

August 9, 2021



Mayor and Members of Council
C/O Mr. James Hutson, Municipal Clerk
Municipality of Middlesex Centre
10227 Ilderton Road
Ilderton, Ontario
N0M 2A0

File No.: 19-1900

**Reference: Official Plan Update and Municipal Comprehensive Review
Letter of Concern - OPR Policy Directions and Recommendations Report (WSP)
Cirrus Developments
10915 Longwoods Road, Delaware**

Monteith Brown Planning Consultants ("MBPC"), on behalf of our client, Cirrus Developments ("Cirrus"), is authoring this letter to express significant concern to Council regarding the findings and recommendations of the recently released *Middlesex Centre Official Plan Review Policy Directions and Recommendations Report* (Final Version). This letter is a follow-up to our previous written submissions and meetings with municipal staff regarding the Municipal Comprehensive Review (MCR) and Official Plan Update process and associated Reports prepared by WSP.

On behalf of our client, MBPC has been following the progression of the MCR process and have had a chance to review the latest population and growth forecasting provided in the Middlesex Centre Official Plan Review Policy Directions and Recommendations Report by WSP. As a result of our review, we have identified a number of concerns with the recommendations thus far, which include:

- The lack of emphasis for positive population growth in Delaware to support a growing and competitive labour force, to provide revenue sources to pay for existing and new municipal services and infrastructure, and to provide opportunity for a more affordable housing market from greater opportunity and supply of housing on developable lands.
- The recommendation for the future inclusion of Delaware as a fully serviced settlement area is appreciated given that Delaware has been specifically overlooked for growth in the last two Comprehensive Reviews. This recommendation; however, seemingly fails to consider the available capacity of designated growth lands within the community to support the cost of new infrastructure based on Delaware's proposed allocation of growth by the Consultants. In short, there are no designated development parcels large enough in Delaware to warrant the necessary investment in infrastructure and still provide a return on that investment.
- There is a clear lack of information with respect to how population projections and allocations have been calculated and analyzed, and what factors were considered and examined, including the recent impacts of the housing crisis in Ontario, drastically rising housing costs, and the impacts that the Covid-19 Pandemic has had on housing demands in Ontario, in particular in Middlesex County ;

- The imbalance of population growth distribution being forecasted between Komoka-Kilworth (anticipated to take almost half of the projected growth) and the remaining Settlement Areas in Middlesex Centre;
- The disparity between the anticipated growth of Mount Brydges in Strathroy-Caradoc, in comparison to Delaware.
- A failure to recognize the geographic positioning of Delaware proximate to an interchange with Highway 402 and proximity to Highway 401 (NAFTA Superhighway).

MBPC calls into question the results and direction of the WSP reporting; most notably, the allocation of the population forecasted for Middlesex Centre by 2046. We recognize that the recommendation is to allocate only 3.7% (2,100) of the 35,500 population forecasted for Middlesex Centre in 2046 to Delaware, which is only about 510 more people than were identified in Delaware **in 2007**. There is a concern associated with how the allocation of the population has been broken down into the four community settlement areas and remaining rural area. Neither the Policy Directions and Recommendations Report, nor the Growth Management Discussion Paper provide calculations and analysis to support these allocations, how they were determined, what factors were analyzed in the projections and allocations, and whether or not an appropriate allocation of growth resulting from the housing crisis in the province and the net immigration resulting from the exodus of the population from the Greater Toronto Area was provided. We believe this proposed allocation also does not effectively plan for the growth and success of Delaware as a vibrant community in Middlesex Centre.

The Policy Directions and Recommendations Report states that, “to build strong, sustainable and resilient communities in Middlesex Centre, a **balanced** approach to growth and development must be achieved...” (emphasis added). However, the Report allocates almost 45% of the population forecasted to Komoka-Kilworth. MBPC questions not only how this would represent balanced growth, but on what basis is Komoka-Kilworth forecasted to almost double its growth versus the existing four other established communities that contribute to the character and community of Middlesex Centre.

The Policy Directions and Recommendations Report also recommends that the Municipality’s servicing hierarchy be updated to reflect the future inclusion of Delaware as a fully serviced (water and wastewater) settlement area. **However**, at a forecasted rate of 510 persons from 2007 to 2046 – or 13 persons per year average – only approximately 5 homes would be built annually. Cirrus Developments owns lands that provide the scale to justify infrastructure costs for a new sanitary sewer system, **and are ready and willing to participate in funding public infrastructure to unlock Delaware**, and it is the goal of the Official Plan and Council to fully service Delaware, it has to make available capacity for growth to support the cost of new infrastructure. As it stands, there is no business case to support the cost of new infrastructure at such a marginal growth rate.

