



SUBMISSION ON METHODOLOGY FOR LAND NEEDS ASSESSMENT FOR THE GREATER GOLDEN HORSESHOE

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Summary

The “Proposed Methodology for Land Needs Assessment for the Greater Golden Horseshoe” aims to improve implementation of Growth Plan for the Greater Golden Horseshoe, 2017, by standardizing land budgeting for municipalities. However, the Proposed Methodology misses the opportunity to implement an “intensification first” planning approach.

Across the Greater Golden Horseshoe there is significant capacity for intensification to account for more development and housing than planned for. CBI’s analysis of intensification potential in Mississauga found 1,627 hectares of land inside the built-up-area with a current density (FSI) of less than 1.0 (excluding established low-rise residential neighbourhoods and employment lands). Even at modest density this land could be redeveloped to accommodate over 160,000 new homes—much more Mississauga’s planned growth through to 2041.

In order to better understand and capture intensification opportunities the Proposed Methodology for Lands Needs Assessment should require municipalities to directly identify, assess and prioritize development and redevelopment opportunities. Taking a more nuanced look at all development and redevelopment opportunities in both the built-up area and designated greenfield area would allow municipalities to more proactively plan to meet and exceed the Growth Plan’s targets.

Such an approach has been taken in the United Kingdom through their Strategic Housing and Land Availability Assessments (SHLAA). Mirroring the UK’s SHLAAs would better implement the “intensification first” approach of the Growth Plan, reduce land consumption, and protect farmland and natural capital in the Greater Golden Horseshoe.

1. Introduction

The Growth Plan for the Greater Golden Horseshoe responds to a series of regional challenges. The plan recognizes expensive infrastructure renewal, costly congestion, degradation of environmental resources and services, environmental disease, and loss of farmland as the result of decades of unhealthy development patterns. The original 2006 plan and the 2017 update identify a shift in development patterns as the solution to these challenges.

The Growth Plan establishes an “intensification-first” approach to development and community building.¹ The plan is meant to protect farmland and natural heritage by curbing sprawl and encouraging higher-density complete communities around Urban Growth Centres and transit infrastructure. In order to achieve the intensification-first approach called for by the Growth Plan, municipalities are required to “*demonstrate that they are optimizing existing urban land, infrastructure and public service facilities, before they expand the urban area to accommodate population and employment growth.*”²

Lands needs assessments act as a tool to implement the Growth Plan by ensuring that municipalities are planning with the minimum intensification and density targets of the Growth Plan in mind. However, the Proposed Methodology has been developed prior to Province offering methodological guidance to municipalities on how to conduct an analysis of intensification potential. Under an intensification first approach that is designed to reduce sprawl, a comprehensive assessment of intensification potential that seeks to maximize intensification opportunities should come before an assessment of required greenfield land.

This submission focuses on the broader application of the Proposed Methodology for Land Needs Assessment, rather than the details of each step of the Proposed Methodology itself, or the availability and reliability of data required to carry out the assessment. Our submission is framed around the question: “*Does the Proposed Methodology support an intensification first approach and the efficient use of land via maximizing intensification opportunities and reducing the consumption of greenfield land?*”

¹ Ministry of Municipal Affairs (May 2017). Growth Plan for the Greater Golden Horseshoe, 2017. Available at: [http://placestogrow.ca/index.php?option=com_content&task=view&id=430&Itemid=14#2.2.3, section 2.1 p12.](http://placestogrow.ca/index.php?option=com_content&task=view&id=430&Itemid=14#2.2.3,section2.1p12)

² Ministry of Municipal Affairs (December 2017). Discussion Paper: Proposed Methodology for Land Needs Assessment For the Greater Golden Horseshoe. Section 1.1.

