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File: P-3232

February 1, 2021

Haldimand County
53 Thorburn Street South
Cayuga, Ontario
N0A 1E0

**Attention: Ms. Shannon VanDalen, MCIP, RPP
Manager – Planning and Development**

**Re: Haldimand County Municipal Comprehensive Review
Hagersville Holdings Ltd. (c/o DG Group)
Part Lot 16-18, Concession 12 Walpole 1, 4 & Part Lot 17 & 18 Concession 12
Walpole Parts 2 and 3**

Dear Ms. VanDalen,

KLM Planning Partners Inc. acts on behalf of Hagersville Holdings Ltd. (c/o DG Group) whom are the owners of the above noted parcels of land, and which can be found on the attached and identified as parcel's A and B.

On behalf of Hagersville Holdings Ltd., Ms. Alexa-Rae Valente provided a submission dated November 20, 2020 and related to the Municipal Comprehensive review process and specifically requested both of their parcels be included in the Urban Boundary for the community of Hagersville. This request was subsequently denied by way of an email from Mr. Matt Reiners dated December 14, 2020. We acknowledge that Ms. Valente in her submission suggested that "Property A" be included for employment purposes however, in this submission we are focusing solely on "Property B" for residential purposes.

Hagersville Holdings has retained Mr. Daryl Keleher of Altus Group to review the land needs analysis prepared by Matt Reniers and Associates which builds upon the report prepared by Watson & Associates. Mr. Keleher raises a number of questions, a copy of which is attached and which are summarized as follows:

1. Table 11 of the Phase 1 report reviews net new residential units added over the 2015-2019 period in both the built boundary and designated greenfield area but there does not appear to be any estimates of how many demolitions will occur in the County each year for the 2021-

- 2051 period that would need to be added onto the estimated housing demand to ensure that the growth in housing demand is net of demolitions;
2. The Phase 1 report does not appear to factor vacant dwelling units into the analysis of housing demand (likely in the range of 1-2%) to account for a typical proportion of dwelling units that will be vacant at any given time;
 3. Figure 5-2A of the Watson report shows there were 164 hectares of land within the Hagersville designated greenfield area, of which 71 hectares were “environmental features” for an adjusted land area of 93 hectares. Of the 93 hectares, 48 were vacant and 45 were occupied or in the development process. The 2020 Growth Strategy Report shows a net vacant land area of 131 net residential hectares in Hagersville, plus another 10 hectare of Community Employment for a Net Total of Community lands of 141 hectares. Why is there a discrepancy between the two reports?
 4. It would appear the net residential and community employment supply of 141 hectares may be inadequate for residential purposes;
 5. How did 1,960 units forecast in Hagersville between 2016-2051 in Table 40 get converted to 1,690 units of growth in Hagersville between 2021-2051? Have 270 units been built since 2016?
 6. The Phase 1 report estimates the total overall housing mix in the County by 2051 will include 22,990 low-density unit, 4,030 medium-density units (or 27,020 low-density and medium-density units) and 3,220 high-density units. The Hemson Technical Report, prepared to inform the 2019 Growth Plan forecasts in Schedule 3 identify 30,000 ground related units and 3,000 apartment units. The Growth Strategy Report appears to underestimate the ground related housing by 3,000 units and over estimated the high-density demand by 200 units;
 7. The Growth Strategy Report does not provide any estimates of demand for non-permanent accommodation of seasonal dwelling;
 8. The Phase 1 Report relies on uniform assumptions of unit mix for each community, which may not be reflective of likely housing demand; and,
 9. The Phase 1 Report also relies on uniform assumptions for intensification within each community.

Building upon the work contained in the memo from Mr. Keleher and the submission made by Ms. Valente, we believe the property owned by Hagersville Holdings, identified as “Property B” is well suited for residential purposes. It behooves us to understand why there are lands which are clearly not developable for residential purposes remain included in the Official Plan for residential purposes.

