended, and the boundaries of the settlement area in the Urban Hamilton Official Plan shall not be modified by the LPAT and shall not be modified until a municipal comprehensive review has been completed except in accordance with Growth Plan policies 2.2.8.4 and 2.2.8.5.

# Proposed Land Needs Assessment Methodology

## Key Changes:

- In 2018, the Province released the *Land Needs Assessment Methodology for the Greater Golden Horseshoe*.
- Methodology was a stand-alone document which clearly identified the approach that municipalities were required to follow to complete the LNA.
- Proposing to replace the 2018 Methodology with an approach that provides more flexibility to municipalities in completing the LNA.
- No stand-alone document is proposed, instead a less formal identification of minimum requirements to be considered.

# Proposed Land Needs Assessment Methodology

Summary of concerns:

1. Lack of a standardized methodology
2. Market-based approach
3. Consultation requirements



## Lack of a Standardized Methodology

- Benefit of a standardized methodology is that it allows for easy comparison amongst municipalities, and removes the opportunity for debate over the best approach to follow.
- Concern that the lack of detail in the new methodology will lead to debate and questioning over the best approach to complete the LNA.
- Defeats the purpose of establishing a methodology and may slow the City's GRIDS 2 / MCR conformity exercise.

# Lack of a Standardized Methodology

## Recommendation:

- (b)(i) The Land Needs Assessment methodology must provide a detailed, standardized approach to the completion of the LNA and remove any opportunities for doubt or debate regarding the approach to LNA completion. The revised methodology should be presented in a detailed stand-alone document similar the 2018 version.

# Market-based Approach

- Proposed methodology follows more of a market-based approach to the consideration of housing need.
- Concern that basing the LNA in part on market demand raises the question of:
  - how market demand is defined?
  - how market demand can be reconciled with required minimum intensification and density targets?

# Market-based Approach

## Recommendation:

- (b) (ii) The Province should provide greater detail as to how market demand is to be defined and provide direction on how municipalities can reconcile market demand with the required Growth Plan intensification and density targets.

# Public Consultation

- New language in the ERO posting regarding public consultation on the LNA document.
- Consultation is an important part of the process and the public is engaged on inputs into the LNA including intensification and density targets and employment land review.
- Under the previous methodology, consultation on the technical LNA method and calculations was not required.
- Opportunity for consultation on the technical components of the LNA could result in lengthy delays to the City's growth management planning.

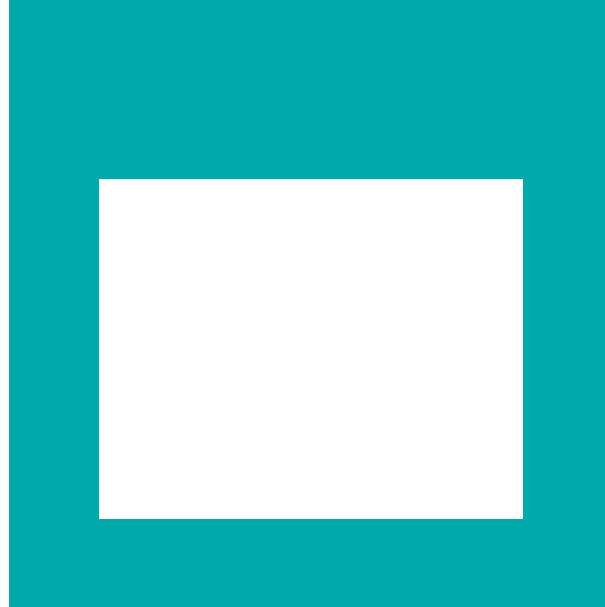
# Public Consultation

## Recommendation:

- (b)(iii) The completion and approval of the LNA should not require additional public consultation, potentially resulting in lengthy debates and delays, as the completion of a Land Needs Assessment is a technical document, and it is understood that municipalities consulted on LNA inputs such as intensification and density targets.

# ERO Postings

- Comments on the ERO Postings were provided to the Province by staff in advance of the July 31 commenting deadline.
- The Staff report, including any changes requested by Council, will be further submitted as the City's comments on the two postings.



# THANK YOU FOR ATTENDING

THE CITY OF HAMILTON PLANNING COMMITTEE