REGIONAL MUNICIPALITY OF WATERLOO
MUNICIPAL COMPREHENSIVE REVIEW

LAND NEEDS ASSESSMENT

Proposed Option 4

An Alternative No Community Area Expansion Option for Consideration Based on an Increased Intensification Target

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1.0 INTRODUCTION

In 1994, the Region of Waterloo released a draft Regional Official Policies Plan (ROPP) with a planning horizon of 2016 for public consultation. Among the policies in the draft ROPP, was one calling for an increase in the minimum intensification target to 10%. This policy was opposed by the development industry and local municipalities as being unrealistic. In the end, the policy in the new ROPP approved in 1995 contained a 5% minimum intensification target. This policy remained in force and effect until the Ontario Municipal Board (OMB) approval of the current Regional Official Plan (ROP) in 2015.

Times have changed. The 2016 planning horizon of the 1995 ROPP falls roughly in the middle of the 10-year period from 2012 to 2021 where the average intensification rate in the Region of Waterloo was 59.5%. Over the five years since the 2016 planning horizon of the 1995 ROPP (2017 to 2021), the average intensification rate has been 64.0%.

Planning in a changing world is not easy. The days of looking backwards and extrapolating forward are gone and over the next 30 years addressing the existential challenges we now face associated with climate change will be no different.

1.1 Climate Change is the Major Threat Facing Us Today

Climate change is the most important challenge we face today. With time running out on our ability to mitigate its effects, we are in desperate need of enlightened leadership and decision making at all levels of government and throughout the community. We cannot depend on major initiatives to fix this. Success can only be achieved through millions of decisions made by millions of people. While some of these decisions may not in and of themselves have a major impact on mitigating climate change, **each one is important, especially for the message it sends**.

1.2 A Legacy of Leadership

People throughout the province look to the Region of Waterloo for leadership, particularly when it comes to planning. Innovations such as Environmentally Sensitive Policy Areas (ESPAs), watershed planning, Water Resource Protection, the Brownfield Incentive Program, Mennonite clusters, the Regional Growth Management Strategy (RGMS), the Countryside Line, the Protected Countryside, Environmentally Sensitive Landscapes (ESLs), Regional Recharge Areas, the Community Building Strategy, Light Rail Transit (LRT) and aggressive facilitation of intensification ... the list of enlightened leading edge planning initiatives embarked upon by the Region and supported through complimentary local municipal initiatives over the years, goes on and on. The Region has never just simply followed the rules. In fact, many of the rules have subsequently been changed to mirror what is happening here in the Region of Waterloo.

Once again Regional Council is being called upon to show the type of leadership others depend on the Region of Waterloo to provide. The world is rapidly changing and the problems we face today won't be solved by being timid or repeating the errors of the past. Currently, Region of Waterloo Staff is proposing three possible Growth Options for the future featuring differing levels of intensification, density, and lands required to accommodate future growth.

However, none of the three options may be sufficient or ideal to meet our future needs.

This paper recommends a no-Community Area expansion Option 4 structured around a Designated Greenfield Area (DGA) density of 60 people and jobs per hectare and an intensification target of approximately 65%. Option 4 is based on an intensification rate reflective of recent and long-term trends being experienced in the Region of Waterloo and the need to continue to aggressively promote a sustainable urban form anchored on an expanding rapid transit system.

2.0 OPTION 4

The three current Community Area options are either insufficient or overly complicated. **Option 4 proposes a no Community Area expansion option** that is far more congruent with current trends and rates of intensification. The following is a comparison of the four Community Area Options:

	Historical Rate (past 10 years)	**Current Rate (past 5 years)**	**Option #1 Provincial minimum, significant farmland loss**	**Option #2 Some farmland loss**	**Option #3 No farmland loss, high density challenges**	**Option #4 No farmland loss, closest to current trends**
Intensification Rate	59%	64%	50%	60%	60%	65%
Density Target	54	54	50	60	66	60
Total Farmland/ Greenfield Required			2,208 hectares (5,456 acres)	376 hectares (929 acres)	0 hectares (0 acres)	0 hectares (0 acres)

A no Community Area expansion Option 4 based on a 60 people and jobs DGA density and an increased intensification target of approximately 65% is generally consistent with current trends. In addition:

- Option 4 serves as a no risk placeholder to see how the post pandemic world, the on-going change from age-in-place to age-in-neighbourhood, efforts to promote soft intensification, development of the missing middle, and climate responsive changes/initiatives unfold over the next five years
- Option 4 also provides time to develop a more robust forecasting methodology integrating economic models such as the one currently being developed by the University of Waterloo that will better reflect the changing world we live in

Changing demographics, affordability issues, shifting life-style choices, increasing transportation and housing options, work at home opportunities, increasing multi-generational responsibilities, length of retirements, availability of family support and community supported planning objectives are all affecting where and in what we live. Add to that the emerging realities of climate change and Council needs to get it right. This is especially true over a 30-year planning horizon where the decisions being made today will impact residents well beyond most of our lifetimes.

