300 Dufferin Avenue
P.O. Box 5035
London, ON
N6A 4L9

Oct 7, 2025

**Re: Revisiting the Urban Growth Boundary Review Using Updated Population Projections**

Dear Members of Council,

I am writing to express my support for revisiting Council's decision regarding London's Urban Growth Boundary (UGB) in light of the updated population projections released by the Ontario Ministry of Finance in August 2025.

The UGB is one of the most important planning tools we have to manage growth responsibly. It helps to protect current and future property taxpayers by preventing higher municipal servicing costs associated with urban sprawl. Growing inwards and upwards also helps to protect farmland, and ensures that development is sustainable, affordable, and aligned with real population needs. Decisions of this magnitude should be based on the most accurate and up-to-date information available.

Since Council's original decision about the Land Needs Assessment in June 2024, the Ministry of Finance has significantly revised its long-term population projection for Middlesex-London. The 2054 estimate has been reduced by 48,300 people, from 770,100 (2024 projection) to 710,600 (2025 projection). This is not a minor adjustment: it represents a major shift that directly impacts how much new residential land the city requires. **Using the most current data and best quality of evidence we have available are integral to making good planning decisions.**

The Planning and Environment Committee voted on October 1, 2025, to move forward with the outdated population projections, which request an expansion of 1,476 hectares for community (residential) use and 88 hectares for industrial use. I did not attend this meeting as I did not want to occupy the committee's limited time, and since I am not a member of PEC I would not have been able to bring forward a motion to reconsider at that Committee.

Opening more acres of land than needed for development under outdated projections risks creating excessive land supply, which would drive sprawl, reduce agricultural protections, and undermine the integrity of our growth management framework. Once land is moved inside the Urban Growth Boundary, it cannot be put back. Future City Councils will have less flexibility to limit sprawl because future decisions refusing development proposals within the Boundary can be appealed at the Ontario Land Tribunal.

**Expanding the Urban Growth Boundary (UGB) doesn't necessarily lower housing costs. Here's why:**

**Land cost is not the main driver of housing prices.** The cost of a house is made up of land + construction + financing + profit. Land is only one piece, and often not the dominant one. Even if more land is added, developers don't sell homes at cost — they sell at what the market will bear. Prices are set by demand, not by raw land availability.

**Developers release land strategically.** Land is often held back from development ("land banking") to keep prices stable or rising. Simply designating more land for growth does not mean it will be built on quickly or cheaply. Builders pace housing starts to maintain profit margins. They will not flood the market to push prices down because doing so would undermine their business model.

**Infrastructure costs make new land expensive.** Expanding the boundary means extending roads, sewers, water lines, schools, and transit — costs that often get passed

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directly onto homebuyers. This can make new “greenfield” housing as expensive (or more) than infill housing.

**Demand-side pressures outweigh land supply.** If population growth, interest rates, or investor speculation are pushing up demand, adding more land won’t counteract that. In many cities, we’ve seen housing prices rise even as UGBs or greenfield land supplies expand, because demand growth outpaces new supply.

**Cheaper land doesn’t equal cheaper homes.** Even if land outside the UGB is initially cheaper, once it’s moved inside, the value jumps (because it can now be developed). That windfall goes to landowners, not buyers. The homes built on that land are typically “market-rate” suburban subdivisions — not affordable starter homes or deeply affordable housing.

**Better ways to increase supply exist (which we are doing)**. Gentle density (duplexes, triplexes, townhomes) in existing neighborhoods produces more diverse, affordable housing types. Encouraging infill and missing-middle housing makes better use of existing infrastructure, keeps costs lower, and adds supply where people already want to live.

**Additionally, the UGB review is ongoing, and not yet finalized.**

The City is currently in a formal Official Plan review / UGB review stage, which is when we are supposed to make changes. Draft mapping and policy amendments are still under consultation.

- Because the boundaries and growth forecasts are still being debated, there is room to adjust assumptions, targets, and mapping before final adoption.
- Making adjustments now while review is live would not create much additional work for staff and ensures that the city is not stuck with suboptimal maps or policy that fail to meet demand or reflect new reality.
- Changing targets transparently during the consultation period signals responsiveness to new information, instead of using outdated plans based on convenience or political expedience. We are updating the Official Plan and UGB precisely for the reason of not relying on outdated information to plan future growth.

I respectfully urge Council to:

1. Reconsider its earlier decision and apply the most current 2025 MOF population projections.
2. Direct staff to update the Land Needs Assessment accordingly to the most current population growth forecast before finalizing the UGB review.

This relatively minor update to our review process will maintain the credibility of the city’s planning framework in compliance with rules laid out in the Provincial Planning Statement, and demonstrate to Londoners that our growth decisions are rooted in the best available evidence. Thank you for your consideration of this important matter.

Sincerely,



Skylar Franke,
Ward 11 Councillor

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**Process to reconsider:**

**Step 1: Notice of Motion**
**Purpose:** To allow the reconsideration to even be brought forward.
**Vote required at Council:** Majority of members present.

**Step 2: Reconsideration Motion**
**Who can move:** Any member of Council who voted in the majority on June 24th (i.e., one of the 12 listed "Yeas").

**Motion from Council meeting – 24 June 2024**
Motion to approve the following: d) notwithstanding the Council-approved corporate growth projections for 2021-2051, the 2023 Ministry of Finance population projections BE ENDORSED for use as the basis for the Land Needs Assessment of The London Plan and Urban Growth Boundary Review, subject to further consultation with the Housing Supply Reference Group, the findings of the third-party economic consultant identified in clause e), below and review by Municipal Council at a future meeting of PEC; and,

- **Yeas: (12):** Mayor J. Morgan, H. McAlister, S. Lewis, P. Cuddy, S. Stevenson, J. Pribil, C. Rahman, S. Lehman, P. Van Meerbergen, S. Franke, D. Ferreira, and S. Hillier
- **Nays: (2):** S. Trosow, and A. Hopkins
- **Absent: (1)**: E. Peloza

**Motion Wording:**
That, pursuant to Section 35.7 of the Council Procedure By-law, the Council decision with respect to endorsing the 2023 Ministry of Finance population projections for use as the basis for the Land Needs Assessment of The London Plan and Urban Growth Boundary Review, as appended to the staff report dated June 11, 2024, BE RECONSIDERED to update the Land Needs Assessment (Community Growth) and Land Needs Assessment (Employment Areas) to apply the current 2025 Ministry of Finance population projections and, to revise the Urban Growth Boundary Review to accommodate approximately 1,054 hectares of developable land for Community Growth land uses.

**Vote required at Council:** Two-thirds of the whole Council (i.e., 10 of 15 members).

**Step 3: If Reconsideration Passes — New Motion**

**Motion wording:**
That Civic Administration BE DIRECTED to update the Land Needs Assessment (Community Growth) and Land Needs Assessment (Employment Areas) to apply the current 2025 Ministry of Finance population projections, consistent with findings in Appendix 'M' to this report; and, to revise the Urban Growth Boundary Review to accommodate approximately 1,054 hectares of developable land for Community Growth land uses, and that no further action be taken with regards to an Employment Areas/Industrial Urban Growth Boundary Review.

**Vote required at Council:** Simple majority.