

July 15, 2013

(Via Email)

The Corporation of the City of London 300 Dufferin Avenue, Room 214 London, Ontario N6A 4L9

Attention: Mayor and Councillors

Dear Sir or Madam:

SUBJECT: 2011 Official Plan Review, ReThink London - Land Needs Background

Study (2011-2031), Consideration of Growth Boundary Amendment

(south half of Lot 21, Concession 6) - Policy Analysis

Since the Draft Terms of Reference for the 2011 Official Plan Review process appeared before the City's Committee of the Whole on October 4, 2011, we have followed and participated in the City's ReThink London process, with much interest. We recognize and acknowledge the significant efforts of your Planning staff in undertaking the massive ReThink public engagement process, overseeing the 2011 Altus Group growth forecasts, developing the eight (8) key direction / discussion papers, and completing the Land Needs Background Study. We look forward to the culmination of these efforts into the formulation of a policy approach for the new master plan for the City and anticipate our involvement in reviewing the draft polices for the new Official Plan.

Through this involvement, it is our understanding that the results of the recent Land Needs Background Study (2011) demonstrate that there is "...no need to consider the addition of new lands into the City's Growth Boundary through the 2011 Official Plan Review process". This finding is difficult to contest when land needs are contemplated solely on an acreage basis. This is essentially identical to the results of the previous Land Needs Analysis Background Study (2006) that was completed as part of the last Official Plan Review process, as it also demonstrated that there was no need for any expansion of the Urban Growth Boundary (UGB) at that time. Unfortunately, neither the 2006 nor the 2011 studies looked beyond the simple methodology of "Land Needs = Supply – Demand". These studies assumed that the lands which are located within the present Urban Growth Boundary are the lands which are most appropriate to accommodate the forecasted growth. Neither study considered lands which are presently excluded from the UGB (not designated for growth), even though some of these lands can likely be serviced more efficiently and cost effectively than other lands within the City's present UGB.

Concerns surrounding the costs of services and facilities and the affect that these costs have on the City's capital budget and development funds is well documented. The first step



to solving these concerns is to make sure that the land which is most efficiently serviced is designated for growth within the City's UGB. This was recognized by Municipal Council (at its session held on August 13, 2007) as part of the 2006 Official Plan Review process, when they resolved:

- 1. That the following actions be taken with respect to the Land Needs Background Study for the Official Plan Review:
- (d) Planning and Development staff BE REQUESTED to prepare a report for a future meeting of the Planning Committee with respect to the process to be followed for the next five-year Official Plan Review that will include a review of strategic priorities in relation to the alignment of the Urban Growth Boundary (UGB) and a cost benefit analysis relating to servicing issues for any lands being considered for inclusion within the UGB. As well as those lands already within this boundary; it being notes that the report will be forthcoming in 2009. (emphasis added)

At the time of its release, we read with great interest the October 4, 2011 "Draft Terms of Reference for the 2011 Official Plan Review" staff report and specifically the section entitled "Land Needs Background Study and Discussion Paper". Through the consultation period, we acknowledged in writing (Nov. 16/11) to the Planning Division the appropriateness of their hypothesis that a significant expansion to the Urban Growth Boundary is unlikely to be warranted as part of the Official Plan Review, in light of vacant land supply estimated as part of the last (2006) Official Plan Review. Notwithstanding this, we also acknowledged and appreciated that within this staff report, the Planning Division identified that "...a review is required to confirm the land requirement projections, identify priority areas for development based on cost - effective servicing considerations...and evaluate the merits of individual requests for adjustments to the Urban Growth Boundary". Unfortunately, to date, we are not aware of a report that has fulfilled Council's August 13, 2007 resolution (referenced above) or the Terms of Reference outlined for the 2011 Official Plan Review. The Settlement Area policies contained in Section 1.1.3 of the Provincial Policy Statement (PPS) indicate that a planning authority may identify a settlement area (i.e. with an Urban Growth Boundary) or allow for the expansion of a settlement area boundary only at the time of a comprehensive review (i.e. Official Plan Review process). Unfortunately, the 2006 and 2011 Land Needs Background Study's collectively relied on the settlement boundary (Urban Growth Boundary) which was established through the "Vision '96" process (and resultant appeals) and did not go beyond the "Land Needs = Supply - Demand" methodology to determine if we have included the most efficient / appropriate land for growth within the settlement boundary (Urban Growth Boundary). Since the "Vision '96" process, municipal services have been extended and development has occurred in various parts of the City. In addition, there have also been major decisions made such as the decision to not build the Southside Sewage Pollution Control Plant. Is a settlement boundary (Urban Growth Boundary) which was drawn approximately fifteen (15) year ago based upon an



