



Peer Review of White Church Urban Boundary Expansion Area Land Needs Analysis

City of Hamilton

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List of Acronyms and Abbreviations

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| A.D.U. | Additional Dwelling Unit |
| B.U.A. | Built-up Area |
| C.M.A. | Census Metropolitan Area |
| D.G.A. | Designated Greenfield Area |
| G.D.P. | Gross Domestic Product |
| G.G.H. | Greater Golden Horseshoe |
| G.T.H.A. | Greater Toronto Hamilton Area |
| L.N.A. | Land Needs Assessment |
| L.R.T. | Light Rail Transit |
| M.C.R. | Municipal Comprehensive Review |
| N.F.P.O.W. | No Fixed Place of Work |
| M.O.F. | Ministry of Finance |
| M.T.S.A. | Major Transit Station Area |
| N.P.R. | Non-Permanent Residents |
| O.P. | Official Plan |
| O.P.A. | Official Plan Amendment |
| O.P.R. | Official Plan Review |
| P.P.S., 2020 | Provincial Policy Statement, 2020 |
| P.P.S., 2024 | Provincial Planning Statement, 2024 |
| U.B.E. | Urban Boundary Expansion |
| U.G.C. | Urban Growth Centre |
| U.H.O.P. | Urban Hamilton Official Plan |

1. Introduction

1.1 Terms of Reference

Watson & Associates Economists Ltd. (Watson) was retained by the City of Hamilton in April 2025 to conduct a peer review of a report prepared by urbanMetrics. The Report, titled, “White Church Urban Boundary Expansion Area – Land Needs Analysis” (hereinafter referred to as the White Church Land Needs Analysis Report) was prepared for the White Church Landowners Group Inc. as part of an Official Plan Amendment (O.P.A.) application.^[1] The White Church Land Needs Analysis Report, provides an assessment of housing and urban land needs for the City of Hamilton to the year 2051 in support of a proposed urban boundary expansion (U.B.E.) application in south Hamilton, referred to as the White Church Boundary Expansion Area. This application seeks to remove approximately 347 hectares (857 acres) of rural lands within the City and add these lands to the urban area. As identified in the concept plan, this area is proposed to be developed with approximately 7,600 ground related residential units, as well as commercial, institutional and recreational uses.

1.2 Background

The City of Hamilton completed a Municipal Comprehensive Review (M.C.R.) of its Urban Hamilton Official Plan (U.H.O.P.) in 2022. Through this M.C.R. process the City undertook a Land Needs Assessment (L.N.A.), which explored three long-term growth scenarios to the year 2051, including: 1) Growth Plan Minimum, 2) Increased Targets and 3) Ambitious Density.^[2] Each of these scenarios comprehensively examined the impacts of varying residential intensification forecasts and greenfield density assumptions on the City’s long-term urban land needs to the year 2051. By 2051, these scenarios produced a range in urban land requirements from a low of 1,340 gross hectares (3,310 acres) under the Ambitious Density Scenario to a high of 2,190 hectares (5,410 acres) under the Growth Plan Minimum Scenario. The City also prepared a Residential Intensification Market Demand Analysis in 2021 to support its

^[1] White Church Urban Boundary Expansion Area. Land Needs Analysis. City of Hamilton, Ontario. Prepared for Whitechurch Landowners Group. February 3, 2025. urbanMetrics Inc.

^[2] City of Hamilton Land Needs Assessment to 2051. Technical Working Paper – Summary of Results. March 2021. Appendix A to Report PED17010(i). Lorus and Associates.



long-term assessment of residential intensification potential to the 2051 planning horizon.^[3] It is important to note that the City's L.N.A. was completed prior to the new Provincial Planning Statement, 2024 (P.P.S., 2024) and this application is being considered under a new policy regime.

Upon reviewing each of these long-term scenarios, City staff recommended the Ambitious Density Scenario in March 2021. The City's L.N.A. was subsequently peer reviewed by Watson in 2021.^[4] The results of the 2021 Watson peer review concluded that the approach and methodology utilized in the City's L.N.A. documents was appropriate within the context of the provincial planning framework and L.N.A. methodology guidelines in force at the time of the peer review. In November 2021, the City of Hamilton General Issues Committee approved the "No Urban Boundary Expansion Scenario" as the recommended long-term Growth Strategy for the City.

Over the past five years considerable technical analysis has been prepared for the City of Hamilton by consultants and City staff to comprehensively assess the potential need for future urban land expansion to accommodate future housing and employment growth to the year 2051. These scenarios explore a wide range of long-term growth scenarios which test varying rates of residential intensification as well as average greenfield population and employment density. A comprehensive L.N.A. document was prepared for the City, as mentioned above and recommended long-term urban expansion land requirements included 1,340 hectares.

1.3 Scope of Peer Review

As previously mentioned, the City of Hamilton General Issues Committee approved the "No Urban Boundary Expansion Scenario" as the recommended long-term Growth Strategy for the city in November 2021. While the U.H.O.P. does not support any urban boundary expansions outside of a City initiated M.C.R. or O.P. Review (O.P.R.), the City also recognizes that under the Provincial Planning Statement (P.P.S.), 2024 and recent

^[3] City of Hamilton Residential Intensification Market Demand Analysis. March 2021. Appendix B to Report PED17010(i). Lorus and Associates.

