

February 9, 2016

Chair Emmerson and Members of Regional Council
Regional Municipality of York
17250 Yonge Street
Newmarket, Ontario
L3Y 6Z1

Attention: Denis Kelly, Regional Clerk

RE: York Region 2041 Preferred Growth Scenario

Dear Sirs and Madams:

We are writing on behalf of our clients, Royalpark Homes and SigNature Communities, to express our concerns with the assumptions, methodology, and conclusions of the recently released York Region 2041 Preferred Growth Scenario, and its associated supporting documents. On review of Staff's Report, our team raises the following key concerns:

1. The Concept of “More than Conformity”

We understand that the Region of York has an obligation to conform to the Provincial Growth Plan (2013). It appears however, that the planning rationale for both the enhanced intensification target and the higher than required ‘Whitebelt’ greenfield density targets in the York Region Preferred Growth Scenario are based on the assumption that more intensification and higher densities better achieve Provincial policy objectives. In the Growth Plan (2013), the test is **conformity**, and not **more than conformity**. We do not see any rationale that indicates more than conformity will achieve a better planning outcome, particularly from a market acceptance perspective. The Provincial requirement of 40% intensification is a minimum target and the minimum ‘Whitebelt’ greenfield density target is 50 persons and jobs per gross hectare. As these are minimum targets, we are of the opinion that adopting them as they are in the Growth Plan (2013) does not preclude the achievement of higher rates of intensification, or the achievement of higher ‘Whitebelt’ greenfield densities based on market acceptance over time.

Overall, we believe that adopting the **more than conformity** approach significantly compromises the Region’s attractiveness for development in comparison to other Regional Municipalities in the Greater

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Golden Horseshoe that adopt the minimum intensification and 'Whitebelt' greenfield density targets established by the Growth Plan (2013). Conformity can still be achieved by adopting lower targets.

2. The Intensification Assumption

The Growth Plan (2013) requires a 40% intensification target. The 2041 Preferred Growth Scenario instead is based on a 45% intensification target. At a general level, we feel that this target for intensification:

- Promotes a housing mix that is not realistic from a market perspective, and is consequently, not likely to be achieved by 2041;
- Threatens housing affordability because the 45% intensification target effectively and unnecessarily restricts the supply of designated greenfield areas; and
- Compromises the Region's attractiveness for development in comparison to other Regional Municipalities in the Greater Golden Horseshoe that utilize a lower intensification target.

For example, to achieve the 45% intensification target, a substantial shift in built form will be required throughout the Region, with an emphasis on the development of apartment type units. It is agreed that some municipalities such as Markham, Richmond Hill, and Vaughan will begin to accommodate a greater share of apartment units, based on their evolving urban contexts. However, it is not apparent if the Region as a whole can accommodate 94,450 new apartment units (36% of all housing growth) to 2041. There is no historic or evolving urban context that would make apartment living attractive to the market in the more rural/suburban communities in the north part of York Region.

Taking a pragmatic and market focused look at the impact of these apartment unit allocations, today in East Gwillimbury, there are 250 apartment units, primarily in low/mid-rise forms. There are no condominium apartment buildings over 5 storeys in the Town. The Region has forecasted the number of apartments in East Gwillimbury to reach 2,570 units by 2041. We question whether the market in East Gwillimbury can support that number of apartment units.

Further, and as land in York Region and other areas in the GTA becomes too expensive and/or is exhausted and housing values continue to increase, it is possible that municipalities such as East Gwillimbury could become more attractive to purchasers in search of ground-oriented housing. If increased demand for new ground-oriented housing is absorbed by East Gwillimbury, the Town could develop its designated greenfield areas and 'Whitebelt' expansion lands much earlier than projected by the Region. We suggest the 40% intensification target identified in the Growth Plan (2013) is appropriate.

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3. The Greenfield Density Targets

We question the requirement for 70 persons and jobs per hectare for new community areas in the existing designated greenfield areas going forward. The Growth Plan (2013) instead requires 50 persons and jobs per hectare. Further, the proposed increase to 75 persons and jobs for new ‘Whitebelt’ designated greenfield areas raises substantial concern and seems an unprecedented approach in the Greater Golden Horseshoe. Our concerns are the same as those related to the intensification target and we believe that these higher than required or typical ‘Whitebelt’ greenfield density targets:

- Promote a housing mix that is not realistic from a market perspective, and is consequently not likely to be achieved by 2041, particularly in King, East Gwillimbury, Georgina, and Whitchurch-Stouffville;
- Threaten housing affordability because they effectively and unnecessarily reduce the supply of designated greenfield areas; and
- Compromise the Region’s attractiveness for development in comparison to other Regional Municipalities in the Greater Golden Horseshoe that utilize lower greenfield density targets.

In addition, we feel that these higher than required or typical ‘Whitebelt’ greenfield density targets will result in an urban structure where the oldest neighbourhoods are representative of the lowest densities, and the newest areas achieve the highest densities. This regional and local scale urban structure would seem counter intuitive and may lead to an urban form that is not desirable. In our opinion, it is essential that the ‘Whitebelt’ greenfield density assumptions be reviewed in terms of urban structure, built form, housing mix, housing affordability, marketability, as well as infrastructure and service delivery perspectives.