2. Areas of Concern

In considering whether the Proposed Methodology will encourage municipalities to reduce land consumption our primary concern is that most of the inputs and assumptions for the Proposed Methodology are provincially set. This top-down approach reduces the responsibility for municipalities to adequately study the local market, servicing and environmental conditions. We have three more detailed concerns:

1. The methodology is designed to quantify (and by extension, permit) the maximum allowable amount of greenfield land that a municipality can develop based on meeting the minimum Growth Plan targets. A more effective LNA would aim to quantify, optimize and prioritize all development opportunities in attempt to exceed the Growth Plan's targets.
2. There is a lack of guidance for either Intensification Analyses or Designated Greenfield Area (DGA) density analyses. These analyses, if well designed, would help municipalities better understand opportunities to reduce land consumption. These analyses are also important in order to ensure that a municipality has not over constrained development opportunities. Because the Growth Plan limits greenfield development, municipalities must plan for an abundance of available and feasible intensification opportunities in order to ensure housing supply is not restricted.
3. Because the Proposed Methodology sets the long-term upper limit on DGA land available for development we are concerned that the process could lead to a failure in meeting Growth Plan targets if municipalities achieve less growth than anticipated by the Growth Plan forecasts.

These concerns are discussed in more detail below.

2.1 The Proposed Methodology asks “how much land is needed?” not “how do we best use land?”

The Proposed Methodology's purpose is to “*assess how much land is needed to accommodate forecasted population and employment growth.*”³ Specifically, the output of the Proposed Methodology is the quantum of designated greenfield land required by a municipality in order to meet its forecasted growth.

The Proposed Methodology does not ask Municipalities to proactively plan to reduce land consumption. Applying the Growth Plan's minimum targets is sufficient.⁴ The Proposed

³ Ministry of Municipal Affairs (December 2017). Section 1.3.

⁴ E.g. Ministry of Municipal Affairs (December 2017). Section 1.1: “*Municipalities are required to demonstrate, among other matters, that there are insufficient opportunities to accommodate forecasted growth to the*

Methodology establishes, and by extension, permits the upper limit of how much greenfield land a municipality would potentially require were it to meet the Schedule 3 forecasts. No iteration or evaluation of how this amount of greenfield land could be reduced is required. At a minimum, an “*intensification first*” lands needs assessment should require such an evaluation to occur and be informed by a comprehensive intensification analysis.

There is another approach to land budgeting which is more appropriate—an *activity-based* approach that assesses the optimal potential of real sites, including opportunities in both the Built-Up Area (BUA) and DGA.⁵ This type of approach is required in the United Kingdom through their Strategic Housing Land Availability Assessment (SHLAA) and is discussed in more detail in section 3.2 of this submission.

An activity based approach to lands needs assessments would determine how much programming—housing, employment, services and infrastructure—each site across a municipality could accommodate. This approach would place an emphasis on maximizing the potential of each development opportunity and would equip municipalities with the analysis needed to proactively plan and shift policy in order to meet and exceed the Growth Plan’s targets in both the short and long-term.

These assessments would also help municipalities generate a stronger understanding of urban structure, infrastructure needs, opportunities to integrate land-use and transit planning, and the local benefits of intensification.

2.2 Lack of guidelines for an Intensification Analysis and DGA Density Analysis

As noted, the Proposed Methodology permits the application of the Growth Plan’s minimum targets. However, the Proposed Methodology does suggest that alternative (e.g. increased) intensification rates and DGA densities can be applied to the Lands Needs Assessment via the application of an Intensification Analysis and a DGA Density Analysis. Given that one of the Growth Plan’s key goals is to reduce land consumption, an Intensification Analysis and DGA Density Analysis should be critical components of a complete Lands Needs Assessment methodology, rather than just inputs.

While some municipalities have undertaken intensification analyses, the rigour and approach of these analyses varies widely.⁶ Developing consistent, pro-active methodologies for

Growth Plan Horizon through intensification in delineated built-up areas and in designated greenfield areas based on the respective minimum intensification and density target for each of these policy areas”

⁵ Taylor, Zach and John van Nostrand, (2008), Shaping the Toronto region, past, present, and future: an exploration of the potential effectiveness of changes to planning policies governing greenfield development in the Greater Golden Horseshoe, report; Neptis Foundation.

⁶ For example, the City of Guelph conducted a thorough site-based analysis of intensification potential (Community Design and Development Services, City of Guelph (2007) Guelph Growth Management Strategy:

intensification analyses and DGA density analyses that help municipalities minimize DGA land consumption would help strengthen the outcomes and effectiveness of the Growth Plan.