^[4] City of Hamilton Land Needs Assessment Peer Review. City of Hamilton. Final Report. October 4, 2021. Watson & Associates Economist Ltd.



legislative changes made to the Planning Act through Bill 185, new privately initiated urban boundary expansion applications can be received and approved at any time and are not subject to an M.C.R.^[6] To ensure that private applications for an U.B.E. are complete and comprehensive, the City has developed a framework for receiving, processing and assessing O.P.A. applications to expand Hamilton's urban boundary under the P.P.S., 2024.^[7]

On August 13, 2024, City of Hamilton Planning Committee directed that City staff use the Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications when they review an O.P.A. for urban boundary expansion applications. Section 2.2. of the Technical Memo prepared by Dillon Consulting Ltd. (Dillon) outlines five key topic areas that U.B.E. applications should address, as part of the U.B.E. Submission Requirements.^[8] These five key top areas are listed below:

“1. Need for the Expansion. Recognizing that under the proposed P.P.S., (2024) municipalities will be required to consider the need for settlement area expansion, proponents should be required to demonstrate that any proposed expansion is necessary to accommodate the range and mix of land uses, including housing by type based on the City's approved U.H.O.P. housing targets. The justification would not necessarily be a full 'market-based' assessment of land need to the plan horizon at 2051, since the no U.B.E. scenario by definition requires that a significant shift away from historic patterns to accommodate be achieved to accommodate all growth within the existing urban boundary. Rather, the proponent should be required to support the need to provide additional supply for 'ground-related' housing, at the time of application, and show that this type of supply cannot reasonably be provided within the existing urban area. This position would need to be less in the form of an overall "market-based" demand argument, but rather a supply-based assessment of the likelihood of the City accommodating its ground-related housing needs within the existing urban area, through the delivery of detached accessory units, like

^[6] City of Hamilton Staff Report, Official Plan Amendment and Final Framework for Processing and Evaluating Urban Boundary Expansion Applications, Report PED24109(b), April 8, 2025.

^[7] City of Hamilton Staff Report, Official Plan Amendment and Final Framework for Processing and Evaluating Urban Boundary Expansion Applications, Report PED24109(b), April 8, 2025.

^[8] City of Hamilton Draft Framework for Processing and Evaluating Urban Boundary Expansion Applications, Appendix "A" to Report PED24109.



laneway houses and garden suites, lot splits, multiplex conversions and other gentle densification options. Work undertaken as part of the March 2021 L.N.A. concluded that delivering the necessary number of larger, family-sized apartments and ground-related units within existing areas would be a challenge. To address this challenge the City has undertaken a number of initiatives and strategies, as discussed further below.

2. Impact on City-wide Intensification objectives. Proponents should be required to show that the proposed expansion would not adversely affect City-wide intensification objectives including demand for higher-density apartment forms within the downtown U.G.C. and other priority nodes and corridors, notably the Major Transit Station Areas (M.T.S.A.) along the planned Light Rail Transit (L.R.T.) and other transit lines. To the extent that higher density apartment forms are proposed as part of 'complete communities' in new greenfield areas the proponent should be required to show that these units would not compete or otherwise reduce demand within other local apartment markets, especially the downtown and key transit-oriented nodes. Implications for the planned distribution of intensification should also be addressed in terms of the shares of growth anticipated for the downtown, other nodes and corridors and established neighbourhoods.

3. Densification of Existing Neighbourhoods and DGA Supply. Recognizing that a critical aspect of the City's no U.B.E. strategy is to 'redirect' greenfield demand for ground-related housing to other potential opportunities within existing residential communities in the form of detached accessory units (i.e. laneway housing) proponents should be required to show how any proposed expansion would not impede that objective. The proponent should also be required to show that there are no opportunities for the reasonable densification of existing vacant D.G.A. supply.

4. The Greenfield Density Target. At a minimum, any new expansion areas should be required to achieve the planned greenfield density of new urban areas proposed as part of the Ambitious Density Scenario (approximately 77 residents and jobs per hectare) which at the time was one of the highest D.G.A. densities proposed within the Greater Toronto and Hamilton Area (G.T.H.A.). It is likely that innovative approaches will be required to deliver such a high D.G.A. target without planning for significant greenfield apartment units, which are currently envisioned to be accommodated largely within the existing urban area. The City may wish to encourage new and flexible approaches achieving both high D.G.A.



density and intensification targets supported by fiscal impact analysis to illustrate implications to the municipal corporation.

4. Phasing of Development. And finally, consistent with long-standing planning practice at the City and other fast-growing municipalities within the G.T.H.A., and in accordance with both the 2020 P.P.S. (Section 1.1.3.7) and P.P.S., 2024 (2.3.1.6) the proponent should be required to show that any new expansion is orderly and aligns with the timely provision of infrastructure and public service facilities and avoids the uneconomical expansion of infrastructure into rural areas. The timing of growth, especially to the 2031 horizon is key. The likelihood of achieving the current 10-year housing targets by interim period should be addressed, along with associated implications for the orderly provision of servicing infrastructure to the plan horizon. The issue of infrastructure spending, fiscal impact criteria and submission requirements is addressed in more detail in the next section.”