Either employment option proposed with the 25% intensification rate is supportable provided the majority of lands added are subject to an amended Prime Industrial Strategic Reserve designation that provides, where feasible, that such lands be restricted to a 20 ha parcel size until required (as opposed to the current 8 ha).

2.1 Why Use a Higher Intensification Rate to Achieve a No Expansion Option?

Unlike DGA density targets, intensification targets are not retroactively applied to lands already built, thereby making them simpler to implement and easier to correct through future processes if the need arises.

The no Community Area expansion Option 3 proposes a 66 people and jobs per ha DGA density target but requires an average density of 73 on any new development occurring in the DGA from 2021 to 2051. This higher density is required to compensate for the lower densities on the 1,331 ha of DGA lands developed in the Region of Waterloo since 2006.

The average DGA density achieved on DGA lands developed since 2006 is 54 people and jobs per hectare. It will be argued that achievement of an average density of 73 on all newly DGA developing lands over the next 30 years after achieving only 54 in the past 15 years will not be an easy task.

Alternatively, it is estimated that an intensification rate of approximately 65% is required to achieve a no Community Area expansion Option 4 while maintaining a DGA density target of 60.

Over the past five years the Region of Waterloo has averaged 64% intensification. Unlike the DGA density targets required to achieve a no Community Area expansion option, the Region of Waterloo is already experiencing very close to the intensification rate required.

This is not to say that higher DGA densities should not be pursued over time ... they should, and thankfully the marketplace will likely accomplish that even without policy requiring it ... but it can reasonably be argued that achievement of a no Community Area expansion option is more uncertain and unnecessarily complicated using increased DGA density targets than it is using increased intensification targets.

2.2 What is the Risk Associated with Using a Higher Intensification Rate?

The intensification target is a key input into determination of the amount of land needed to accommodate forecasted growth. A higher intensification target reduces the number of new units that need to be accommodated in the DGA. Any dwelling units proposed to be shifted into the Built-Up Area (BUA) through an increase in the intensification rate to 65% through Option 4 would only affect development of lands otherwise anticipated to occur at the earliest in 2047 under Options 2 and 3.

By 2047, the Region will have undertaken a total of four additional mandated Municipal Comprehensive Reviews (MCRs) during which course corrections could be made to address any issues that arise, including shortfalls in DGA. It is anticipated that the Growth Plan planning horizon will be extended in 2031 to 2061 followed by a further extension in 2041 to 2071.

With up to four opportunities for course corrections if needed, and the anticipated extension of the planning horizon twice before any actual shortfall would be realized, the risk to the marketplace of Council choosing an Option 4 is minimal. Even if no efforts were made to correct for a shortfall in DGA land occurring because of a failure to achieve the extra 5% intensification proposed under Option 4, there would still be 24 years' worth of DGA land available in 2047 when that land is needed.

2.3 Transition

As with any significant shift in paradigm, the potential exists for minor issues to arise that need to be addressed between MCR processes. An example could be the limited availability of DGA in the Village of Wellesley should the necessary transition towards senior's housing discussed in Section 3.5 below fail to materialize quickly enough. In such event, Provincial Growth Plan Policies 2.2.8.4 through 2.2.8.6 provide options to address such matters by allowing a limited urban boundary expansion in exceptional circumstances to address a specific need or opportunity.

