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June 17, 2025

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Mayor and Members of Council
King Town Hall
2585 King Road
King City ON L7B 1A1

Your Worship and Members of Council:

Agenda Item 9.2:
Official Plan Review and Growth Management Strategy
File Nos: PP-2023-04 & PP-2023-05

We act on behalf of Criterion (Nobleton) Development Corporation, GB (Nobleton2) Inc. 2798791 Ontario Inc. and 1001004791 Ontario Inc., collectively referred to as the Nobleton Southwest Landowner's Group (the "Group"). They are individually the registered owners of a number of parcels of land within the southwest quadrant of the Nobleton settlement boundary (the "Subject Lands") (see Attachment 1). The Group, as well as its planning consultants MHBC have previously made submissions to the Township dated December 12 and 13, 2024 to provide input to the Township GMS/OP Process.

The Group has retained Keleher Planning and Economic Consulting ("KPEC") to carry out a Land Needs Analysis with respect to the Region of York more generally and the Township and Nobleton more specifically. A copy of their report dated May 23, 2025, (the "KPEC Report") is attached.

KPEC and the Group have reviewed Report GMS-PL-2025-033 and the Final Addendum Report dated June 11, 2025. More substantive comments on the Addendum Report will be provided following a more detailed review by KPEC.

The Group is supportive generally of the direction in the Report to further examine the potential for growth in the southwest quadrant of Nobleton. However, as set out in more detail below and in the KPEC Report, any examination of future growth must take into consideration the change in approach in provincial policy to growth management and the importance of meeting market needs.

The KPEC Report takes into consideration the new policy regime that applies to all *Planning Act* decisions in the province, in particular the new Provincial Planning Statement, 2024, as well as the repeal of the Growth Plan for the Greater Golden Horseshoe. It also takes into consideration York's Regional Land Needs Assessment

(2022) as well as the work carried out by Watson and Associates (Phase 1 Growth Management Strategy and Employment Land Strategy Findings, King Township Final Report, August 29, 2024) in support of the Township's Growth Management Strategy. Both the Region and Township's work pre-date the 2024 PPS and therefore do not reflect the current planning and growth management policy regime in Ontario.

The KPEC Report uses a methodology that reflects the current provincial policy approach of ensuring that municipalities are planning for the type of growth that the market is demanding. It does so by determining land need by examining demand vs supply by unit type to ensure that the market demand by each unit type is met. Using this approach results in a deficit across the Region of York of 4,352 hectares, which is 2,035 hectares more than assumed by the Region. Applying this approach to the Township results in a need for 184 hectares.

The conclusion of the KPEC Report is that in order to meet market demand more land is needed than determined by the Region's and Township's approach. It is the Group's position that the approach taken in the KPEC Report reflects the overall direction of the provincial policy approach to growth management, which is to provide sufficient land to respond to market needs. By differentiating by unit type, the KPEC Report provides a more accurate and market responsive approach to land needs.

The KPEC Report also concludes that the Village of Nobleton presents the best opportunity for the Township to accommodate growth in order to align with in force provincial policy to have sufficient land available for an appropriate range and mix of land uses to meet for projected needs for between 20-30 years. Nobleton is the only area within the Township where the "Nobleton Urban Area" boundary is less than the settlement area boundary. Designation of the Subject Lands for residential development will assist the Township in meeting provincial policy.

Existing Official Plan policies speak to the existing servicing constraints in Nobleton. As part of York Region's municipal comprehensive review, the York Region Land Needs Assessment excluded designated greenfield lands in Nobleton on that basis.

Long range planning (as required by the PPS 2024) should not be driven by engineering. The Township should plan for an appropriate amount of growth to meet projected demand to be consistent with provincial policy. Phasing policies can be put in place in order to ensure that development does not proceed in advance of servicing capacity, but the long term planning as to the location of growth should proceed.

Historically, the Nobleton community has grown incrementally based on an alleged servicing capacity restriction. However, servicing potential for a full build out of Nobleton has never been studied because the lands are not designated for urban uses.

KPEC's Report demonstrates that the settlement area of Nobleton, in its entirety, can and should be planned comprehensively while maintaining consistency with the PPS 2024 growth management policies.

The proposed redesignation of the Subject Lands from Nobleton Reserve Area to permit urban uses as part of the Township's Official Plan Review will assist the Township in meeting more recent provincial growth management policy direction and conform with the Region Official Plan.

Yours truly,

Osler, Hoskin & Harcourt LLP

Chris Barnett
Partner

CB:s

c: Nobleton Southwest Landowner Group
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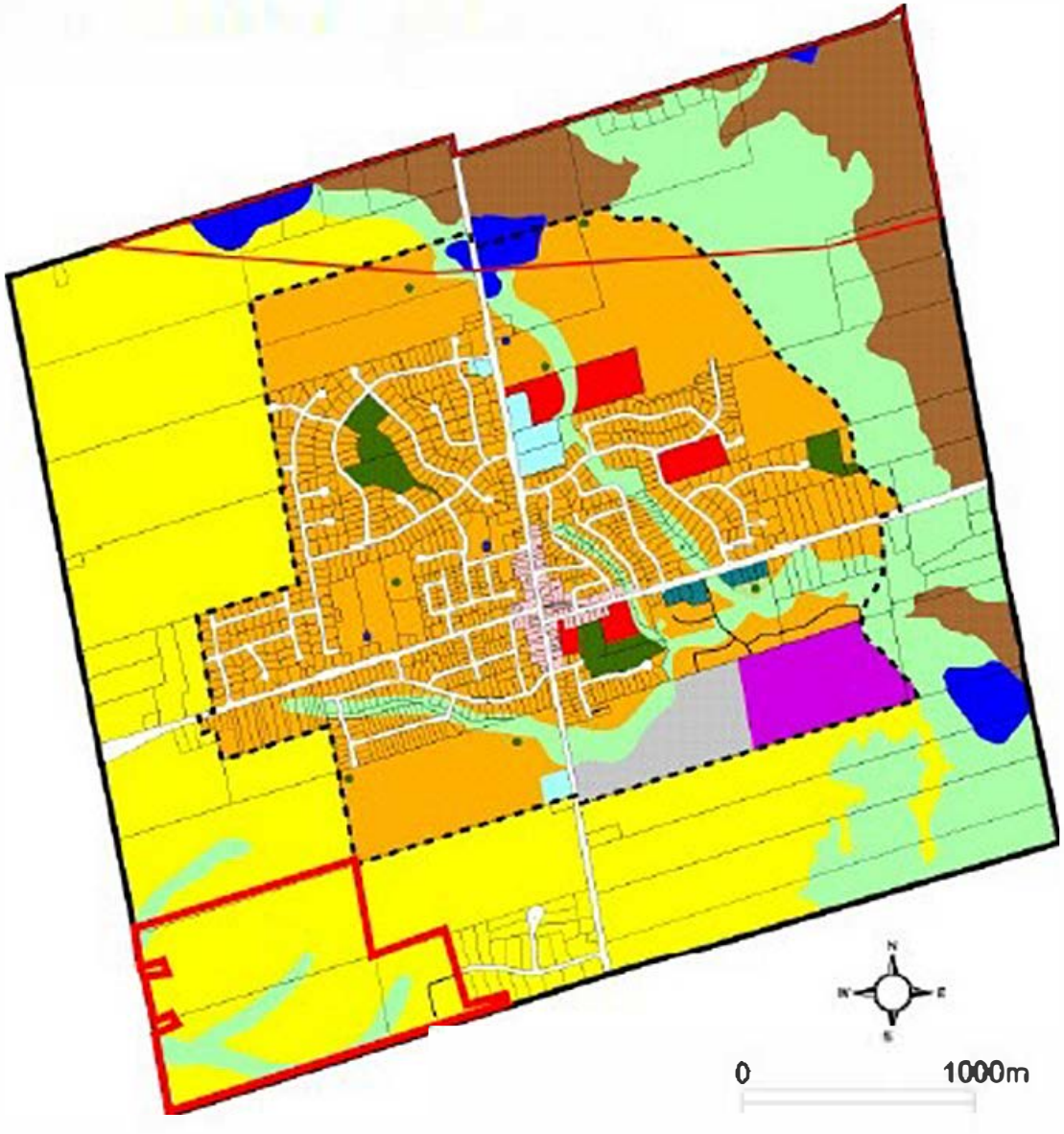
Attachment 1

Location of Subject Lands within Nobleton Community Plan



Township of King

Schedule 1
Land Use Plan

Nobleton Community Plan
Oak Ridges Moraine Plan Area

Community Plan Boundary
County Roads
Nobleton Urban Area Boundary
Oak Ridges Moraine Settlement Area and Amendment Boundary

(Source: MMAH, February 2003)

Land Use
- Agricultural Area
- Business Area
- Commercial
- Deferred Residential
- Highway Service Commercial Area
- Institutional
- Natural Heritage
- Park-Existing
- Park-Future
- Residential
- Rural Area
- Village Core
- Wetland
- Medium Density Area
- Park-Future

Attachment 2

Land Needs Analysis

Nobleton Community, King Township

June 16, 2025

KPEC
Planning + Economics

Land Needs Analysis

Nobleton Community, King Township

Prepared for:

Nobleton Landowners Group

KPEC
Planning + Economics

[redacted]

June 16, 2025

EXECUTIVE SUMMARY

Overview

The 2024 Provincial Planning Statement directs municipalities to make sufficient land available to accommodate an appropriate range and mix of land uses to meet projected needs for a time period of at least 20 years, but not more than 30 years.