1. DGA Density Analysis

The Proposed Methodology offers no guidance as to what a DGA density analysis should include. Without guidelines we expect that DGA density analyses will focus on how to meet the minimum density target. As it stands, meeting the minimum requirement presents a challenge for those municipalities who failed to meet minimum targets during the first decade of the Growth Plan: nine outer ring municipalities had lower DGA density targets approved under the original Growth Plan⁷ due to anticipated challenges in meeting the 50 people and jobs per hectare target.

In order to help municipalities achieve a more compact built form in the DGA, the Land Needs Assessment should include direct guidelines for carrying out a DGA density analysis. These guidelines should be designed to ensure that DGA density analyses are carried out in the spirit of the Growth Plan's objectives. To do so, the guidelines should be designed to identify which DGA lands can accommodate higher densities (e.g. new avenues, transit corridors and transit stations), and if/how the overall DGA can be planned to achieve a density higher than the Growth Plan requirements.

2. Intensification Analysis

The Proposed Methodology does offer limited guidance for the completion of Intensification Analyses.⁸ However, the guidance offered may lead to municipalities only planning to meet the minimum intensification target, rather than fully evaluating actual local conditions and optimizing intensification.

The Proposed Methodology discussion paper indicates in Explanation Box 5 that a catalogue of sites with intensification potential is necessary—this would be a critical first step to comprehensively understanding the full potential of intensification. However, the Proposed Methodology does not require a robust analysis of site potential. Specifically, the Proposed Methodology suggests that the intensification potential of sites can be calculated according to existing zoning by-laws. This approach fails to proactively plan for intensification since most municipalities have not updated their zoning by-laws to optimize for intensification.

Residential Intensification Analysis Report.) Other municipalities, like Northumberland County, have undertaken non-site based analyses, or have not published the methodologies used. Other municipalities, like Peel, have not quantified intensification potential.

⁷ Ministry of Municipal Affairs and Housing (2015). Performance Indicators For the Growth Plan for the Greater Golden Horseshoe, 2006. Available at: <http://www.mah.gov.on.ca/AssetFactory.aspx?did=10849>

⁸ Ministry of Municipal Affairs (December 2017). Explanation Box 5.

The proposed approach allows for a restrictive approach to intensification—a municipality only needs to show that it can meet the intensification target. Instead, a thorough intensification analysis and associated intensification plan should identify and plan for an abundance of potential intensification sites that allow for intensification to happen more organically, rather than on as few sites as needed. In order to ensure housing supply is not constrained, there should be a healthy supply of intensification sites that are available and where redevelopment is feasible.

2.3. The Proposed Methodology does not sufficiently incorporate time factors

The final challenge with the Proposed Methodology is that it only considers the long-range land needs of a municipality and assumes that the Growth Plan's population and employment forecasts are infallible—municipalities must plan as though they will achieve the exact growth called for. Because the Proposed Methodology only produces the long-term quantum of land required, any variation to growth rates, particularly in the short-term, could have consequences towards meeting the Growth Plan's targets.

Early assessments have indicated that economic growth is intensifying in existing growth centres more than predicted.⁹ This means that municipalities that follow the Proposed Methodology risk over-dedicating land in peripheral greenfield areas, undermining the intent of the Growth Plan.

The Growth Plan does require municipalities to meet the intensification target on an annual basis. However, if growth varies from the Growth Plan's forecasts, municipalities might not have the correct policies in place and/or may over-invest in greenfield-supportive infrastructure, making it more difficult to achieve sufficient intensification.

Furthermore, if growth proceeds slower than anticipated, municipalities may not achieve the required density in greenfield areas. Since the greenfield density target is not applied annually, but on aggregate, slower than anticipated growth risks leaving behind lower-density greenfield development than initially planned for. Municipalities have shown a propensity to “front load” low-density greenfield development: Through to 2011, all but one outer ring municipality had developed its greenfield areas to a lower density than called for; three inner ring municipalities also fell short (see table 1).