Case in point are the lands on the south side of Concession 13 Walpole, which appears to be a lake created as a result of previous aggregate extraction activities. We would like to understand the rationale for maintaining a residential designation on this parcel. Furthermore, lands which are clearly sterilized for an indeterminate time period due to the existing aggregate extraction activities occurring north of King Street West and east of the CNR rail line. A large majority of these lands will

not be able to develop until the aggregate operations have ceased. With these lands not being developable, it will be very difficult for Hagersville to meet or exceed their population projections moving forward.

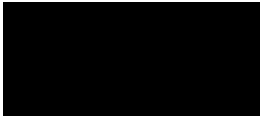
Given that Hagersville Holdings Parcel "B" is directly abutting the high school lands, has direct frontage onto King Street West where municipal services are readily available and there are no constraints obstructing this parcel from developing in the short term, we respectfully request this parcel be included in the Settlement Boundary in order to allow Hagersville to grow and meet the objectives of both the Growth Plan and the Provincial Policy Statement.

In conclusion, Mr. Keleher has outlined a number of concerns related to the analysis undertaken to determine the appropriate levels of growth with Hagersville. Similarly, and in addition to the submission made by Ms. Valente, we believe Hagersville Holdings Parcel "B" represents a logical extension of the settlement boundary which will allow these lands to be developed in the short term while those lands which are already designated but are constrained remain designated but unable to developed well into the future. In designating Parcel "B", Hagersville can continue to grow in a responsible manner while ensuring existing infrastructure is used efficiently. As such, we respectfully request Parcel "B" be included in the Hagersville Settlement boundary for residential development.

Should you have any questions, please do not hesitate to contact the undersigned.

Yours truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon, MCIP, RPP
Partner

Copy: Alexa-Rae Valente - DG Group
Darren Steedman – DG Group
Daryl Keleher – Altus Group



Subject Lands owned by Hagersville Holdings Ltd.



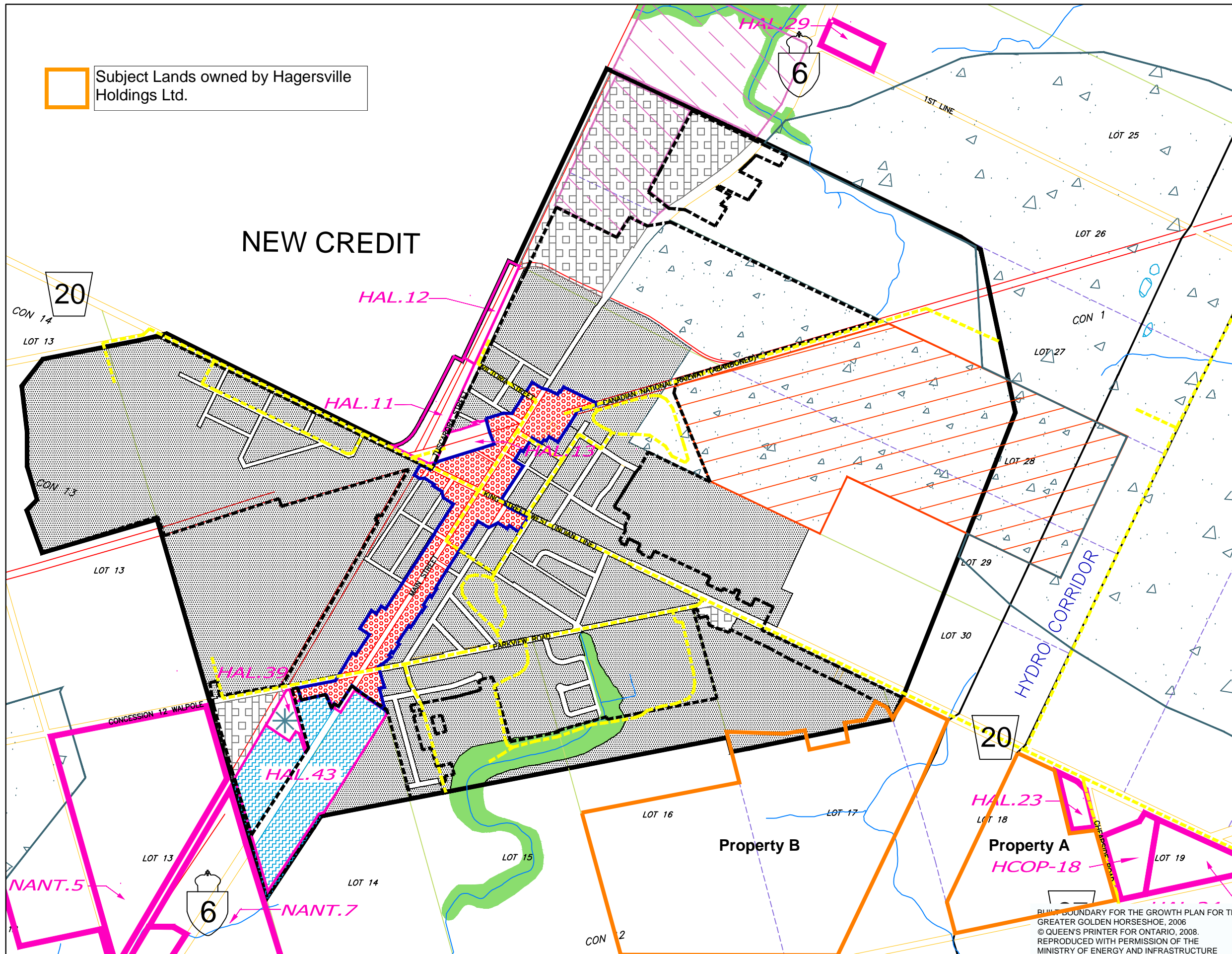
OFFICIAL PLAN SCHEDULE "B.4"