The Region of York's projected growth rate for the Township of King over the 2016-2051 period is 102%, which is above the 80% growth-rate seen Region-wide - the ability of the Township to achieve the projected amount of growth depends on it ensuring that it has a sufficient supply of available land suitable to provide a range of housing forms that match the demand for housing in the Township.

Given the available land supply in Nobleton, and the emphasis on infill/intensification in the Township's other Villages (King City and Schomberg combine for 82% of anticipated intensification), the Village of Nobleton would present the Township with the best opportunity to accelerate residential development in the Township to align with Provincial policy, and help address the Township's potential imbalance of population growth with housing unit growth in the Township.

Nobleton is the only Village in the Township (King City, Nobleton, Schomberg) where the designated greenfield area is 'less than' the settlement area boundary. Any new greenfield development will have to be located within the Nobleton community, which would require the designation of additional lands, which are readily available within the Nobleton settlement area boundary.

Region-Wide Community Land Needs

The Regional Land Needs Assessment (LNA) relies on a number of questionable assumptions, one of which being an assumed turnover of ground-related housing units by older adult households. Even with this adjustment, York Region's available supply was over 101,000 units of ground-related housing short of demand. Without this adjustment, the estimated shortfall of ground-related housing forms was approximately 137,000 units.

The Region's approach to estimating urban land needs assumed that the 67,600-unit shortfall in designated and available lands for residential uses could be addressed through an urban expansion area that provides space for 36,000 units on an urban expansion area of approximately 2,300 hectares. When market demand by unit type is compared to the available supply of lands in the Region, the Region's 16-year supply of urban expansion lands is insufficient under both the 2020 PPS and 2024 PPS.

The more practical and appropriate way to assess land needs is to undertake the analysis of land needs (demand) by unit type with the available supply by unit type to ensure that the range of housing necessary to meet projected needs is available, and not affected by the application of a surplus of one unit type being used to offset the shortfall in other type, which is the implicit assumption made when various unit types are aggregated in comparing available supply and demand.

If the estimated land needs were instead based on fulfilling market demand by unit type, and did not assume that the surplus supply of apartments and accessory units relative to demand would fully address the corresponding deficit in supply of single-detached, semi-detached, row and stacked townhouses, it is estimated that the Region's urban expansion would have been 4,352 hectares, or 2,035 hectares more than planned for in the Region's LNA. Therefore, there is a significant shortfall of lands for residential uses that the Nobleton community can address.

Township-Specific Land Needs

When an analysis is undertaken on the Town that incorporates unit types by policy area (DGA/BUA) in the Township's supply with the Township's demand allocation from the York Region OP forecasts, there is a significant shortage of community area lands within the Township, equal to roughly 184 hectares, which is roughly 10% of the Region-wide shortfall.

Caveat re: Addendum Report

This report does not take into account updated inputs and data from the Township's Growth Management and Employment Lands Strategy Addendum Report, dated June 11, 2025. An update to the calculations contained in this report based on the Addendum Report will be provided in the future.

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1. INTRODUCTION

Keleher Planning & Economic Consulting Inc. (KPEC) was retained by the Nobleton Landowners Group to assess the Township of King's analysis of need for additional residential lands within the Township and the village of Nobleton, in particular.

1.1. Background

The Township of King is undertaking a Growth Management Strategy (GMS) exercise that would set out the need for additional urban land in the Township, and set out the basis for the Township's Official Plan Review process in ensuring that the Township has sufficient land and associated land designated to accommodate growth to the year 2051.

According to a presentation dated May 14, 2024, the Township is undertaking a study of land needs, employment lands strategies, and various other topics.

I have reviewed the following materials:

- Watson & Associates, King Township, Growth Management and Employment Lands Strategy, Final Report, (February 10, 2025);
- Watson & Associates, King Township, 2024 Growth Management Strategy – Public Open House, (May 14, 2024);
- York Region, Proposed 2051 Forecast and Land Needs Assessment (March 2021);
- Township of King, 2020 Development Charges Background Study (November 12, 2020);
- Township of King Official Plan
- York Region, Housing Supply Update: December 2022, (February 23, 2023).

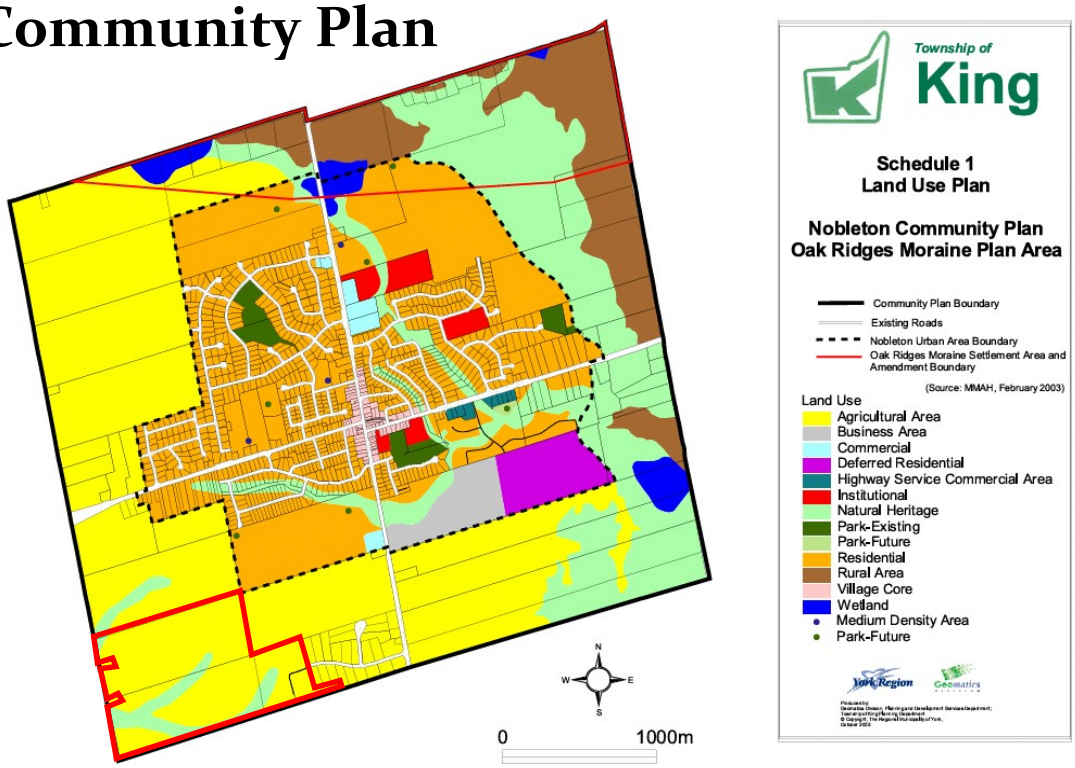
In preparing the analysis of need for community area lands in the Township, the basis for the methodology used is the Projection Methodology Guideline.

1.2. Overview of Subject Site

The subject lands are located within the boundaries of the Community Plan for Nobleton, as shown in the Figure below. The lands are designated Agricultural, and have a combined size of 229.3 acres, or 92.8 hectares.

Figure 1

Location of Subject Lands within Nobleton Community Plan



Caveat re: Addendum Report

This report does not take into account updated inputs and data from the Township's Growth Management and Employment Lands Strategy Addendum Report, dated June 11, 2025. An update to the calculations contained in this report based on the Addendum Report will be provided in the future.