Delaware is located immediately adjacent to the Strathroy-Caradoc Municipal Boundary, and in proximity to Mount Brydges which forms part of Strathroy-Caradoc. From the Comprehensive Demographic Review and Growth Projections undertaken by Watson & Associated Economists (Watson) for Middlesex County in the Fall of 2020, Strathroy-Caradoc Council had endorsed the **high scenario** as the projection to be used in the Municipality’s Official Plan, which forecasts a population of 35,360 by 2046 (including census undercount). Should the Municipality anticipate a 70% and 30% allocation to Strathroy and Mount Brydges, respectively, as has been the historical split for the municipality with respect to growth and development, than that would provide Mount Brydges with an approximate population allocation of 10,600 – **five times** greater than that of Delaware. With the Middlesex County population boom and growing housing demand,

and the geopolitical location to Delaware, Strathroy-Caradoc shall have no issue taking development opportunity away from Delaware and distributing it to Strathroy and Mt. Brydges. What makes Mt. Brydges more important to the County than Delaware?

The geographical location of Delaware positions itself to be an excellent location for growth. Delaware is located adjacent to Highway 402, which ties into Highway 401, allowing for greater employment accessibility and community connectivity.

As noted in the Growth Management Discussion Paper by Watson & Associates, positive population growth is an essential component of a growing and competitive labour force and business community, as well as providing revenue sources to pay for existing and new municipal services and infrastructure. From a Housing Affordability perspective, constraining Delaware from growth based on the allocation recommendation in the Policy Directions and Recommendations Report will create a significant challenge to local residents and potential future residents, where limiting growth will further expedite rising housing prices and land costs that will appreciate at a faster rate relative to household income. There has never been a better time than now to provide land supply for housing in Delaware. This is further supported in an article by *The Globe and Mail* which stated that, "*The new leader of Canada's national housing agency says the best way to combat soaring home prices is to build more housing*".¹

The Policy Directions and Recommendations Report also states that, "*By 2046, 16% of housing growth in Middlesex Centre will be high-density housing (i.e., apartments) and 20% will be medium density housing (i.e., townhouses and units in a duplex).*" The Report further states that the medium and high-density development within the context of Middlesex Centre would, "*typically refer to townhouse units, triplexes, fourplexes, stacked townhouse units, and **mid-rise** apartment buildings*". The Report does not provide a definition for "mid-rise" apartment buildings; there is also no reference to low-rise apartments.

MBPC would like to again emphasize that Delaware has been overlooked in the last 2 Official Plan Reviews, with minimal potential to build homes due to lack of servicing infrastructure. During the last Official Plan Update (OPA 28) the future expansion of the Delaware settlement area boundary was contemplated through a subsequent Official Plan Amendment. The staff report in support of the amendment recommended to "*expand Delaware settlement area boundary and provide sanitary services with treatment at Komoka WWTF when justified based on land needs by a future OPA.*" As is evidenced by the rapid increase in development and demand for housing in communities all around southwestern Ontario there is a need for additional serviced land in settlement areas. Cirrus' development lands provide opportunity to alleviate some of the rapid demand for developable lands. However, notwithstanding this previous recommendation it does not appear that this has been taken into account with the projected population allocation in the Policy Directions and Recommendations Report.

On behalf of our client, **we respectfully request that the Municipality and its Consultants reconsider the results and recommendations brought forward by WSP in the Policy Directions and Recommendations Report to include a higher proportion of growth to Delaware and consider the inclusion of our client's lands within the settlement area boundary to accommodate residential growth.** Our client remains committed to work with Council, staff and the local development community in advancing municipal servicing infrastructure to the community to "unlock Delaware" for growth.

¹ See <https://www.theglobeandmail.com/business/article-new-canada-mortgage-and-housing-corp-ceo-worried-by-escalating-house/>

Thank you for your consideration of this letter, and we look forward to working with Council, staff and the project Consultants in increasing development opportunities in Delaware.

We request that we continue to be notified of all meetings, consultations, reports, and decisions relating to the Municipal Comprehensive Review and Official Plan Update.

Respectfully submitted,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, MCIP, RPP
Vice-President and Principal Planner

JMc:pm

cc: Michael DiLullo, Chief Administrative Officer
Marion-Frances Cabral, Planner, Middlesex County
Cirrus Developments Ltd.
Dillon Consulting Ltd.