To support the City's intensification target of 80%, a variety of initiatives are being implemented to enhance housing development and affordability. These include completing additional phases of the M.C.R. to update policies for increased height and intensification, delineating M.T.S.A. boundaries to support the B-Line LRT, and updating Secondary and Neighbourhood Plans to allow for more intensification. City-wide low-density zoning is being amended to remove exclusionary practices and permit a wider range of uses, such as semi-detached units and multi-plexes. Flexible mixed-use zoning is being applied to commercial areas to allow residential redevelopment, and inclusionary zoning is being implemented to facilitate affordable and larger residential units. Development approvals are being streamlined through increased staffing, improved processes, and amended timelines. The City is reviewing its land portfolio to identify opportunities for housing development, providing financial incentives through the Housing Accelerator Fund, and planning necessary infrastructure. Additionally, the City is collaborating with community partners, the development industry, and federal and provincial partners to leverage resources and funding. New Site Plan provisions are being developed to assist large-scale residential projects affected by market downturns, and a review of the site plan process aims to improve communication and shorten



approval times. The City has also implemented surety bonds to provide flexibility and reduce costs for developers.^[9]

This peer review does not critic each technical assumption made by urbanMetrics regarding the subject report discussed herein. However, a number of broad technical considerations related to population growth projections, housing requirements by structure type and urban land needs have been identified by Watson. These considerations are offered to provide context for the City based on Watson's experience as well as generally accepted industry practices when conducting long-range growth analysis studies and urban land need assessments.

This peer review further examines the adequacy of the analysis provided in the White Church Land Needs Analysis Report prepared in responding to the City's draft evaluation framework, specifically related to the five topic areas set out above. Consideration has also been given to the potential impact the proposed U.B.E. application would have on the City's Growth Strategy as approved in the U.H.O.P.

^[9] Meeting with Southwest Residential Construction Labour Bureau Briefing Note - Appendix A, prepared by the City of Hamilton, 2025.



2. Assessing Long-Term Urban Land Needs within the Context of the Current Provincial Policy Framework and Recent Economic Conditions

2.1 Introduction

This chapter provides a brief overview of current provincial planning policies that are particularly relevant to the preparation of long-term growth analysis and urban land need assessments for Ontario municipalities.

On August 19, 2024, the Province released the P.P.S., 2024, which replaces the Provincial Policy Statement, 2020 (P.P.S., 2020) and a Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (the Growth Plan) as one integrated document. The P.P.S., 2024 came into effect on October 20, 2024, and was released in coordination with Bill 185, *Cutting Red Tape to Build More Homes Act*.

A key focus of the P.P.S., 2024 is that it recognizes that the approach to delivering housing, employment associated urban need requirements will vary by municipality and, as such, it moves away from a prescriptive guideline-based approach. The following highlights the relevant P.P.S. changes when assessing long-term urban growth and urban land requirements. It is important to note that the City's L.N.A. was completed prior to the new Provincial Planning Statement, 2024 (P.P.S., 2024) and this application is being considered under a new policy regime.

2.2 Ministry of Finance Population Projections

The P.P.S., 2024 now requires municipalities to consider population and employment growth forecasts prepared using Ministry of Finance (M.O.F.) projections and allows municipalities to modify these forecasts as appropriate.^[10] The use of the M.O.F. projections are not meant to replace long-term forecasting by municipalities. However, the M.O.F. population projections are to be used as a starting place in establishing

^[10] P.P.S., 2024, policy 2.1.1., p.6.



forecasts and testing the reasonableness of alternative regional forecasts and area municipal population and employment growth allocations.

Watson has recently completed a number of long-term growth analysis and urban land needs assessments for Ontario municipalities under the current provincial planning policy framework. As a starting point, each of these studies include an examination of the most current 2024 M.O.F. population projections. Our general observation regarding the most recent 2024 M.O.F. population projections is that they represent an ambitious long-term growth scenario for Ontario, and more specifically the municipalities within the G.T.H.A. when examining forecast immigration levels required over the long term to achieve these population projections.

The most recent 2024 M.O.F. projection has decreased the growth outlook for Ontario and Hamilton by 2046 (relative to the 2023 M.O.F. population forecast), largely driven by the recent federal government announcement to reduce the percentage of non-permanent residents (N.P.R.) from 7.3% of the national population to 5.0%.^{[11],[12]} Since the release of the 2024 M.O.F. projections, the federal government has also announced an additional reduction in the number of new permanent residents it will accept, lowering the 2025 and 2026 targets of 500,000 to 395,000 in 2025, 380,000 in 2026, and 365,000 in 2027.

With respect to the near-term national and provincial economic outlook, BMO Capital Markets has recently forecast that gross domestic product (G.D.P.) growth will decline to 0.6% in Ontario and 1.0% overall for Canada in 2025. For 2026, an annualized G.D.P. growth rate of 0.9% is forecast for Ontario and 1.2% for all of Canada, suggesting a significant downturn in economic growth in the near term, largely driven by global economic uncertainty in response to current U.S. tariffs and protectionist measures.^[13] These above changes to federal immigration policy, combined with the current slowdown in national and provincial economic growth will result in further downward adjustments to future near-term and long-term population growth for Ontario

^[11] N.P.R. share as of Q3 2024 derived from Statistics Canada Tables 17-10-0009-01 and 17-10-0121-01. There are 3,002,090 N.P.R. out of 41,288,599 residents in Canada.