2. POLICY ANALYSIS

2.1. 2024 Provincial Planning Statement

Section 2.1 of the 2024 Provincial Planning Statement ("2024 PPS") provides for municipalities in areas with Provincially-issued forecasts to continue to use them, and at the time of creating or updating an official plan, shall ensure that sufficient land is made available to accommodate an appropriate range and mix of land uses to meet projected needs for at least 20 years, but no more than 30 years.

Policies also state that municipalities may exceed the 30 years supply maximum for strategic growth areas and employment areas, among others. Similarly, any supply authorized by MZOs are to be considered over and above projections.

> *1. As informed by provincial guidance, planning authorities shall base population and employment growth forecasts on Ontario Population Projections published by the Ministry of Finance and may modify, as appropriate.*
>
> *2. Notwithstanding policy 2.1.1, municipalities may continue to forecast growth using population and employment forecasts previously issued by the Province for the purposes of land use planning.*
>
> *3. At the time of creating a new official plan and each official plan update, sufficient land shall be made available to accommodate an appropriate range and mix of land uses to meet projected needs for a time horizon of at least 20 years, but not more than 30 years, informed by provincial guidance. Planning for infrastructure, public service facilities, strategic growth areas and employment areas may extend beyond this time horizon. Where the Minister of Municipal Affairs and Housing has made a zoning order, the resulting development potential shall be in addition to projected needs over the planning horizon established in the official plan. At the time of the municipality's next official plan update, this additional growth shall be incorporated into the official plan and related infrastructure plans.*

Policy 4 sets out the need to maintain at all times a 15-year supply of designated and available (which would be within the 20-30 years of 'sufficient' land to meet projected uses being 'available'), and at least a 3-year supply of land with servicing, in draft approved or registered plans.

> *4. To provide for an appropriate range and mix of housing options and densities required to meet projected requirements of current and future residents of the regional market area, planning authorities shall: a) maintain at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and b) maintain at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.*

Policy 5 of section 2.1 refers to both a 'land supply' and a 'unit supply' as being required to be maintained by a lower-tier municipality when those have been allocated to them by an upper-tier municipality.

> *5. Where planning is conducted by an upper-tier municipality, the land and unit supply maintained by the lower-tier municipality identified in policy 2.1.4 shall be based on and reflect the allocation of population and units by the upper-tier municipality.*

2.2. York Region Official Plan

The Region's 2051 forecast contained in Table 1 of the York Region Official Plan ("ROP") growth between 2016 and 2051 of 920,000 persons, of which King Township is to see growth of 25,700 persons.

The Township's growth equates to 2.8% of Region-wide growth. The Township's growth rate of 102% over the 2016-2051 period is above the 80% growth-rate seen Region-wide. The ability of the Township to achieve the amount of growth planned depends on ensuring that it has a supply of available housing that matches the demand for housing in the Township.

Figure 2

2051 Forecasts, York Region Official Plan, Region and Township of King

Year	King	York Region
2016	25,300	1,143,900
2021	28,100	1,209,300
2031	36,300	1,447,600
2041	43,500	1,717,700
2051	51,000	2,063,900
2016-51	25,700	920,000
% Growth	102%	80%

Source: KPEC based on York Region OP

2.3. King Township Official Plan

The King Township Official Plan ("Township OP") was adopted by Council in September 2019 and approved by York Region in September 2020.

The population and housing forecasts in the Township OP are to 2031, and the Town is undertaking an Official Plan review to update its plan to achieve the 2051 forecasts.

Table 1 of the Township OP (subject to appeal) includes population forecasts in the Township to 2031 broken down by location:

Figure 3

Table 1 – Population Growth Forecasts for 2016 to 2031

Location	2016 Population	2031 Population	Growth (2016 – 2031)
King City	6,900	15,500	8,600
Nobleton	5,700	6,750	1,050
Schomberg	2,900	3,100	200
Countryside (including all lands outside the Villages)	10,000	9,550	-450
Total	25,500	34,900	9,400

Policy 2.3.2.4 of the Township OP states that the population forecast for the Village of Nobleton is based on limitations posed by sanitary sewer servicing.

> *4. That the population forecast for the Village of Nobleton on Table 1 reflects limitations posed by the municipal sanitary sewer services, which can accommodate a total population in Nobleton of 6,750 by 2031.*

Policies 2.3.2.5 to 2.3.2.7 state that any proposed growth beyond existing servicing capacity may require additional infrastructure, and that the amount of land designated for residential uses would permit growth that exceeds the Table 1 forecasts for Nobleton, such that if all land designated were developed, the total population would reach 9,600 to 10,900 persons, or between 2,850 persons to 4,150 persons higher than the 2031 forecast of 6,750 persons. The additional persons from the land designated are identified in the policy as being considered for development within the 2031-2041 horizon.

> *5. That any proposed growth beyond the existing infrastructure servicing capacity may require additional infrastructure.*
>
> *6. That the provision of appropriate municipal services including sewage treatment and adequate water supply is fundamental to achieving the long-term projected growth. The Township and York Region will monitor available sewage treatment and water capacity in relation to the forecasted growth and observed development activity.*
>
> *7. To recognize that the amount of land designated for residential uses in Nobleton would permit growth that exceeds the forecasted population for Nobleton. If all land designated for residential development and intensification were developed, the total population of the Urban Area Boundary of Nobleton would reach between 9,600 and 10,900 persons. However, growth in Nobleton is anticipated to be limited over the horizon of this Plan due to servicing constraints, and as such, the lands may be considered for development within the 2031 – 2041 horizon, subject to the completion of the Municipal Comprehensive Review of the York Region Official Plan, the Nobleton Class Environmental Assessment for water and wastewater improvements and subsequent review of this Plan. At the time of completing this Plan, an Environmental*

> *Assessment process has been initiated to consider alternatives for the servicing constraints in the Urban Area Boundary of Nobleton.*
>
> *8. To monitor growth in Nobleton and, if growth is expected to exceed the forecasted growth of 6,750 for Nobleton, to initiate a review of the applications and growth allocations with York Region.*

Policy 2.3.2.8 states that if growth is to exceed forecasted growth for Nobleton of 6,750 persons, that the growth allocations within York Region would be reviewed.

> *To monitor growth in Nobleton and, if growth is expected to exceed the forecasted growth of 6,750 for Nobleton, to initiate a review of the applications and growth allocations with York Region.*

Section 2.3.4 of the Township OP deals with Intensification, which includes the following policies:

> *1. To achieve a minimum intensification target of 15%, meaning that a minimum of 15% of annual residential unit growth to 2031 will be located within the built boundary as shown on Schedule D to this Plan.*

2.4. Conclusions

Nobleton is the only Village in the Township (King City, Nobleton, Schomberg) where the designated greenfield area is ‘less than’ the settlement area boundary (see Slide 30 of GMS Presentation). Any new greenfield development (which tend to 50-70 units per hectare, as per York Region Planning for Density analysis from 2020) will have to be located within the Nobleton community, however this would require the designation of additional lands, which are readily available within the Nobleton settlement area boundary.

Allowing an increased amount of residential uses within Nobleton presents an opportunity for the Township to ensure an appropriate range and mix of housing remains available in the Township residential supply.

Policy 2.3.2.8 states that if growth is to exceed forecasted growth for Nobleton, that the growth allocations within York Region would be reviewed. Should the servicing issues be resolved, the Township OP policy would require that the Township review with the Region the extent to which the Township’s allocation of growth within the Region should be adjusted, presumably upwards from existing planning forecasts.

3. ANALYSIS

3.1. May 2024 GMS Presentation

Slide 20 of King Township's May 2024 GMS Presentation ("GMS Presentation") shows annual growth rate of 2016-2022 of 1.1%, but this ignores that outflows from the Region were higher than normal (see Demographic Data section of presentation), so population growth may have been higher had sufficient supply or the unit mix available/approved/permitted and constructed been different and better met potential household demand, by type, location, and cost.

The GMS Presentation shows a 58% increase in housing units from 2021-2051 over 2006-2021 levels, however based on PPUs from 2020 DC Study, the forecast 58% increase in housing units would translate to an only 30% increase in population growth. The relative imbalance is owing to the relatively high proportion of higher-density housing forms in the housing forecast, with those units having typically lower average household sizes per unit.

