

Clause No. 14 in Report No. 11 of Committee of the Whole was adopted, without amendment, by the Council of The Regional Municipality of York at its meeting held on June 26, 2014.

14

REVIEW OF THE PROVINCE'S PROPOSED PERFORMANCE INDICATORS FOR THE GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE, 2006

Committee of the Whole recommends adoption of the following recommendations contained in the report dated May 28, 2014 from the Executive Director, Corporate and Strategic Planning:

1. RECOMMENDATIONS

It is recommended that:

- 1. Council endorse staff comments (*Attachment 2*) on the Province's proposed performance indicators for the *Places to Grow: Growth Plan for the Greater Golden Horseshoe*, 2006, as submitted to the Province on April 30, 2014.
- 2. The Regional Clerk forward this report to the Minister of Infrastructure and local municipalities.

2. PURPOSE

This report advises Council of the release of the Province's proposed performance indicators for the *Places to Grow: Growth Plan for the Greater Golden Horseshoe*, 2006. This report also seeks Council endorsement of comments submitted to the Province by Regional staff on April 30, 2014 (to meet the Province's submission deadline of April 30, 2014).

3. BACKGROUND

The Growth Plan for the Greater Golden Horseshoe, 2006 is a framework for implementing the Province's vision for building stronger, prosperous communities by better managing growth

The Province of Ontario's *Growth Plan for the Greater Golden Horseshoe*, 2006 ("*Growth Plan*") came into effect on June 16, 2006. The *Growth Plan* guides where and how growth should occur in the Greater Golden Horseshoe (GGH) and ensures that communities are planned and built to be sustainable and prosperous. The *Growth Plan* works with other key government documents including the *Provincial Policy Statement*, *Greenbelt Plan*, and *Oak Ridges Moraine Conservation Plan* to implement the Government of Ontario's vision of smart growth, agricultural vitality and environmental protection.

The development and monitoring of *Growth Plan* performance indicators forms a key part of an evidence-based approach to policy development

The *Growth Plan* (Section 5.4.3) requires the Minister of Infrastructure to monitor the implementation of the *Growth Plan* policies, including developing and reviewing performance indicators, and to report on this implementation. In addition, the *Places to Grow Act*, 2005 requires that the Minister of Infrastructure review the *Growth Plan* at least every 10 years after the plan comes into force. The first scheduled formal review will be required by 2016. The development of performance indicators is an important step in the implementation of the *Growth Plan* and the Province's preparation for the upcoming formal review, as understanding how policies are being implemented and assessing progress forms a key part of an evidence-based approach to policy development.

The Province released proposed performance indicators for the *Growth Plan* for public and stakeholder feedback

In March 2014, the Province released proposed performance indicators for the *Growth Plan*. This release was the first opportunity for the public and stakeholders, including York Region staff, to review the performance indicators. The materials released by the Province consisted of a Printed Brochure and a Technical Report, which included some additional details on data sources and calculation methodologies. The Printed Brochure is included as *Attachment 1*.

The Province set a deadline of April 30, 2014 to receive all public and stakeholder feedback on the proposed indicators. Specifically, the Province requested comments on:

- The proposed performance indicators, including methodologies and additional indicators
- Data sources
- Reporting on the performance indicators, including the frequency of reporting

Following this consultation process, the Ministry of Infrastructure will finalize the performance indicators and reporting program.

4. ANALYSIS AND OPTIONS

Performance indicators are a tool to help evaluate the outcomes of *Growth Plan* policies

The Province wants to establish performance indicators for the *Growth Plan* that:

- Measure on-the-ground outcomes
- Are easily understood
- Are based on credible data sources available across the GGH
- Can be repeated easily
- Are manageable in scale, scope and cost

It is the Province's intent that these performance indicators only be used to measure the effectiveness of the *Growth Plan*'s targets and policies. The Province emphasizes that the results are not intended to be a report card for municipalities to assess municipal conformity with the requirements of the *Growth Plan*, or be used to compare municipalities to one another.

Once finalized, the performance indicators will be used to assess the implementation of the *Growth Plan* and inform the mandated reviews of this Plan. This includes the upcoming 10-year review that is scheduled to occur by 2016.

The twelve proposed performance indicators are divided amongst four themes

The Province developed four key themes that encapsulate the guiding principles of the *Growth Plan*:

- 1. Building Compact and Efficient Communities
- 2. Creating Vibrant and Complete Communities
- 3. Planning and Managing Growth to Support a Strong and Competitive Economy
- 4. Protecting, Conserving, Enhancing and Wisely Using Natural Resources

The proposed performance indicators are categorized by these four key themes, as outlined in Tables 1 through 4. *Attachment 1* includes some additional details about why these indicators matter and how they are measured.