HAGERSVILLE URBAN AREA LAND USE PLAN

- LEGEND**
- CORE NATURAL ENVIRONMENT AREAS**
- PROvincially SIGNIFICANT WETLANDS
 - RIVERINE HAZARD LANDS
- NATURAL ENVIRONMENT AREAS**
- FLOODWAY
 - OTHER HAZARD LANDS
 - FLOODWAY/ FLOOD FRINGE LIMITS
 - NATURAL ENVIRONMENT/WETLAND AREAS
- AGRICULTURE**
- MINERAL AGGREGATE RESOURCE AREAS
 - LICENSED AGGREGATE AREA
 - GYPSUM DEPOSITS
 - ABANDONED MINES
 - RESIDENTIAL
 - COMMUNITY COMMERCIAL
 - LARGE FORMAT RETAIL
 - MAJOR INDUSTRIAL
 - INDUSTRIAL
 - URBAN BUSINESS PARK
 - RURAL INDUSTRIAL
 - INDUSTRIAL INFLUENCE AREA
 - SEWAGE TREATMENT FACILITY
 - ACTIVE WASTE DISPOSAL SITES
 - APPROXIMATE LOCATION OF FORMER LANDFILL SITES
 - SITE SPECIFIC POLICY AREAS
 - URBAN BOUNDARY
 - SECONDARY PLAN AREA
 - HAMLET BOUNDARY
 - LANDS PROPOSED TO JOIN THE RESERVE
 - PROVINCIAL HIGHWAY
 - HALDIMAND ROAD
 - WATER COURSE
 - INTENSIFICATION AREA
 - INTENSIFICATION CORRIDOR
 - BUILT BOUNDARY
 - IDENTIFIED TRAIL LOCATIONS