⁹ Clayton, Frank (February 2018). City of Toronto's Economic Success Poses a Conundrum for Province's "Growth Plan." Available at: <https://www.ryerson.ca/cur/Blog/blogentry23/>

Table 1: Planned DGA density vs. Estimated Density of Developing DGA¹⁰

Inner Ring	Planned DGA Density	Estimated Density of Developing DGA (2011)
Toronto	N/A	N/A
City of Hamilton	50	36
Region of Durham	50	40
Region of Halton	50	60
Region of Peel	50	60
Region of York	50	49
Outer Ring	Planned DGA Density	Estimated Density of Developing DGA (2011)
City of Barrie	50	38
City of Brantford	50	39
City of Guelph	50	35
City of Kawartha Lakes	40	8
City of Orillia	42	55
City of Peterborough	50	23
County of Brant	40	22
County of Dufferin	44	25
County of Haldimond	29	12
County of Northumberland	30	8
County of Peterborough	40	18
County of Simcoe	39	10
County of Wellington	40	20
Region of Niagara	50	18
Region of Waterloo	50	31

¹⁰ Ministry of Municipal Affairs and Housing (2015)

A more robust land needs assessment should consider how a municipality will be developed over multiple time scales (e.g. next five years, 5-15 years, and 15-25 years). Such an assessment should show where growth in each time scale is anticipated to occur, and how this growth will comply with the Growth Plan's objectives within each time scale.

Carrying out a site specific analysis, as advocated above would aid with this issue. If development sites within the DGA and BUA are assessed not just for development capacity, but also availability and development achievability/feasibility, municipalities can better plan for and adjust to changing growth rates.

3. Improving the Proposed Approach

As discussed, implementation of the Growth Plan would be improved if the Proposed Methodology incorporated a method to proactively identify actual development opportunities within the built-up area. While most upper- and single- tier municipalities within the Greater Golden Horseshoe have assessed residential intensification potential to some degree, only a few have identified actual sites of intensification potential.

There is significant potential for more intensification beyond the minimum requirements of the Growth Plan—that the Growth Plan's own intensification target increases over time is a tacit admission of this. In order to better capture this potential municipalities need to be better equipped to understand where and how intensification can proceed.

