

July 6, 2022

Our File: #17-1401

Middlesex County
Administration Offices
399 Ridout Street North
London, Ontario
N6A 2P1

Attention: Marcia Ivanic, Middlesex County Clerk

**Reference: Township of Lucan Biddulph Official Plan Amendment #10
& Official Plan Update
Request for the Proposed Inclusion of Part Lot 29, Concession 5
In the Lucan Settlement Area Boundary**

Monteith Brown Planning Consultants (MBPC), on behalf of our client, Landea Developments Inc. (a subsidiary of Southside Group), would like to register **our objection** to the Township of Lucan Biddulph's recommendation to approve the revised land use schedules of Official Plan Amendment #10 ('OPA #10'), as it fails to recognize our client's request for the inclusion of their lands (known legally as Part of Lot 29, Concession 5 in Lucan) into the Settlement Area of Lucan.

Request for Inclusion in the Lucan Settlement Area Boundary

The westerly portion of our client's lands (approximately 2.91 Ha) is currently situated within the Lucan Settlement Area and is actively being considered for residential development through Draft Plan of Subdivision Application 39T-LB210 and Zoning By-law Amendment Application ZBA-11-2021. Throughout the Official Plan Review process our client has made numerous requests and submissions to Council to have their lands included wholly within the settlement area boundary of Lucan. Attached for your reference are copies of the correspondence submitted to the Township on behalf of our client on November 29, 2021, December 27, 2021, January 28, 2022, February 18, 2022, and April 14, 2022 highlighting the planning merits and servicing rationale for the inclusion of their lands within the Lucan Settlement Area.

The proposed expansion of Lucan to the east to include our client's lands is consistent with the Provincial Policy Statement and conforms to the general intent and purpose of the County of Middlesex Official Plan and the Township of Lucan Biddulph Official Plan with regard to directing growth to fully-serviced urban areas. The lands on the east side of Lucan (including our client's property) represent a logical extension and "rounding out" of the proposed settlement area boundary, contiguous to existing and proposed development. This area is within a 10-minute walking distance of a wide variety of recreational, commercial, educational, and institutional buildings and spaces within Lucan, including the central commercial area and Wilberforce Elementary School. Further, our client's engineer has confirmed that Landea's property can be efficiently serviced with sanitary, water and stormwater infrastructure. In contrast, the severely undersized portion of our client's lands remaining outside the settlement area boundary will serve no material value to the agricultural resource. The recent release of the 2021 Census of Population results confirmed that the Township's

population grew by an average of 4.17% each year between 2016 and 2021, eclipsing the current Official Plan's population projections and making Lucan Biddulph **one of the 25 fastest-growing municipalities in Canada**. Additional serviceable land should be brought into the Settlement Area to accommodate future residential growth, as required by the Provincial Policy Statement.

We also note that the proposed expansion of the settlement boundary to the east is consistent with the general direction originally recommended by Findlater & Associates in their Municipal Comprehensive Review ("MCR") Report dated April 2021 and the first version of the proposed OPA #10 presented at a Public Meeting on November 30, 2021. Through the MCR Report, Findlater & Associates and B.M. Ross identified that the lands to the west of Lucan were subject to planning constraints, and there was *"a good opportunity for expansion to the north east of the Village"* on the lands highlighted in green on Figure 5.6 of the MCR report, which includes our client's lands (see attached Figure 1). The proposed OPA added 6 Ha (15 acres) of our client's lands into the settlement area boundary. As we have highlighted in previous submissions, incorporating the remaining 14.62 Ha (36.1 acres) of our client's lands into the settlement area boundary will allow for the efficient and contiguous future development of the property in order to meet present and future demands for housing in the rapidly growing community, and **avoid** development in constrained areas.

On behalf of our client, we **respectfully request that Middlesex County reconsider the proposed settlement boundary expansion and include our client's lands into the Settlement Area of Lucan.**

Notification Regarding the Passage of OPA #10

Through this letter, MBPC is also requesting to be notified of any reports, meetings, and/or decisions in relation to OPA #10, as adopted by Township Council on June 7, 2022. We would like to request that digital copies of any such notices be emailed to the following addresses:

- Jay McGuffin, Vice-President & Principal Planner, MBPC: jmcguffin@mbpc.ca
- Hannah Surgenor, Planner, MBPC: hsurgenor@mbpc.ca
- Michael Frijia, Development Manager, Southside Group: michael@southsidegroup.ca
- Analee Baroudi, Lawyer, Baroudi Law Professional Corporation: analee@baroudilaw.ca

If physical copies of the Notice of Passing are mailed out, we would also request that the notices be sent to the following addresses:

Monteith Brown Planning Consultants
610 Princess Avenue
London ON
N6B 2B9

Southside Group
75 Blackfriars Street
London ON
N6H 1K8

Baroudi Law Professional Corporation
150 Dufferin Avenue, Suite 702
London ON
N6A 5N6

Conclusion

We respectfully request that the County reconsider the proposed settlement boundary expansion to the west in favour of expanding the settlement boundary on the east side of Lucan to include our client's lands, and that the County notify us of all updates regarding OPA #10. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me.

Yours very truly,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, MCIP, RPP
Vice-President, Principal Planner
jmcguffin@mbpc.ca

JMc:hs

copies: Michael Frijia, Development Manager, Southside Group
Jay McGuffin, Vice-President and Principal Planner, MBPC
Jason Fleury, Senior Partner, Development Engineering (London) Limited
Analee Baroudi, Baroudi Law Professional Corporation
Durk Vanderwerff, Director of Planning and Development, Middlesex County

