



June 13, 2025

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Township of King
2585 King Road
King City, ON L7B 1A1

via email: policyplanning@king.ca

Attention: Ms. Aloma Dreher, Project Manager – Policy Planning

**RE: Comments on King Growth Management Strategy
TFP Nobleton Inc.**

Malone Given Parsons Ltd. (“MGP”) is the planning consultant for TFP Nobleton Inc. (“TFP Nobleton”), the owner of property municipally known as [REDACTED] in the Township of King (“Subject Lands”).

The purpose of this letter is to provide comments on Growth Management Strategy (“King GMS”) that King has been undertaking as part of its ongoing Official Plan Review process. Specifically, we are responding to the Phase 2 Growth Management and Employment Lands Strategy report (dated February 10, 2025) presented to Council on February 24, 2025, as it relates to the Subject Lands. On behalf of our client, TFP Nobleton, we appreciate the opportunity to provide input into this process and to underline how the Subject Lands can be integral to supporting this growth.

Through our review of King GMS, we identified several key concerns regarding the assumptions and targets used in the assessment. The King GMS overemphasizes high-density housing, particularly apartments, despite limited market demand and historical growth patterns. This imbalance is inconsistent with the Provincial Planning Statement (PPS 2024), which calls for a diverse range of housing types responsive to local context.

The King GMS also relies on an unrealistic intensification target of over 50%, mainly comprised of 3,424 apartments, which is not achievable given King’s limited transit infrastructure and Greenbelt constraints, and market demand in King. **In this regard, a more realistic intensification rate of 30% is appropriate for King as this rate better aligns with King’s planning context and reflects the natural limitations on growth, while still supporting the broader goal of a diverse and balanced housing supply as outlined in the PPS 2024.**

Given the relatively limited amount of growth directed to King City by the York Region Official Plan, King can reduce its intensification target without undermining the Region’s ability to achieve 50% intensification overall, while providing for much needed grade-related housing that will otherwise fail to be provided in the Region.

In addition, the King GMS lacks a proper unit-type demand analysis, leading to distorted land need projections. These issues, combined with local opposition to high-density forms, risk undermining King's ability to meet housing needs.

Adjusting the King GMS assumptions results in a shortfall of approximately 53 hectares of Community Area land (or 1,300 ground-oriented units).

At the regional level, York's focus on high-density growth in urban municipalities like Vaughan and Markham has created a gap in ground-oriented housing supply. **King Township is well-positioned to accommodate a portion of this displaced growth. Based on our analysis, King should accommodate its share of this displaced growth, which would require an additional 1,850 housing units, translating to approximately 110 hectares of Community Area land.**

We recommend revising the King GMS to ensure a more realistic and balanced approach to housing development in King. A summary of the refinements is provided in the table below.

| Refinements | Units | Land Area (ha) |
|----------------------------|--------------|----------------|
| King GMS | 1,300 | 53 |
| Addressing Regional Market | 1,850 | 110 |
| TOTAL | 3,150 | 163 |

A detailed commentary of this matter and of the merits of the Subject Lands is provided below.

Subject Lands and Surrounding Context

The Subject Lands are located south of King Road, on the west side of Highway 27 within the village of Nobleton in the Township of King. The Subject Lands are currently vacant, as shown in Figure 1.

Figure 1: Subject Lands



Subject Lands: 12650 Highway 27, Nobleton, King

Immediately north of the Subject Lands is a low-density residential neighbourhood. The lands immediately to the south are also residential with large lot estate dwellings. The lands to the east and west are currently vacant however it is anticipated that these areas will be redeveloped in the future.

Comments on the King GMS

Through our review of King's GMS, we identified a few significant concerns related to the assumptions and targets that were used in the assessment.

High-Density Housing Assumptions

The King GMS assumes a greater proportion of high-density housing (e.g., apartments) than is appropriate based on the market demand and historical growth. The PPS 2024 promotes a balanced housing strategy that reflects market demand and provides a diverse range and mix of housing types. While higher-density forms should be prioritized within the built-up area, the assessment should also ensure an adequate supply of ground-oriented, family-friendly housing across both the Built-Up Area and other designated growth areas.

Historically, King has provided a modest amount of housing growth (172 units annually from 2006 - 2021), with much of its development being low-density housing types such as single-detached homes, semi-detached homes, and townhouses (94% as of the 2021 Statistics

Canada Census). This pattern aligns with the Township's characteristics, where much of the land is constrained by the Greenbelt Plan and transit infrastructure is limited. Other municipalities, such as Vaughan, Markham, and Richmond Hill, have been the focus for high-density growth due to their heavy investments in higher-order transit infrastructure, making them better suited for accommodating high-density development. King, in contrast, is uniquely positioned to accommodate low-density growth, which aligns with its planning context and infrastructure limitations.

