



Memorandum

TO: Committee of the Whole
FROM: Paul Freeman, Acting Chief Planner
DATE: March 22, 2018
RE: **York Region Comments on Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe**

This memo provides a summary of York Region staff comments on the Proposed Land Needs Assessment Methodology for the Greater Golden Horseshoe (Land Needs Assessment). The Region will be required to use the final methodology as part of the Municipal Comprehensive Review to update its population and employment forecasts to 2041 and to assess the potential need for urban expansion lands.

The draft Provincial methodology is very detailed and technical in nature and contains assumptions and analysis regarding persons per unit, household formation rates, employment densities and other related growth forecast and land budget inputs.

The attached letter with the Region's detailed comments was submitted to the Province on February 27, 2018. Staff support the need for a standardized land needs assessment methodology and the general approach proposed by the Province, however staff have a number of concerns with the proposed approach, the most significant of which are highlighted below:

- The methodology needs to recognize the link between the Land Needs Assessment, the Regional Housing Strategy (as required by the Growth Plan) and the local municipal housing forecast in order to ensure consistency with the detailed technical assumptions related to population and housing unit growth by policy area (built-up area, designated greenfield area, rural area).
- The undelineated built-up area consists of mainly hamlets in the Region that have very limited growth potential. These areas should not be considered as part of the designated greenfield area density calculation. Including the undelineated built-up area as part of designated greenfield area would significantly lower the overall density and would likely make the density target of 60 residents and jobs per hectare unattainable. Regional staff are pleased to see that an additional Environmental Registry posting has been issued by the Province to address this

March 22, 2018

2

York Region Comments on Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe

issue. Regional staff will be providing comments to the Province on this posting in late March 2018.

Staff will continue to work with Provincial staff as needed to finalize the Land Needs Assessment Methodology in the coming months.

Paul Freeman, MCIP, RPP
Acting Chief Planner

Attachment (1)

#8229159



February 27, 2018

Mr. Aidan Grove-White, Manager
Partnerships and Consultation Branch
Ontario Growth Secretariat
Ministry of Municipal Affairs
777 Bay Street, 17th Floor
Toronto, ON M5G 1Z3

Dear Mr. Grove-White

Re: York Region Comments on Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe (Notice #013-2016)

Further to the release of the Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe on December 19th, 2017, York Region staff are pleased to provide the following comments on the draft methodology.

1. Staff support the need for a standardized land needs assessment methodology and the general approach proposed

During the 2006 Growth Plan conformity work, the land needs assessment was often subject to appeals at the Ontario Municipal Board for many municipalities across the GGH, including York Region. As part of the 2006 conformity exercise, York Region staff and others requested the Province develop a standardized method for assessing land needs. Staff are generally in support of the standardized approach developed by the Province and commend the Province for putting forward a draft methodology in a relatively timely manner following the release of the new Growth Plan in May 2017.

2. The methodology needs to clearly identify the link between persons per unit assumptions in the land needs assessment, the Housing Strategy and the local municipal forecasts

As set out in the proposed methodology, the calculation of population resulting from growth in new housing units requires assumptions to be made regarding the calculation of an overall weighted persons per unit (PPU) factor. In order to calculate a weighted PPU, information is needed on what the appropriate housing mix should be. The housing supply by structure type would be a prime determinant of this together with the Housing Strategy and the Intensification Strategy.

In addition, the population generated through the housing mix provided by the Housing Strategy and local municipal forecast needs to be consistent with the population calculated through the land need assessment by policy area. Achieving this requires consistent assumptions regarding housing mix and persons per unit by policy area.

The methodology needs to recognize the link between the outcome of the land needs assessment and the Housing Strategy and the local municipal forecast, which upper tier municipalities are required to undertake as per Growth Plan policy 5.2.3.2.

3. Need for Guidance on PPU Adjustments for New Units to Reflect More Families Occupying Higher Density Housing Types

As stated in the draft methodology, achieving the overall Growth Plan policy objectives will likely mean higher persons per unit in medium and higher density housing types than in the past. Explanation Box 7 on page 52 of the draft methodology provides a general description of the need to make this adjustment. Staff are requesting that a specific example be added to the explanation that would set out the basis for making such an adjustment and to show these calculations as part of the methodology.

4. Undelineated Built-up Area Should Not Be Considered as part of the Designated Greenfield Area

York Region has approximately 1,400 developable hectares of undelineated built-up area community lands that are developed at very low densities and have very limited potential for additional development. Including the undelineated built-up areas as part of the Designated Greenfield Area (DGA) would significantly lower the overall density for the DGA and would likely make the DGA density target of 60 residents and jobs per hectare unattainable in York Region. Regional staff are pleased to see that an additional EBR posting has been issued to address this issue. The proposed amendment to the Growth Plan transition regulation would exempt undelineated built-up areas in the inner ring from being counted as DGA for the purposes of calculating the DGA density target and land needs assessment. Any additional comments will be provided in response to the EBR posting.