Figure 1 – Opportunities & Constraints Mapping

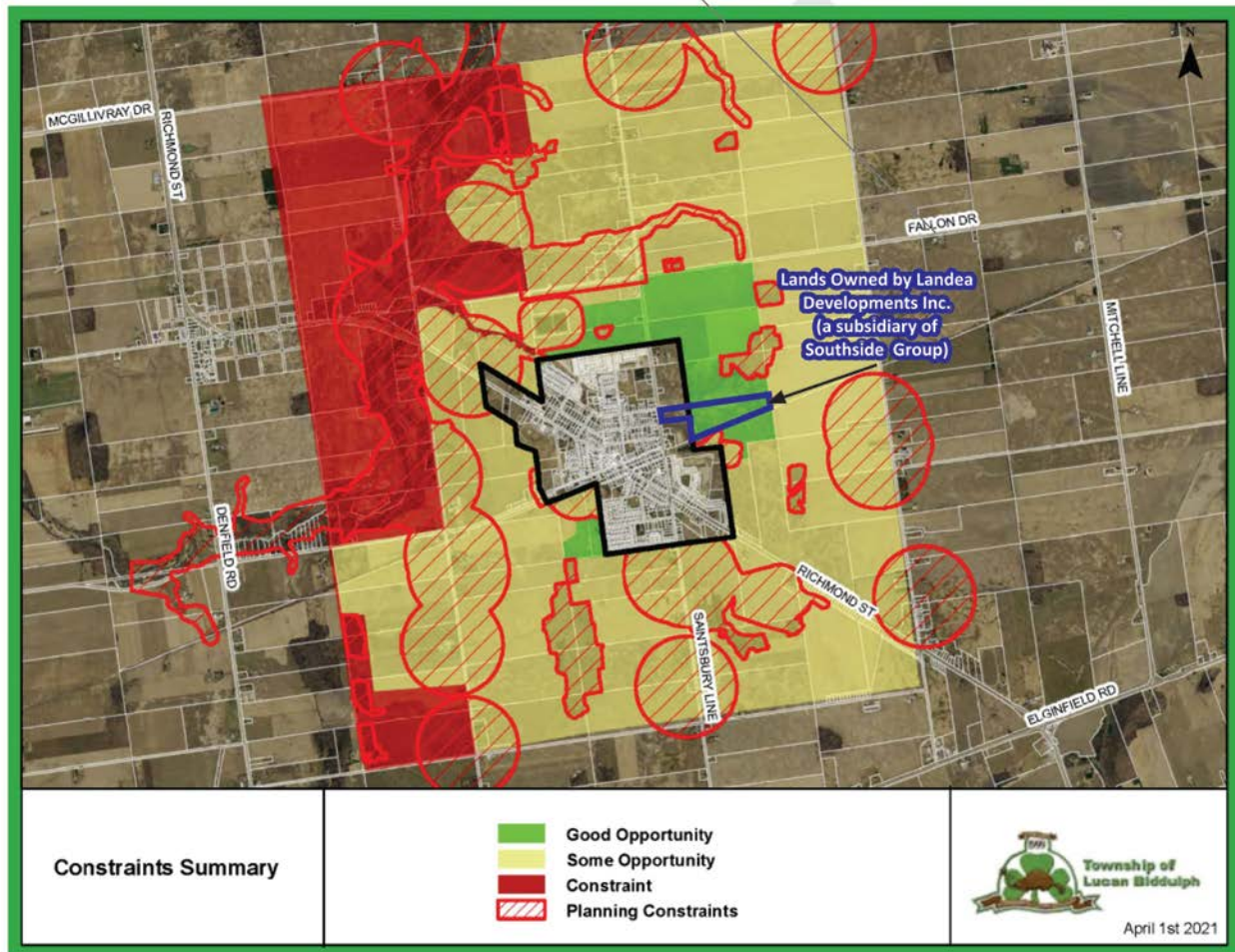


Figure 5.6

Source: Municipal Comprehensive Review Report, April 2021, Findlater & Associates

November 29, 2021

Our File: #17-1401

Township of Lucan Biddulph
Planning Department
270 Main Street
Lucan, Ontario
N0M 2J0

Attention: Dan FitzGerald, Planner and Tina Merner, Deputy Clerk

**Reference: Township of Lucan Biddulph Official Plan Amendment #10 (OPA 1/2021)
Lucan Biddulph Municipal Comprehensive Review**

Monteith Brown Planning Consultants (MBPC), on behalf of our client, Landea Developments Inc. (a subsidiary of Southside Group), would like to thank the Township of Lucan Biddulph ('the Township') for proposing to include a portion of our client's lands (known legally as Part of Lot 29, Concession 5, in Lucan) in the expansion of the Lucan Settlement Area Boundary proposed through Official Plan Amendment #10 (OPA 1/2021, referred to herein as 'OPA #10'). Our client is grateful for the Township's suggested inclusion of an additional 6 Ha (15 acres) of our client's lands within the settlement area, and their proposed re-designation from 'Agricultural' to 'Residential'. After undertaking a detailed review of the proposed OPA #10 and the Township's Municipal Comprehensive Review ('MCR') in advance of the public meeting on November 30, 2021, MBPC is pleased to provide the following comments on behalf of our client, for the Township's consideration.

Our client's lands, known legally as Part of Lot 29, Concession 5 ("the subject lands"), have a total area of approximately 17.53 Ha (43.4 acres). The westernmost portion (approximately 2.91 Ha) is located within the **existing** Lucan Settlement Area Boundary. Our client has submitted Draft Plan of Subdivision and Zoning By-law Amendment applications to permit the development of a residential subdivision consisting of 27 single-detached dwelling lots and two medium-density townhouse residential blocks on this portion of the property. At this time, the remaining 14.62 Ha (36.1 acres) are proposed to continue as agricultural lands.

Based on our review of the draft OPA #10, we understand that the Township is proposing to **expand** the Lucan Settlement Boundary to the north and east by adding 56.4 Ha (139 acres) of surrounding lands to the settlement area, and re-designating these areas from 'Agricultural' to 'Residential' in order to accommodate anticipated population growth for the next 25 years (through to 2046) (s. 1 and s. 3, Amendment No. 10). The settlement boundary expansion includes approximately 6 Ha (15 acres) of our client's lands, which are proposed to be re-designated from 'Agricultural' to 'Residential'. The text of the Township of Lucan Biddulph Official Plan ('Local OP') is also proposed to be amended to ensure that growth and housing policies conform to the 2020 Provincial Policy Statement ('PPS').

On behalf of our client, MBPC is formally making three requests of the Township:

1. That the extent of the proposed Settlement Boundary expansion be reconsidered in light of the publication of a recent report from the Smart Prosperity Institute entitled *Baby Needs a New Home: Projecting Ontario's Growing Number of Families and Their Housing Needs*, which projects a need for **one million** additional homes in Ontario over the next ten years;
2. That the Township **defer** the passage of OPA #10 until such time as the 2021 Census of Population and Dwelling Counts data can be evaluated (Statistics Canada is scheduled to release the datasets on February 9, 2022); and
3. Although our client is grateful for the proposed addition of 6 Ha of their lands into the Lucan Settlement Area through the MCR process, they would request that that the Township revise the Lucan Settlement Area Boundary to include the **entirety** of Part of Lot 29, Concession 5, which would add a total of 14.62 Ha (36.1 acres) of residential land to the settlement area.

The purpose of these requests is to ensure that the proposed Settlement Boundary expansion includes an adequate amount of land to accommodate future residential growth in Lucan over the next 25 years to avoid the need to **repeat** the comprehensive review process within the next few years in response to an accelerating demand for housing fuelled by Ontario's increasing population and the "drive until you qualify" phenomenon.