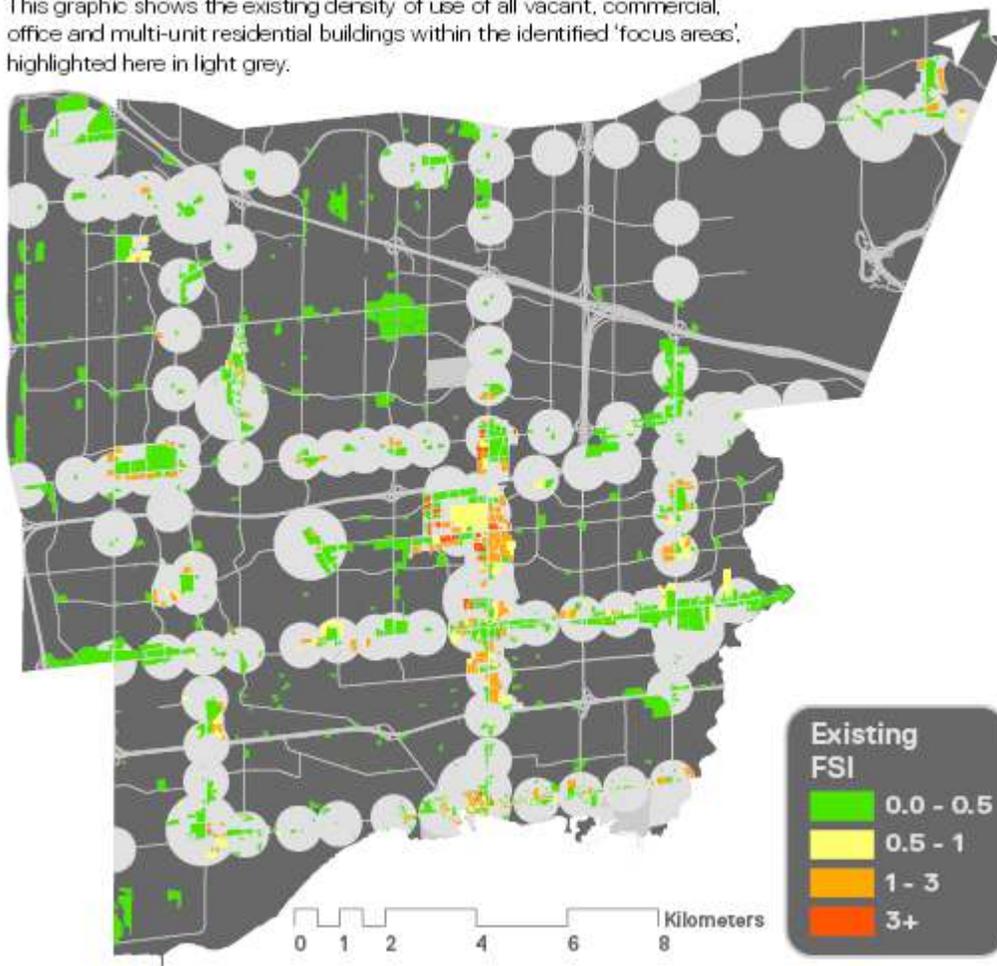
3.1 CBI's Analysis of Mississauga

The Ryerson City Building Institute has been carrying out an intensification analysis of Mississauga based on a straightforward GIS-based analysis. This analysis is based on identifying sites within Mississauga's built boundary that would be suitable for intensification. Our primary filter was identifying existing low-density commercial and multi-residential sites along proposed or potential transit corridors as these sites offer easier redevelopment opportunities.

Our initial analysis shows that Mississauga has **1,627 hectares** of land outside established residential neighbourhoods and employment areas with a density (Floor Space Index) less than 1.0. These sites, when redeveloped to modest densities (between an FSI of 1.5 and 3.25) have the potential to accommodate over **160,000 new homes**, even after reserving land for population based employment and services.

Potential Land Supply in Mississauga

This graphic shows the existing density of use of all vacant, commercial, office and multi-unit residential buildings within the identified 'focus areas', highlighted here in light grey.



Incorporating opportunities to add additional density to low-density residential neighbourhoods through secondary suites, accessory dwelling units, and gentle density (e.g. townhouses, walk-up apartments, multiplexes) would add even more units to our analysis.

Important findings from this analysis include:

1. The amount of housing that Mississauga's BUA can accommodate far exceeds the needs of Mississauga's 2041 population growth allocation of 100,000 new residents and could accommodate growth well beyond 2051.
2. Mississauga's BUA could accommodate 80% of the forecasted population growth for the entire Region of Peel through 2041.
3. Our analysis "footprint" in the BUA is relatively conservative and focuses mostly on developable land close to transportation corridors and hubs. There are still significant redevelopment opportunities beyond those identified. Mississauga could apply a variety of strategies/policy approaches to deliver an abundance of intensification opportunities to ensure that supply is not restricted.

4. Accommodating the projected population growth in Mississauga does not require high levels of density. In theory, the projected population could be accommodated entirely through mid- and low-rise buildings.

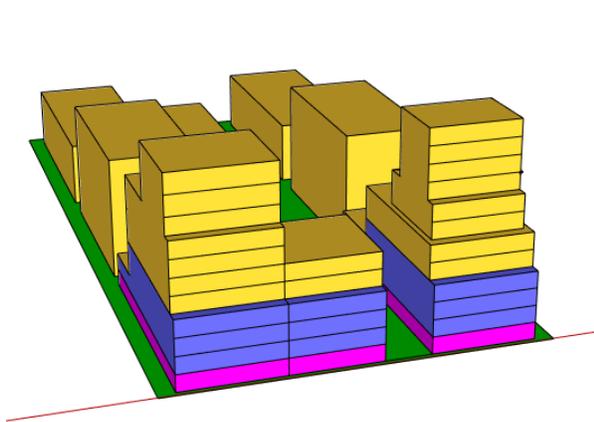


Figure 1: Midrise typology of 3.0 FSI

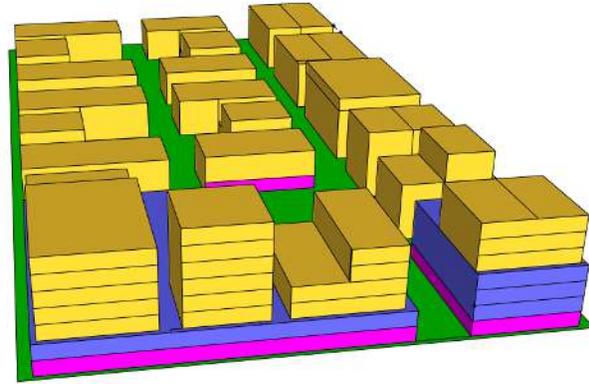


Figure 2: Low-midrise typology of 2.0 FSI

These findings point to important policy considerations when it comes to land needs assessment and population forecasts:

