Appendix J: Clarification of Matters Raised Through the Public Consultation

In reviewing the submissions to the Public Information Meeting on February 16 and 17, 2010, Staff has identified the need for further comment on certain matters discussed regarding growth. This Appendix is intended to provide more information to assist in clarification. References to the items elaborated on in this Appendix, appear in the main report.

1. Agriculture in Markham Means Local Food Production

The comments of some observers appear to equate agriculture in Markham with the production of local food. In some submissions there appear to be implicit assumptions that agriculture in Markham relates only to growing food, that food must be grown in Markham to be considered local, and that locally grown food will be sold in Markham.

While food production predominates, there is a range of agricultural activity in Markham, which does not include food. Examples of non-food production include sod, horticultural products and horses. In the larger regional agricultural system other examples include the breeding of fur-bearing animals and the production of trees, corn or grasses for bioenergy which could also be produced in Markham. The choice of agricultural products is an economic decision made by farmers, and may not always involve food production.

Some comments appear to assume that food production must take place in Markham for the food to be considered local. The Town's procurement policy relating to produce and materials for corporate consumption, requires that a percentage of purchases be local. Markham has retained Local Food Plus, a non-profit organization that certifies local sustainable farmers in Ontario, to assist with implementing the policy. To qualify as 'local', the targeted percentage of the purchases must be sourced from Ontario, not just Markham. Sourcing from throughout Ontario clearly makes sense, when it is recognized that there is a much wider range of agricultural products available across the Province than within the Town, and that supporting agriculture in the Province is a broader and more sustainable public benefit.

Finally, there appears to be an inherent assumption that any food grown by farmers in Markham will be sold locally. It is probable that farmers will choose to sell their products based on the best economic return, which may not result in the sale of products exclusively or partly, within Markham.

Another significant aspect of local food production alluded to in some submissions, is the potential benefit of urban agriculture and promoting community and "backyard gardens". A recent report for the City of Toronto (Food Connections: Toward a Healthy and Sustainable food System for Toronto) highlights the significant benefits of community food activities, public education and municipal support for "growing your own", and similar initiatives aimed at residents becoming knowledgeable and active in urban agriculture. Markham has enjoyed success through "Communities in Bloom" and has the

experience to institute a comparable community-based program to support residents growing food. Significant advantages of such an approach are its practicality, being relatively inexpensive to implement, the opportunity to build community awareness and responsibility, and giving residents who have a genuine interest in food the incentive to actually do something themselves. Programs of this nature offer a beneficial counterpart to farming, but are not dependent on farming to sustain a continuing contribution to community based food production.

Regardless of the alternative chosen for growth, agriculture will continue in Markham. Support for agriculture, and support for local food, is not however, dependent on food production by farmers in Markham. Nor does the Town have the authority to dictate the production, or conditions of sale of food products, by farmers within the Town.

2. Based on the Historic Absorption Rate of Employment Land, the Available Supply of Land is Sufficient to Meet Needs to 2031

Reference was made to the Town's Employment Lands Strategy Study, completed in 2009, in which a supply of 485 hectares of vacant land designated for business park employment is identified as remaining within the current settlement area, and that the past absorption of employment land has averaged 22 to 25 ha per year. By applying the average absorption to the supply, it is has been suggested that no additional lands are required to accommodate future employment growth to 2031, and that no lands need to be added to the settlement area for this purpose.

The argument put forward does not recognize:

- that the absorption rate in Markham has been in decline because of the declining supply of market-ready land (which the consultants identify) and that this falling average rate under-represents market demand,
- that the amount of designated land available is not the sole criterion for meeting business needs; for example, the lack of diversity in parcel size, and the availability of market-ready land are among other factors,
- that the 485 ha must satisfy the need for forecast growth in some of the Town's office and retail/service employment, as well as all industrial employment,
- the consultants' comments relating to the problems associated with using an absorption rate method for determining future land requirements. The consultants state that, "while absorption is one way to evaluate future land requirements, there are some important limitations to this approach, especially when planning over a long time frame. The key problem with the absorption methodology is that it fails to capture the changing role that a municipality plays within a regional employment market over time.", and,
- the consultants' detailed forecast analysis included in the report.

It should be noted that the historic absorption rate method is generally regarded in the industry as a backward looking approach to determining future land requirements. Today, an approach using the actual employment forecasts to be met, together with employment density assumptions, is preferred. This approach has been endorsed by the Province for

determining employment land requirements. Land budget forecasts by the Region use this approach. Such an approach permits the future density of development, including intensification, to be employed as a forecast input, as the Town's work has done.

The Town's consultants determined that the Town's forecast growth in office, retail/service and industrial employment to 2031 to be located on industrial lands (ie. excluding lands in Regional Centres and commercially designated lands) would require an additional 456 gross ha, including a contingency of 132 ha.

Staff recommended to Council that this requirement could be reduced to +/-291 ha if the contingency were excluded and if lands already identified for employment use, but awaiting designation, were also assumed to become available.