The Smart Prosperity Institute ('SPI') recently released a report entitled *Baby Needs a New Home: Projecting Ontario's Growing Number of Families and Their Housing Needs* (October 2021). This report is intended to **inform planners and policy makers** of the high levels of population growth and housing demand projected to occur over the next ten years, so that policymakers can plan "for an adequate supply of family-friendly, climate-friendly housing, in or near the communities in which people work, to attract and retain talent, to provide available and attainable housing and a high quality of life for all Ontarians, and to ensure employers have access to the local labour they need to build a stronger, cleaner economy" (SPI, p. iii). The projection focuses on the type of homes Ontarians will want in the future, where they want to live, and how many units need to be built to satisfy projected demand (SPI, p. 38). *Baby Needs a New Home* projects a need for **an additional one million new homes in Ontario over the next ten years** (200,000 high-rise apartment units and 715,000 low- and medium-density units) to address the growing supply gap between the number of households being formed across Ontario, and the number of housing units that are constructed each year (SPI, p. iii, p. 10). This projection does **not** account for any potential supply gap that existed before 2016, so SPI states that "policymakers should treat our one million households in the next ten years as a floor, rather than a target. And while the gross number of households matters, so too does their geographic location" (p. 31).

In the introduction to *Baby Needs a New Home*, SPI specifically references Lucan as a community that has seen a significant increase in population since 2016 due to the "drive until you qualify" phenomenon, as young families leave the Greater Toronto Area in search of housing they can afford (p. 9). SPI also notes that Middlesex (including the City of London) is one of "the ten Census Divisions with the largest projected household formation of young families in low and medium-density housing. For each of the ten Census Divisions, **generational roll-over will provide less than half of the new low- and medium-density housing units needed by young families between 2021 and 2031**" (p. 32, emphasis added)). The following key points from the report are particularly relevant for the Lucan context:

- "1. If Ontario Ministry of Finance population growth projections of 2.27 million more people over the next ten years prove prescient, Ontario will need to build one million new homes to keep up with population growth, the formation of young families, and to address current and future housing supply shortages.
3. The growing population of Ontarians in their late 20s and early 30s is driving the demand for family-friendly housing. **Families are spreading out across the province looking for a home in which to raise a family or are delaying having children due to a lack of housing options.**

7. Generational turnover of other forms of housing will house roughly 45% of the new young families that will live in forms of housing other than high-rise apartments. The rest will come from new home construction (p. iv)

Based on the high-demand projection for housing (particularly low- and medium-density housing) put forward in *Baby Needs a New Home*, it is our professional opinion that the Township should consider further expanding the Lucan Settlement Area Boundary beyond the extent currently proposed, to ensure the Township can meet projected demands for housing in the coming decades.

While *Baby Needs a New Home* projects a future of increased housing demand in Middlesex, the soon-to-be-released Population and Dwelling Counts data from the 2021 Census will provide an up-to-date snapshot of **existing** conditions in Lucan. The Housing Growth and Population Forecasts prepared for Middlesex County by Watson & Associates Economists Ltd. ('Watson') in 2020 utilized the Ministry of Finance's 2019 population forecast by age cohort, with consideration given to historic population trends based on Statistics Canada Census data from 2001 to 2016 (Watson, Middlesex County – Housing Allocations Letter Report, s.s. 2.1). As Census data from 2021 is not included in the consideration of historic population trends, this forecast does **not** consider the impacts that the COVID-19 pandemic has had on out-migration from urban to rural areas, which has led to increased demands for housing in the region over the past year and a half.^{1,2}

In light of the considerations listed above, on behalf of our client MBPC is requesting that the Township revise the Lucan Settlement Area Boundary to include Part Lot 29, Concession 5 in its **entirety** to allow for the efficient and contiguous future development of the property in order to meet present and future demands for housing in the community. Our client has already filed one Draft Plan of Subdivision application for the 2.91 Ha of land located within the Settlement Area at present. If the proposed settlement boundary is approved, our client will need to file a **second** set of applications for the 6 Ha proposed to be brought in, and then a **third** set of applications would be required to permit development of the remaining 8.62 Ha if those lands are brought into the Settlement Area Boundary in the future. The preparation and approval of a Draft Plan of Subdivision application can take years (which does not include clearance of draft conditions or construction timelines), which further constrains housing supply in the community at a time when demand for housing is increasing (particularly in Middlesex, and particularly for young families).

We would like to thank the Township of Lucan Biddulph for considering our client's request, and also thank the Township again for proposing to include 6 Ha of our client's lands within the revised Settlement Area Boundary. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me.

Yours very truly,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, MCIP, RPP
Vice President, Principal Planner
jmcguffin@mbpc.ca

JMc:hs
copies: Michael Frijia, Development Manager, Southside Group

¹ Martin, Max. (2021, February 7). "Golden Opportunity": Small towns primed for comeback during pandemic." *London Free Press*. <https://lfpres.com/news/local-news/golden-opportunity-small-towns-primed-for-comeback-during-pandemic>

² Loring, Jacob. (2021, February 11.) "Canada could see a 'rural boom' as remote work becomes permanent, study finds." *Toronto Star*. <https://www.thestar.com/business/2021/02/11/canada-could-see-a-rural-boom-as-remote-work-becomes-permanent-study-finds.html>

December 27, 2021

Our File: #17-1401

Township of Lucan Biddulph
Planning Department
270 Main Street
Lucan, Ontario
N0M 2J0

Attention: Dan FitzGerald, Planner and Tina Merner, Deputy Clerk

**Reference: Township of Lucan Biddulph Official Plan Amendment #10 (OPA 1/2021)
Lucan Biddulph Municipal Comprehensive Review
Proposed Inclusion of Part of Lot 29, Concession 5
in the Lucan Settlement Area Boundary**

Monteith Brown Planning Consultants (MBPC), on behalf of our client, Landea Developments Inc. (a subsidiary of Southside Group), is pleased to provide this letter in support of our client's request to have the entirety of their lands noted above included within the revised Lucan settlement area boundary, as a follow up to our first submission and the comments heard through the public meeting on November 30, 2020.