Slide 30 of the GMS Presentation shows the boundaries of the built-up area, designated greenfield area and Settlement Area for each of the Township's three villages. The Nobleton community has the most capacity for growth of designated greenfield area lands within the existing settlement area boundary.

Slide 34 of the GMS Presentation shows that within King Township, the majority of intensification potential is in King City with very little potential for infill/intensification present in Nobleton. Given the available land supply in Nobleton, and the emphasis on infill/intensification in King City and Schomberg, the Village of Nobleton would present the Township with the best opportunity to add more potential residential growth than anticipated, and help address the Township's potential imbalance of population growth with housing unit growth in the Township. Population growth by age group in the Township has significantly skewed towards growth in persons over the age of 60, with minimal growth in young adults, while a substantial portion of increasing domestic net outmigration from the Region being from young adults in household-forming years.

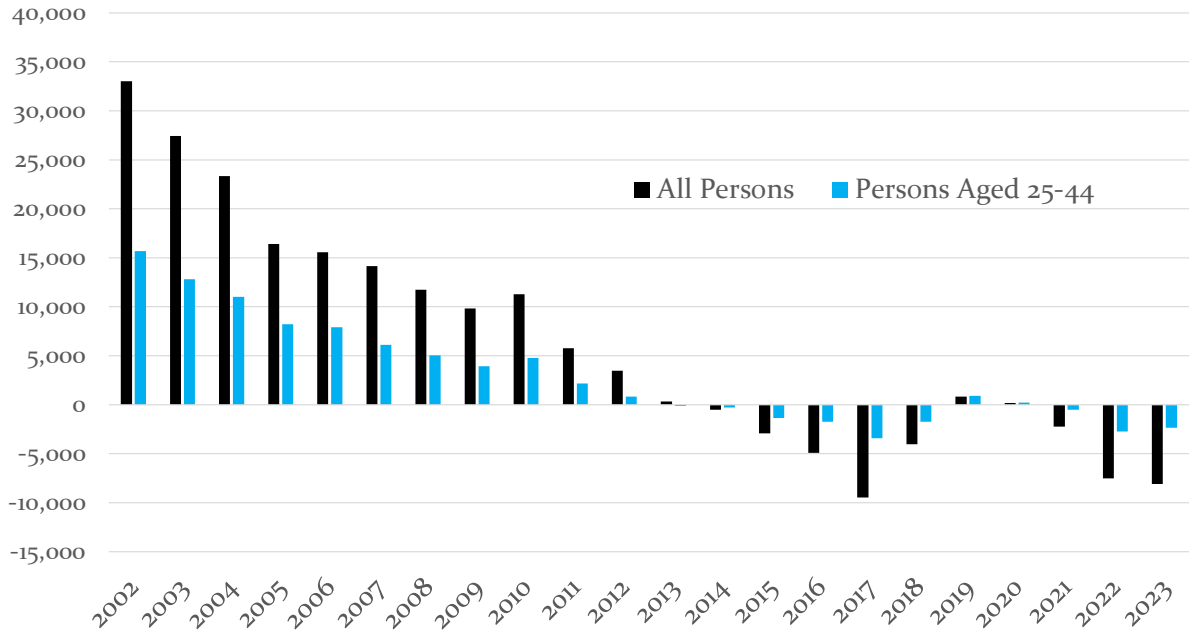
3.2. Demographic and Housing Trends

The amount of migration to/from the Region from other parts of Ontario and Canada has declined significantly and in 8 of the last 10 years has seen an outflow of people from the Region to other parts of Ontario and Canada. The past 10 years come after a 10-year period from 2002-2011 where upwards of 20,000 to 30,000 persons per year would move to the Region from elsewhere in Canada and Ontario.

Over the 2014-2023 period, a net of 38,700 persons left the Region for other parts of Ontario and Canada. Over the preceding 2004-2013 period, 111,970 persons on net moved to the Region.

Figure 4

Combined Intraprovincial and Interprovincial Migration, York Region, 2002-2023

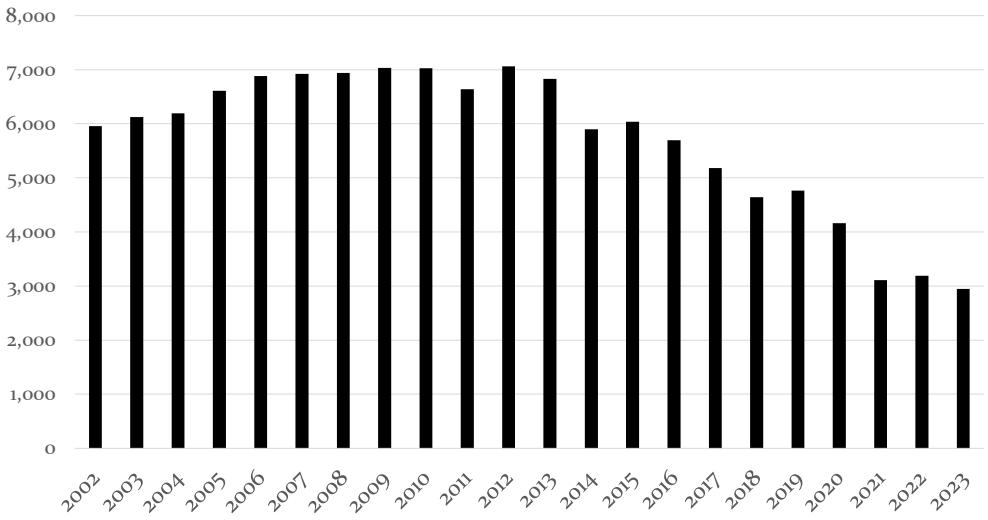


Source: StatsCan, Table 17-10-0153-01

In York Region, the amount of 'natural increase', which is calculated by comparing Births and Deaths, has reached a 20-year low, with a net gain of less than 3,000 persons, down from prior highs upwards of 7,000 last decade.

Figure 5

Natural Increase (Births less Deaths), York Region, 2002-2023

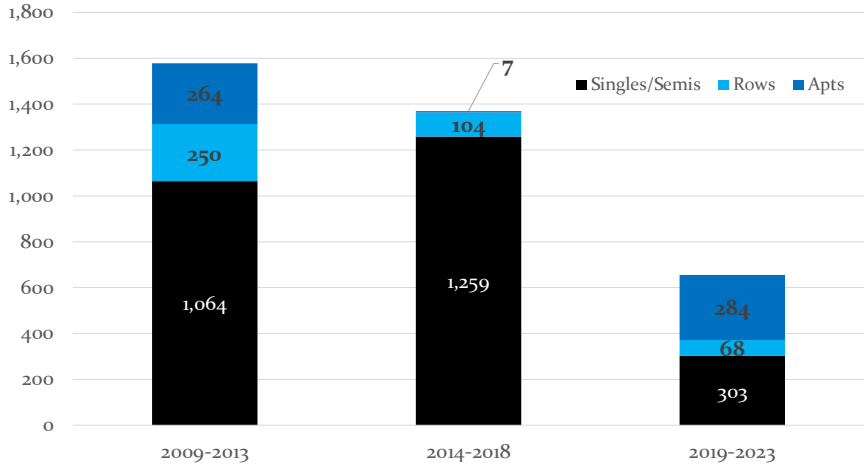


Source: StatsCan, Table 17-10-0153-01

The amount of single-detached housing that is being constructed in King Township has declined significantly in the past five years, with only 303 single-detached housing units started since 2019, compared to 1,064 to 1,259 singles started in the prior two five-year periods.

Figure 6

Housing Starts, King Township, 2009-2023, by Five-Year Period



Source: CMHC

3.3. King Township Official Plan Review Process

According to one of the Discussion Papers prepared for the Township's 2051 Official Plan Review, both an Employment Land Strategy (ELS) and Growth Management Strategy (GMS) are being undertaken and will include:

- An assessment of existing policies and macroeconomic conditions at the broader regional level and locally;
- A residential vacant land supply analysis;
- A review of existing Employment Areas and employment conditions, in alignment with the Employment Area vacant land supply analysis;
- An assessment of the Township's long-term growth potential for population, housing and employment to 2051;
- A 5-year population, housing and employment forecast for each Village;
- An Employment Area land needs analysis to 2051; and
- A Community Area land needs analysis to 2051

4. REGION-WIDE LAND NEEDS

4.1. Assumptions Regarding Turn-Over of Grade-Related Housing

The Region released a “Foundational Housing Analysis” dated March 2021, which provides an assessment of the Region’s long-term housing forecast to the year 2051, prepared by the Region as part of its MCR, with specific attention to “housing demand by structure type, tenure, planning policy area, and rate of development”.