A key issue with the application of higher ‘Whitebelt’ greenfield densities is the definition of developable area. Stormwater management facilities, schools, parks and other community-supporting facilities, while necessary elements of a complete community, require substantial land areas that do not assist in achieving density targets. In some cases the development standards for schools have become even more suburban over time. The higher than required or typical ‘Whitebelt’ greenfield density targets, in combination with significant land takings for low density or no density community supporting facilities compounds the already stated issues of market acceptance, housing mix and affordability, and the competitiveness of York Region as a place to invest.

4. The Definition of “Leap Frog” Development

The York Region 2041 Preferred Growth Scenario states that: *“Within local municipalities requiring urban expansion, fill in existing ‘Whitebelt’ gaps in the urban fabric before extending outwards from the existing urban area, avoiding ‘leap frog’ development patterns.”* This statement raises a number of concerns that require further explanation and articulation.

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To begin, and while this approach may represent a valid planning proposition with respect to overall urban structure in the Region, it has not been adequately evaluated with respect to other alternative approaches that may be more appropriate and more generally acceptable throughout York Region, and in particular, in East Gwillimbury. This approach assumes that an urban structure that fills in ‘Whitebelt’ gaps is the preferred approach to greenfield development moving forward. This approach to community building has, to date, produced the amorphous suburban pattern of Markham, Richmond Hill and Vaughan where historic communities have been absorbed by new development, and consequently, their once distinct character and identity was virtually lost.

In York Region, the municipalities of King, East Gwillimbury, Whitchurch-Stouffville, and Georgina still retain an urban fabric that includes urban communities that are separated by rural/agricultural lands, as well as the Natural Heritage System. The communities within each of these municipalities retain their historic identity and character, elements that are highly valued by residents. We are concerned that a continuation of an approach to growth that focuses on filling in the ‘Whitebelt’ gaps will create an urban structure of one gigantic suburban agglomeration that ignores existing development patterns and wipes out historic community character and identity.

Further, the phrase “leap frog development patterns” is undefined, and appears to be applied in the York Region 2041 Preferred Growth Scenario without clear criteria. It is our understanding that development that is not contiguous to existing or planned development would represent “leap frog development patterns” and would produce new communities that are not an extension of an existing community. We are unclear how the York Region 2041 Preferred Growth Scenario defines “leap frog development patterns”, and how this term has been applied to assess the range of growth options.

The specific requirements for urban area expansion within the Region are found under YROP 2010 Policy 5.1.12. Under Section 8.1 of Attachment 4, the eleven (11) requirements of YROP 2010 Policy 5.1.12 are outlined as the policy requirements for urban boundary expansion in the Region. Under Attachment 1 2041 Draft Growth Scenario Evaluation, additional factors are also outlined that refer to the September 2015, Council adopted recommendations of the Draft Growth Scenario Evaluation report (Clause 10 of Committee of the Whole Report No.13), in which staff outlined a number of factors that would inform the municipal comprehensive review and evaluation of the three 2041 draft growth scenarios.

We understand the policies and criteria set forth under Section 5.1.12 and the Council adopted recommendations, but we are unclear how the factors and requirements were applied to each Whitebelt area, and why the lands of East Gwillimbury North do not achieve the requirements?

The *Scoped Agricultural Assessment of Preferred Growth Scenario* report, prepared by PLANSCAPE, specifically identified the East Gwillimbury North lands as agricultural operations that would be most impacted by growth. In comparison, Markham was also identified as high impact but is considered an area for expansion



and growth. Were there additional factors, other than agricultural operations, that differentiated the East Gwillimbury North lands from other Whitebelt areas?

Finally, the level of collaboration between our clients, the Town, and the Region has not been recognized or considered by the Region. We refer to the unanimous Town of East Gwillimbury Council resolution CWC2013-198, from October 2013, that stated:

THEREFORE BE IT RESOLVED by the Municipal Council; of the Corporation of the Town of East Gwillimbury as follows:

- 1. THAT Staff be directed to work with the proponents of Green Earth Village development to discuss innovative sustainability and Community initiatives associated with the project;*
- 2. AND THAT Staff takes active steps to ensure the Green Earth Village project is strongly considered when the next opportunity for urban boundary expansion is considered;*
- 3. AND THAT Staff continue to assist the Green Earth Village representatives in the preparation and processing of a Comprehensive Secondary Plan that would be implemented at the appropriate time in the future.*

5. The Role of the 2041 Planning Horizon

The Growth Plan (2013) came into effect in June of 2006, and it has been subsequently Amended in 2012 and 2013. It currently utilizes a planning horizon of 25 years to 2041. The Places to Grow Act requires that the Growth Plan (2013) be updated every 10 years. However, it can be amended at any time. Section 1.1.2 of the Provincial Policy Statement (2014) deals specifically with the time horizon for planning documents in Ontario. It states:

“Sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time period of up to 20 years. However, where an alternate time period has been established for specific areas of the Province as a result of a provincial planning exercise or a provincial plan, that time frame may be used for municipalities within the area.”