understanding of how servicing and growth would occur at that time, still serving the City of London well today? Section 1.6 of the PPS requires that "...infrastructure and public service facilities shall be provided in a coordinated, efficient and cost-effective manner to accommodate projected needs...", that "...Planning for infrastructure and public service facilities shall be integrated with planning for growth...", and that the use of existing infrastructure and public service facilities should be optimized, wherever feasible, before consideration is given to developing new infrastructure and public service facilities". Considering this, is it possible that our Official Plan is not "consistent with" Provincial Policy?

Respectfully, we believe that there are lands within the City of London, outside of the present Urban Growth Boundary, which can be serviced more efficiently than other lands which are presently within the Urban Growth Boundary. Accordingly, we would implore Council to give consideration to completing a comprehensive analysis (as set out in Council's August 13, 2007 resolution), as part of this ongoing Official Plan review process. This analysis would integrate the City's land needs with its financial plan for infrastructure investments, consistent with the vision of the Official Plan and the Provincial Policy Statement. Depending upon the outcome of this review, realignment (not an expansion) of the UGB should be considered. The potential realignment of the Urban Growth Boundary, based upon the City's land needs, should be considered through an integrated analysis of the financial implications associated with the infrastructure needs to service those lands designated for urban growth purposes.

Pursuant to the Notice of Public Meeting, it is our understanding that the purpose of the July 23, 2013 meeting of the Planning and Environment Committee is to hear submissions regarding the Land Needs Background Study and provide an opportunity to hear requests for Urban Growth expansion. Do any of the site specific requests for adjustments to the UGB present opportunities for the orderly progression of growth that would efficiently extend services optimizing the cost effectiveness of existing infrastructure investments? How do these opportunities compare to the costs of proceeding with growth on lands which are already within the City's existing Urban Growth Boundary? Without the benefit of the cost benefit analysis contemplated within Council's August 13, 2007 resolution, it is impossible to answer these questions.

A comprehensive review of the costs to service lands needed to accommodate our growth over the planning period (for inclusion within a realigned UGB) would provide a thorough understanding of how these costs will potentially impact Londoners, whether they are existing homeowners (tax rates) or new home purchasers (development charges and tax rates). Efficiently optimizing our existing infrastructure and services will effectively manage these impacts. Through their most recent Official Plan review process, the Township of Middlesex Centre did just that. They realigned their growth boundary by removing land



from the settlement of Arva (that was unserviceable / too costly to service) and including new lands in the Komoka / Kilworth area.

Considering the above, please find attached, respectfully submitted, an analysis (Appendix 'A') of the existing Planning Policy Framework which works to establish a basis for the review of the present delineation of the Urban Growth Boundary. We have also attached (Appendix 'B') a brief justification for the inclusion of the south half of Lot 21, Concession 6 (northwest corner of Sunningdale Road and Wonderland Road) within the UGB. This property represents lands which should be considered for inclusion within a realigned (not expanded) Urban Growth Boundary as suggested by the existing Planning Policy Framework as it deals with efficient servicing.