^[12] N.P.R. national population target of 5% from the Government of Canada 2025-2027 Immigration Levels Plan.

^[13] Provincial Economic Outlook, BMO Capital Markets, May 23, 2025.



and Hamilton.^[14] The M.O.F. released an interim update to the Ontario population projections in May 2025, reducing the 2051 population from 22.1 million to 20.8 million people. This represents a 22% reduction in Provincial-wide growth between 2024 to 2051 from 6.0 million to 4.7 million people. It is important to note that projections by Census Division have not been released yet, but it is likely there will be a further reduction for the City of Hamilton when they are released later this year.

Notwithstanding the current slowdown in the national, provincial and regional economy, it is our opinion that the long-term population and economic outlook for the province and the City of Hamilton remains very positive. While it is recognized that the M.O.F. population projections for Ontario and many regions of the province (including the City of Hamilton) are ambitious, we acknowledge they serve as a useful starting place in addressing the population outlook for Ontario municipalities for the purpose of assessing long-range planning and infrastructure needs. In light of slowing macro-economic and housing conditions, it is important to ensure that housing demand, urban land expansion needs as well as near- and longer-term infrastructure requirements associated with the most current 2024 M.O.F. growth forecasts are not overstated.

2.3 Long-term Planning Horizon for Urban Land Needs

Compared to the P.P.S., 2020, the P.P.S., 2024 presents a more flexible horizon for planning for growth by providing a planning horizon. More specifically, municipalities are permitted to designate urban land to accommodate growth for at least 20 years, but not more than 30 years with the opportunity to designate additional land beyond the 30-year time horizon for Employment Areas, strategic growth areas, and planning for infrastructure.^[16] Given the potential uncertainties and potential risks associated with forecasting long-term population growth and urban land needs, the City of Hamilton now has the option, if deemed appropriate, to adopt a shorter 20-year planning horizon when assessing City wide urban land needs and considering private applications for urban boundary expansion.

^[14] Government of Canada News Release, October 24, 2024.

<https://www.canada.ca/en/immigration-refugees-citizenship/news/2024/10/government-of-canada-reduces-immigration.html>

^[16] P.P.S., 2024, policy 2.1.3, p.6.



3. Review of White Church Land Needs Analysis Report

This chapter provides a review of the adequacy of the White Church Land Needs Analysis Report in responding to the five key topic areas as developed by Dillon in their Technical Memo which addresses the City of Hamilton growth allocation criteria and housing submission requirements.

As a key observation, we note that the White Church Land Needs Analysis Report provides an updated L.N.A., however direct responses to the key topic areas, as set out in the Dillon Technical Memo, have not been provided by urbanMetrics. Furthermore, while the subject report provides a detailed analysis regarding forecast demand for additional dwelling units (A.D.U.s) within the City, it is unclear how urbanMetrics has assessed the impact of A.D.U.s on the City's future need for ground related units.

A review of the White Church Land Needs Analysis Report is provided below drawing from general standards of practice and Watson's experience in preparing similar studies (including the 2021 L.N.A. update prepared by Watson in 2023). This broad review has been organized within the context of the key topic areas set out in the Dillon technical memo and is summarized below.

3.1 Need for the Expansion

Observation: The White Church Land Needs Analysis Report significantly overstates the City's urban land needs by 2051. The assumed housing supply capacity for ground related housing within the B.U.A. appears conservative and does consider potential longer-term redevelopment opportunities. Existing vacant lands identified for high-density development within the D.G.A. are not utilized by 2051 or beyond.

Analysis:

Section 4.5 of the White Church Land Needs Analysis Report, provides an assessment of the City's urban land needs to the year 2051 under the both the Growth Plan and M.O.F. population forecasts to the year 2031 and 2051. Our response focuses on the 2051 land needs analysis prepared under the M.O.F. population forecast, more



specifically, Figure 4-17 (p. 54) of the White Church Land Needs Analysis Report. Key observations by Watson are provided below.

1. Further discussion is required to confirm the reduced capacity for vacant ground related housing units within the City's B.U.A.

- The housing supply capacity and corresponding demand forecast of 3,900 ground-related housing units within the City of Hamilton B.U.A. represents a conservative long-term estimate, representing approximately 3% of the City total forecast housing forecast between 2023 and 2051 (128,000 total units) and 6% of the City's housing forecast between 2023 to 2051 within the B.U.A. (64,000).
- It recognized that there is a finite supply for ground-related housing within the City's B.U.A., however, the Hamilton M.C.R. has previously examined a range of potential scenarios which are considerably higher than the estimates provided in the subject report. More specifically, the City's 2021 L.N.A. identifies a ground-related housing unit forecast ranging between 11,030 units (Growth Plan Minimum Scenario - 50% residential intensification target) to 13,240 units (Ambitious Density Scenario – 50% to 70% residential intensification target). This represents between 10% to 12% of total forecast housing units and approximately 20% of forecast housing growth in the B.U.A. between 2021 2051.
- The White Church Land Needs Analysis Report reduces the ground related B.U.A. housing forecast for the City by between 7,130 and 9,340 units when compared to the housing scenarios prepared under the City's 2021 L.N.A. This reduction in forecast ground-related housing potential in the City's B.U.A. has the potential of overstating the City's forecast ground-related housing shortfall by 2051.
- Figure 1, below, summarizes the percentage of forecast ground-related housing assigned to B.U.A.s in recently completed L.N.A. studies for comparable Ontario municipalities. As summarized, these comparable municipalities identify that between 14% to 54% of total forecast housing growth in the B.U.A. between 2021 and 2051 will be ground-related, which is considerably higher than what is assumed in the provided in the White Church Land Needs Analysis Report.