2.4 Defensibility

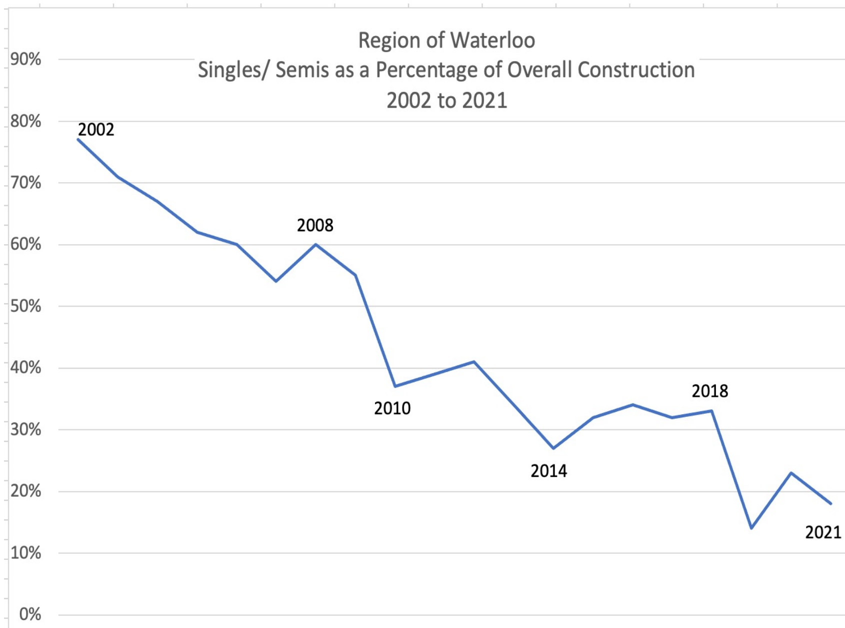
With Bill 109 having recently received Royal Assent, the Province has re-established the potential for individuals or organizations to request the Minister of Municipal Affairs and Housing to refer the results of an MCR process to the Ontario Land Tribunal (OLT) for adjudication/recommendation to the Minister. Consideration by the OLT can occur with or without a hearing being held. While any MCR hearing before the OLT would at best be a venture into the unknown as there has yet to be a case related to MCRs brought before the Tribunal, Option 4, with its reliance on an intensification target consistent with near- and longer-term trends (and a DGA density that is arguably far more attainable at 60 than 66 people and jobs per ha) is potentially more easily defended than the other no Community Area expansion option before Council and the public for consideration.

THE FOLLOWING SECTIONS PROVIDE CONTEXT SUPPORTING CONSIDERATION OF OPTION 4.

3.0 THE EVOLVING HOUSING MARKET

3.1 Decreasing Demand for New Low-Density Housing Units

The Region of Waterloo has experienced a dramatic and consistent reduction in single- and semi-detached units being built since 2002.



This decline has happened despite there being draft approved and vacant registered single-detached lots consistently available.

Year-End Inventory of Vacant Single-Detached Lots in Registered and Draft Approved Plans of Subdivision (2006 to 2019)

Year	Vacant Single-Detached Lots in Registered Plans of Subdivision	Single-Detached Lots in Draft Approved Plans of Subdivision	Total in Vacant Registered and Draft Approved Plans of Subdivision
2006	3,810	5,243	9,053
2007	3,691	7,485	11,176
2008	3,440	5,993	9,433
2009	2,960	5,773	8,733
2010	3,161	6,426	9,587
2011	2,762	5,825	8,587
2012	3,204	5,634	8,838
2013	2,908	4,829	7,737
2014	2,905	5,391	8,296
2015	2,471	6,228	8,699
2016	1,465	7,091	8,556
2017	1,539	6,074	7,613
2018	1,606	6,551	8,157
2019	1,907	5,947	7,854
Average	2,393	5,999	8,392

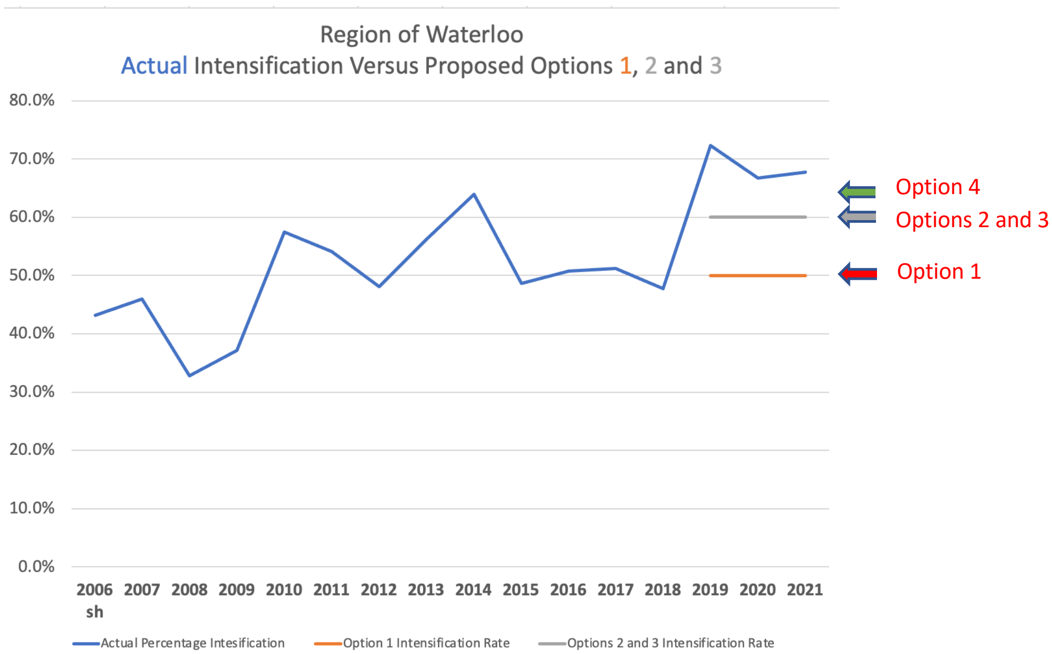
Source: Region of Waterloo Annual Inventory of Dwelling Units in Plans of Subdivision

While the inventory contains some minor fluctuations, there has consistently been vacant registered single-detached lots available within the Region of Waterloo throughout this time period (an average year-end inventory of 2,393 / 8,392 if draft approved lots are included).