We greatly appreciate your time in reviewing and considering this letter and its associated attachments. It provides a detailed analysis that raises many valid considerations with respect to the existing policy regime within which we plan the future growth of our City. Lastly, we look forward to providing a brief presentation at the "Land Needs" public meeting, scheduled before the City's Planning Committee on July 23rd. We would be pleased to discuss this matter with any of you, as you may desire.

Yours truly,

Corlon Properties Inc.

David R. Schmidt

Development Manager

Attachment

cc: John Fleming and Gregg Barrett; City of London – Planning Division (via email)

Jim Kennedy; LDI (via email)

Attachment

Appendix 'A'

2011 Official Plan Review – Land Needs Analysis Background Study, Urban Growth Boundary Realignment- Planning Policy Framework Analysis

Since October 2011, we have been following the City's Official Plan Review process with much interest. As part of this process we have received and reviewed the following reports related to Lands Needs:

- * "Draft Terms of Reference for the 2011Official Plan Review" (October 4, 2011);
- * "Vacant and Underutilized Residential Land Summary" (December 31, 2011)
- "Employment, Population, Housing and Non-Residential Construction Projections, City of London, Ontario – 2011 Update" (Altus Group Economic Consulting, June 18, 2012); and
- * "ReThink London Land Needs Background Study 2011-2031" (June 18, 2013)

In short, the methodology (Land Needs = Supply - Demand) employed through the "Land Needs Analysis" and associated background report has determined that an expansion of the Urban Growth Boundary (UGB) is not warranted. This is understandable when particular policies of the City's Official Plan (OP) and the Provincial Policy Statement (PPS) are considered. However, a comprehensive analysis of the PPS and the City's OP policies, would suggest that a realignment (not an expansion) of the UGB should be considered.

Planning Policy Framework:

The City's Official Plan contains Council's objectives and policies to guide the short-term and long-term physical development of all land within its boundaries and provides direction for the allocation of land use and the provision of municipal services and facilities.¹ It is commonly understood and acknowledged that...

"...the Plan should not be viewed as a static or inflexible document that is resistant to the pressures of emerging or unforeseen economic, social or development trends during the planning period. It is intended therefore that the validity of the Official Plan be maintained through an ongoing process of monitoring, review and modification." ²

In order to ensure that that the goals, objectives and policies of the Official Plan remain relevant, the City maintains an ongoing process of monitoring, review, and modification. This effort is enhanced further by way of Section 26.(1) of the *Planning Act* which requires that Council will determine the need to revise the OP every five years to ensure that it conforms with provincial plans or does not conflict with them, and <u>has regard</u> to the matters of provincial interest, and <u>is consistent</u> with provincial policy statements.

It is not a question of "if we have enough land within the Urban Growth Boundary", but rather, "is this land strategically located to achieve efficient development patterns and optimize the investment in infrastructure and public service facilities"?

Similarly, Section 3 of the *Planning Act* requires that all decisions affecting land use planning matters "shall be consistent with" the Provincial Policy Statement. It is important to recognize

¹ Refer to Section 1.2 of the City of London Official Plan

Preliminary Terms of Reference – 2006 Official Plan Review, City of London Planning Committee Staff Report, February 13, 2006, Agenda Item # 3, page 21

that the policies of the PPS provide minimum standards and that municipalities are encouraged to build upon these minimum standards to address matters that are important to a specific community. In developing OP policies and when making decisions on planning matters, the PPS is not intended to prevent planning authorities and decision-makers from going beyond the minimum standards established in specific policies. It is also important to recognize that the PPS "... is more than a set of individual policies. It is intended to be read in its entirety and the relevant policies are to be applied to each situation." ³

Official Plan:

In 2011 the City commenced its Official Plan Review and "Land Needs" was identified as one of the issues for further review. The Land Needs Background Study undertook an assessment of the City's land requirements (demand) against the supply of vacant land, within the current UGB, and determined that there is no need to consider the addition of new lands into the City's Urban Growth Area through the 2011 OP review process. This finding is consistent with the policy framework established in Section 2.5.5 "Land Requirements" and Policy 2.6.5 "Growth Forecasting and Monitoring" of the Official Plan. This finding is also consistent with Policy 1.1.3.9 of the PPS which indicates that municipalities may identify a growth boundary or permit the expansion of a growth boundary only at the time of a comprehensive review and only where it has been demonstrated that sufficient opportunities for growth are not available through intensification, redevelopment and designated growth areas (within the Urban Growth Boundary). The 2011 Official Plan Review process would be deemed a "comprehensive review" pursuant to the definitions contained within the PPS. As such, while the City may not be identifying a new growth boundary or making adjustment to an existing growth boundary, the current Official Plan Review process is largely reaffirming the existing growth boundary. As such, we would respectfully submit that affirmation of the existing (15 year old) urban growth boundary is not consistent Council's resolution of August 13, 2007, the Terms of Reference for the 2011 Official Plan Review, the objectives of the "Land Needs Background Study" or the balance of the Policies within the OP and PPS.

OP Policy 2.6.8 "Identification of Growth Areas" indicates that in conjunction with the five year review of the Official Plan, Council will consider expansion or adjustments to the Urban Growth Area in keeping with all applicable OP objectives, policies, provincial policies, and will consider <u>alternatives</u> for the direction and sequencing of growth having regard for the comparative costs of providing infrastructure and services, and the financial implications for the municipality. Notwithstanding this policy, Council's resolution of August 13, 2007 and the Draft Terms of Reference for the 2011 Official Plan Review process, no alternatives have been reviewed as part of the OP review process.

Through the 2006 OP review process, staff received several site specific requests (39) for adjustments to the UGB. This report simply identified the location of the specific requests and indicated that they would be evaluated for their potential for future inclusion when it is determined that adjustments to the UGB are warranted. At the public meeting associated with the current Land Needs Background Study, it is quite likely that many of these same requests will be made along with other new emerging opportunities. OP Policy 2.6.4 "Growth Servicing Policies" indicates that the City will plan the provision of services to accommodate growth so that servicing is timely and cost effective. Additionally, the OP (Policy 2.6.8.1 – "Applications to Expand the Urban Growth Area") provides that the primary means for reviewing the adequacy of

³ Provincial Policy Statement, 2005, Ministry of Municipal Affairs and Housing, Part III, page 1

the City's land supply and expanding the urban growth area will be the five year review process and that the evaluation of public benefit will include the costs and benefits of permitting growth at a proposed location. This has not been done. How can we be sure that we have the most appropriate land designated for growth (within the UGB), if we have not analyzed the cost benefit of other lands which are outside of the UGB against those that are within the UGB?

Provincial Policy Statement:

In addition to the policy framework provided within the Official Plan, the Province's vision for our land use planning system indicates that land use must be carefully managed to accommodate appropriate development to meet the full range of current and future needs, while achieving efficient development patterns. Efficient development patterns optimize the use of land, resources and public investment in infrastructure and public service facilities. Does the location of London's Urban Growth Boundary achieve efficient development patterns? The PPS also provides for the following pertinent Sections and Policies;