Figure 1
Summary of Ground-Related Housing Forecasts within B.U.A. for Comparable Ontario Municipalities

| Municipality | Built-Up Area Housing Forecast | | | Municipal-Wide Total Housing Forecast | Built-Up Area Grade-Related Housing Forecast Share of | | Built-Up Area Share of Municipal Total Housing (Intensification %) |
|------------------------|--------------------------------|----------------------|---------------|---------------------------------------|---|---------------------------------------|--|
| | Grade-Related Housing | High-Density Housing | Total Housing | | Total Built-up Area Housing Forecast | Total Municipal-Wide Housing Forecast | |
| Toronto ^[1] | 64,905 | 399,160 | 464,065 | 464,065 | 14% | 14% | 100% |
| Waterloo | 15,825 | 57,330 | 73,155 | 121,080 | 22% | 13% | 61% |
| Guelph | 3,010 | 10,150 | 13,160 | 28,375 | 23% | 11% | 46% |
| London | 12,440 | 32,300 | 44,740 | 98,370 | 28% | 13% | 45% |
| Richmond Hill | 6,900 | 21,400 | 28,300 | 37,300 | 24% | 18% | 76% |
| Pickering | 5,450 | 16,320 | 21,760 | 55,140 | 25% | 10% | 40% |
| Ottawa ^[2] | 49,400 | 42,700 | 92,100 | 194,800 | 54% | 25% | 47% |

^[1] City of Toronto forecast is estimated from the City Reference Scenario for 2051, and 2021 Statistics Canada Census housing.

^[2] City of Ottawa forecast period is 2018-2046.

Source: City of Toronto forecast from Our Plan Toronto: Land Needs Assessment, June 20, 2022. Region of Waterloo forecast from Region of Waterloo Regional Official Plan Review, by Dillon Consulting Ltd. and Watson & Associates Economists Ltd. (2022). City of Guelph forecast from Shaping Guelph: City of Guelph Official Plan Update, by Watson and Associates Economists Ltd. and Dillon Consulting Ltd. City of London forecast from Population, Housing and Employment Growth Projection Study, 2021 to 2051 by Watson & Associates Economists Ltd (2022). Richmond Hill forecast from 2021 Growth Analysis by Traffic Zone by Watson & Associates Economists Ltd. (2022). City of Pickering forecast by Watson & Associates Economists Ltd. City of Ottawa forecast from Residential Growth Management Strategy for the New Official Plan, March 2020.

- It is our opinion that the White Church Land Needs Analysis Report understates the long-term supply potential or ground-related housing through redevelopment within the City's B.U.A. The subject report does not provide further analysis to support this significant reduction in the City's M.C.R. B.U.A. forecast of ground-related housing.

2. D.G.A. housing capacity by all housing structure types should be accounted for in the L.N.A.

- On page 54 of the White Church Land Needs Analysis Report, a supply capacity of 8,200 apartment housing units has been identified in the D.G.A. None of these housing units are identified in the D.G.A. growth forecast since all forecast housing growth has been identified in the form of ground-related units. It is our



opinion that these D.G.A. lands supporting 8,200 apartment units should be utilized prior to addressing the need for additional urban expansion lands.

3. Urban expansion areas should provide a mix of housing by structure type to support planning for complete communities

- Page 54 of the White Church Land Needs Analysis Report identifies that all unmet housing needs with the City's urban areas will be in the form of ground-related housing. It is recognized that a range of potential scenarios by housing type can be applied to achieve an average minimum greenfield density of 77 residents and jobs per hectare. Recognizing provincial and local planning policy direction with respect to complete communities, it is our opinion that a mix of housing options by density type and tenure should be planned for across all existing and future urban areas within the City of Hamilton.

3.2 Impact on City-wide Intensification Objectives

Observation: The White Church Land Needs Analysis Report understates forecast demand for residential intensification by 2051 based on an assumed long-term residential intensification rate of 50%.

Analysis:

- 1. The share of housing demand associated with residential intensification in the City of Hamilton has been steadily increasing over the past decade.**
 - As summarized in Table 2 of the City of Hamilton Market and Land Supply Monitoring Report 2023, residential intensification levels have steadily increased between 2013 and 2023 in absolute and percentage terms, increasing to an average of 2,271 residential building permits annually between 2019 and 2023. During the most recent five years of available residential building permit data, 65% of total City-wide residential building permit activity (new housing units) have been issued within the B.U.A., significantly increasing from 35% during the 2013 to 2018 period.
 - Given recent historical building permit trends, the short-term and longer-term residential intensification supply potential from active development applications, and the forecasted market demand for residential intensification, we believe that



an intensification rate of 50% identified in the White Church Land Needs Analysis Report is below the current market trends in the City. It is our opinion that this assumption reflects a conservative market forecast regarding future demand for residential intensification over the long-term in light of the above observations. The White Church Land Needs Analysis Report does not provide a direct response regarding the impact of a lower residential intensification target on the City's approved Growth Strategy.