Our client, while greatly appreciative of the proposed inclusion of a nominal amount of their lands into the settlement area, respectfully requests that Council reconsider the proposed inclusion of the entirety of their lands, or a substantially larger portion of those lands, into the Settlement Area Boundary. **The inclusion of the entirety of our client's lands, together with the requested expansion by the landowners to the north, provides an excellent opportunity to "round out" east Lucan to ensure that residential growth and development can be accomplished as efficiently as possible to help address the growing supply gap between the number of households being formed and the number of housing units constructed each year in Middlesex.**¹ Both properties were identified as 'Good Opportunities' for settlement boundary expansion by the Township's consultant, and this submission highlights opportunities to facilitate efficient growth, development, and servicing, as well as walkable communities, through their inclusion within the settlement boundary.²

Recent research projects a need for **an additional one million new homes in Ontario over the next ten years** to address the growing gap between housing supply and demand, with Lucan specifically referenced as a community that has seen a significant population increase since 2016 due to the "drive until you qualify" phenomenon.³ Middlesex (including the City of London) is one of the top ten Census Divisions in Ontario with

¹ The proposed expansion would add 35.6 Ha of residential lands and 9 Ha of constrained/open space lands to the settlement area, for a total increase to the settlement area of 101 Ha (75.6 Ha of residential lands, and 24.5 Ha of constrained/open space lands), as illustrated in the attached Figure 1.

² Findlater & Associates. (April 2021.) 'Township of Lucan Biddulph Municipal Comprehensive Review', Figure 5.6.

³ Smart Prosperity Institute. (2021). *Baby Needs a New Home*.

Please note that relevant findings and recommendations from the *Baby Needs a New Home* report were discussed in detail in our previous submission, and for brevity's sake we simply highlight relevant conclusions in this letter.

the **largest projected household formation of young families**. Based on this high-demand projection for housing, it is our professional opinion that the Township should consider further expanding the Lucan Settlement Area Boundary beyond the extent currently proposed, to ensure the Township can meet projected demands for housing in the coming decades.

The proposed eastward expansion of the Lucan Settlement Boundary will allow for efficient and contiguous future development, rather than a disjointed “start-and-stop” process as additional lands are slowly added into the settlement area. As previously noted, our client has already filed one Draft Plan of Subdivision application for the portion of their land located within the Settlement Area, and under the current proposed expansion framework they expect to file at least two more to fully develop the entire property. We expect to see the **same process** repeated on the lands to the north. The subdivision development process can take years to complete, which further constrains housing supply at a time when demand for housing is increasing.

We understand that the Township is planning to discuss the provision of a crosswalk and other pedestrian safety measures across Saintsbury Line with the County. Plans to improve pedestrian safety at Saintsbury Line should serve as many residents as possible, which could be accomplished through the eastward expansion of the Lucan Settlement boundary and additional residential development. With safe crossing measures in place, our client’s lands are within a reasonable walking or cycling distance (1 kilometre) of most of Lucan, including the Wilberforce Elementary School (less than 800 metres) and the Main Street commercial area (less than 1 kilometre) (see Figure 1, attached). There are also opportunities to improve walkability on lands east of Saintsbury Line through the provision of trails and sidewalks connecting to safe crossing places along the County Road.

Finally, we expect that the proposed eastward expansion of the Lucan Settlement Area boundary would support opportunities for servicing efficiencies. The proposed Timber Ridge and Landea subdivisions will share the same Township-owned regional SWM facility, which could also serve the lands proposed to be added into the settlement area. The properties are immediately adjacent to existing water and wastewater infrastructure on Saintsbury Line, and the proposed settlement boundary expansion will provide an opportunity for logical and orderly extension and expansion of existing services through a master planning strategy, rather than continuously stopping and starting infrastructure planning and construction as small parcels are added to the settlement area.

In light of the considerations listed above, MBPC, on behalf of our client, is requesting that the Township revise the Lucan Settlement Area Boundary to include Part of Lot 29, Concession 5 in its **entirety** and **consider** an opportunity to “round out” the settlement area by adding in the remainder of the lands to the north (Part of Lot 28, Concession 5). It is our professional opinion that this proposal will allow for the efficient and contiguous future development of lands on the east side of Lucan to meet present and future demands for housing in the community.

We would like to thank the Township of Lucan Biddulph for considering our client’s request, and thank the Township again for proposing to include 6 Ha of our client’s lands within the revised Settlement Area Boundary. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me.

Yours very truly,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, MCIP, RPP
Vice President, Principal Planner

jmcguffin@mbpc.ca

JMc:hs

copies: Michael Frijia, Development Manager, Southside Group

January 28, 2022

Our File: #17-1401

Township of Lucan Biddulph
Planning Department
270 Main Street
Lucan, Ontario
N0M 2J0

Attention: Dan FitzGerald, Planner and Tina Merner, Deputy Clerk

**Reference: Township of Lucan Biddulph Official Plan Amendment #10 (OPA 1/2021)
Lucan Biddulph Municipal Comprehensive Review
Proposed Inclusion of Part of Lot 29, Concession 5
in the Lucan Settlement Area Boundary -- Servicing Considerations**

Monteith Brown Planning Consultants (MBPC), on behalf of our client, Landea Developments Inc. (a subsidiary of Southside Group), is pleased to provide this supplementary letter in support of our client's request to have the entirety of their lands noted above included within the revised Lucan settlement area boundary, as a follow up to our first submission (dated November 29, 2021) and the comments heard through the public meeting on November 30, 2020; and our second submission (dated December 27, 2021) and the comments heard at the Township Council Meeting on January 4, 2022.

Our client has requested additional information from their Engineering Consultant, Development Engineering (London) Limited ('DevEng'), to illustrate how the above noted lands may **easily be serviced** for future residential development, should the lands be incorporated into the revised settlement area boundary. The letter from DevEng is attached with this correspondence for your convenience.

In summary DevEng has concluded that:

- The existing topography of the subject lands provides the required slope and elevations to support the site grading, storm drainage, and sanitary servicing strategy without internal challenges and/or constraints;
- The lands proposed to be added to the settlement area can be efficiently serviced with SWM, water, and sanitary through a logical extension of the servicing strategy for Phase 1 of our client's proposed subdivision outlined in the attached letter, without any further constraints; and
- The subject lands have direct road access to Saintsbury Line with potential connectivity to the lands north and south for future planning applications and developments.

Based on these confirmed servicing opportunities, and the fact that a portion of our client's lands are already within the Settlement Area Boundary and are advancing through the subdivision approvals process, we believe that the proposed expansion represents a sound and logical opportunity for growth. By contrast, orphaning any retained portion of the subject lands (which are already undersized for agricultural use) serves no value to the agricultural resource. We believe that the inclusion of the entirety of our client's lands represents sound land use planning and is in the best interest of the community of Lucan.

We would like to thank the Township of Lucan Biddulph for considering our client's request, and thank the Township again for proposing to include 6 Ha of our client's lands within the revised Settlement Area Boundary. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me.