- 1.1.1 Healthy, liveable and safe communities are sustained by: (a) promoting efficient development and land use patterns which sustain the financial well-being of the Province and municipalities over the long term; (d) avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas; (e) promoting cost effective development standards to minimize land consumption and servicing costs; (g) ensuring that necessary infrastructure and public services facilities are or will be available to meet current and projected needs;
- 1.1.3.2 Land use patterns within settlement areas shall be based on: (a.)(2.) are appropriate for, and efficiently use the *infrastructure* and *public service facilities* which are planner or available, and avoid the need for their unjustified and / or uneconomical expansion.
- 1.1.3.7 New development taking place in designated growth areas should occur adjacent to the existing built-up area ...allow for the efficient use of land, infrastructure and public service facilities.
- 1.1.3.9 A planning authority may identify a settlement area or allow the expansion of a settlement area boundary only at the time of a comprehensive review (an Official Plan Review initiated by a planning authority which is integrated with the planning for infrastructure and public service facilities) and only where it has been demonstrated that:
 (b) the infrastructure and public service facilities which are planned or available are suitable for the development over the long term and protect public health and safety. In determining the most appropriate direction for expansions to the boundaries of settlement areas or the identification of a settlement area by a planning authority, a planning authority shall apply the policies of Section 2 "Wise Use and Management of Resources" and Section 3 "Protecting Public Health and Safety".
- 1.6.1 Infrastructure and public service facilities shall be provided in a coordinated, efficient and cost-effective manner to accommodate projected needs. Planning for infrastructure and public service facilities shall be integrated with planning for growth so that these are available to meet current and projected needs;
- 1.6.2 The use of existing infrastructure and public service facilities should be optimized, wherever feasible, before consideration is given to developing new infrastructure and public service facilities;
- 1.6.4.1 Planning for sewage and water services shall: (a) direct and accommodate expected growth in a manner that promotes the efficient use of existing: (1.) municipal sewage services and municipal water services; (b) ensure that these systems are

⁴ Provincial Policy Statement, 2005, Ministry of Municipal Affairs and Housing, Part IV, page 2

- provided in a manner that: (2.) is financially viable...; (d) integrate servicing and land use considerations at all stages of the planning process
- 1.7.1 Long-term economic prosperity should be supported by: (a) Optimizing ...infrastructure and public service facilities.

While it is evident that an expansion to the present Urban Growth Boundary is not justified (at this time) based upon a pure inventory and assessment (Land Needs = Supply – Demand) of acreage, there has been no corresponding analysis, as supported by existing OP and PPS Policy, of the ability to optimize our existing infrastructure and or the financial implications of servicing the lands which are presently located within the existing Urban Growth Boundary. The sanitary servicing plans for some parts of the City call for the installation of costly infrastructure to pump sewage to existing plants for treatment. Meanwhile, there are lands in this City which are naturally tributary (by gravity) to these same treatment plants, with conveyance systems already in place, which are not with the present Urban Growth Boundary.

The time to complete this analysis is now, as part of the City's Official Plan review process. This analysis should not be put off until the next OP review in 2016, but should be included as part of a *comprehensive review* envisioned by both the City's Official Plan and Provincial Policy and completed as part of the present Official Plan review.

The potential realignment (not expansion) of the Urban Growth Boundary, based upon the City's land needs, should be considered through an integrated analysis of the financial implications associated with the infrastructure needs to service those lands designated for urban growth purposes. A comprehensive review of the costs to service the lands within the UGB, whether it be the existing or a realigned UGB, will provide a thorough understanding of how these costs will potentially impact the tax rate (to finance the "non-growth" portion of these capital costs) and the overall development charge rate. Designating lands for development which are more efficiently serviced, by way of their inclusion within the UGB, will be beneficial to all Londoners.

Over the last 10 years, there has been an increasing desire to understand the growth related infrastructure and facility costs and the financial implications of the required works on the City's capital budget and development funds at an early stage of the planning process. Without a comprehensive analysis to understand the growth related infrastructure needs and financial implications to service the lands which are presently within the Urban Growth Boundary, we will have no appreciation of these costs until the area planning process and / or the development approvals process - after these lands have already been earmarked for development (within the UGB). Additionally, without this comprehensive analysis, we will have no ability to understand if there are other lands within the City (but presently outside of the UGB) which are much more efficiently serviced through the extension of existing services in order to optimize the past investment in these services. A comprehensive review which integrates our land needs with our financial plan for infrastructure investments would represent an investment in sound planning, consistent with the vision of our Official Plan and our Provincial Policy. This in many ways is a watershed moment for the City's Official Plan. Concerns surrounding the costs of services and facilities and the affect that these costs have on the City's capital budget and development funds is well documented. The first step to solving these concerns is to make sure that the land which is most efficiently serviced is designated for growth within the City's Urban Growth Boundary.