3.3 **Densification of Existing Neighbourhoods and D.G.A. Supply**

Observation:

It is not clear in the White Church Land Needs Analysis Report how A.D.U.s impact forecast demand for ground-related units. Additionally, urbanMetrics does not forecast any A.D.U.s in the D.G.A. to 2051.

Analysis:

- Section 4.4 of the White Church Land Needs Analysis Report states that urbanMetrics has used the 2023 rate of A.D.U. completions in their analysis, resulting in 14,600 additional A.D.U.s from 2021 to 2051. Section 4.5 further states that A.D.U.s that are in a physically separate building ("A.D.U. – detached") from the primary dwelling unit were assumed to meet the demand for ground-related units, while A.D.U.s within the same building as the primary dwelling unit were assumed to meet the expected demand for apartment units due to their small size.
- Figure 4-15 to 4-18 in the White Church Land Needs Analysis Report show the housing forecast by structure type and planning policy area and D.G.A. land needs. Figure 4-17 illustrates this based on the M.O.F. population projections to 2051, which forecasts 60,100 apartment units and 3,900 ground-related units in the B.U.A., and 64,000 ground-related units and 0 apartments in the D.G.A.
- It is not clear how A.D.U.s are accounted for by planning policy area in the forecast. If there are A.D.U.s forecast in the B.U.A. that can accommodate families, then these units will complete for grade-related housing options in the City and account for a portion of the demand for grade-related housing forecast



in the D.G.A. This would have an impact on lowering the D.G.A. expansion needs.

- Additionally, building on the B.U.A. housing unit mix in Section 3.1 of this report and previous work undertaken for the City of Hamilton, it is reasonable to assume that the D.G.A. will accommodate both high-density development and A.D.U.s to 2051. This may also result in a minor downward impact on urban area expansion needs.

3.4 Greenfield Residents and Jobs Density Target

Observation: The White Church Land Needs Analysis Report assumes an average density of 77 residents and jobs per hectare for the U.B.E. lands, which aligns with the Ambitious Density Scenario in the City's L.N.A. However, the report assumes a housing mix that is predominantly low-density housing units (80% single-detached and semi-detached homes) compared to the City's L.N.A., which uses a mix of 63% low density housing units and 37% medium density housing units under the same scenario. Additionally, the White Church Land Needs Analysis Report lacks a detailed explanation of how the density was determined. It is our opinion that the greenfield density is overstated in the subject report.

Analysis:

1. The White Church Land Needs Analysis Report uses inappropriate comparisons to support the claim that 77 residents and jobs per hectare can be achieved with predominately low-density housing units (single-detached and semi-detached housing units).
- The White Church Land Needs Analysis Report references seven residential Statistics Canada census tracts in the G.T.H.A. as comparables: two in the City of Mississauga, two in the City of Brampton, two in the City of Toronto, and one



in the City of Markham.^[17] Each of these examples has a density of at least 77 residents and jobs per hectare and over 80% ground-related housing (as noted in the White Church Land Needs Analysis Report). These examples are used to support the claim that 77 residents and jobs per hectare can be achieved with predominately low-density housing units (single-detached and semi-detached housing units).

- When assessing appropriate density levels using comparables, it is important to select examples that reflect a broader range of land uses, including non-developable and public realm features such as roads, parks, and non-residential areas. The examples provided in the White Church Land Needs Analysis Report represent a very small cross-section of a community, with limited non-developable features, and are more indicative of net residential densities rather than gross developable densities. This makes it inappropriate to apply these density figures on a larger scale, especially for a community of the size envisioned for the U.B.E. (with a population estimate of 26,700 residents as estimated in the White Church Land Needs Analysis Report). To ensure a more accurate and relevant assessment, the comparables should be based on a similar population and job base, as well as a comparable land area.
- In our opinion, achieving a density of 77 residents and jobs per hectare in a greenfield community that is predominantly (80%) low density housing units (single-detached and semi-detached housing units) is likely unrealistic. While this density is not uncommon in the G.T.H.A., it typically occurs in communities with a greater mix of medium-density housing forms, such as townhouses, and in some cases, higher-density forms like low-rise apartments and stacked townhouses. As such, the City's L.N.A. results, highlighted the need for more innovative housing forms to support the density of 77 residents and jobs per hectare. The City's L.N.A. under the Ambitious Density scenario is based on a

^[17] Census tracts are boundaries created by Statistics Canada for C.M.A.s and typically have a population fewer than 7,500 persons according to Statistics Canada website. Furthermore, according to Statistics Canada website, the aim of the census tracts is to be as homogeneous as possible in terms of socioeconomic characteristics, such as economic status and social living conditions, at the time they are created. As a result, they are not reflective of a broad range of socioeconomic conditions that would be observed in a community. They are not considered an appropriate geographic unit to use as a benchmark in planning for a broader community that would require consideration in planning for a range of housing options and demographic needs.



housing mix of 63% low-density units (single-detached and semi-detached) and 37% medium-density units (townhouses). The City's L.N.A. indicates that achieving this density would be challenging and would require more compact developments and a shift away from lower-density forms.^[18]