1 IN = 350 METRES

OFFICE CONSOLIDATION JAN 2014



PREPARED BY: HALDIMAND COUNTY PLANNING & ECONOMIC DEVELOPMENT DEPT., GRAPHICS SECTION

BUILT BOUNDARY FOR THE GROWTH PLAN FOR THE
GREATER GOLDEN HORSESHOE, 2006
© QUEEN'S PRINTER FOR ONTARIO, 2008.
REPRODUCED WITH PERMISSION OF THE
MINISTRY OF ENERGY AND INFRASTRUCTURE

DECISION DATE: JUNE 8, 2009

January 26, 2021

Memorandum to: Keith MacKinnon,
KLM Planning

From: Daryl Keleher, Senior Director
Altus Group Economic Consulting

Subject: Preliminary Residential Land Needs Analysis - Hagersville
Our File: P-6568

Altus Group Economic Consulting was retained by DG Group to review issues relating to residential land needs within Haldimand County and the Hagersville community in particular. The key report reviewed is the Growth Strategy Phase 1 Report ("Phase 1 Report") prepared for the County by Matt Reniers and Associates. The Phase 1 Report builds on a June 2019 report by Watson & Associates, Population, Housing and Employment Forecast Update and Land Needs Assessment ("Watson Report").

Conformity with Provincial Land Needs Assessment Methodology

- The Phase 1 Report acknowledges the presence of the Province's Land Needs Assessment Methodology document ("LNA Methodology") by stating that:

An overriding principle in the Province's Land Needs Assessment Methodology document is to ensure that municipalities, in their official plans, make sufficient land available for all housing market segments ... and plan for the infrastructure required to meet the forecasted population and employment set out in the Growth Plan, 2020. The objective is to avoid shortages in land supply that can drive up the cost of land for housing and employment uses.

In Schedule 3 of the Growth Plan, the distribution of population and jobs to upper- and single-tier municipalities to the year 2051 includes allocations of 75,000 persons and 29,000 jobs for the County. Policy 5.2.4.2 of the Growth Plan states that the Schedule 3 forecasts are minimums, with municipalities enabled (through a MCR) to apply higher forecasts than those set out in Schedule 3.

- On page 18 of the Phase 1 Report, the requirements from the LNA Methodology are set out, and the following necessary steps are noted:
 - Population forecasts by age groups;
 - Calculation of housing needs by dwelling type, and consideration of factors such as demolitions and vacancies;
 - Determination of housing supply potential by policy area, including determination of potential supply in each of the six urban areas;
 - Determination of jobs that should be allocated to the community areas;

- Determination of settlement area boundary expansions required to accommodate forecasted population growth.
- Despite acknowledging the required steps in the assessment of land needs, there appear to be several steps missing from the model presented in the Phase 1 Report.
 - While Table 11 of the Phase 1 Report looks at net new residential units added over the 2015-2019 period in both the built boundary area and designated greenfield area, there does not appear to be any estimates of how many demolitions will occur in the County each year for the 2021-2051 period that would need to be added onto the estimated housing demand to ensure that the estimated growth in housing demand is net of demolitions;
 - The Phase 1 Report also does not appear to factor vacant dwelling units into the analysis of housing demand – instead, the estimated housing demand should be inflated by a small percentage (likely in the range of 1-2%) to account a typical proportion of dwelling units that will be vacant at any given time;

Questions re: Land Supply within Hagersville

- Figure 5-2A of the Watson Report shows that there were 164 hectares of land within the Hagersville designated greenfield area, of which 71 hectares were “environmental features” for an adjusted land area of 93 hectares. Of these 93 hectares, 48 were vacant, and 45 hectares were occupied or in the development process. The 2020 Growth Strategy Report (“2020 GSR”) shows a “net vacant land” area of 131 net residential hectares in Hagersville, plus another 10 hectares of “Community Employment” for a “Net Total of Community Lands” of 141 hectares. We would like to understand the reason for the apparent discrepancy between the Phase 1 Report (141 net vacant hectares) and the Watson Report (48 vacant hectares, or 93 hectares including sites in the development process);
- We would like to be able to visualize the supply of lands included in the net residential and community employment supply of lands of 141 net hectares. It is our understanding that a significant share of lands within the Hagersville settlement area boundary may be inadequate for residential purposes due to the current use or other environmental constraints that may make certain sites undevelopable.
- How did the 1,960 units forecast in Hagersville between 2016-2051 in Table 40 get converted to 1,690 units of growth in Hagersville between 2021-2051 in Table 41? Have there been 270 units built since 2016? What proportion of those units are projected to occur in 2020/2021 when actual data may not be available?