3.2 Increasing Rates of Intensification

At the same time as the construction of single- and semi-detached units has declined, intensification has increased correspondingly.

- Since the Growth Plan came into effect (June 16, 2006 to December 31, 2021) intensification has averaged 55.6%
- The past 10 years (January 1, 2012 to December 31, 2021) intensification has averaged 59.5%
- The past 5 years (January 1, 2017 to December 31, 2021) intensification has averaged 64.0%



Source: Region of Waterloo building permit data

This significant change **<u>has been market driven</u>**, not policy led.

- The 1995 Regional policy in force and effect until July 2015 required a minimum of 5% intensification
- An increase in the intensification target to 10% was proposed in the draft 1995 ROPP and was vehemently opposed by the development industry and area municipalities as being unrealistic
- The 1995 Projection Methodology Guideline issued by the Province assumes a 4.5% intensification rate in the example provided in Table 3.12 of the Guideline

The dramatic change in intensification from a planned minimum target of 5% from 1995 to 2016 to actuals averaging 64% over the past five years (2017 to 2021) demonstrates how quickly the housing market can change in relatively short periods of time. With the current planning horizon being extended to 30 years, it is even more important that we get it right.

3.3 Changing Role of Accessory Units

One of the intriguing changes occurring in the housing market today relates to the increasing prevalence of soft intensification (typically associated with the construction of additional housing units on lots occupied by single-detached dwellings). Like what is happening with single-detached units, the market is already way ahead of the planners and politicians when it comes to accessory units.

The LNA prepared for this MCR process forecasts accessory units from 2021 to 2051 as follows:

Option 1 - 3,570 (average of 119 /year) = 2.9% of total units forecast

Option 2 - 3,210 (average of 107 /year) = 2.7% of total units forecast

Option 3 - 3,210 (average of 107 /year) = 2.7% of total units forecast

In a recent report to Region of Waterloo Council, staff stated:

> Over the past decade, there has been rapid growth in accessory apartments added to existing dwelling units, such as basement suites or duplex conversions. In 2012, only 67 permits were issued for these units across the Region. By 2020, the number reached 398, and increased by a further 37 per cent to <u>**546 units in 2021 – that is, nine per cent of total residential units**</u>. This number also includes detached additional dwelling units such as garden suites or laneway homes. [emphasis added]

	2012	2020	2021
Accessory Units	67	398	546
Total Units	2,411	5,111	6,009
% Accessory Units	2.8%	7.8%	9.1%

Source: Region of Waterloo building permit data

In the <u>past two years</u> (2020 and 2021) there have been permits issued for 944 accessory units (an average of 472 units per year). This is the equivalent of 26% of all such units forecast in Option 1 and 29% in Options 2 and 3 <u>over the next 30 years</u>. This is yet another example of the dramatic changes occurring in the housing market that have failed to be addressed in the forecasting methodologies. <u>**This trend alone justifies consideration of the higher intensification target proposed by Option 4**</u>.

This type of construction, which often results in more affordable dwellings suitably sized for smaller households, is meeting an increasing demand for such units in the community. Accessory units also make better use of existing infrastructure. The potential for this type of soft intensification within the current built-up area is huge, particularly as the larger lot singles currently owned in significant numbers by Baby Boomers recycle back onto the market over the next 30 years.

The lack of focus on this type of development is a major flaw in Options 1 to 3 presented in the LNA. Working to further facilitate this type of development would help the Region of Waterloo address affordability issues, while at the same time easing some of the pressure for more intense forms of intensification such as high- and mid-rise apartment buildings.

3.4 Aging Population - The Need to Rethink Housing for Seniors

Our aging population (particularly of the exceedingly large Baby Boomer generation) creates huge potential for the recycling of single-detached units from seniors to younger families over the next 30 years.

- A recent study has shown that in the Region of Waterloo the first five-year cohort of Baby Boomers sold their single-detached units at a rate 65% higher than the previous generation just before and after entering retirement
- 68% of the owners of single-detached units in 2016 will be over 80 years of age in 2051 (this represents 77,535 single-detached and semi-detached homes)
- 88% of the owners of single-detached units in 2016 will be over 70 years of age in 2051 (99,965 single-detached and semi-detached homes)

The potential exists that upwards of 80,000 to 90,000 existing single-detached units will have recycled back into the marketplace between 2016 and 2051. For context, only 18,071 new single-detached units were built from June 16, 2006 (the coming into effect of the Growth Plan) to December 31, 2021.