- The City's L.N.A. under the Ambitious Density Scenario suggested that low density housing units (single-detached and semi-detached), would need to achieve an average density of 35 units per net hectare. Meanwhile, medium density housing units (townhouses), would need to achieve an average density of at least 70 units per net hectare. This would result in lot sizes and built forms that are not yet typical in the City of Hamilton.^[19] The White Church Land Needs Analysis Report does not provide any details to suggest that the U.B.E. would accommodate housing options that are not currently the norm in the City of Hamilton's greenfield areas.
- 2. It is difficult to understand how urbanMetrics arrived at the figure of 77 residents and jobs per hectare, as no calculation workflow is provided to support their analysis. The White Church Land Needs Analysis Report should include details that combine the estimated units, the average units per net hectare, population and jobs estimates and the non-developable and public realm features.**
- On page 2 of the White Church Land Needs Analysis Report, it is noted that the net residential land area is 249 hectares (615 acres), while the gross developable area, excluding environmental features is approximately 347 hectares (857 acres). This results in a net-to-gross ratio of 72%, indicating that 72% of the land area is allocated for residential developable parcels, with the remaining 28% allocated for non-developable and public realm uses. This net-to-gross ratio of 72% is significantly higher than what Watson has observed across the G.T.H.A., suggesting a higher yield of housing units can be achieved in a community as there is less non-developable and public realm take-outs. Additionally, the City's

^[18] City of Hamilton Land Needs Assessment to 2051 Technical Working Paper – Summary of Results March 2021 prepared by Lorus and Associates, March 21, 2021.

^[19] City of Hamilton Land Needs Assessment to 2051 Technical Working Paper – Summary of Results March 2021 prepared by Lorus and Associates, March 21, 2021.



L.N.A. assumes a net-to-gross ratio of 50%.^[20] While it is recognized that the non-developable and public realm components may vary by community, a lower proportion may indicate that the community lacks the necessary public realm elements required for a new community (e.g., parks, trails, recreational facilities, commercial and institutional uses).

3. The job estimates in the White Church Land Needs Analysis Report lack details on how these jobs will be accommodated.

- On page 12 of the White Church Land Needs Analysis Report, it mentions that an additional 760 jobs will be supported by offsite commercial space. However, it is unclear what this entails. It could possibly refer to jobs without a fixed place of work (N.F.P.O.W.). If this is the case, it appears to be a high estimate, given that it would suggest 40% of the total employment (1,130 on-site commercial jobs + 760 offsite jobs) is N.F.P.O.W. As a result, it is possible that urbanMetrics has overestimated the number of jobs, which in turn affects the density figure.

4. The White Church Land Needs Analysis Report provides an estimate of 2,800 additional Work at Home jobs which seems to be overstated based on the population anticipated in the U.B.E.

- This estimate as noted by urbanMetrics is based on the 2021 Census data from Statistics Canada and the 2024 Work at Home rate for the Hamilton Census Metropolitan Area (C.M.A.).
- The amount of Work at Home jobs seems high, suggesting 1 Work at Home job for every 9 residents in the U.B.E.^[21] For comparison, the City of Hamilton Development Charges Background Study estimates that as of 2023, there is 1 Work at Home job for every 29 residents in the City. Therefore, the Work at Home employment estimate by urbanMetrics may be overstated and could be affecting the residents and jobs density figures.

^[20] Staff Report, GRIDS 2 and Municipal Comprehensive Review – Final Land Needs Assessment (PED17010(i)) (City Wide), March 29, 2021.

^[21] City of Hamilton Development Charges Background Study, June 2024 prepared by Watson & Associates Economists Ltd.



Overall, the White Church Land Needs Analysis Report lacks a clear explanation of how the density of 77 residents and jobs per hectare is calculated. This density seems high, given the predominantly low-density housing anticipated. It is possible that the density is based on a larger net residential land area, which could lead to a higher population yield. Additionally, the employment figures may be overstating the residents and jobs density estimates. It is our opinion that the average residents and jobs per hectare is lower than what is presented in the White Church Land Needs Analysis Report.

3.5 Phasing of Development

Observation: The White Church Land Needs Analysis Report basis its assumptions regarding the timing of population and housing growth on the 2024 M.O.F. forecast. It is our opinion that this forecast is ambitious, particularly with respect to project population growth over the next five to 10 years.

Analysis:

- The City of Hamilton population has increased from 594,100 in 2021 to 632,100 in 2024 based on Statistics Canada Post-Censal population estimates, which the 2024 M.O.F. forecast incorporates.^[22] Over this three-year period of high growth, over 4 in 5 new residents in Hamilton came from international sources (42% from permanent international migration and 42% from non-permanent residents).^[23]
- As discussed in Section 2.2. of this report, in 2024 the federal government announced reduction to the permanent and N.P.R. immigration targets, and the 2025 M.O.F. interim population projections have reduced the 2024 to 2051 provincial-wide forecast by 22%. This will have a downward impact on the amount of future population growth in Hamilton, particularly over the next five to ten years, considering that over 80% of population growth between 2021 to 2024 was attributed to international migration.
- Housing activity in the City has slowed considerably in the past year with 2,140 new housing units from building permits issued in 2024. As illustrated in Figure