Table 1
Proposed Performance Indicators for Theme 1:
"Building Compact and Efficient Communities"

Indicator	Description
Achieving	The percentage of new residential units constructed within the
Intensification	built-up area of the municipalities in the region.
Urban Growth Centre Density	The number of people and jobs per hectare within each of the 25 urban growth centres identified in the Growth Plan.
Major Transit Station Area Density	The number of people and jobs per hectare within major transit station areas.
Designated Greenfield Area Density	The number of people and jobs per hectare in built portions of the designated greenfield areas and the characteristics of development that has occurred in these areas.

Table 2Proposed Performance Indicators for Theme 2: "Creating Vibrant and Complete Communities"

Indicator	Description
Mix of Housing Types	The range and mix of housing types (single-detached dwellings, semi-detached dwellings, row and town houses and apartments) that have been completed each year in upper- and single-tier municipalities across the Greater Golden Horseshoe.
Diversity of Land Uses	The diversity of land uses within areas where the Growth Plan directs intensification, including urban growth centres, major transit station areas and the built-up area. This indicator uses the Simpson Diversity Index.
Community Infrastructure	The percentage of the population in an urban growth centre, major transit station area, and the built-up area within walking distance of a community centre, park and school.
Street Connectivity	The number of intersections per hectare in urban growth centres, major transit station areas and the built-up area.

Table 3
Proposed Performance Indicators for Theme 3:
"Planning and Managing Growth to Support a Strong and Competitive Economy"

Indicator	Description
Transportation Modal Split	The percentage of trips to work made by car, bike, transit or walking for each Census Division in the Greater Golden
1	Horseshoe.
Commute Time by Mode	Commute time by Census Division in the Greater Golden Horseshoe by mode of transportation, broken into 30 minute intervals.
Location of Major Office Space	The percentage of major office space that has been developed inside urban growth centres and major transit station areas since 2006.

Table 4Proposed Performance Indicators for Theme 4:
"Protecting, Conserving, Enhancing and Wisely Using Resources"

Indicator	Description
Land Consumption	Ratio of percentage change in planned population and
	employment to percentage change in amount of settlement area.

Regional staff provided comments on the proposed performance indicators to the Province on April 30, 2014

Regional Planning staff have reviewed all materials released for consultation on the proposed performance indicators for the *Growth Plan*. This includes both the Printed Brochure and the Technical Report. To meet the Province's commenting deadline, Regional staff provided the Ministry of Infrastructure with comments on April 30, 2014. A copy of this submission is included as *Attachment 2*.

As previously indicated, the Province asked for feedback regarding three subject areas: the performance indicators, data sources and reporting program. The following sections summarize the response provided by Regional staff in these areas.

The proposed performance indicators represent a good start; however some modifications and additional performance indicators are suggested

The proposed performance indicators are a good start at evaluating the *Growth Plan* policies, particularly its targets for growth and intensification. However, there are a number of policy directions within the *Growth Plan* that are not addressed through the proposed performance indicators. Additional indicators should be created to evaluate

these policy directions. Some examples include affordable housing and employment land conversions.

Of the proposed performance indicators that monitor policy directions, many are intended to track and evaluate the Urban Growth Centres, Major Transit Station Areas and the Built-up Area. However, it is imperative that these policy directions also be tracked and evaluated in the Designated Greenfield Areas. These areas represent the Region's future new communities and it is important that we ensure that these communities are monitored and are achieving the desired results.

Other key staff comments include:

- The "Urban Growth Centre Density" and "Major Transit Station Area Density" performance indicators currently measure the density across all lands within these areas, as opposed to just the lands that have been developed to date. This is problematic for Urban Growth Centres or Major Transit Station Areas that currently contain large amounts of undeveloped land, as it skews the density calculation. By using the entire land area to calculate density, the current methodology underrepresents the density in the built portions of these areas. This can lead to incorrect conclusions that new development in these areas does not meet the targets of the *Growth Plan*, when this development may actually exceed these density targets. The methodology should be modified to track both the gross density and net density for development in these areas.
- The *Growth Plan* policies related to the density targets in the Urban Growth Centres, Major Transit Station Areas and the Designated Greenfield Areas state that these areas should be "planned to achieve" the density targets. The proposed performance indicators for these targets currently go beyond the planned densities, and speak to the actual densities in these areas. While this is a good measure of what is on the ground, both the planned and achieved densities should be tracked through these indicators to provide a more fulsome vision for these areas. The planned densities can be determined through municipal Official Plans and/or Secondary Plans for these areas.
- The "Designated Greenfield Area Density" performance indicator is problematic in its current form and should mirror the other target-based performance indicators by speaking directly to the population and employment density target in the *Growth Plan*. Presently, this performance indicator has been unnecessarily complicated by including an analysis of the mix of housing types in municipalities, which is already evaluated as its own separate performance indicator ("Mix of Housing Types"). Housing mix is not an appropriate measure of population and employment density. The Province should revisit this proposed indicator to determine how to include and measure employment density, and ensure that the overall population and employment density is calculated over the developable area of the Designated Greenfield Area, which excludes lands located within certain features such as wetlands and woodlands.