Seniors either living alone or as a couple in three and four bedroom single-detached units represent an incredible underutilization in the existing capacity of the housing infrastructure in our communities. While no one is suggesting seniors should be forced to move out of their existing units, facilitating the movement of seniors through provision of a continuum of desirable age appropriate/supportive housing within their existing communities has the potential to free up considerable capacity that exists in the current housing supply. While building a senior's-oriented apartment unit within their existing neighbourhood only adds one or two persons worth of new housing capacity, in many cases it frees up an existing single-detached unit to accommodate a growing young family (consisting typically of three to six people) that may otherwise have ended up living in new greenfield development.

Facilitating a clustering of seniors in a continuum of desirable age-appropriate units will also aid in the delivery of future services to seniors. This is a task that is becoming more and more difficult when seniors, many with impaired driving capabilities for both physical or financial reasons, are spread out in ones or twos throughout suburban areas. We are entering into a world where government finances for support of seniors will be seriously strained given the grey tsunami that is coming. Creating housing opportunities where seniors can help each other may be one of the most effect means we have of dealing with the increasing number of seniors suffering from loneliness and requiring day to day assistance.

The need for a wide range of seniors-oriented housing units within existing communities represents a huge market opportunity that needs to be nurtured. The desire for seniors currently living in two storey, three or four bedroom single-detached dwellings to age-in-place appears not to be nearly as prevalent today as the desire to age-in-neighbourhood. There needs to be an increasing focus on delivering this type of housing over the next 30 years and this is best facilitated through Option 4.

3.5 Need for Seniors' Housing in the Townships

One of the most serious challenges facing the Township municipalities is working to establish the broader mix of housing needed. Greenfield development in the Townships often caters to those who are looking for a less expensive single-detached dwelling and willing to commute to employment in another municipality. From a broader planning perspective, facilitating this form of development makes little sense as it is simply moving single-detached dominated suburban areas even further away from employment and transit. Adding significant numbers of new long-distance commuters also significantly increases the challenge of meeting our commitments to reduce GHG by 50% by 2030 and 80% by 2050.

The 2021 Census information in the chart below shows the dominance of single- and semi-detached units in the mix of housing located in the Townships. Only Woolwich (at 84%) has a housing stock containing less than 87% singles/semis. While the number of farmhouses within the rural areas of the Townships somewhat skews the data towards a higher percentage of singles and semis, there is very little mix of housing types even in the urban areas.

	North Dumfries	Wilmot	Wellesley	Woolwich
Single / Semi Units	3,235	6,925	3,157	7,860
Total Units	3,690	7,890	3,365	9,360
% Singles/Semis	88%	88%	94%	84%

Source: 2021 Census

As the chart below demonstrates, the existing housing stock in the Townships also has a considerable amount of underutilized capacity. At minimum, almost 40% of all single- and semi-detached units in the Townships are currently occupied by only one or two residents. These units have an average Person Per Unit (PPU) value of 1.7, whereas capacity for such units typically ranges between 3 and 6 people.

	North Dumfries	Wilmot	Wellesley	Woolwich
One Person Households	540	1,370	490	1,695
Two Person Households	1,345	3,090	1,055	3,260
Total Private Dwellings	3,690	7,890	3,365	9,360
% One and Two Person Households	51%	57%	46%	53%

Source: 2021 Census

As illustrated below, there will soon be a significantly increasing need in the Townships for a continuum of desirable age appropriate/supportive housing for seniors within existing communities in the Townships. This need is not in the dozens or even hundreds of units. Over the next 30 years there is a potential market for thousands of such units to accommodate both aging urban residents and retiring farmers who want to stay in the community. This form of development (which also serves to free up single-detached units for young people) needs to be the primary focus of housing growth in the Townships over the next 30 years.

	North Dumfries	Wilmot	Wellesley	Woolwich
Number / % of Current Residents over 70	1,180 / 11%	3,200 / 15%	1,030 / 9%	3,350 / 12%
Number / % of Current Residents who would be over 70 in 2051	5,625 / 53%	11,525 / 54%	5,035 / 44%	13,300 / 49%
Number / % of Current Residents who would be over 80 in 2051	4,155 / 39%	8,730 / 41%	3,660 / 32%	9,760 / 36%

