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June 5, 2024

Chair Steve Lehman
Planning and Environment Committee
City of London
300 Dufferin Avenue, London, ON
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RE: OFFICIAL PLAN REVIEW AND LAND NEEDS ASSESSMENT

Chair Lehman,

Auburn Developments, as an LDI member representative on the City of London's Housing Supply Reference Group (HSRG), has been consistently engaged in this process over the past year.

As part of the HSRG Committee collaboration with City staff, we formulated a Plan to ensure a housing supply process to meet the objectives of both the City of London and the Province of Ontario to meet the goal of building 47,000 housing units over the next 10 years. A significant part of meeting that commitment is the assurance of an ample supply of land to accommodate all forms of housing. The Land Needs Assessment is a critical step in fulfilling those goals and as such, should be conducted in collaboration with the development and housing industry, not in isolation, so that we all can have input to ensure flexibility in meeting those goals.

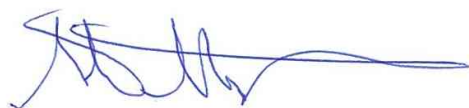
There are many items to be addressed and reviewed to enable an eventual endorsement of Council on an adequate land supply to accommodate growth in London over the next 25 years. We are only at the beginning of the journey and do not have the information necessary to make final assessments, only to acknowledge today that we are deficient in our current boundary configuration.

It is identified by staff that we will require an expansion of the Urban Growth Boundary, but the details on the magnitude of the expansion, determination of the housing supply in the existing land inventory as well as future growth lands is still required and we respectfully suggest, is best done in collaboration through the HSRG Committee.

The HSRG is positioned to develop an accurate methodology to determine the capacity of existing lands inside the Urban Growth Boundary to deliver housing, a necessary first step as an input to the Land Needs Assessment process. This capacity of existing lands is referred to as the City's Vacant Land Inventory (VLI). We have serious concerns over the City's accounting of housing supply in the current iteration of the VLI which identifies nearly 80,000 units of greenfield supply on lands inside the Urban Growth Boundary, including approximately 40,000 high density units in the greenfield alone. We believe the City is overestimating supply through the VLI and look forward to focused discussions on this topic at the HSRG table over the coming months. Accounting for an accurate housing supply is critical to ensuring that we plan for the right amount of land as we grow over the next 25 years.

The basic information provided by staff to date is only sufficient to acknowledge an expansion in principle. A more complete and accurate determination is yet to be done and should be the role of the HSRG to undertake to limit debates on the Council floor. There is much work to do and therefore we seek this Committee and Council to acknowledge the need to expand the Urban Growth Boundary at this preliminary stage and direct staff to reconvene the HSRG to undertake the task of developing the proper methodology to determine the key components required to satisfy the goals associated with meeting our objectives to construct a minimum of 47,000 built housing units by 2031, and accommodate growth across the City over the next 25 years. We look forward to continued collaboration with the City in this regard.

Sincerely,



Stephen Stapleton, Vice President
Auburn Developments

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