• The two performance indicators related to transportation patterns ("Transportation Modal Split" and "Commute Time by Mode") need to be linked to the distance of these commutes to properly evaluate this policy direction from the *Growth Plan*. Distance is one of the major contributing factors to why individuals choose to use a particular mode of transportation or the length of their commute. Additionally, commute distance is needed to better understand whether individuals are living close to where they work.

The Province should use the best possible data sources for each performance indicator, regardless of whether this data source is available across the GGH

The public release of the proposed performance indicators was the first opportunity that York Region and other municipal staff were given to comment on the performance indicators. Based on the information provided in the Printed Brochure and Technical Report, Regional staff have a number of questions surrounding the raw data, methodology and calculations that were used for each performance indicator. It is suggested that the Province work more closely with municipalities to address these issues and determine best available data sources.

Regional staff recognize that it is challenging to measure these performance indicators across all municipalities in the GGH in a streamlined and consistent manner. However, this challenge may be alleviated by the Province's emphasis that the results from performance indicators are not to be considered a municipal report card or used to compare municipalities to one another; but should only be used to compare a municipality to itself over time. Considering this parameter, the Province should focus on using the best available dataset for each municipality, for example York Region's annual employment survey.

The reporting program for *Growth Plan* performance indicators could encapsulate the results from each municipality separately and should be available for the mandated *Growth Plan* reviews

The Province has emphasized that the results from these performance indicators should only be used to compare a municipality to itself over time; not against other municipalities. The reporting program for the performance indicators should be structured in this way, by separating the data for each municipality and encapsulating it in separate chapters or appendices. Formatting the data in such a way will have a number of benefits:

- The document will be more accessible and easier to understand for the public, who may be interested in only reviewing the results of their own municipality.
- The graphics and tables associated with each municipality will be easier to read and will better illustrate the trends within that municipality over time.
- The document will make an explicit connection between when the *Growth Plan* policies came into effect at the municipal level, and when the results of a performance indicator can transition from baseline data into the actual results of the *Growth Plan* policies.

It is important that the performance indicator results are available and used during the Province's mandated reviews of the *Growth Plan*, which are scheduled to occur at least every 10 years. However, in order to have a transparent and fulsome dialogue on these performance indicators, the monitoring program should report on results more frequently than the mandated reviews. Regional staff suggest that the Province develop the *Growth Plan* reporting program on a five-year cycle and ensure that the results are available for each mandated *Growth Plan* review.

The Provincial monitoring program could benefit from working closely with municipalities that are creating their own performance indicator monitoring programs, such as York Region's *YROP-2010* monitoring program

York Region is currently developing a monitoring program to evaluate the success of the *York Region Official Plan-2010* (*YROP-2010*) targets and policy directions, identify emerging trends and inform the next five year review of the *YROP-2010*. The framework for this monitoring program was received by Regional Council at its meeting on May 16, 2013 through Clause 2 of Report 5 of the Planning and Economic Development Committee. An update to this monitoring program, including a list of indicators and results, has been submitted to Committee of the Whole and Council in June 2014 through the report titled "Monitoring the York Region Official Plan", dated May 28, 2014. *Table 5* includes a summary of the indicators that have been identified to monitor the *YROP-2010*.