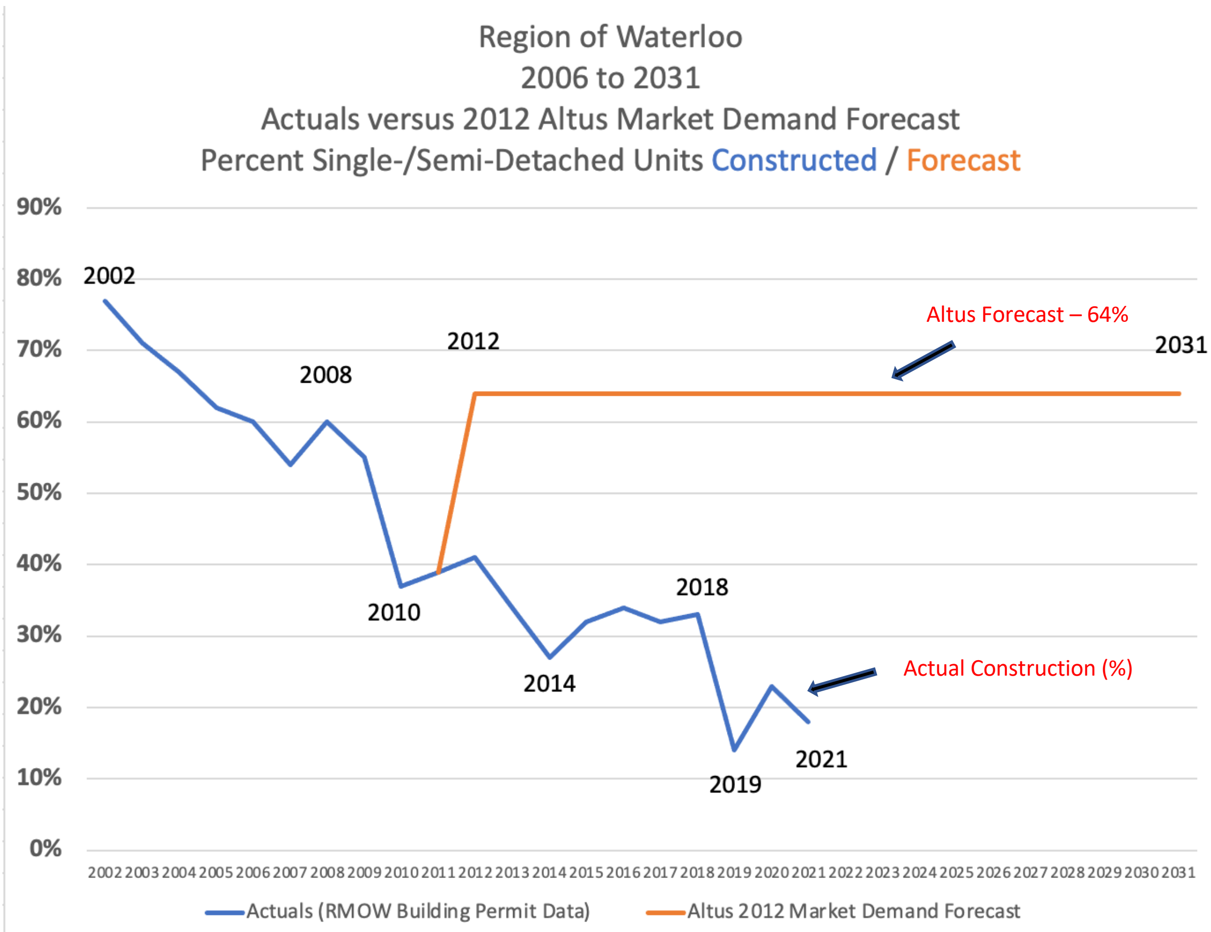
Source: 2021 Census

4.0 FORECASTING METHODOLOGIES NEED TO CHANGE

Market Demand Forecasts required by the province have typically proven to be extremely poor in their ability to predict the need for future housing types in a rapidly changing world both locally and throughout the Province.