Yours very truly,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, MCIP, RPP
Vice President, Principal Planner
jmcguffin@mbpc.ca

JMc:hs

enclosed: Letter from Development Engineering (London) Limited dated January 27, 2022

copies: Michael Frijia, Development Manager, Southside Group
Jason Fleury, Senior Partner, Development Engineering (London) Limited
Ron Reymer, Chief Administrative Officer, Township of Lucan Biddulph



41 Adelaide Street North, Unit 71
London, Ontario, N6B 3P4
Tel: (519) 672-8310 Fax: (519) 672-4182
e-mail: deveng@deveng.net
website: www.deveng.net

CONSULTING CIVIL ENGINEERS

January 27, 2022

Project: DEL19-093

**Re: *Proposed Settlement Boundary Expansion for Lucan Biddulph
Request to Include Additional Lands owned by Landea Developments Inc.
(a subsidiary of Southside Group)***

Development Engineering (London) Limited (DevEng) has been retained by Landea Developments Inc. to provide engineering design and support services for the development of Part of Lot 29, Concession 5 in the County of Middlesex ("the subject property"), which is located on the east side of Saintsbury Line between Kent Avenue and Duchess Avenue. The property has a total area of approximately 17.53 Ha (43.4 acres), approximately 2.82 Ha of which is located within the existing Lucan Settlement Area Boundary. This letter has been prepared to demonstrate the ease and practicality of servicing the remaining 14.71 Ha, to support our client's request that the Township revise the Lucan Settlement Area Boundary to include the entirety of the subject property.

Our client has submitted Draft Plan of Subdivision and Zoning By-law Amendment applications to permit the development of a residential subdivision consisting of 27 single-detached dwelling lots and two medium-density townhouse residential blocks; an internal roadway; a storm sewer/overland flow easement on the western portion of the property located within the Settlement Area Boundary, with a temporary turning circle located just outside the boundary (see Appendix A for a copy of the Draft Plan prepared by Monteith Brown Planning Consultants). At this time, the remaining portion of the property is proposed to continue as agricultural lands, but our client is planning to develop these lands through a Draft Plan of Subdivision application once they are incorporated into the expanded Lucan Settlement Area Boundary.

The servicing analysis discussed in this letter regarding external services was referenced from the Township of Lucan Biddulph 2021 Lucan Urban Municipal Servicing Master Plan as prepared by BM Ross.

Elevations on the subject property ranges from approximately 310.0 m to the north-east to approx. 302.0 m on the edge of the site boundary near Saintsbury Line, generally sloping from northeast to the south and west, with the approximate 8.0 metres of grade differential (average just under 1.0% slope). The existing topography of the subject lands provides the required slope and elevations to support the site grading, storm drainage, and sanitary servicing strategy without internal challenges and/or constraints.

Storm drainage from the subject property is tributary to the proposed Regional Stormwater Management Facility (SWMF) to be constructed on Township owned lands immediately south of the Phase 1 Draft Plan. Phase 1 has direct access to the Township's SWM Block via a proposed storm sewer easement in Phase 1 of the Draft Plan (as highlighted in yellow on the enclosed Draft Plan), the



proposed expansion lands can be serviced directly through an extension of Phase 1. The Regional SWMF will outlet to the existing Whitfield Drain immediately adjacent to the SWMF without physical restriction on the location of the outlet. The Township purchased the lands as highlighted in blue on the enclosed Draft Plan for the purpose of providing Regional SWM Facilities and a storm outlet for the developable lands surrounding the Township Block including the subject property. Consultation with the ABCA confirmed that they are willing to work with the Township and the Developers to locate the SWMF within the Township's Block. If additional lands are required, Landea owns the lands immediately adjacent to the east of the SWM block which could be used to expand the facility.

A new water distribution network with a 250mm PVC watermain would service the proposed subdivision development by teeing into the existing 250mm watermain located on the west side of Saintsbury Line. The new watermain has direct access to the existing watermain and would enter the proposed development through Street A (as shown in blue on the enclosed Draft Plan), the proposed expansion lands can be serviced directly through an extension of Phase 1. Typical residential water services would be provided by a 25mm diameter services extended from the proposed watermain. Additional watermain looping can be provided through the lands north and south of the subject lands with future planning applications and developments. No immediate constraints have been identified within the existing water system for the proposed potential residential growth in this area of the Township.

An internal gravity sanitary sewer system with private drain connections is proposed to provide sanitary drainage for the subject lands (as noted above, the existing topography rises from west to east providing a natural drainage pattern for the site). The internal gravity sanitary sewers will drain west to a new gravity sewer to be installed on Saintsbury Line conveying sewage to an existing sanitary maintenance hole located within the right-of-way (ROW) at the east end of Kent Ave (shown as red/green markups on the enclosed draft plan). The site has unobstructed physical access to the existing sanitary sewer on Kent Ave. The proposed expansion lands can be serviced directly through an extension of Phase 1 sanitary servicing infrastructure. It is our understanding that potential upgrades may be required in four (4) runs of the existing downstream conveyance system on Kent Street between Stanley Street and Campanale Way based on existing pressures and anticipated demand from proposed developments within the existing settlement area boundary. Potential upgrades may also be required at the Chestnut Pumping Station as identified in the 2021 Lucan Urban Municipal Servicing Master Plan. These already-necessary upgrades will assist the Township with servicing future residential growth on the subject lands once the balance of the property is incorporated into the Settlement Area.

The subject property has direct road access to Saintsbury Line with potential connectivity to the lands north and south of the subject lands with future planning applications and developments.

We hope this letter and the enclosed figure demonstrates the ease and practicality of servicing the current proposed Phase 1 along with the balance of the subject lands to be considered in the current proposed Settlement Boundary Expansion. The extension of Phase 1 to the balance of the lands currently extending outside of the provides a logical expansion of municipal services without any further constraints.