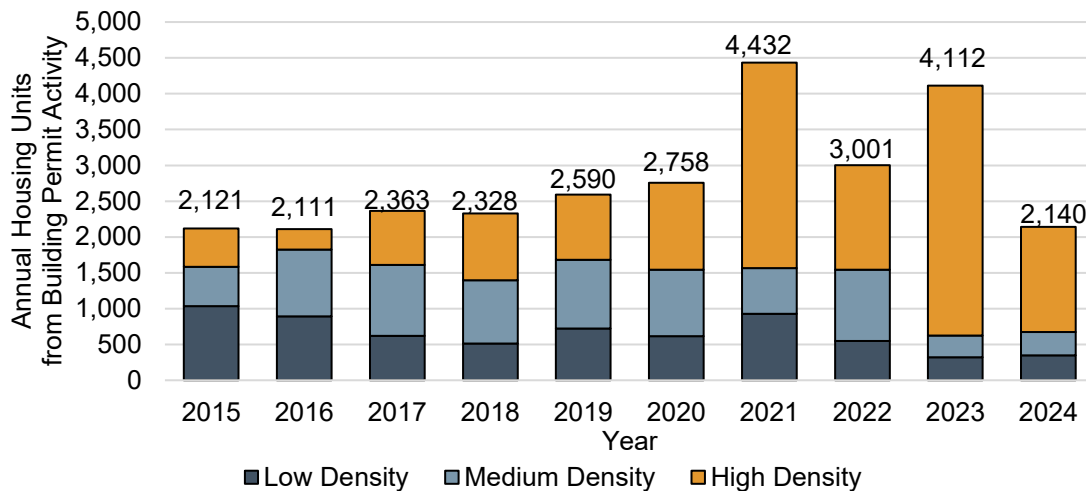
^[22] Statistics Canada Table 17-10-0155-01.

^[23] Statistics Canada Table 17-10-0153-01.



2, this is a decrease from the 2015 to 2023 historical annual average of approximately 2,870 units.^[24]

Figure 2
City of Hamilton Housing Units from Building Permit Activity, 2015 to 2024



Source: Derived from City of Hamilton building permit data, by Watson & Associates Economists Ltd.

- In light of these trends and those discussed in Section 2.2, it is anticipated that population growth will slow and that the current housing market downturn experienced in 2024 will continue over the near-term. It is important to ensure that the phasing and timing of growth established in the 2024 M.O.F. forecast is reasonable over the next 5 to 10 years and also not overstated over the longer-term. As stated in Section 2, Ontario municipalities are required to consider the M.O.F. population forecasts and modify as appropriate.
- Additionally, the timing for the phased development within the U.B.E. is unclear. More detailed information is needed to understand how the U.B.E. will be phased in alignment with the City's overall growth strategy.

^[24] Housing units based on custom order Statistics Canada building permit data.



4. Conclusions

In accordance with our review of the White Church Land Needs Analysis Report, the following conclusions are provided by Watson.

The White Church Land Needs Analysis Report does not provide direct responses to the key topic areas set out in the Dillon Technical Memo and the U.B.E. framework which addresses the City of Hamilton growth allocation criteria and housing submission requirements. In the absence of a direct response to these key topic areas it is difficult to determine exactly how the subject report has addressed the impact of the proposed U.B.E. application on the City's growth management objectives under the No Urban Boundary Expansion Scenario.

Watson has reviewed the subject report within the framework of the key topic areas set out in the Dillon Technical Memo, and has concluded the following:

Need for the Expansion

The White Church Land Needs Analysis Report significantly overstates the City's urban land needs by 2051. The assumed housing supply capacity for ground related housing within the B.U.A. appears conservative and does consider potential longer-term redevelopment opportunities. Existing vacant lands identified for high-density development within the D.G.A. are not utilized by 2051 or beyond.

Impact on City-wide Intensification Objectives

The White Church Land Needs Analysis Report understates forecast demand for residential intensification by 2051 based on an assumed long-term residential intensification rate of 50%.

Densification of Existing Neighbourhoods and D.G.A. Supply

It is not clear in the White Church Land Needs Analysis Report how A.D.U.s impact forecast demand for ground-related units. Additionally, urbanMetrics does not forecast any A.D.U.s in the D.G.A. to 2051.



Greenfield Residents and Jobs Density Target

The White Church Land Needs Analysis Report assumes an average density of 77 residents and jobs per hectare for the U.B.E. lands, which aligns with the Ambitious Density Scenario in the City's L.N.A. However, the report assumes a housing mix that is predominantly low-density housing units (80% single-detached and semi-detached homes) compared to the City's L.N.A., which uses a mix of 63% low density housing units and 37% medium density housing units under the same scenario. Additionally, the White Church Land Needs Analysis Report lacks a detailed explanation of how the density was determined. It is our opinion that the greenfield density is overstated in the subject report.

Phasing Development

The White Church Land Needs Analysis Report basis its assumptions regarding the timing of population and housing growth on the 2024 M.O.F. forecast. It is our opinion that this forecast is ambitious, particularly with respect to project population growth over the next five to 10 years.

Additionally, the timing for the phased development within the U.B.E is unclear. More detailed information is needed to understand how the U.B.E. will be phased in alignment with the City's overall growth strategy.