The Region’s FHA is based on an assumption regarding ‘turn-over’ of grade-related housing units to new buyers, or 40,000 grade-related households over the 2016-2051 period. This assumption appears to be based on extrapolation of the trend from 2011-2016 over the entirety of the 2016-2051 period. During the 2011-2016 period, there were 5,700 fewer baby-boomer (a term undefined in the table) households than five-years prior in ground-related housing forms, and 3,700 more baby-boomer apartment households.

This assumption is based on change from the 2011 National Household Survey (NHS) and 2016 Census and therefore the results may not be reliable, which may affect the results over the 2006-2011 and 2011-2016 period.

The change evident from the 2016 Census to the 2021 Census show that the trend depicted in Figure 8 of the Region FHA has been reversed over the 2016-2021 period, with an increase in Baby Boomer’s in ground-related housing forms (16,305 households) that is now in-line with the average 5-year change seen over the 1996-2011 period (16,900 persons)

Figure 7

Change in Age of Primary Household Maintainer by Structure Type, York Region, 2016-2021

	Ground-Related			High-Density		
Age Group	2016	2021	Change	2016	2021	Change
15 to 24 years	1,425	1,785	360	1,340	1,900	560
25 to 34 years	23,305	23,540	235	9,090	12,080	2,990
35 to 44 years	59,355	56,695	(2,660)	9,350	11,835	2,485
45 to 54 years	84,260	80,390	(3,870)	11,290	11,070	(220)
55 to 64 years	66,855	77,500	10,645	10,545	12,025	1,480
65 to 74 years	38,245	47,710	9,465	9,400	12,100	2,700
75 to 84 years	16,705	21,405	4,700	7,855	9,400	1,545
85 years and over	4,435	6,575	2,140	3,550	4,920	1,370
Total	294,585	315,600	21,015	62,420	75,330	12,910
Baby Boomer (65+)	59,385	75,690	16,305	20,805	26,420	5,615
Change by 5-YR Period						
1996-2001			27,100			(200)
2001-2006			18,600			1,800
2006-2011			5,000			2,100
2011-2016			(5,700)			3,700
2016-2021			16,305			5,615

Source: KPEC based on Statistics Canada data (Table 98-10-0232-01), Watson & Associates

Otherwise, the FHA anticipates the aging of the Region's population to place "increasing demand on the need for a range of new housing options by type and built form".

4.2. Comparison of Region-wide Supply and Demand by Type

Even with this assumption, a comparison of the estimated demand for housing by type with the estimated housing supply available in the Region shows that the Region's available supply was over 101,000 units of ground-related housing short of FHA estimates of demand.

Figure 8

Comparison of Regional LNA Forecasts by Unit Type and Estimated Housing Unit Supply, York Region

Unit Type (Demand) - 2021-2051	Built-Up Area	DGA	Rural	Total
Singles/Semis	6,700	68,500	1,000	76,200
Rows/Stacked	26,800	49,000	-	75,800
Apartments/Duplex	104,500	19,500	-	124,000
Total	138,000	137,000	1,000	276,000

Unit Type (Supply)	Registered	Draft Approved	MZO	Proposed	Total
Singles/Semis	2,872	12,122	148	6,413	21,555
Rows/Stacked	1,838	10,507	174	15,823	28,342
Apartments/Duplex	4,336	13,956	46,006	92,693	156,991
Total	9,046	36,585	46,328	114,929	206,888

	Supply	Demand	Surplus / (Deficit)	Total Deficits
Singles/Semis	21,555	76,200	(54,645)	(54,645)
Rows/Stacked	28,342	75,800	(47,458)	(47,458)
Apartments/Duplex	156,991	124,000	32,991	
Total	206,888	276,000	(69,112)	(102,103)

Source: KPEC based on York Region Housing Supply Update (December 2022), York Region Proposed 2051 Forecast and LNA, (March 2021)

Figure 9

Comparison of Housing Demand and Estimated Housing Unit Supply, York Region

	Supply	Demand	Surplus / (Deficit)	Total Deficit
Singles/Semis	21,555	128,600	(107,045)	(107,045)
Rows/Stacked	28,342	56,000	(27,658)	(27,658)
Apartments/Duplex	156,991	86,600	70,391	
Total	206,888	271,200	(64,312)	(134,703)

Source: KPEC based on York Region Housing Supply Update (December 2022), Hemson Technical Report (August 2020)

The York Region LNA forecasts by unit type show a shortfall of 54,645 singles/semis and 47,458 rows, for a combined shortfall in ground-related housing of 102,100 units. The estimate of housing demand from the Hemson Technical Report would result in a shortfall of 107,045 singles/semis and 27,658 rows, for a total shortfall of 134,703 ground-related housing units relative to available supply in the December 2022 report. In this scenario, without the additional adjustment to demand based on additional shifting of older adults into higher-density housing forms than already accounted for in the base demand model used in the Technical Report, the amount of additional land

area necessary to fully address demand for each unit type, would be substantially higher.

The Region's LNA ignores the importance of differentiating by unit type in making comparisons of supply and demand, and instead estimates the net amount of new expansion lands necessary based on the total difference of 137,000 units of demand (regardless of unit type).

4.3. Estimated Residual Remaining Land Need to Meet Housing Demand by Type

Based on the Region's approach to estimating urban land needs on the assumption that planning to meet the 67,600-unit shortfall with an urban expansion area that provides space for 36,000 units, the Region's approach yielded an urban expansion area of approximately 2,300 hectares.

Figure 10

Estimated Shortfall in Regional Community Urban Expansion Areas to 2051

	Singles / Semis	Rows / Stacked	Apartments/ Accessory		Total	
Dec 2022 Supply	21,555	28,342	156,991		206,888	
DGA (Supply) (2)	21,555	28,342	51,103	(4)	101,000	(1)
DGA (Demand)	68,500	49,000	19,500		137,000	
Estimated Surplus / (Shortage)	(46,945)	(20,658)	31,603		(36,000)	
Total Net Shortage (ignoring surpluses)	(46,945)	(20,658)			(67,603)	

	Regional LNA	Revised	Difference
Unit Shortfall	(36,000)	(67,603)	(31,603)
Density (Units / Ha)	17	17	
Land Need	2,118	3,977	1,859
Contingency (%) (3)	9.44%	9.44%	
Contingency	200	376	176
Urban Expansion Area Needs	2,318	4,352	2,035

Note (1) - 101,000 designated greenfield area supply as referenced in Regional LNA
Note (2) - to be as conservative as possible, assumed 100% of singles/semis and 100% of rows/stacked were in DGA supply (and not in built-up area)
Note (3) - based on calculated contingency rate from Regional LNA (200/2100), which is then applied to the net amount evident in Proposed Model
Note (4) - calculated based on assumptions in (1) and (2)
Source: KPEC

If the estimated land needs were based on the difference of each unit type, did not blend the surplus in apartments and accessory units with the deficits in single-detached, semi-detached, row and stacked townhouses, and was converted to an unmet land

need in the same way that the Regional LNA estimated urban expansion needs, there would be a need for 4,352 hectares of urban expansion area, or 2,035 hectares more than planned for in the Region's LNA.

Under the revised estimates of 4,350 hectares, the annual demand for additional urban lands would be approximately 145 hectares per year. Therefore, the 2,318 hectares equates to just under 16 years of land supply, below 2024 PPS minimums of 20 years.

The 2024 Provincial Planning Statement directs municipalities to make sufficient land available to accommodate an appropriate range and mix of land uses to meet projected needs for a time period of at least 20 years, but not more than 30 years. However, the 2024 PPS also allows for strategic growth areas to be planned beyond the 30-year horizon. Strategic Growth Areas encompass areas within settlement areas, nodes, corridors and other areas identified by municipalities as the focus for accommodating intensification and high-density mixed-uses. Based on the direction provided in the 2024 PPS, these SGAs would be where the majority of the apartment supply in the Region would be based, meaning that the majority of the surplus of apartment units should be considered as 'beyond 30 year' supply, and likely unable to address any unit-type specific shortfalls in ground-related housing forms.

4.4. Treatment of Nobleton Agricultural DGA Lands in LNA

The York Region LNA states that growth was only contemplated in locations within existing or planned water/wastewater capacity. In the case of Nobleton, the LNA states that a population of 10,800 persons was considered for Nobleton due to existing capacity constraints, and based on the cost of expanding capacity beyond the 10,800 population, with cost estimates of $100 to $200 million.