Appendix 'B'

Proposed Urban Growth Boundary Amendment (South half of Lot 21, Concession 6)

Locational Context / Site Characteristics / Surrounding Land Uses:

The subject lands are located within the northwest quadrant of the intersection of Wonderland Road North and Sunningdale Road West.

Current Land Use – Agriculture – cash crops (includes vacant farm dwelling and accessory building

Sunningdale Road West Frontage – 428.79 metres (1406.79 feet)

Wonderland Road North Frontage – 696.99 metres (2286.71 feet)

Area – 43.352 hectares (107.12 acres)

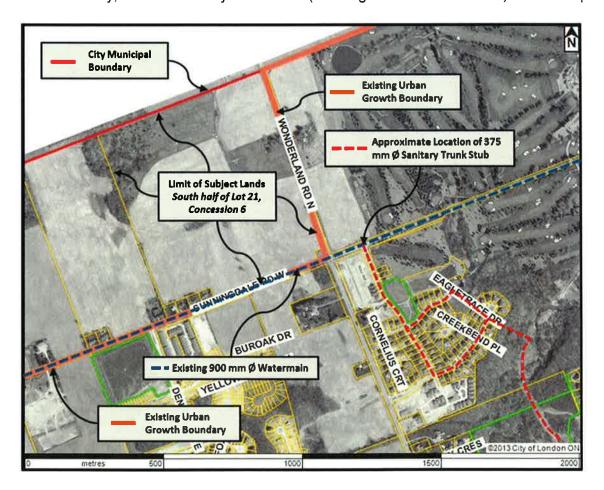
Shape - Rectangular

North – Agriculture (Township of Middlesex Centre) – cash crops, gas pipeline

South – Multi-Family, Medium Density Residential (Fox Hollow Community Planning Area) – cash crops

East – Agriculture (presently outside UGB) – cash crops

West - Multi-Family, Medium Density Residential (Sunningdale North Area Plan) - cash crops



Serviceability:

Sanitary Sewer Services:

On June 25, 2007, Municipal Council approved, by way of resolution, the construction of Stage 1 of the Medway Trunk Sanitary Sewer. The extension of this sewer was necessary to service the balance of the lands within the Medway Servicing Area. The first development that I benefited from this extension is "Sunningdale West" which was draft approved in June of 2006. As part of the development servicing efforts associated with Sunningdale West, internal sanitary sewer services were extended to Sunningdale Road West, less than 100 metres (approx.) from its intersection with Wonderland Road North. These internal sanitary sewers, along with the Medway Trunk Sanitary Sewer extension, have all been sized to ultimately service certain external (to "Sunningdale West") sanitary drainage areas (all of which are part of the Medway Servicing Area), including all of the lands (South half of Lot 21, Concession 6) which are requested, herein, to be included within a realigned Urban Growth Boundary. The extension of the Medway Trunk Sanitary Sewer is complete and "Sunningdale West" is developed. With the major sewer servicing infrastructure in place according to the current requirements of the Class Environmental Assessment (Class EA) for Municipal Projects, additional Class EA work is not expected to be required for the servicing of the subject lands.

In short, the sanitary sewer is in place, less than 100 metres from the northwest corner of Wonderland Road and Sunningdale Road. This sanitary sewer is the approved outlet for these lands.

Stormwater Management:

On June 25, 2007, Municipal Council approved, by way of resolution, the appointment of a consulting engineer to undertake the Municipal Class Environmental Assessment (EA) Study for Sunningdale Storm / Drainage and Stormwater Management (SWM) servicing woks. The objective of this study was to provide an evaluation of storm / drainage and SWM servicing work alternatives for the undeveloped lands which are tributary to the Medway Creek. This study included all of the lands (South half of Lot 21, Concession 6) which are requested, herein, to be included within a realigned Urban Growth Boundary, as the drainage of these lands ultimately outlets to the Medway Creek. This analysis will included the completion of the conceptual design and Municipal Class EA associated with the required servicing works for the SWM facility identified as No. E2 / 8 (Sunningdale North Area Plan / Fox Hollow Development area Municipal Class EA for Storm Drainage). This SWM facility (No. E2 / 8) is located to the northwest of the intersection of Wonderland Road and Sunningdale Road, entirely within the limits of the lands subject to this request.