DEVELOPMENT ENGINEERING (LONDON) LIMITED

A handwritten signature in blue ink that reads "Jason Fleury". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jason Fleury, C.E.T.
Senior Partner

APPROVAL AUTHORITY CERTIFICATE

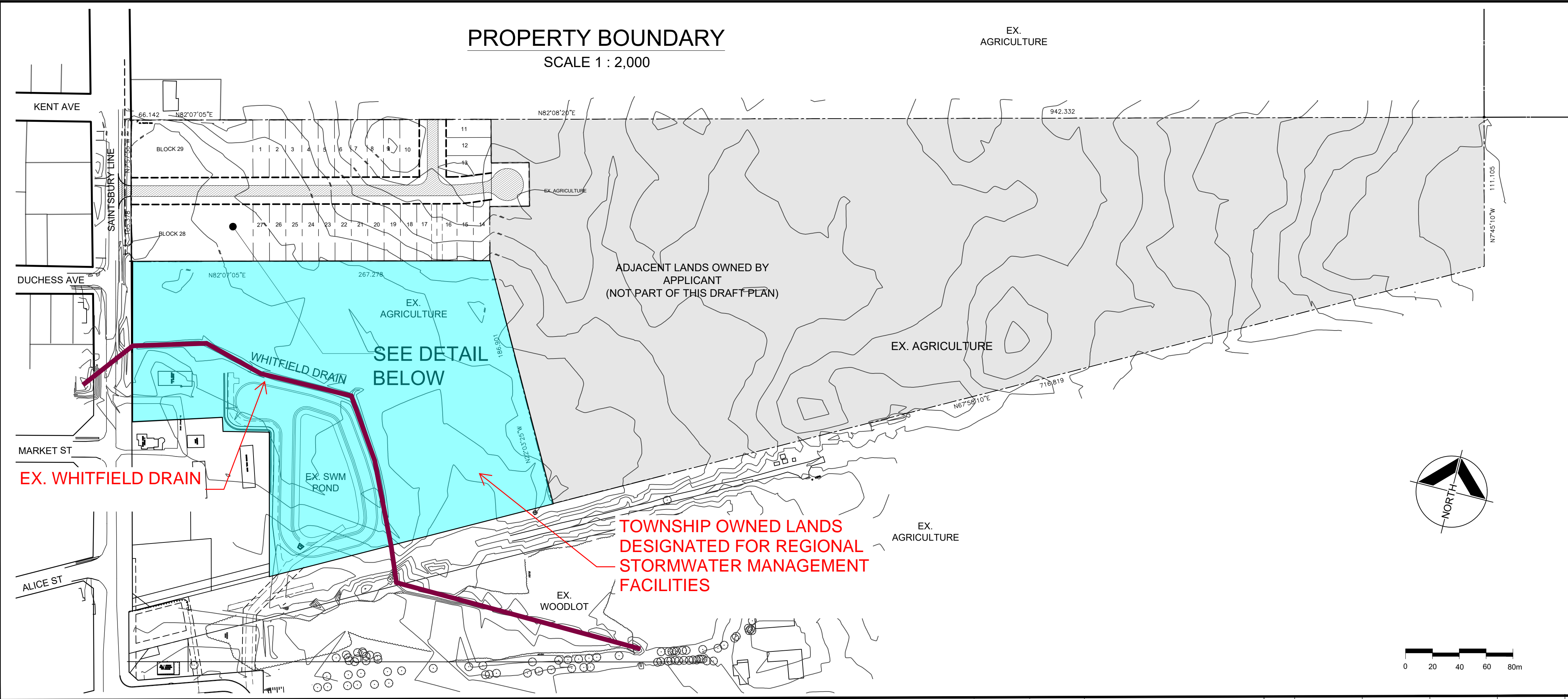
THIS FINAL PLAN OF SUBDIVISION IS APPROVED BY THE COUNTY OF MIDDLESEX UNDER SECTION 51(58) OF THE PLANNING ACT, R.S.O. 1990, ON THIS _____ DAY OF _____, 20____.

DIRECTOR OF PLANNING _____

- LEGEND
- LIMITS OF DRAFT PLAN
 - LIMITS OF PROPERTY
 - PROPOSED LOT LINE
 - PROPOSED STREET LINE

PROPERTY BOUNDARY

SCALE 1 : 2,000



mbpc

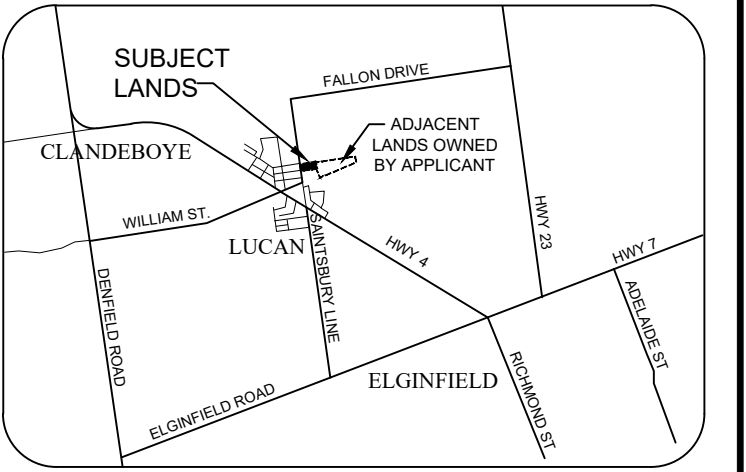
Monteith + Brown

planning consultants

610 PRINCES AVENUE, LONDON, ONTARIO N6B 2B9
Tel.: (519) 666-1300 E-mail: mbpc@mbpc.ca

DRAFT PLAN OF SUBDIVISION

PART OF LOT 29 CONCESSION 5
TOWNSHIP OF LUCAN BIDDULPH
COUNTY OF MIDDLESEX



KEY PLAN
N.T.S.

OWNER'S CERTIFICATE

I, Jay McGuffin of Monteith Brown Planning Consultants, am authorized to submit this Draft Plan of Subdivision on behalf of the owner.

J. McGuffin, BA, MCIP, RPP
Monteith Brown Planning Consultants

Date _____

SURVEYOR'S CERTIFICATE

I hereby certify that the boundary of the lands to be subdivided as shown on this plan and their relationship to the adjacent lands are correctly shown.

Terry P. Dietz, OLS
Callon Dietz Incorporated

Date _____

REQUIREMENTS UNDER SECTION 51 (17) OF THE PLANNING ACT, 1990

a) as shown on plan	g) as shown on plan
b) as shown on plan	h) municipal water
c) as shown on key plan	i) clayey silt till
d) as shown on land use schedule	j) as shown on plan
e) as shown on plan	k) municipal sanitary
f) as shown on plan	l) as shown on plan

LAND USE SCHEDULE

LAND USE	AREA in Ha	PERCENTAGE
SINGLE DETACHED RESIDENTIAL LOTS 1 to 27	1.42	48.8
MEDIUM DENSITY RESIDENTIAL BLOCKS 28 & 29	0.77	26.5
STREETS A, B & 0.3m RESERVE BLOCKS 30 to 33	0.63	21.6
TEMP. TURN CIRCLE BLOCK 34	0.09	3.1
TOTAL SITE AREA	2.91	100.0

CLIENT

Landea Developments Inc.