3. Provincial Plans Did Not Consider Soils Quality When Establishing the "Whitebelt" area in Markham

It has been suggested to the Town that rural lands in Markham, outside the Current Settlement Area, commonly referred to as the 'whitebelt', should not be considered for accommodating urban growth because the Province did not know they were Class 1 agricultural lands when it prepared the Greenbelt Plan and the Growth Plan for the Greater Golden Horseshoe. The Provincial reports referenced below indicate that the Province had specifically assessed agricultural lands in preparing its Plans.

In 2006, the Province completed an Agricultural Land Evaluation and Area Review (LEAR). The LEAR, examined lands outside the existing urban boundaries of municipalities in the GTA, at that time. It was completed to provide information on which to base the preparation of the Greenbelt Plan and the Growth Plan. One of the purposes of the Greenbelt Plan is "...to provide permanent protection to the agricultural land base." The LEAR collected and evaluated information on soil capability, climate, land use, parcel sizes etc. The mapped information was interpreted into soil capability classifications, used to help identify the boundaries of the Greenbelt Plan. The Greenbelt boundary, in combination with the boundary of the Settlement Area, identified in the Growth Plan, created the area between the two boundaries now, commonly referred to as the 'whitebelt'.

The Provincial LEAR study report notes that,

"As part of the development of the Greenbelt Plan, the MMAH [Ministry of Municipal Affairs and Housing] ensured that sufficient land was left outside the Greenbelt Plan to accommodate population and employment growth to the year 2031 and beyond, based on information provided by the Ministry of Public Infrastructure and Renewal (MPIR)".

This statement confirms that defining the boundary of the Greenbelt was intended to exclude sufficient land to accommodate growth mandated by the Province through the Growth Plan. Further confirmation is available in the Growing the Greenbelt document, released by the Province in August 2008, which states:

"The final Greenbelt area was determined by identifying a natural heritage system and defining an agricultural system...The government also considered the amount of land required to accommodate anticipated growth."

4. Existing and Proposed Residential Development in Markham is "Sprawl"

The term "sprawl" and the need to curb sprawl has been employed in some submissions. Sprawl is sometimes used in a generic fashion and may mean different things to different people. There is however a body of work that attempts to attach meaning to the term. One way to define sprawl is in terms of the density of residential development. For example, the Sierra Club (a leading organization supporting sustainable practices) suggests that sprawl is represented by a gross density of 7.4 units per residential hectare, or less. Development displaying a higher density is not characterised as sprawl.

During the last two decades Markham's comparable gross density for residential development in new communities has approached an average of 17 units per hectare (not including the units developed in higher density residential projects). This density is more than double that used by the Sierra Club to define sprawl. Looking forward, the minimum density of ground-related housing in new communities will begin at 20 units per gross hectare, and can go higher, provided the housing mix needed to serve Markham's residents can be delivered.

In terms of residential density then, there has been no development in Markham for a very long time that can be characterised as sprawl, nor is it correct to suggest that proposed future residential development will be sprawl.

Density however, is only one characteristic of sprawl. Additional characteristics of sprawl include:

- developments, including residential subdivisions and commercial malls, expanding in an unlimited and noncontiguous (leapfrog) manner,
- land uses, including residential, commercial, shopping, schools, public buildings, are spatially segregated,
- no regional or provincial authority for regional planning and coordination,
- total reliance on the automobile for all transportation in and out of residential subdivisions and to and from work, shopping, schools and recreation,
- use of prodigious amounts of agricultural lands, green spaces and environmentally sensitive areas,
- fragmented governmental jurisdictions with little or no integrated land use planning and zoning
- great variance in local fiscal capacities for new infrastructure and local services required by new developments,
- low income housing ill-served in suburban and exurban sprawl developments, which are aimed at middle to high income, single-family home buyers.*

(*The foregoing list was sourced and adapted from <u>Economic Implications and Consequences of Population Growth, Land Use Trends and Urban Sprawl in Southern Ontario, June 2008</u>, prepared for the Office of the Environmental Commissioner of Ontario)

Knowledgeable observers of the growth and development in Markham, also familiar with Provincial planning policies and local governance, will recognize that the development of planned, compact communities in Markham, incorporating principles of New Urbanism, does not correspond to the characteristics of sprawl. Markham has placed environmental protection, transit supportive development, a balance of land uses, a range of development forms, intensification and fiscally-responsible development at the forefront in managing growth.

Recently, the Neptis Foundation, a charitable foundation conducting nonpartisan research on growth and change in urban regions, released a study of intensification rates in the Greater Golden Horseshoe. The Foundation working with the University of Toronto, tracked residential intensification over a period of 15 years (1991 to 2006), to monitor how municipalities were performing before the Provincial Growth Plan intensification targets were established.

For the ten year period up to 2001, York Region had one of the highest rates of intensification in the Greater Golden Horseshoe at 32% with Markham recording a 46% rate of intensification over the same period of time. Markham's pre Growth Plan intensification rate actually exceeds the 40% residential intensification target established by the Growth Plan in 2006. The report findings provide further evidence that since the mid 1990's the focus of new residential development in Markham has already shifted to a more compact form, characterised by intensification and higher density forms of ground-related housing. Such findings reinforce the fact that Development in Markham is not consistent with sprawl.