The lands in Nobleton with growth potential but with servicing constraints were excluded from the supply of lands used to estimate the net community area land needs, which resulted in an estimated need for 2,300 hectares of new community lands across the Region to 2051.

4.5. Approved Urban Boundary Expansion as Share of Total Region-Wide Whitebelt

The Region's LNA estimates that the Region has 4,100 hectares of developable Whitebelt lands available, including lands in East Gwillimbury, King, Markham, Vaughan and Whitchurch-Stouffville.

The Proposed Urban Expansion would see roughly 80% of the Region's available Whitebelt lands used, and only 715 hectares remaining.

Figure 11

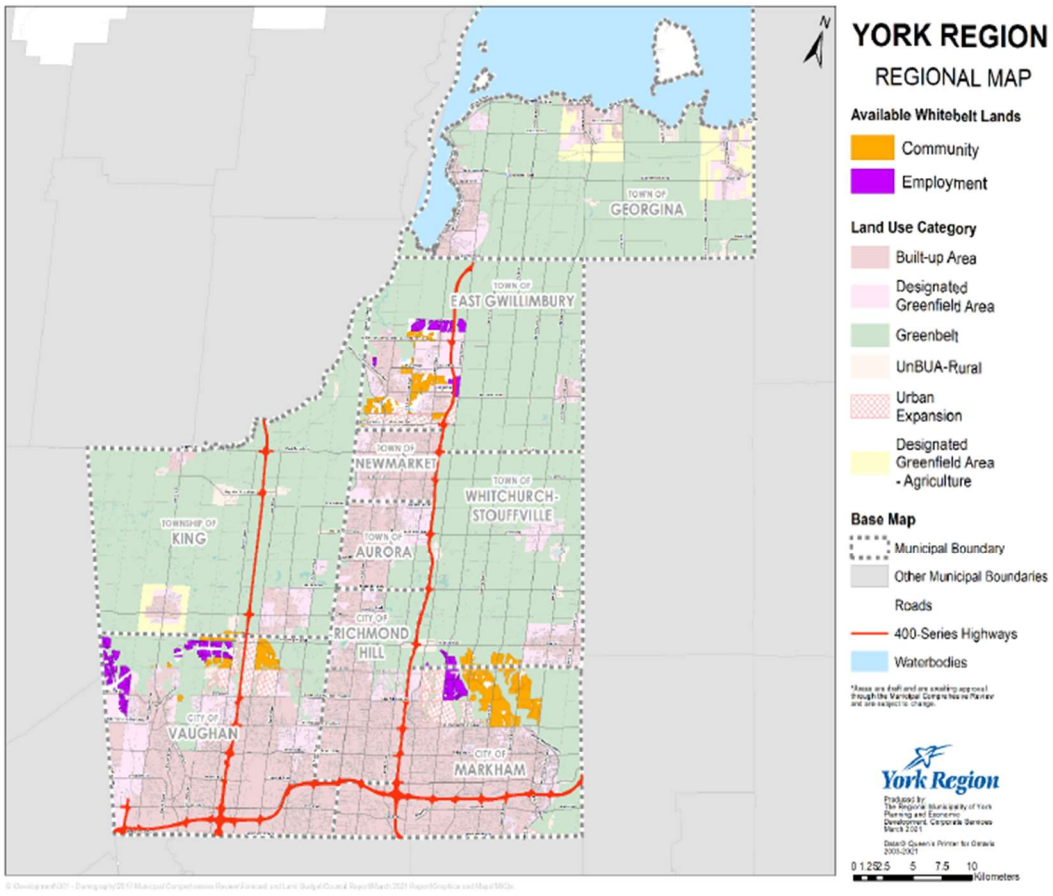
Municipality	Available	Urban Boundary Expansion	Remaining Whitebelt Lands
East Gwillimbury	960	245	715 hectares
King	80	80	0 hectares
Markham	1,490	1,490	0 hectares
Vaughan	1,210	1,210	0 hectares
Whitchurch-Stouffville	375	375	0 hectares

The only remaining Whitebelt lands after accounting for the Region's urban boundary expansion is 715 hectares in East Gwillimbury.

Figure 12

Figure 14

Available Whitebelt Lands



5. KING TOWNSHIP LAND NEEDS ANALYSIS

5.1. Methodology and Assumptions

Compared

5.2. Demand Analysis

The Phase 1 GMS Report includes an estimate of population growth to 2051 in each of the Township's three urban areas, and its rural area. Over the 2024-2051 period, the Township is forecast to grow by 21,200 persons, or 785 persons per year. The Phase 1 GMS report also provides a forecast of annual housing growth in each area, with the Township-wide forecast amounting to 305 units per year.

These units are allocated to each Village, and the GMS assigns the unit forecast to the Designated Greenfield Area and the Built-Up Area in each Village.

5.2.1. Built Boundaries

Lands in the Township's Villages include a built-boundary, as identified through the lands inside of the red line on each of the maps below.