In short, the conceptual design for the SWM facility necessary to service the lands at the northwest corner of Wonderland Road and Sunningdale Road has been completed and all necessary EA requirements will have been satisfied.

Municipal Water Supply:

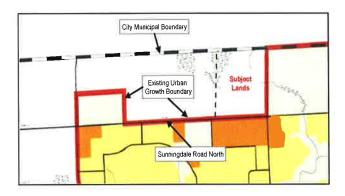
In 1994 / 95 a 900 mm diameter watermain was constructed along Sunningdale Road as the northwest supply line for the City to connect to the main Arva pipeline from Lake Huron to the other major water supply and distribution facilities that were existing or proposed in the west end of the City. This project included the construction of feeder mains on Richmond Street and Wonderland road from Sunningdale Road to connect the northwest supply line to the existing water distribution system along Fanshawe Park Road. The immediate supply of water at

adequate flows and pressures is already in place. With the major water supply servicing infrastructure in place according to the current requirements of the Class Environmental Assessment (Class EA) for Municipal Projects, additional Class EA work is not expected to be required for water supply for the subject lands.

In short, sufficient water supply mains are currently in place and directly available to service the future development of the lands (South half of Lot 21, Concession 6) which are requested, herein, to be included within a realigned Urban Growth Boundary.

Summary Overview:

The subject lands are a portion of a small "pocket" of lands which are encircled by the City's Municipal Boundary to the north, the Urban Growth Boundary to the east and south and a potion of the Urban Growth Boundary to the west. This area is almost entirely encircled (save and except for the fact that the UGB along Hyde Park Road stops approx. 200 metres short of the municipal boundary) by lands designated for growth (within the UGB) within the City of London.



- Realigning the Urban Growth Boundary to include the subject lands would represent a natural and logical progression of expansion to the urban area (O.P. Policy 2.6.8 ii) "Identification of Growth Areas");
- Municipal water and sewerage services are available within the existing arterial roads which are immediately adjacent to this property and can be provided in accordance with the servicing and financing components of the City's Growth management Policies (O.P. Policy 2.6.8 iii), "Identification of Growth Areas");
- The costs to provide infrastructure and services to these lands would likely represent a substantial savings as compared to the costs to provide infrastructure and services to some other lands which are presently located within the Urban Growth Boundary (O.P. Policy 2.6.8 iv) "Identification of Growth Areas"):
- The inclusion of these lands within the UGB and designating them for growth would enable the completion of the communities (Sunningdale / Fox Hollow) within this portion of the City (O.P. Policy 2.6.8 iv) "Identification of Growth Areas");
- Considering the supply of land within the present UGB, the Land Needs Analysis has confirmed that there will be a major shift in development from the north to the southwest of the City. If / when this occurs, this "pocket" of land will remain in an agricultural state, even though it represents an orderly progression of development which would facilitate the efficient extension of services (O.P. Policy 2.6.4.1 iv)"Growth Servicing Policies");
- This land represents the "low hanging fruit". The Development Charges that will be collected from the development of this land will far exceed the costs to service this land, as most of the services are at its property lines.
- There has been a significant investment in the north end in the last number of years (new schools, library, community centre, fire station / ambulance and general infrastructure. Little more is needed. The payment of development charges and the increase in property assessment and from the development of the subject property represents the ultimate financial return on the investments that have already been made. The return on these investments should be maximized through the development of the subject property, prior to going to another area of the City and investing in all the necessary hard and soft costs (services) in that area.