4.1 Local Examples

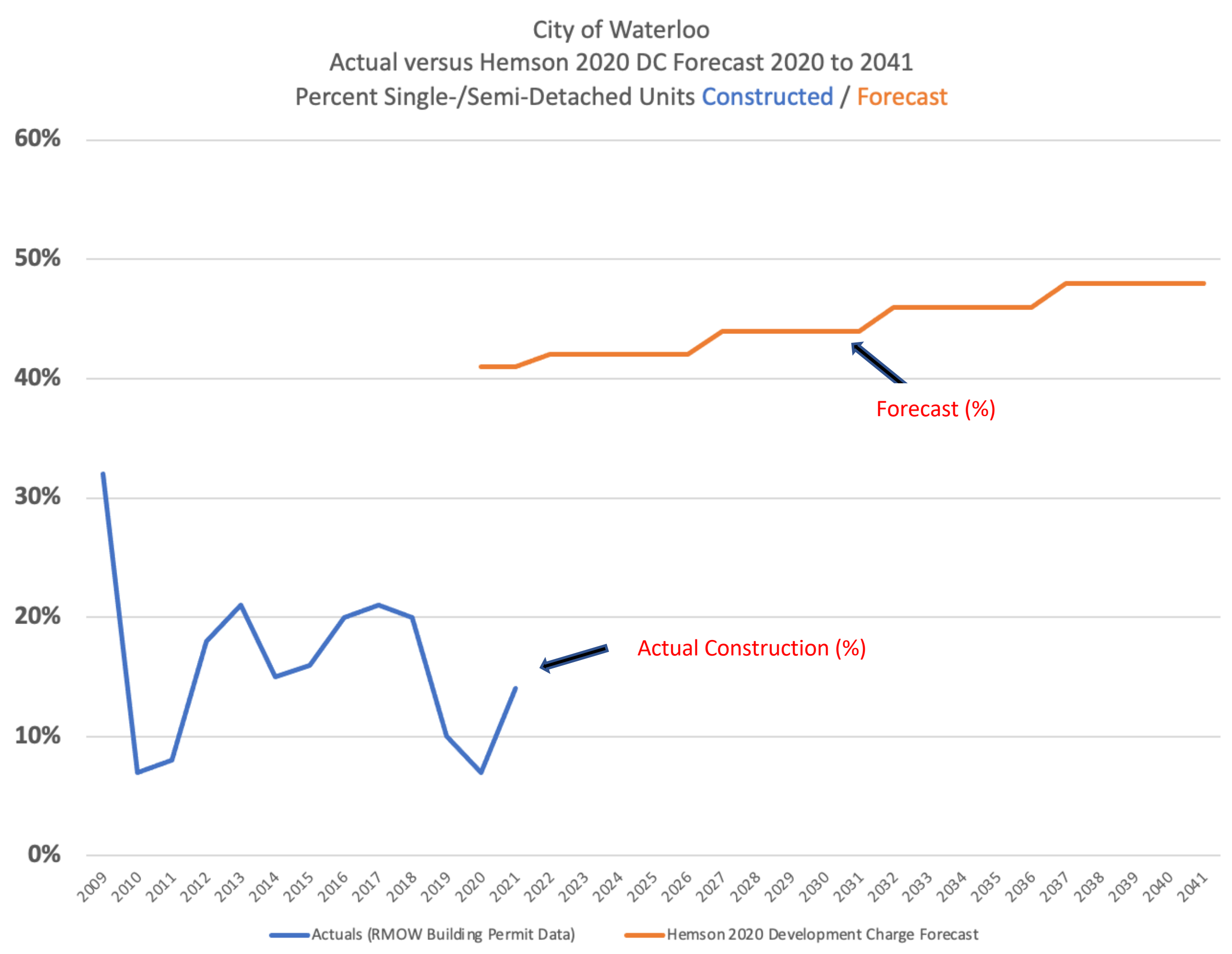
The 2012 Market Demand Forecast prepared for development interests as part of the 2012 Region of Waterloo Land Budget OMB hearing is a good example.



Source: Witness statement of Jeannette Gillezeau, Altus Group Economic Consulting (June 15, 2012) - Figure 5 - Market Demand Forecast including students and Region of Waterloo building permit data

- To year end 2021, building permits have been issued for 129% of the apartment units (28,724) the 2012 Market Demand Forecast predicted would be built from 2006 to 2031 (22,260)
- More than 100% single-/semi-detached units would have to be built from now until 2031 to meet the 2012 Market Demand Forecast

The methodology used by most land economists to create these forecasts simply does not work in a rapidly changing planning environment. The 2020 forecast done for the City of Waterloo Development Charge By-law review, is a good example.



Source: City of Waterloo - Development Charges Background Study - Hemson Consulting Ltd (January 6, 2020) TABLE A.7 Household Growth by Unit Type and Region of Waterloo building permit data

- The City of Waterloo has not built even half of the number of single-/semi-detached units forecast annually from 2020 to 2041 at any time since 2009
- In the first two years of the forecast, the City of Waterloo has issued building permits equal to 72% of all the apartments (2,245) anticipated by the forecast to 2029 (3,124) and 35% of the apartments anticipated to 2041 (6,404)

Watson & Associates' methodology is an exception. They attempt to forecast changes that will occur, rather than simply extrapolating past or existing occupancy rates forward. In a recent report for York Region, Watson found that using the standard methodology would have over-predicted by almost twice the recent construction of single-detached units.

Option 4 requires only slight adjustments to some of the forecast inputs Watson used in the preparing Options 2 and 3 in the LNA. The changing role accessory units are playing in the current housing market (as discussed in Section 9 above) provides ample justification for the changes required for Option 4.