Figure 13 – King City

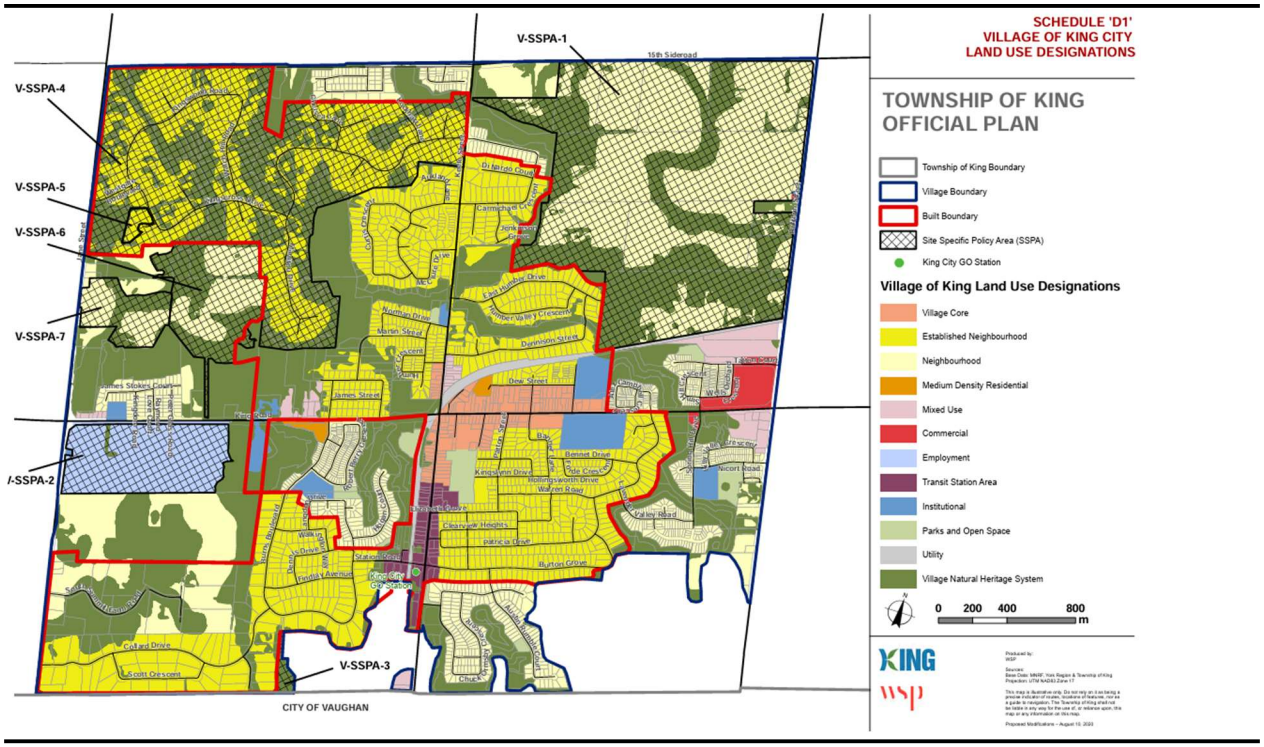


Figure 14 - Nobleton

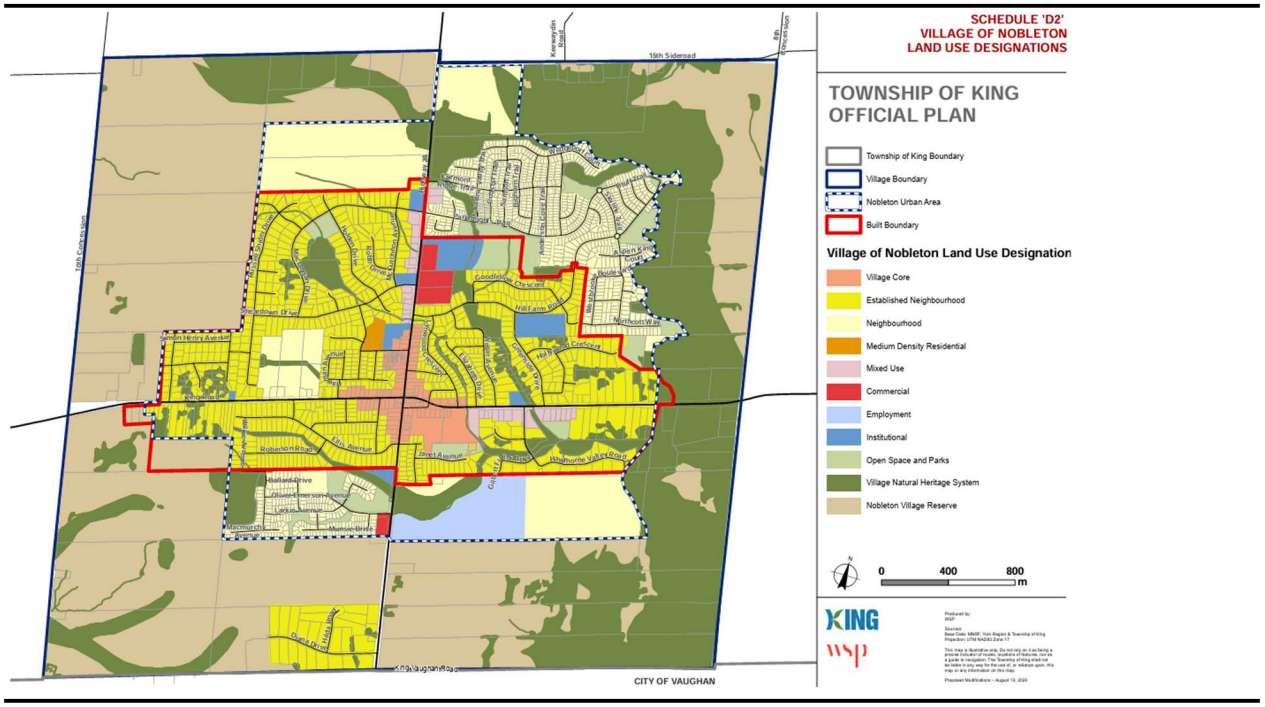
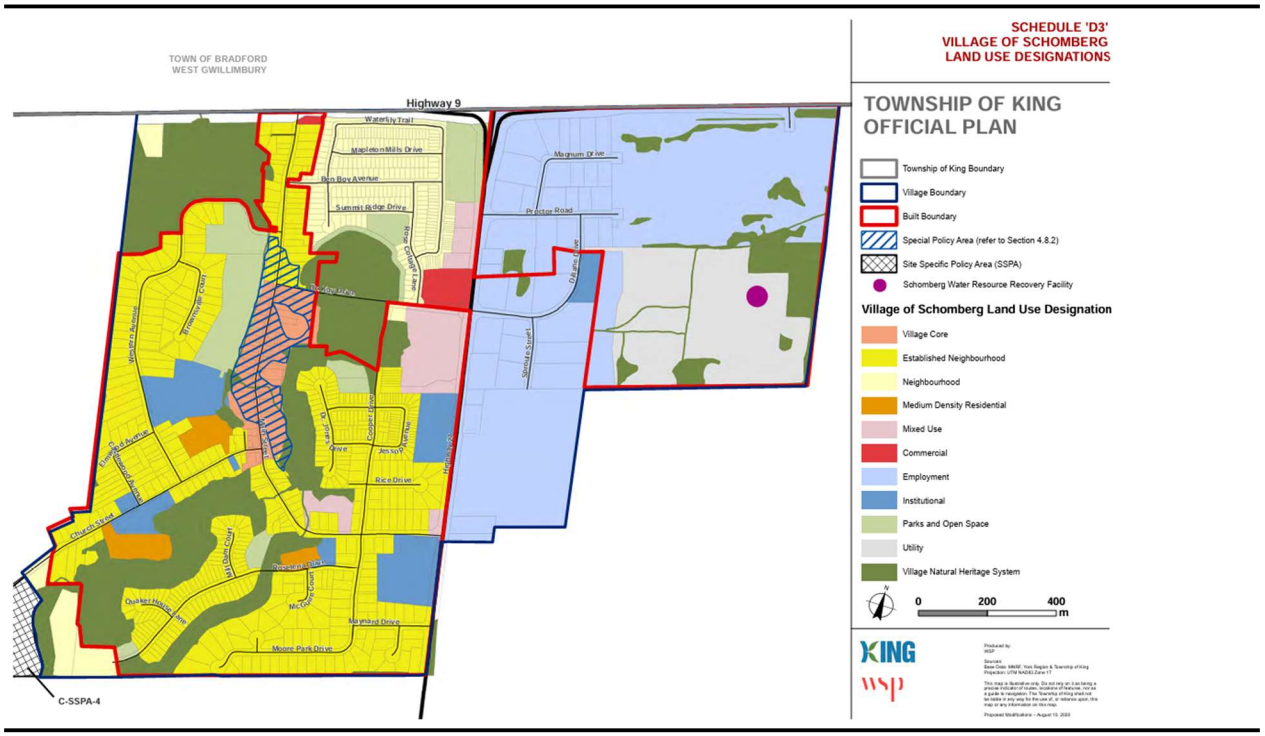


Figure 15 - Schomberg



5.3. Supply Analysis

There are several components to the Township's residential supply:

- Registered and vacant residential lots;
- Draft approvals;
- Active applications;
- Vacant residential lands designated prior to recent urban boundary expansion
- Urban boundary expansion lands

The analysis is based on data available on the Township's website, as well as data contained in Township documents, such as the Phase 1 GMS report.

Figure 7 of the Phase 1 GMS Report included an estimate of potential housing supply, which includes units under application, those approved, and other potential units on vacant designated greenfield area (DGA) lands and on underutilized parcels in the built-up area (BUA). There is no breakdown provided for the anticipated unit mix by type within those applications, approvals, or other potential units.

5.4. Land Needs to Ensure Sufficient Supply to 2051

5.4.1. Base Scenario: Using Township Assumptions Regarding Intensification

The table below takes data and forecasts including population forecasts, share of household growth by type by settlement area, and policy-based split between Designated Greenfield Area (DGA) and Built-Up Area (BUA). The share of units by type within DGA and BUA are estimated based on typical ratios but balance back to the total forecasts.

Figure 16

Estimated Housing Demand and Available Housing Supply, Township of King

Township Demand/Supply, by Unit Type and Planning Geography

BASE SCENARIO - TABLE 1	Phase 1 GMS				
Population Growth	Nobleton	King City	Schomberg	Rural	Total
2024 Population	7,050	9,690	2,620	10,440	29,800
2051 Population (Figure 6 GMS)	13,580	23,210	3,350	10,860	51,000
Total Population Growth 2024-2051	6,530	13,520	730	420	21,200
Household Growth by Type					
Ground-Related	70%	50%	43%		
High-Density	30%	50%	57%		
Ground-Related	1,533	2,605	129	120	4,387
High-Density	657	2,605	171	-	3,433
Total Household Growth 2024-2051 (Figure 4 GMS)	2,190	5,210	300	120	7,820
Planned DGA % (Figure 10 GMS)	63%	44%	18%	n.a.	48%
Planned BUA % (Figure 10 GMS)	37%	56%	82%	n.a.	51%
Designated Greenfield Area Units	1,380	2,292	54	-	3,726
Share (Assumed)					
Ground-Related	90%	80%	60%		83%
High-Density	10%	20%	40%		17%
Number by Type					
Ground-Related	1,242	1,834	32		3,108
High-Density	138	458	22		618
Total DGA	1,380	2,292	54		3,726
Built-Up Area Units					
Number by Type					
Ground-Related	153	656	97		906
High-Density	519	2,147	149		2,815
Total BUA	810	2,918	246	-	3,974
Share (Assumed)					
Ground-Related	19%	23%	39%		23%
High-Density	64%	74%	61%		71%
Rural Units	-	-	-	135	

Note: Phase 1 GMS report does not provide breakdown of DGA or BUA unit forecasts by unit type
Source: KPEC based on Phase 1 GMS, Watson & Associates

It is estimated that when the supply of units in the DGA are compared to the demand by unit type in the DGA, that there is a shortage of approximately 46 gross hectares of land within the Township's DGA.