Based on our understanding of Provincial Policy, we agree that the York Region 2041 Preferred Growth Scenario should utilize the same time horizon (to 2041) as the Growth Plan (2013). We also believe, however, that the Region should not differentiate any additional time frame detail (or add time frame restrictions) within the 25 year horizon, and that the local municipalities should also use the same time horizon for their land use planning purposes in their Official Plans.

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For example, the York Region 2041 Preferred Growth Scenario states: *“Urban expansion in East Gwillimbury is proposed for post 2036. There is no urban expansion prior to 2036 because of the relatively abundant existing ground-related residential supply in the Town, and the anticipated pace of development in East Gwillimbury.”* We feel that this additional time frame restriction is both unnecessary and problematic because it artificially restricts the supply of land for greenfield development in East Gwillimbury, which has implications with respect to market acceptance, housing affordability, and the Region’s and Town’s investment attractiveness.

Local municipalities should be permitted to manage their land supplies over the entire time horizon to respond to the market and ensure a competitive development environment. Phasing is appropriately a complex decision about market responsiveness and infrastructure investment rather than simply a planning policy response.

Further, development in York Region will not end in 2041. There will be ongoing adjustments to the time horizon, as well as the population and employment projections that have become so fundamental to the planning process in the Greater Golden Horseshoe. At this point in time, the Region needs to strategically consider all of the issues of urban structure, built form, housing mix, housing affordability, as well as infrastructure and service delivery in the context of market acceptance and investment attractiveness over time, including beyond 2041.

6. Climate Change Mitigation and Adaptation

In addition to all of the other option evaluation criteria established through the Region’s process, climate change mitigation and adaptation are issues that need to be addressed. These additional criteria are necessary to manage the risks of a changing climate to our health, economy, environment, and infrastructure. Climate change programs and sustainability criteria should be at the forefront of the growth option evaluation and the consideration of these needs should be acknowledged in the Preferred Growth Scenario.

In addition to climate change and sustainability, there should also be clear linkages between public health and built form choices. We face the issues of rising greenhouse gas emissions, an ageing population, and increasing public health challenges all related to the way in which we interact with our built and natural environments. Direct intervention in order to correct these converging issues can be effectively dealt with at the local and municipal levels, and importantly, at the regional level.

The “Thinking Green Development Standards” sustainability program prepared by the Town of East Gwillimbury was approved by Council with the intent of improving sustainability and climate change outcomes through more progressive built form solutions. Opportunities to utilize this program have been thwarted to a great extent by an abundance of previously approved plans that are exempt from the “Thinking Green” review and by a lack of enforcement provisions within Provincial policy documents.



Encouragement to progressive builders who can demonstrate and achieve higher order scores within programs such as “Thinking Green” should be considered as a component within the Region’s evaluation of new growth areas as a means to leveraging meaningful improvements to current climate change levels.

Key Points

The following is a summary of the key points from the above discussion.

1. Minimum targets of 40% intensification and 50 persons and jobs per gross hectare, as targets in the Growth Plan (2013), do not preclude the achievement of higher rates of intensification. The test is **conformity**, and not **more than conformity**.
2. The 2041 intensification target of 45% rather than 40%:
 - Promotes a housing mix that is not realistic from a market perspective, and is consequently, not likely to be achieved by 2041;
 - Threatens housing affordability because the 45% intensification target effectively and unnecessarily restricts the supply of designated greenfield areas; and,
 - Compromises the Region’s attractiveness for development in comparison to other Regional Municipalities in the Greater Golden Horseshoe that utilize a lower intensification target.
3. Higher than required or designated ‘Whitebelt’ greenfield density target of 70 persons and jobs per hectare combined may lead to an urban form that is not desirable and should be reviewed in terms of urban structure, built form, housing mix, as well as infrastructure and service delivery perspectives, all in the context of market acceptance and investment attractiveness over time.
4. The filling in of ‘Whitebelt’ gaps between communities will create a suburban agglomeration that absorbs existing development patterns and historic communities.
5. The use of the phrase “leap frog development patterns” is not clearly defined, and in our opinion, not appropriately applied in this planning exercise.
6. The Region should not differentiate additional and specific time frame details, or restrictions within the 25-year time horizon. Local municipalities should be permitted to manage their land supplies over the entire time horizon to respond to the market and ensure a competitive development environment.
7. Climate change mitigation and adaptation, as well as sustainability criteria should be included in the review of growth options and acknowledged in the Preferred Growth Scenario.

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In closing, we hope that this letter proves to be helpful as the Region works toward an appropriate growth management strategy. Our team welcomes any opportunity to meet with staff to discuss our concerns and ideas and to work with them, and with Council to ensure a healthy, sustainable, and prosperous future for York Region.

Sincerely,



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Principal

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