5. More flexibility is requested to revisit assumptions in the land needs assessment throughout the MCR process

The methodology needs to recognize that before finalization of the land needs assessment, the required inputs from the MCR need to be completed including input from the Housing Strategy, Employment Strategy, Intensification Strategy and local municipal forecasts. The finalization of the land needs assessment should be contingent on the required inputs determined through the MCR.

6. York Region staff are requesting confirmation of ability to adjust household formation rates

York Region's household formation rates in the 2016 Census are relatively lower than other upper tier municipalities in the GTHA (particularly in the 65+ age groups) resulting in a lower housing forecast than previous forecasts prepared by York Region staff. The draft methodology states that while it can be assumed that household formation rates in 2031 and 2041 will not vary significantly from 2016, different rates can be assumed if a clear rationale is provided. As York Region matures and becomes more urban, the shift toward more non-family households is likely to have an impact on household formation rates. Given this trend, York Region staff anticipate a need to adjust the household formation rates to reflect this anticipated shift and request confirmation that this adjustment meets the criteria for a clear rationale.

7. Request for flexibility in using 2031 Growth Plan Population and Employment Forecasts

Although staff have not yet undertaken the detailed land needs assessment, York Region may have challenges in meeting the 2031 Growth Plan forecasts due to the timing of

required infrastructure. Should this case arise when the land needs assessment work is undertaken, York Region staff would request the use of alternative forecasts as necessary for 2031 that better reflect the timing of infrastructure.

8. Clarification in the methodology is required on the sequence of steps to derive the overall employment land density target

The land needs assessment methodology requires the employment land forecast to be divided by a density target from the Employment Strategy in order to calculate any additional employment land need. The methodology suggests that different density targets can be applied to existing versus newly developing areas in order to inform the overall target. However, it is not clear how this can be accomplished given that it is not known whether urban expansion is required at this stage in the process (Step E6 in the draft methodology).

York Region staff propose establishing a job “capacity” in existing employment areas (vacant lands plus intensification potential) and comparing this to the employment land employment forecast in 2041. If employment land employment exceeds the existing capacity, a density target specific to new expansion areas could be applied. This new density would be used to generate the quantum of additional employment land required to support growth. The new overall density target at 2041 would be calculated by dividing the 2041 employment land employment by the existing plus new employment land area.

9. More direction is required on the distribution of the major office forecast by GTHA municipality

The methodology states that coordination among the GTHA municipalities when planning for employment will be very important. The methodology requires that the major office employment forecast take into account the broader regional market. The amount and distribution of major office employment growth is a fundamental input to planning for transit and other major infrastructure. York Region staff request clarification and direction from the Province on how municipalities are to assess the major office forecast in the context of the broader GTHA office market.

10. York Region is requesting to use its 2016 employment survey estimate as the 2016 employment base

The land needs assessment methodology proposes using the 2016 Census data as the base for the employment forecast. The Census estimate underrepresents the actual employment in the Region (as referenced on page 71 of the draft methodology which states that the Census only counts a maximum of one job per person and does not capture cases where people hold multiple jobs). Use of the 2016 Census employment estimate presents challenges because the Census base is lower than the 2016 York Region Employment Survey estimate by approximately 67,900 jobs. The York Region Employment Survey directly surveys all businesses with a physical location in the Region and therefore provides a more accurate estimate of the 2016 employment base.

11. The methodology should soften the language regarding the need to assess employment area lands for conversion

Page 101 of the draft land needs methodology states that if there is a shortage of community area land, municipalities will need to assess whether any employment land is appropriate for conversion (also subject to criteria tests in accordance with Growth Plan policy 2.2.5.9) prior to undertaking a settlement area boundary expansion. Notwithstanding the need to meet the criteria tests in the Growth Plan for conversions, this statement undermines the protection of employment lands by implying that municipalities *need* to

assess whether *any* employment land is appropriate for conversion. Staff recommend that the wording be revised such that municipalities *may* consider employment land conversions subject to the required tests in the Growth Plan.

12. York Region is requesting additional guidance on the Housing Strategy

The Growth Plan and the proposed Land Needs Assessment provide a high level description of what the Housing Strategy should contain. Staff are requesting clarification on the expected content of the Housing Strategy and how the housing structure type forecast is to be integrated in the land needs assessment.

York Region staff would be happy to discuss these comments further with Provincial staff as part of the finalization of the land needs assessment methodology. For questions regarding the above comments, please contact Paul Bottomley, Manager, Policy, Research and Forecasting at 1-877-464-9675, ext. 71530 or at Paul.Bottomley@york.ca.

Sincerely,



Paul Freeman, MCIP, RPP
Acting Chief Planner