BAR SCALE

SCALE 1 : 500

0 5 10 15 20m

ADDRESS

Saintsbury Line
Saintsbury Subdivision - Phase 1
Lucan

DRAWN BY: BS	CHECKED BY: JMC	PROJECT No.: 17-1401
DESIGNED BY: BS	APPROVED BY: -	DRAWING No.: 1
SCALE: on 24x36 AS NOTED	DATE: Jun 24, 2021	

EX. SANITARY OUTLET

PROPOSED SANITARY OUTLET

KENT AVE

EX. DWELLING

PROPOSED SANITARY OUTLET

EX. DWELLING

BLOCK 31
0.3m RESERVE

BLOCK 29
MEDIUM DENSITY RESIDENTIAL
0.38 Ha

PROPOSED WATERMAIN

BLOCK 28
MEDIUM DENSITY RESIDENTIAL
0.38 Ha

BLOCK 30
0.3m RESERVE

EX. 250 WATERMAIN

EX. AGRICULTURE

DRAFT PLAN
SCALE 1 : 500

BLOCK 32
0.3m RESERVE

LIMITS OF PROPOSED DRAFT PLAN
AREA = 2.91 Ha

BLOCK 34
TEMP. TURN
0.09 Ha

BLOCK 33
0.3m RESERVE

ADJACENT LANDS OWNED BY APPLICANT
(NOT PART OF THIS DRAFT PLAN)

TOWNSHIP OWNED LANDS DESIGNATED FOR REGIONAL STORMWATER MANAGEMENT FACILITIES

8.0m STORM EASEMENT

February 18, 2022

Our File: #17-1401

Township of Lucan Biddulph Mayor & Council
270 Main Street
Lucan, Ontario
N0M 2J0

Attention: Tina Merner, Deputy Clerk

**Reference: Township of Lucan Biddulph Official Plan Amendment #10 (OPA 1/2021)
Lucan Biddulph Municipal Comprehensive Review
Landea Developments Inc.
Request for Proposed Inclusion of Part of Lot 29, Concession 5
in the Lucan Settlement Area Boundary
in the Context of the 2021 Census & Increasing Demand for Housing in Ontario**

Monteith Brown Planning Consultants (MBPC), on behalf of our client, Landea Developments Inc. (a subsidiary of Southside Group), is pleased to provide this supplementary letter in support of our client's request to have the entirety of their lands noted above included within the revised Lucan settlement area boundary. This letter serves as a follow up to our previous submissions dated November 29, 2021, December 27, 2021 and January 28, 2022 and is provided in response to comments heard through the public consultation process and new information coming available from the Statistics Canada 2021 Census of Population.

In our first submission, we requested that the Township **defer** the passage of OPA #10 until such time as the forthcoming 2021 Census of Population and Dwelling Counts data could be evaluated, to ensure that the proposed Settlement Boundary expansion includes an adequate amount of land to accommodate future residential growth in Lucan over the next 25 years. That data has since become available (February 9, 2022) and it has confirmed that **Lucan-Biddulph is not only one of the fastest growing municipalities in Ontario, but also in Canada.**

The Housing Growth and Population forecasts prepared by Watson & Associates Economists Ltd. ('Watson') for Middlesex County and the Township's Municipality Comprehensive Review ('MCR') **does not include** Census data from 2021, instead it relies on data from 2001 to 2016. The recently released Census data revealed that the population of Lucan Biddulph **grew by 20.9% in the last five years, or an average of 4.17% growth per year** (2016-2021), far exceeding the pace of growth predicted in the Township Official Plan and the Watson forecasts (2.25% annual growth - high forecast).

On behalf of our client, we would like to highlight the potential implications of the 2021 Census data and the findings of two recently-released reports from the Smart Prosperity Institute and the Ontario Housing Affordability Task Force on development in Lucan and the MCR process, in support of our client's respectful request to include the **entirety** of their lands within the revised settlement boundary. In summary:

1. The population of Lucan Biddulph grew by an average of 4.17% each year over the past five years and the Township is one of the **25 fastest-growing municipalities in Canada**, yet the “high population growth” scenario forming the basis of the MCR predicts a much lower growth rate of 2.25% per year (almost twice the pace). It is our professional opinion that the future population of the Township is being **underestimated** through MCR process and **additional land** should be brought into the Settlement Boundary to accommodate future residential growth;
2. A failure to plan for population growth in the GTAH has led to increased out-migration to communities outside the Greater Golden Horseshoe fueled by the “drive until you qualify” phenomenon, which should be considered when planning for growth in Lucan; and
3. The Ontario Housing Affordability Task Force has called for the construction of **1.5 million more homes** in Ontario over the next **ten years**, and recommends sweeping changes to the land-use planning process, which may impact future growth and development in the Township.

2021 Population and Dwelling Count Data (Statistics Canada, 2022)

The recent Census data release confirms what was anticipated, that the population growth in the Township is accelerating at a pace not predicted by the current Official Plan, which assumed “modest” future growth rate of 0.7% per annum and a population of 4,821 by 2026 (s.s. 1.4). The Township has far eclipsed this projection, reaching a population of 4,700 by 2016 and a population of 5,680 by 2021 (excluding the census undercount).¹

The “high population growth” scenario prepared by Watson & Associates Economists Ltd. (‘Watson’) for Lucan Biddulph (which forms the basis of the Municipal Comprehensive Review prepared by Findlater and Associates) predicted a growth rate of only **2.25%** per year for the next 25 years (including the census undercount) which is almost 2% **less** than the historic growth rate over the past five years.

In light of this new information on accelerating population growth in Lucan Biddulph, we again request that the Township include the entirety of our client’s lands into the settlement area boundary to accommodate this increased demand for residential land in Lucan.

Forecast for Failure (Smart Prosperity Institute, 2022)

The *Forecast For Failure* report from the Smart Prosperity Institute builds on the findings and recommendations of *Baby Needs A New Home* (October 2021) regarding the shortage of housing in southern Ontario and the need to address the growing supply gap by building one million new homes over the next ten years (see MBPC’s submission to Council dated November 29, 2021). “Forecast for Failure” examines **why** past forecasts have contributed to regional housing shortages, and the implications for the future of housing in southern Ontario.

