

File: P-3232

June 21, 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,

Further to our submission dated February 16, 2021, Hagersville Holdings Inc. economic consultant, Altus Group, have reviewed the update growth analysis prepared by Matt Reiners and Associates and dated June 2021 and offer the following concerns that remain outstanding from our previous submissions:

- The 2051 housing forecast for Haldimand County (page 44) are exactly the same in this report as in the December 2020 report. On page 149, the Watson housing forecast (unlike the Hemson forecast) was prepared specifically for Haldimand County and Council accepted the Watson forecast and directed that it be used for planning purposes. No technical explanation is provided as to why Watson's housing forecast is significantly lower than the Hemson housing forecast.
- The allocation of the 2051 housing forecast to the various urban areas on page 44 is exactly the same in this report as in the December 2020 report.
- The table on page 49 shows a small change in the number and allocation of net new units for the 2021 to 2051 period.

	December 2020	June 2021
Built Up Area	2,260	2,231

Designated Greenfield Area	8,300	8,354
Rural Area	740	572
Total	11,300	11,157

- The table on page 53 shows a slightly smaller supply of land available for residential development in Hagersville (8 ha) and Jarvis (2 ha).
- The assumptions used to translate the vacant DGA lands into population potential on pages 54 to 56 remain unchanged from the December 2020 report. No consideration was made for the impact of Census undercount.
- There is a new discussion about the impact of land claim protests on the developability of lands in Caledonia (pages 53 and 54), no allowance appears to have been made to ensure ongoing maintenance of an adequate housing supply in the face of this uncertainty. The potential population on the vacant land in Caledonia remains exactly the same (9,820 residents, page 56) and the allocation of population to Caledonia is unchanged (20,100 residents).
- There are a few minor changes to the numbers for Hagersville. Total household growth over the 2021 to 2051 period was increased from 1,690 units to 1,794 units (page 137). Household growth allocated to the designated greenfield area was increased from 1,330 units to 1,416 units, which increased land need from 105 ha to 111 ha (page 138). The vacant land supply is down from 143 ha to 133 ha, but the net result is still a surplus – albeit a smaller surplus of 22 ha down from 37 ha in the December 2020 report.
- The report now acknowledges the existence of the quarry, but treats the planning implications in a way that is not consistent with the Provincial and County planning policies (quoted in the Altus report, pages 10 to 11). The Growth Strategy report is focused on distance from the “blasting limit” of the Lafarge Quarry (page 144) and areas where there is a current license for quarry operations (pages 144 and 147). The relevant Provincial and Municipal planning policies regarding the protection of aggregate resources and land use compatibility are not limited to areas with active licenses. Any development that could hinder future aggregate operations is only to be permitted under certain prescribed conditions. The Growth Strategy Report does not address these conditions.
- Even so, there is a recognition that 653 housing units that could potentially be located on vacant residential lands within 300 m of the blasting area of the quarry would be “frozen or encumbered for an indefinite period of time” (page 144).
- The only significant change in the recommendations for Hagersville is the recommendation that an additional area, Area 5 with 10 to 12 ha of developable land, be added to the western

end of settlement area boundary. The total area to be added is significantly larger because it includes a quarry pond (page 147). These lands are currently zoned Extractive Industrial.

- According to Empire, the combined parcels on the west end of Hagersville could accommodate 1,250 to 1,450 units. The discussion on the bottom of page 147 acknowledges the active railway and the sewage treatment plant may affect yield, but there is no real consideration of the potential implications of the land use compatibility policies of the PPS and County OP for the developability of the existing DGA or the proposed settlement area expansion. Instead, the Growth Strategy Report indicates that the development of these lands would compensate for the lands held out of development by the blasting activities at the Lafarge Quarry.

In conclusion we are disappointed the submissions made on behalf of Hagersville Holdings have seemingly been ignored in this latest version of the Growth Analysis report based on the following:

- A second look at the housing forecast, which is significantly lower than forecast used in establishing 2051 population forecast for Haldimand County in the Growth Plan, was not undertaken;
- The report continues to ignore Provincial and County planning policies regarding the protection of aggregate resources and existing and future aggregate operations;
- The report does not fully consider the potential implications of Provincial and County planning policies related to the development of sensitive uses near major facilities such as railways, industrial operations and sewage treatment plants; and,
- The report ignored implications of these matters for Provincial planning policies that require municipalities to maintain at all times a sufficient supply of housing to meet the needs of current and future residents.

As noted in our earlier submissions, we continue to be of the opinion that expanding the Hagersville settlement area to the south on the Hagersville Holdings lands would address these issues and provide for a reliable supply of housing for residents of Haldimand County. Based on the above, we object to the conclusions presented in this document and request that Haldimand County reconsider the recommendations being put forth for adoption.



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

Yours truly,

KLM PLANNING PARTNERS INC.



Keith MacKinnon, MCIP, RPP
Partner

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