1. All municipalities should be required to conduct a thorough intensification strategy to determine the extent of population growth that can be accommodated through intensification in their BUAs and in DGAs .
2. This intensification strategy should inform assessment for DGA land requirements.
3. In order to better protect land, intensification analyses should inform population allocations, not the other way around. The Growth Plan's population and employment allocations should be informed by the intensification capacity and potential of upper- and single- tier municipalities.
4. Population and employment allocation between lower-tier municipalities should also be informed by intensification analysis. For example, in Peel Region, more growth could be allocated to Mississauga and downtown Brampton where there is strong intensification potential, and less growth could be allocated to Caledon.

Our analysis of Mississauga demonstrates that intensification has incredible potential to accommodate a significant amount of population growth across the Greater Golden Horseshoe. With an appropriate proactive approach towards intensification there are abundant opportunities to add housing and employment directly within the built boundaries of our municipalities. Encouraging municipalities to recognize and plan for this abundance of intensification opportunities should be a core aspect of how land needs assessments are carried out; at a minimum intensification strategies should be a core requirement for all municipalities.

3.2 Strategic Housing and Land Availability Assessments

The United Kingdom, which achieved a national intensification rate of 61% in 2015-16,¹¹ has implemented a rigorous land assessment and budgeting approach on a national scale—Strategic Housing Land Availability Assessments (SHLAA).¹² The SHLAA process is a site and location-based approach intended to assess the quantity, suitability and market viability of potential housing land.¹³ All local governments are required to complete SHLAAs, updated on an annual basis.

The national guidelines set out the key steps municipalities must follow:¹⁴

- First, a municipality must identify sites and locations with development potential through an exhaustive search that includes a desktop review and a wide public call for sites.
- Second, municipal planners must assess the development potential (number of units) of those sites, taking into consideration location, access to infrastructure and services, and physical site characteristics.
- In parallel with the second step, municipalities must assess the suitability and likelihood of development of each site—including the deliverability of the units within a 5 year, 6-10 and 11-15 year timeframe based on economic considerations.

The SHLAA process has some key lessons that address the weaknesses identified in Ontario's Proposed Methodology.

Consideration of Physical Conditions and Site Location

The SHLAA guidelines require municipalities to consider the physical constraints, including proximity to infrastructure, and the surrounding context of every site in order to assess redevelopment potential and feasibility.¹⁵

¹¹ Department for Communities and Local Government, U.K. (2 March 2017). Land Use Change Statistics in England: 2015-16. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/595749/Land_use_change_statistics_England_2015-16_-_2_March_2017_version.pdf

¹² Ministry of Housing, Communities and Local Government. (6 March 2014). Housing and economic land availability assessment *Guidance Document*. Para 002. <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#about-the-assessment>

¹³ Cullingworth, Barry, Vincent Nadin, Trevor Hart, Simin Davoudi, John Pendlebury, Geoff Vigar, David Webb and Tim Townshend. (2014) *Town and Country Planning in the UK*. Routledge. e-book.

¹⁴ Ministry of Housing, Communities and Local Government. (6 March 2014).

¹⁵ Ministry of Housing, Communities and Local Government. (6 March 2014). Para 016.

For example, the suitability of each site—both in greenfield and built-up areas—in Leeds’s 2014 SHLAA¹⁶ is labelled by relative accessibility to public transportation. Each site is also identified by which of the 5 urban structure “density zones” it falls into. These categorizations allow the municipality to project reasonable density assumptions to each site based on location. The detailed, spatially specific local portrait of planning potential that this process generates allows for more efficient land use planning.