5. Markham Can Simply Replace Housing and Jobs Proposed in an Extension of the Current Settlement Area with other kinds of Housing and Jobs inside the Settlement Area

A number of submissions in support of no further extension of the current settlement area expressed the view that any development in such an extension could simply be replaced with development within the current settlement area. However, such arguments do not reflect the realities of the market in Markham, for housing or business accommodation. In each case there are distinct market preferences that must be accounted for.

Housing Accommodation

To date, the housing market in Markham is primarily by those seeking family accommodation and those who do not need to house a family (singles and couples). In the former case families have traditionally sought lower density ground-related unit types, most commonly single and semi-detached dwelling and townhouses. These unit types are better suited to family households, offering more space, some form of private outdoor space, and a neighbourhood context suited to the preferences of families. Today, approximately 90% of all Markham households have chosen this type of accommodation. The remaining households, primarily individuals, or young or older couples without children, occupy apartments, or some equivalent form such as a stacked townhouse. Their

needs reflect the choice of a unit that is likely to be smaller, less expensive to operate, and offering amenities that support their preferred living arrangements.

As the population ages, and household arrangements continue to diversify, it is expected that a larger proportion of households will seek smaller or less expensive housing forms, however the demand will evolve slowly and may be shaped by the broader and very competitive market for higher density housing across the GTA. Many more opportunities will be available across the wider market area and younger and older households may be more flexible in where they choose to live.

It is not correct to assume, that if a household seeking a ground-related unit cannot find one it can afford in Markham, it will automatically opt for a higher density unit in Markham. Most apartment units for example, are marketed to non-family households and not designed for the needs of family households. Few larger apartment units are built, because of low market demand and higher cost. It is typically easier for a family household to find a townhouse for almost the same cost, than an apartment of equivalent size. More importantly, the market for ground-related housing also extends over the entire GTA; if a suitable unit is not available in Markham, one will likely be available in another municipality. A primary reason for a family household to choose an apartment form may be economic, and may be temporary until a preferred unit type can be acquired.

The Housing Stock Analysis completed by the Town confirmed the continued significance of family households in the Markham housing market. Unless economically constrained, a preference for a particular housing type based on the needs of the household, will drive housing choice. Planning policy can direct housing form and density, but market preferences cannot be controlled through public policy.

Employment Accommodation

Just as with housing, the market for accommodating businesses falls into two broad categories, those who can operate in an office building and those who require an industrial or retail building form, suited to the needs of the business operation. The accommodation needs of Markham businesses are reflected in the type of employment and business activities they undertake. For example, an accounting firm could easily work in a large or small office building or even in a unit within a multi unit industrial building. A printing firm, requiring a large continuous floor area, storage and shipping space would be unlikely to select an office building, but could easily customize space to their production needs within a single floor industrial building. In most cases this space would be less expensive to buy or lease than space in an office building.

Markham is responsible for accommodating a range of office, industrial, retail and service employment, as prescribed in growth forecasts established by the Region. The Town must ensure that the accommodation needs of this employment are planned for, including sufficient land to accommodate the growth. The Town's Employment Lands Study concluded that forecast growth in office and retail/ service employment could be substantially accommodated within the Town's current settlement area, on remaining

vacant lands or within identified intensification areas (provided none of the currently developed employment land is converted to other uses). Some additional employment land, primarily for prestige industrial use in a sustainable business park setting, will need to be provided in and extension to the current settlement area.

It is not appropriate to simply assume industrial employment can be replaced with office employment, or to assume that businesses will change the way in which they operate, in order to avoid addressing future land requirements. If the available accommodation does not suit business needs, businesses will find accommodation elsewhere that does. In this event, the Town will fail to meet the established employment forecasts and to achieve the intent of the Economic Development Strategy to serve a broad range of businesses.

6. Markham Can Avoid the Need to Add more Land for Employment by Increasing Office Jobs in the Current Settlement Area

This was a recurring comment in submissions that argued against adding land to the current settlement area to accommodate growth, and relates to item 5, above. The Region of York has the responsibility to allocate employment to local municipalities in the Region and allocates employment in three categories. One of these is Major Office Employment (MOE) with 69% of the total MOE jobs assigned to the Town of Markham. Another category, Employment Land Employment (ELE), comprises other jobs typically locating in business parks. Of the total growth of 165,680 ELE jobs, Markham is assigned almost 20%. Markham therefore, already accounts for the "lion's share" of the increase in Major Office jobs, but receives a smaller share of the ELE jobs. York Region municipalities base their employment planning on their assignments of employment growth. The assigned jobs are regarded as important in the economies of these municipalities.

It is estimated that the number ELE jobs to be accommodated in an extension of Markham's current settlement area would be in the order of 14,000. Replacing these jobs with 14,000 MOE jobs located in the current settlement area, would require an increase in the total MOE job growth assigned to Markham to 51,440, about 94% of the total growth in MOE jobs for the Region as a whole, to 2031. It would not be realistic for Markham to assume that it could simply increase its assigned MOE growth to capture virtually all forecast growth in the Region, or simply reduce its assigned ELE growth.