Figure 17

Comparison of Supply and Demand by Policy Area and Village, Township of King
BASE SCENARIO - TABLE 2

DGA Demand	Nobleton	King City	Schomberg	Rural	Total
Ground-Related	1,242	1,834	32		3,108
High-Density	138	458	22		618
Total DGA Demand	1,380	2,292	54		3,726
DGA Supply (Figure 7 GMS)					
Active Applications	1,115	2,105	10	-	3,230
Remaining Potential on Vacant Lands	-	220	40	-	260
Total	1,115	2,325	50	-	3,490
Assumed Unit Mix - DGA Supply (Based on Active Applications)					
Ground-Related	100%	87%	100%		
High-Density	0%	13%	0%		
DGA Supply by Type					
Ground-Related	1,115	2,022	50	-	3,187
High-Density	-	303	-		303
Estimated Unit and Land Needs					
DGA Unit Surplus / (Shortage)					
Ground-Related	(127)	188	18		79
High-Density	(138)	(155)	(22)		(315)
PPU					
Ground-Related	3.212	3.212	3.212		3.212
High-Density	1.86	1.86	1.86		1.86
DGA Population Shortage					
Ground-Related	(407)	-	-		(407)
High-Density	(257)	(289)	(40)		(586)
Total	(664)	(289)	(40)		(993)
DGA Employment	(66)	(29)	(4)	-	(99)
Persons and Jobs	(730)	(318)	(44)	-	(1,092)
DGA Density (persons & jobs per hectare)	30	30	30		30
Net Land Area Shortage	(24)	(11)	(1)		(36)
Gross Land Area Shortage (80% n:g)	(30)	(13)	(2)		(46)

Source: KPEC based on Watson & Associates Phase 1 GMS Report

5.4.2. Alternate Scenario – Updated Intensification Rates

The table below builds upon the Base Scenario but with updates to the Planned Built-Up Area share of housing units from 51% to 35%. The share of units by type in each of the DGA and BUA were adjusted from the Base Scenario to ensure that the Town-wide demand was achieved.

Estimated Housing Demand and Available Housing Supply, Township of King

Alternate Calculations - 35% intensification

ALTERNATE SCENARIO - TABLE 1	Phase 1 GMS				
Population Growth	Nobleton	King City	Schomberg	Rural	Total
2024 Population	7,050	9,690	2,620	10,440	29,800
2051 Population (Figure 6 GMS)	13,580	23,210	3,350	10,860	51,000
Total Population Growth 2024-2051	6,530	13,520	730	420	21,200
Household Growth by Type					
Ground-Related	70%	50%	43%		
High-Density	30%	50%	57%		
Ground-Related	1,533	2,605	129	120	4,387
High-Density	657	2,605	171	-	3,433
Total Household Growth 2024-2051 (Figure 4 GMS)	2,190	5,210	300	120	7,820
Planned DGA %	75%	61%	44%	n.a.	
Planned BUA % - 35%	25%	39%	56%	n.a.	35%
Designated Greenfield Area Units	1,643	3,201	131		4,974
Share (Assumed)					
Ground-Related	90%	80%	60%		86%
High-Density	10%	20%	40%		17%
Number by Type					
Ground-Related	1,478	2,560	78		4,117
High-Density	164	640	52		857
Total DGA	1,643	3,201	131		4,974
Built-Up Area Units					
Number by Type					
Ground-Related	55	45	51		270
High-Density	493	1,965	119		2,576
Total BUA	548	2,009	169	-	2,737
Share (Assumed)					
Ground-Related	10%	2%	30%		
High-Density	90%	98%	70%		
Rural Units	-	-	-	135	

Note: Phase 1 GMS report does not provide breakdown of DGA or BUA unit forecasts by unit type
Source: KPEC based on Phase 1 GMS, Watson & Associates

It is estimated that when the supply of units in the DGA are compared to the demand by unit type in the DGA in the Alternate Scenario, that there is a shortage of approximately 184 gross hectares of land within the Township's DGA.

Figure 18

Comparison of Supply and Demand by Policy Area and Village, Township of King
ALTERNATE SCENARIO - TABLE 2

DGA Demand	Nobleton	King City	Schomberg	Rural	Total
Ground-Related	1,478	2,560	78		4,117
High-Density	164	640	52		857
Total DGA Demand	1,643	3,201	131		4,974
DGA Supply (Figure 7 GMS)					
Active Applications	1,115	2,105	10	-	3,230
Remaining Potential on Vacant Lands	-	220	40	-	260
Total	1,115	2,325	50	-	3,490
Assumed Unit Mix - DGA Supply (Based on Active Applications)					
Ground-Related	100%	87%	100%		
High-Density	0%	13%	0%		
DGA Supply by Type					
Ground-Related	1,115	2,022	50	-	3,187
High-Density	-	303	-		303
Estimated Unit and Land Needs					
DGA Unit Surplus / (Shortage)					
Ground-Related	(363)	(538)	(28)		(930)
High-Density	(164)	(337)	(52)		(554)
PPU					
Ground-Related	3.212	3.212	3.212		3.212
High-Density	1.86	1.86	1.86		1.86
DGA Population Surplus / (Shortage)					
Ground-Related	(1,167)	(1,729)	(91)		(2,987)
High-Density	(306)	(627)	(97)		(1,030)
Total	(1,472)	(2,356)	(188)		(4,017)
DGA Employment	(147)	(236)	(19)	-	(402)
Persons and Jobs	(1,619)	(2,592)	(207)	-	(4,419)
DGA Density (persons & jobs per hectare)	30	30	30		30
Net Land Area Shortage	(54)	(86)	(7)		(147)
Gross Land Area Shortage (80% n:g)	(67)	(108)	(9)		(184)

Source: KPEC based on Watson & Associates Phase 1 GMS Report

6. CONCLUSIONS

The following presents the concluding assessment regarding how the subject lands could be designated to allow for residential uses.

The Region of York's projected growth rate for the Township of King over the 2016-2051 period is 102%, which is above the 80% growth-rate seen Region-wide - the ability of the Township to achieve the projected amount of growth depends on it ensuring that it has a sufficient supply of available land suitable to provide a range of housing forms that match the demand for housing in the Township.

Given the available land supply in Nobleton, and the emphasis on infill/intensification in the Township's other Villages (King City and Schomberg combine for 82% of anticipated intensification), the Village of Nobleton would present the Township with the best opportunity to accelerate residential development in the Township to align with Provincial policy, and help address the Township's potential imbalance of population growth with housing unit growth in the Township.

Nobleton is the only Village in the Township (King City, Nobleton, Schomberg) where the designated greenfield area is 'less than' the settlement area boundary. Any new greenfield development will have to be located within the Nobleton community, which would require the designation of additional lands, which are readily available within the Nobleton settlement area boundary.

Community Land Needs

When market demand by unit type is compared to the available supply of lands in the Region, the Region's urban expansion lands are insufficient under both the 2020 PPS and 2024 PPS.

Relying instead on a more practical and appropriate way to assess land needs it is estimated that the Region's urban expansion would have been 4,352 hectares, or 2,035 hectares more than planned for in the Region's LNA.

Under this approach, the analysis of housing demand by unit type is compared to the available supply by unit type to ensure that the range of housing necessary to meet projected needs is available and not affected by the application of a surplus of one unit type being used to offset the shortfall in other type.

Therefore, there is a significant shortfall of lands for residential uses that the Nobleton community can address without the need for an urban boundary expansion, but through the designation of the subject lands for residential uses.

The Regional LNA is agnostic to the location of supply in the DGA or the type of housing units in the supply that are needed to meet the demand for new housing. When an analysis is undertaken on the Town that incorporates unit types by policy area (DGA/BUA) in the Township's supply with the Township's demand allocation from the York Region OP forecasts, there is a significant shortage of community area lands within the Township, equal to roughly 184 hectares, which is roughly 10% of the Region-wide shortfall.

Should the remaining ~90% of the Region-wide shortfall be unable to be met in other Regional municipalities, the Township may be able to accommodate more than the 184 hectares needed within the Township-specific land needs analysis.