The Role of Assessments versus Policy and Plans

The SHLAA process also recognizes that existing and emerging local planning policies are important factors in determining the suitability, availability and achievability of sites. However, the SHLAA guidelines are also clear that sites without major constraints are not to be marked as unfeasible only because of policy conflict—the guidelines in fact suggest that policy should be reviewed if it is constraining development:

“Sites, which have particular policy constraints, should be included in the assessment for the sake of comprehensiveness... An important part of the desktop review, however, is to test again the appropriateness of other previously defined constraints, rather than simply to accept them.”¹⁷

And:

*“Where constraints have been identified, the assessment should consider what action would be needed to remove them... Actions might include ... **a need to review development plan policy, which is currently constraining development.**”¹⁸*

Throughout the SHLAA process the role of the assessment (along side the corresponding *housing and economic needs assessments*¹⁹) is to support robust plan making rather than the implementation of predefined plans and policies. This approach is an improvement to Ontario’s Land Needs Assessment process where existing plans and policies inform how the need for land is defined and assessed.

¹⁶ Leeds City Council (2014). Strategic Housing and Land Needs Assessment (SHLAA), 2014. Available at: <https://www.leeds.gov.uk/docs/SHLAA%202014%20composite-Web.pdf>

¹⁷ Ministry of Housing, Communities and Local Government. (6 March 2014). Para 011.

¹⁸ Ministry of Housing, Communities and Local Government. (6 March 2014). Para 022.

¹⁹ Ministry of Housing, Communities and Local Government. (15 March 2015). Guidance: Housing and economic development needs assessments. <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Flexibility and adaptability of Assessment Methodology

The national guidelines to conduct SHLAAs are much more succinct than Ontario's Proposed Methodology, and allow for a greater degree of flexibility. The UK guidelines clearly specify the steps that municipalities must take, the inputs they must consider, what types of sites must be included, the expected analyses of sites, and the way in which SHLAAs are meant to influence policy.²⁰ However, municipalities have some discretion to determine how to assess the suitability, availability and achievability of development, provided that the methodology is thoroughly explained.²¹ This approach allows municipalities greater latitude to consider local conditions in their analysis, ultimately increasing the applicability of the results to local planning processes.

3.3 Additional Benefits of an Activity-Based Lands Needs Assessment

Understanding intensification sites' potential and spatial distribution supports long-term planning in a number of ways beyond just the development of more robust local plans. Specifically, this level of understanding would help both the Province and municipalities better align infrastructure investments and growth.

One challenge with the implementation of the Growth Plan is the alignment of growth and servicing. For example, the planned regional transit network—Metrolinx's Draft Regional Transportation Plan (2041)—is not projected to increase transit's modal share. This is largely because many planned stations are located in areas with low existing population and low potential for higher-density growth.²²

Mississauga's Dundas Connects project, on the other hand, is an excellent example of how smart intensification analysis can synergize with infrastructure planning to support transit oriented development. The City of Mississauga found that the planned Bus Rapid Transit route along Dundas street in Mississauga could unlock development of new housing for 52,000 people, or 40% of the region's projected population growth over the next 25 years.²³ Requiring municipalities to carry out activity-based land needs assessments, in line with the UK's SHLAA guidelines, would better equip municipalities and the Province to find synergies.

²⁰ Ministry of Housing, Communities and Local Government. (6 March 2014). Housing and economic land availability assessment *Guidance Document*. Para 011.

²¹ Ministry of Housing, Communities and Local Government. (6 March 2014). Housing and economic land availability assessment *Guidance Document*. Para 005.

²² Blais, Pamela and Marcy Burchfield (Nov. 20, 2017). "Why a \$45 billion transportation plan fails to increase transit ridership" Opinion. Toronto Star. Available at: <https://www.thestar.com/opinion/contributors/2017/11/20/why-a-45-billion-transportation-plan-fails-to-increase-transit-ridership.html>

²³ SvN (2017) Dundas Connects Public Presentation 3 Panels. Mississauga|AECOM|SvN|Swerhun

4. Recommendations

The Proposed Methodology for Lands Needs Assessment presents a straightforward methodology to calculate the quantum of DGA land required were a municipality to meet the minimum requirements of the Growth Plan. Instead, the Ryerson City Building Institute recommends that the Lands Needs Assessment Methodology should be designed around an activity based approach that seeks to maximize and prioritize development opportunities across both the DGA and BUA in an attempt to reduce land consumption:

1. **An activity based approach to lands needs assessments, similar to SHLAAs in the UK, should be adopted.** This approach would require municipalities to identify all potential development sites, the potential each site has to accommodate housing, employment, services and infrastructure, and the feasibility of developing each site.
2. **The proposed activity based approach should not be based on current municipal policy.** That is to say current policies (e.g. official plans and zoning by-laws) should not inform a given site's development capacity. Understanding where and how much growth is possible across a municipality will provide municipalities with better information with which to update their official plans and zoning by-laws in order to plan for an abundance of intensification opportunities and ensure that housing supply is not constrained.
3. **The proposed activity based approach should consider the availability and achievability/feasibility of development on every site.** This will allow municipalities to better plan across a variety of time scales and pro-actively adjust to changing growth rates while still meeting Growth Plan requirements.