Questions re: Estimated Housing Demand

- The Phase 1 Report estimates that the total overall unit mix in the County by 2051 will include 22,990 low-density units, 4,030 medium-density units (or 27,020 low-density and medium-density units, which combined are known as ground-related units), and 3,220 high-density units. However, the Hemson Technical Report which was used to estimate demand and inform the 2019 Growth Plan forecasts in Schedule 3, show that the housing mix in the County to 2051 would be 30,000 ground-related units and 3,000 apartment units. The GSR therefore appears to understate ground-related housing demand by approximately 3,000 units and overstates high-density/apartment demand by roughly 200 units.

When expressed as household growth over the 2016-2051 period, the GSR forecasts housing growth of 12,720 units to meet 2051 forecasts, while the Hemson Technical Report indicates that 15,480 units are required, or 22% more than what is in the GSR. We do not understand why there is such a significant difference between the estimates of housing demand by Hemson and what is shown in the Phase 1 Report;

- The GSR does not provide any estimates of demand for non-permanent accommodation or seasonal dwellings – according to the 2016 Census, roughly 10% of dwellings in the County are used by non-permanent occupants (there are 17,502 private occupied dwellings and 19,472 private dwellings in the County). This ratio is roughly in line with other communities with large seasonal dwelling components, such as Simcoe County (11%).

While most new seasonal dwellings are most likely to be in unserved rural areas, it may have implications for the allocation of new dwelling units and population estimates for the County's Rural areas, which are currently forecast in the GSR to add 870 dwelling units so as to maintain the current populations in the Rural areas. If a significant share of the new rural units are meeting the demand for seasonal dwellings in the County, some amount of the 870 rural units would not contribute towards the County meeting its population forecasts, and an equal offsetting amount of units would need to be added to the demand for permanent accommodation in the County's urban centres (Hagersville and Caledonia) and hamlets (Dunnville, Cayuga, Jarvis, Townsend).

- The Phase 1 Report relies on uniform assumptions of unit mix for each community that may not be reflective of likely housing demand in each community:
 - The forecast of new housing units by unit type for the DGA in each community appears to be split 67% low-density, 30% medium-density and 3% high-density.
 - Similarly, the forecast of new units by type in the Built Boundary area appears to be roughly 17% low-density, 13% medium-density and 70% high-density in each community.

However, it is more likely that the demand for dwelling units in the Caledonia settlement area (both in the built-up area and DGA) would be more oriented towards a higher proportion of medium- and high-density units than the otherwise less urban settlements of the County, with the other communities in the County more likely to see higher proportions of demand for low-density units;

- Similarly, the Phase 1 Report uses a uniform assumption for intensification within each community - the proportion of forecasted dwelling units in the built boundary as a % of all units forecast for each urban area is roughly 21.5%.

However, it is more likely that the demand for units within the built boundary (medium- and high-density units) would be more concentrated in Caledonia than other areas of the County. This is most likely due to the proximity of Caledonia to the GTAH relative to the other areas of the County.

The Phase 1 Report notes that the County has existing OP policies that "direct and encourage higher density intensification" on two intensification corridors, one of which is along Argyle Street in Caledonia, the other along Main Street in Dunnville.

The Watson Report also notes that growth pressure is anticipated to most heavily felt in Caledonia, with reference to that opinion on page 31 of the Phase 1 Report.