4.2 2020 Growth Plan Forecast Background Report - Housing-by-Type Forecast

Throughout the MCR process there have been continued references to the housing-by-type forecast applicable to the Region of Waterloo that was completed as part of the 2020 Growth Plan Forecast background report.

- The 2020 Growth Plan background report housing-by-type forecast was prepared at the GGH level and then distributed to municipalities based primarily on land and servicing availability
- The Growth Plan housing-by-type forecast did not take into consideration the range of local circumstances or trends necessary to predict the future housing mix in the Region of Waterloo
- The Growth Plan Forecast background report specifically recognizes this limitation, stating 26 times in one form or another in the report that:

  > The housing forecast does not replicate / predict the housing mix that would be determined through each municipality's APTG conformity work.

- The Growth Plan housing-by-type forecast for the Region of Waterloo **<u>is completely irrelevant to the Region's MCR and LNA processes</u>**

4.3 Effects of the Pandemic

It is unclear what short- and longer-term effects the COVID pandemic will have on the housing market. Will people continue to work remotely, thereby triggering a need for different sizes and types of units required for people to live/work in? How will it affect migration patterns and the use of transit by commuters? What is going to be the impact of the pandemic and new hybrid workplaces on the need for employment lands? These are questions that will take time to answer and no forecasting methodology in use today can be relied upon to reflect the results of return to a new normal. Option 4 provides us with the time to assess the changes and ensure they are appropriately considered going forward.

5.0 WHY DOES IT MATTER IF TOO MUCH LAND IS BROUGHT INTO URBAN AREAS?

Over-designation of land does not generally increase the amount of residential and employment development that will occur. In the absence of effective and enforceable staging policies that restrict new areas from being opened up for development before other areas are substantially built out, over-designation of land typically results in a similar amount of development simply being spread out over a larger area. Unfortunately, there are very few examples of where such staging policies have been effectively used. This results in:

- Prematurely taking agricultural land out of production
- Driving up the speculative value of agricultural land
- Eliminating the incentive for farm investments on land that otherwise could otherwise remain part of a viable agricultural area of an extended period
- Planning for development beyond the planning horizon based on current policy objectives and market conditions that may evolve considerably before such development occurs
- Increasing capital costs eventually passed onto homebuyers (thereby affecting affordability) to prematurely service lands not required within the planning horizon
- Delaying the introduction of cost-effective transit and other services/infrastructure (such as schools, libraries, local plazas and community centres) to newly developing areas
- Extending the time required to achieve full build-out of various community planning areas, thereby affecting the quality of life of residents by leaving large portions of neighbourhoods, unfinished for extended periods of time
- Creating unnecessary long-term financial liabilities for municipalities, potentially to replace infrastructure never fully utilized within its 30-to-40-year life span

6.0 NEED TO POSITION THE REGION FOR LRT EXPANSION FUNDING

Competition for senior government level funding for transit systems will be intense over the coming years. Currently, the Region of Waterloo is well positioned to ensure it receives a fair share of such funding provided it continues to be seen as innovative and is continuing to work toward achieving increased ridership. Settling for virtually the same intensification level in the future that we have already been achieving on average over the past decade could prove detrimental to such efforts when other municipalities are making great strides forward in that regard.

7.0 CONCLUSION

Option 1 as presented in the LNA would represent a clear abandonment of the legacy of progressive leadership in growth management that Regional Council is renowned for. This paper has been prepared assuming Option 1 was never intended as a serious option and was included simply to illustrate the impact of implementing the minimum targets established in Provincial policy.

Option 4 as presented in this paper has clear advantages over both Options 2 and 3 through a combination of:

- Continuing the legacy of forward-thinking planning and innovative leadership for which the Region of Waterloo is renowned
- Making a clear statement that Regional Council is serious not only about responding to climate change, but also is willing to take a leading role in doing so
- Promoting a higher rate of intensification generally consistent with current trends, making it the most easily achievable of the no Community Area expansion options
- Continuing to enhance support for expansion of LRT and other higher order / high frequency forms of transit as a tool to reshape the urban areas of the Region consistent with the vision of the RGMS
- Delaying consideration of expansions for Community Area purposes until a better forecasting methodology is developed
- Serving as a low / no risk placeholder to see how the post pandemic world, the on-going change from age-in-place to age-in-neighbourhood, efforts to promote soft intensification, development of the missing middle, and climate responsive changes/initiatives unfold over the next five years
- Providing the opportunity for simple course corrections, if necessary, through future MCR processes
- Allowing resources to be directed to implementation measures aimed at solving near-term problems rather than being wasted on the process of allocating limited areas of expansions associated with Option 2, which, even if eventually required (which this paper disputes), would not be needed for decades to come