Regardless of whether an activity based approach is adopted by Ontario, improvements can be made to the Proposed Methodology for Land Needs Assessments in order to ensure that it better supports the "intensification first" intent of the Growth Plan:

4. At a minimum, an "*intensification first*" lands needs assessment should require **municipalities to comprehensively evaluate opportunities to exceed the Growth Plan's intensification and DGA density targets** in order to minimize land consumption.
5. In order to help municipalities achieve a more compact built form in the DGA, **a thorough DGA density analysis, carried out in the spirit of the Growth Plan, should be required before or as part of land needs assessments.** The DGA density analysis should be designed to identify which DGA lands can accommodate higher densities, and how the overall DGA can be planned to achieve a density higher than the Growth Plan requirements.

6. In order to help municipalities maximize intensification opportunities, **a thorough intensification analysis and associated intensification plan should be required before or as part of land needs assessments.** This intensification analysis and intensification plan should identify opportunities to exceed the Growth Plan's requirements.
7. In order to ensure sufficient development opportunities and to protect affordability, **municipalities should be required to plan for an abundance (e.g. excess) of intensification sites.** With a proactive approach towards intensification, including (p)re-zoning and infrastructure investment, there are significant opportunities to add housing and employment directly within the built boundaries of our municipalities.
8. **Require land needs assessments to demonstrate how a municipality will be developed over multiple time scales** (e.g. next five years, 5-15 years, and 15-25 years) and how this this development will comply with the Growth Plan's objectives within each time scale.
9. **Intensification analyses should inform population and employment allocations, not the other way around.** Upper and single tier municipalities with more potential and capacity for intensification should be allocated more growth.
10. **Upper-tier municipalities should be required to allocate population and employment growth between lower-tier municipalities based on intensification potential and capacity.** Lower-tier municipalities with more intensification opportunities should be assigned more growth.

5. Conclusions

The Proposed Methodology for Lands Needs Assessment is a top-down approach that flows from the Growth Plan's intensification target and DGA density target. As designed the Proposed Methodology will help ensure that municipalities are planning to meet the requirements of the Growth Plan. However, this approach permits a bare minimum approach to meeting the Growth Plan, rather than planning with a true "intensification first" approach.

To respect the "intensification first" intention land needs assessments need to do more than just quantify how much greenfield land is needed in order to meet long-range population and employment forecasts. A more appropriate approach would see Ontario mirror the United Kingdom's Strategic Housing Land Availability Assessment methodology. SHLAAs are a bottom-up approach to planning and assessing land needs. Under this approach municipalities would need to comprehensively identify, assess and prioritize development and redevelopment opportunities across both the BUA and DGA. Such an approach would encourage municipalities to take a more proactive role to exceeding Growth Plan targets.

In the absence of an activity-based approach like the UK's SHLAAs there are other opportunities to improve the Proposed Methodology for Land Needs Assessment. Specifically, robust DGA density analyses and intensification analyses that identify opportunities to exceed the Growth Plan's targets should be required inputs to or (more ideally) direct components of the process.

Furthermore, because the Growth Plan is designed to restrict greenfield growth, an appropriate land needs assessment (and supporting intensification analysis) should demonstrate an abundance of available and feasible intensification opportunities in order to ensure that housing supply is not restricted. As it stands many municipalities continue to restrict intensification via outdated zoning by-laws and a do-minimum approach to intensification.

Finally the Proposed Methodology should require municipalities to better demonstrate land needs and the achievement of the Growth Plan's targets over different planning horizons (e.g. 5 years, 5-15 years, and 15-25 years). This will ensure that municipalities are better prepared for any real-world variations from the Growth Plan's population and employment growth forecasts.