Mid-rise housing development, where most of the apartment growth would be expected in King, faces significant barriers. These include high construction costs, slow absorption rates, and a market preference for more affordable ground-related units. Moreover, there has been notable opposition to high-density development from existing residents, particularly throughout the block planning process, which has delayed or halted apartment projects. These economic and social challenges, compounded by limited opportunities for intensification due to the Greenbelt and existing infrastructure constraints, make it unrealistic to assume a significant increase in the number of apartments in King going forward.

The King GMS forecasts 3,424 new apartments in King between 2024 and 2051 (127 annually). However, only 214 apartments were built in King between 2006 and 2021 based on Statistics Canada (14 annually), meaning the **current forecast requires a nearly 900% increase in the annual delivery of apartments**, an increase that is highly unlikely given the existing barriers.

Unrealistic Intensification Target

We believe that the 50% intensification target set for King is unrealistic, given its specific planning context. Historically, intensification targets have been lower in areas where transit infrastructure is limited and where there are fewer intensification opportunities compared to other regions. The PPS 2024 encourages municipalities to plan for growth in a way that reflects their context, which supports a more balanced approach to intensification in King.

The current proposed target in the King GMS was established by the now repealed Growth Plan, which had specific minimum intensification targets that municipalities were required to meet. Historical data indicates that King has built an average of 172 units a year (2006 – 2021), while only 58 of those units being within the Built-Up Area (between 2013 – 2023), resulting in an effective intensification rate of 34%. The King GMS assumes that intensification will go up 147 units a year, which is a 250% increase in what has previously been achieved, while supply opportunities will generally decline as the Built-Up Area continues to intensify over the years. Moreover, the potential for intensification must be considered along with the need to provide an appropriate range and mix of housing.

An appropriate level of intensification should be determined based on the potential to accommodate forecasted demand for apartments and some ground-related units, with this potential assessed through an intensification analysis. Generally, there is greater potential to provide apartment housing through intensification compared to ground-related units, where relatively small vacant or redevelopment sites can accommodate a significant amount of apartment growth, but would have a relatively smaller supply of ground-related housing.

Assuming a similar level of intensification to past trends (70 units within the Built-Up Area (BUA) annually) is a reasonable assumption and one that accounts for a slight increase in the annual rate. As built-up areas intensify over time, the easier to achieve intensification opportunities will be developed leaving only sites that are harder to develop. Without a detailed intensification analysis to confirm more potential, it is likely that possibilities for intensification will be reduced in the future, not increased. Despite the increasing challenge to achieve continued or higher levels of intensification, King's growth management approach would seek to increase the intensification target to 230-240 units annually.

If these targets are retained and ultimately not met, the Township will fall short of its population and housing forecasts, which would not be in alignment with the PPS 2024, which emphasizes the need for a sufficient supply of market-based housing across all unit types. Including additional Community Area lands now will help ensure that King can meet its growth forecasts.

Moreover, under the new Development Charges Act rules, municipalities now face delayed receipt of DC revenues, which are essential for funding infrastructure. High-density units—especially apartments—tend to have longer delivery timelines and higher cancellation risks in the current market. In contrast, including the Subject Lands for low-rise, ground-oriented development provides a more reliable and fiscally sustainable growth stream to support infrastructure investment and service delivery.

It is our opinion that a target intensification rate of around 30% is more appropriate. As intensification opportunities dwindle, particularly in the BUA, it becomes difficult to sustain the same level of growth. Given that growth is to be of an appropriate scale within the Greenbelt Plan Area (e.g. it is not a strategic growth area where significant growth and density is to be concentrated to support the delivery of transit), as well as the reduced availability of intensification opportunities in King compared to other municipalities in the Region, this revised rate more accurately reflects the planning realities and forecasted market demand. This approach does not undermine the intent of the Greenbelt Plan, as it remains consistent with the principle of managing growth in a sustainable manner while respecting the appropriate scale and nature of residential development contemplated by the Greenbelt Plan.

Unit-Type Basis Demand Analysis

The King GMS did not conduct the demand analysis on a unit-type basis, and instead blends the densities of multiple unit types. This does not accurately assess the land needs. Blending densities in any land needs assessment distorts results by misrepresenting the relationship between housing demand and land supply for specific unit types. This risks underestimating land needs for low-density housing or overestimating for high-density types like apartments, leading to mismatched planning outcomes. By assessing housing demand by unit type, the assessment ensures a more accurate alignment between supply and the housing mix required to meet market-based needs, resulting in balanced growth and sustainable community development.