The report focuses on regional housing shortages in the Greater Toronto Area and Hamilton (‘GTAH’) and the Greater Golden Horseshoe (‘GGH’), but **these regional issues have implications on demands for housing and housing affordability in Middlesex County** as well. This is evidenced by the recent increase in net population out-migration (driven by young parents and their preschool-aged children) from the GTHA and GGH to surrounding communities: “at the GGH level, only a marginal number of people were migrating out of the GGH to other parts of Ontario until 2015-16; by 2017-18, more than 20,000 persons, on net, per year were doing so” (p. 23). **As Mike Moffat (co-author of *Forecast For Failure*) noted in a statement to TVO: “You’ve got more people than anticipated and fewer homes being built than anticipated [...] Families get priced out of those homes, and they ‘drive until they qualify,’ to Woodstock or Tillsonburg or London.”**² A failure to plan for population growth in the GTAH has led to increased out-

¹ Statistics Canada. 2022. (table). Census Profile. 2021 Census. Statistics Canada Catalogue no. 98-316-X2021001. Ottawa. Released February 9, 2022.

<https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/index.cfm?Lang=E> (accessed February 18, 2022).

² 2022, January 28. McGrath, J.M. “What happens when you plan around population growth, but your numbers are wrong?” TVO.org, <https://www.tvo.org/article/what-happens-when-you-plan-around-population-growth-but-your-numbers-are-wrong>.

migration fueled by the “drive until you qualify” phenomenon, which should in turn be considered when planning for growth in Lucan.

Report of the Ontario Housing Affordability Task Force ('OHATF') (Housing Affordability Task Force, 2022)

In December 2021, the Province created a new Housing Affordability Task Force ('HATF') to identify additional measures to increase housing affordability in Ontario. Their report was released in February 2022 and identifies that spiraling house prices over the past decade have led to a **housing crisis** in this province. The OHATF is urging Ontario “to set a bold goal of **adding 1.5 million homes over the next 10 years** and update planning guidance to make this a priority” to address the existing supply shortage, along with policy recommendations to modernize the municipal planning process and cut red tape to allow more housing to be built faster.

The OHATF's housing construction target of 1.5 million new homes is far higher than the ambitious goal of one million new homes set out in *Baby Needs a New Home*.³ The recommendations proposed in the Task Force report, if implemented, will have a considerable impact on the planning and development of Ontario communities, including Lucan-Biddulph. **In light of the ongoing MCR process, it is our professional opinion that these recommendations support the need for additional growth lands in Lucan, and further supports our client's request for the inclusion of the entirety of their lands within the revised Settlement Area boundary.**

As we have noted in previous submissions, the westernmost portion of our client's lands are already located within the existing Settlement Area and subject to an active application for subdivision approval, and an additional 6 Ha of those lands are currently proposed to be added through the MCR process. It is our professional opinion that the Settlement Area boundary should be revised to include Part Lot 29, Concession 5 in its **entirety** to allow for the efficient and contiguous future development of the property to meet present and future demands for housing within the community. There is sound planning rationale for the proposed expansion (as noted above and in our previous submissions), and our Client's Engineer has confirmed in writing that the property can be efficiently serviced with SWM, water, and sanitary infrastructure and the remaining severely undersized portion of the parcel will serve no material value to the agricultural resource.

We would like to thank the Township of Lucan Biddulph for considering our client's request. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me.

Yours very truly,

MONTEITH BROWN PLANNING CONSULTANTS



Jay McGuffin, MCIP, RPP
Vice President, Principal Planner
jmcguffin@mbpc.ca

JMc:hs

copies: Michael Frijia, Development Manager, Southside Group
Jason Fleury, Senior Partner, Development Engineering (London) Limited
Ron Reymer, Chief Administrative Officer, Township of Lucan Biddulph
Dan FitzGerald, Planner, County of Middlesex

³ Ontario Housing Affordability Task Force. 2022. *Report of the Ontario Housing Affordability Task Force*.
<https://s3.documentcloud.org/documents/21199912/ont-housing-report.pdf>

April 14, 2022

Our File: #17-1401

Township of Lucan Biddulph Mayor & Council
270 Main Street
Lucan, Ontario
N0M 2J0

Attention: Tina Merner, Deputy Clerk

**Reference: Township of Lucan Biddulph Official Plan Amendment #10 (OPA 1/2021)
Lucan Biddulph Municipal Comprehensive Review
Landea Developments Inc.
Request for Proposed Inclusion of Part of Lot 29, Concession 5
in the Lucan Settlement Area Boundary
in the Context of the Proposed Updated Mapping to be Presented at the
April 19, 2022 Council Meeting**

Monteith Brown Planning Consultants (MBPC), on behalf of our client, Landea Developments Inc. (a subsidiary of Southside Group), is pleased to provide this supplementary letter in support of our client's request to have the entirety of their lands noted above included within the revised Lucan settlement area boundary. This letter serves as a follow up to our previous submissions dated November 29, 2021, December 27, 2021, January 28, 2022, and February 18, 2022 and is provided in response to the latest version of the proposed Lucan Settlement Boundary mapping prepared by Findlater & Associates Inc.

Based on our review of the updated mapping prepared by Findlater & Associates Inc. at the request of Township Council, it is our understanding that Council feels that the **western** edge of the current settlement area boundary of the Village of Lucan is the best place for growth at this time. On behalf of our client, MBPC would like to state our **strong disagreement** to the proposed re-allocation of future residential lands so close the conclusion of the Municipal Comprehensive Review process for reasons including but not limited to the ones listed below (noting that other matters may arise through the MCR process).

The proposed expansion of Lucan to the east is consistent with Provincial Policy Statement and conforms to the general intent and purpose of the County of Middlesex Official Plan and the Township of Lucan Biddulph Official Plan. Findlater & Associates and B.M. Ross previously identified that the lands to the west were subject to planning constraints, and there was *"a good opportunity for expansion to the north east of the Village"*. The lands on the east side of Lucan (including our client's property) represent a logical extension of the proposed settlement area boundary. This area is within an 11-minute walking distance of many recreational, commercial, and institutional buildings and spaces within Lucan, including the central commercial area and Wilberforce Elementary School, and our client's engineer has confirmed that our client's property can be efficiently serviced with SWM, water, and sanitary infrastructure.

In conclusion, we respectfully request that the Township reconsider the proposed settlement boundary expansion to the west in favour of the proposed settlement boundary expansion on the east side of Lucan, the general direction originally recommended by Findlater & Associates. We would like to thank the Township of Lucan Biddulph for considering our client's request. If you have any questions regarding this matter or require any additional information, please do not hesitate to contact me.

Yours very truly,

MONTEITH BROWN PLANNING CONSULTANTS



Hannah Surgenor, M. Plan, MCIP, RPP
Planner
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HS

copies: Michael Frijia, Development Manager, Southside Group
Jay McGuffin, Vice-President and Principal Planner, MBPC
Jason Fleury, Senior Partner, Development Engineering (London) Limited
Ron Reymer, Chief Administrative Officer, Township of Lucan Biddulph
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