MGP Land Needs Assessment

In response to the King LNA, MGP conducted a comprehensive Greenfield Supply Analysis and LNA for King as part of our input into this process. Our analysis assumes a more balanced growth scenario that projects the following unit mix:

- Low Density: 73%
- Medium Density: 14%
- High Density: 13%

This scenario would align with market demand, enhance housing affordability, and deliver complete communities, and does not assume an over-reliance on high-density housing that will realistically not be achieved as outlined earlier. The proposed intensification target of 30% reflects a realistic balance between accommodating growth and protecting agricultural lands. This balanced growth scenario sets a realistic intensification target to achieve balanced, sustainable development while ensuring sufficient land supply.

Our analysis concludes that approximately 53 hectares of additional Community Area land for the Township is required to meet growth demands through 2051. These figures are based on a detailed review of existing land supply, growth projections, and the feasibility of achieving planned densities and intensification rates.

Addressing Housing Need in the Regional Market Area

Under PPS 2024, regional market areas are defined as larger geographic regions that encompass multiple municipalities and reflect how housing markets, employment patterns, and population growth function at a broader scale. York Region meets the definition of a regional market area.

The municipalities within York Region share economic, demographic, and employment characteristics, reinforcing the need for a coordinated approach to growth. This interconnectedness underscores the strategic advantage of coordinating growth across municipal boundaries. Given this regional interconnection, the PPS 2024 requires planning authorities to provide an appropriate range and mix of housing to meet projected needs within the regional market area.

Through our review of the York LNA, we have determined that the Region is undersupplying ground-oriented housing by approximately 43,000 units. This conclusion is based on the Hemson Technical Backgrounder, which sets the minimum level of housing required to meet projected demand. The Backgrounder accounts for demographic trends, household formation rates, and migration patterns to ensure that municipalities plan for an adequate supply of single-detached, semi-detached, and row housing alongside higher-density options. Any undersupply of these housing types indicates that York Regions current planning does not fully accommodate projected needs, impacting housing availability across the broader regional market area.

Given the planning context of King Township, where much of the land is constrained by the Greenbelt Plan and there is limited transit infrastructure, King is best positioned to accommodate this type of ground-oriented growth within the Region.

Our preliminary review of the York LNA indicates a significant shortfall of approximately 43,000 ground-oriented dwelling units by 2051, requiring an estimated 2,900 hectares of additional Community Area land. In our opinion, King Township is well-positioned to accommodate a portion of this displaced growth. As King is forecasted to accommodate 6.4% of the Region's total ground-oriented housing growth, it is reasonable to assume that approximately 6.4% of the displaced growth. Taking into account that some of this additional ground-oriented growth is proposed to occur through our earlier revisions to the King GMS, the additional housing need that should be directed to King, over and above this, is roughly 110 hectares. Accommodating this growth in King would help ensure that the regional market area can meet its long-term housing needs while maintaining a diverse housing mix that reflects market demand.

Summary

Making these adjustments to the current King GMS would create more opportunities for ground-oriented housing, which is currently underrepresented in the existing analysis. The Subject Lands, located within the settlement area, can readily accommodate this type of housing, supporting the broader goal of providing a more diverse range of housing types.

While King faces certain growth constraints due to the Greenbelt, there are greater intensification opportunities in surrounding municipalities such as Markham, Richmond Hill, and Vaughan. These areas are more appropriate to focus and plan for higher-density growth, whereas King has the unique position to provide more ground-oriented housing.

The Subject Lands, though within the settlement area, are currently not designated for urban growth. By designating them for urban growth, there can be a more balanced and sustainable approach to meeting the housing needs in King. This designation would ensure the availability of ground-oriented units while respecting the environmental constraints imposed by the Greenbelt, aligning with Provincial and local planning policies.

Conclusion

It is our opinion that there is a need to provide growth within King to accommodate future residential development, and specifically Nobleton, which can be provided by the Subject Lands.

As such, we are requesting that given that there is proven insufficient land to accommodate the allocated population to 2051, that the King Township, through its GMS work, revise its analysis and include the Subject Lands to accommodate growth within the 2051 horizon.

In conclusion, we thank you for the opportunity to provide input into the King's GMS process. If you have any questions or wish to discuss this letter, please do not hesitate to contact the undersigned at any time.

Yours very truly,
Malone Given Parsons Ltd.



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