Table 5List of *YROP-2010* Indicators

ROP Theme	Indicator
Chapter 2 – Sustainable	Tree and shrub plantings
Natural Environment	 Environmental land protection and preservation
	 Woodland cover
	Housing mix
Communities	 Housing supply
	 Affordable housing
	 New non-profit housing
Chapter 4 – Economic	Live/work ratio
Vitality	• Activity rate
•	• Employment land conversion
Chapter 5 – An	 Population and employment forecasts
2 2	 Designated Greenfield Area density
<u> </u>	 Sustainable buildings
Complete Communities	 Residential intensification
	 Development activity in Regional Centres and Corridors
	 Density of development in Regional Centres
Chapter 6 – Agricultural	Area farmed
and Dunal Amass	
and Kurai Arcas	Gross farm receipts
Chapter 7 – Servicing	Modal split
Our Population	Wastewater inflow and infiltration
	Water conservation
	Waste diversion

While these are two separate monitoring programs, many of the *YROP-2010* indicators have a direct link to the *Growth Plan*, particularly the population and growth forecasts, intensification targets and density targets. There may be value added if the Province were to work closely with all upper and single-tier municipalities that are developing monitoring programs to identify the most appropriate *Growth Plan* performance indicators, consistent methodologies and high quality, reliable data sources. The Province would benefit from the wealth of detailed knowledge and expertise that municipalities have about the on-the-ground results in their geographies.

Link to key Council-approved plans

The targets and policies of the *Growth Plan* are mirrored throughout many of the Region's policy and implementation plans, including the Strategic Plan and *YROP-2010*. Within the *2011 to 2015 Strategic Plan*, the Priority Area of "Focus Growth along Regional Centres and Corridors" is echoed in the *Growth Plan*'s policies on Urban Growth Centres and intensified mixed-used development in these areas. In addition, the *YROP-2010* is legislatively required to conform with the targets and policies of the *Growth Plan*. The *YROP-2010* is one of the key municipal tools for implementing the growth forecasts, density targets and identification targets found within the *Growth Plan*.

The Province's performance indicators for the *Growth Plan* will help evaluate and monitor the effectiveness of the targets and policies of the *Growth Plan*. The results of these evaluations will provide a foundation for both the Province and York Region to use an evidence-based approach to future growth management-related policy directions and decisions.

5. FINANCIAL IMPLICATIONS

There are no direct financial implications associated with Council's endorsement of staff comments on the Province's proposed performance indicators for the *Growth Plan*.

6. LOCAL MUNICIPAL IMPACT

Local official plans are legislatively required to conform to the policies of the *YROP-2010*, which themselves are required to conform to the *Growth Plan*. This results in overall policy consistency and ensures that what is built on the ground is an accurate reflection of the *Growth Plan* policies and targets. At the time of writing this report, not all local municipalities have completed their official plan conformity exercises. As well, some local official plans have been appealed to the Ontario Municipal Board.

Ultimately, the development and monitoring of the *Growth Plan* performance indicators will create a feedback loop between Provincial policies and targets with the on-the-ground results of local municipal policy implementation. It is important that the local municipal conformity exercises continue to move forward and be completed in a timely manner. The development review and approval process can take time. It can be a number of years between when the local municipal official plan policies that conform with the *Growth Plan* are approved and take effect, and when the resulting developments are finally built. Because of this, it may be a number of years before the results of the *Growth Plan* performance indicators begin to reflect Provincial policies.

7. CONCLUSION

On April 30, 2014, York Region staff provided the Ministry of Infrastructure with staff comments on the proposed indicators for the *Growth Plan*. This submission was in response to the Province's request that comments on the proposed performance indicators, data sources and reporting program be received by April 30, 2014. This was the first opportunity for the public and stakeholders, including Regional staff, to review the proposed performance indicators. Following this consultation process, the Ministry of Infrastructure will finalize the performance indicators and reporting program.

The development of performance indicators is an important step to measure the implementation of the *Growth Plan* and the Province's preparation for the upcoming formal review of the *Growth Plan*. Understanding how policies are being implemented and assessing progress forms a key part of an evidence-based approach to policy development.

Overall, Regional staff believe that the proposed performance indicators represent a good start at evaluating *Growth Plan* policies. However, some of the proposed performance indicators could be adjusted and additional performance indicators developed to effectively evaluate the policy directions of the *Growth Plan*. The submission by Regional staff suggests that the reporting program for the *Growth Plan* performance indicators should occur on a five-year cycle and ensure that results are available for each mandated *Growth Plan* review.

York Region's *YROP-2010* monitoring program has a direct link to the *Growth Plan*, especially the population and growth forecasts, intensification targets and density targets. The submission by Regional staff recommends that the Province work closely with municipalities, especially those that are developing similar monitoring programs, to identify the most appropriate *Growth Plan* performance indicators, consistent methodologies and high quality data sources. The Province would benefit from the wealth of detailed knowledge and expertise that municipalities have about the on-the-ground results in their geographies.

For more information on this report, please contact Valerie Shuttleworth, Director of Long Range Planning at Ext. 71525.

The Senior Management Group has reviewed this report.

Attachments (2)

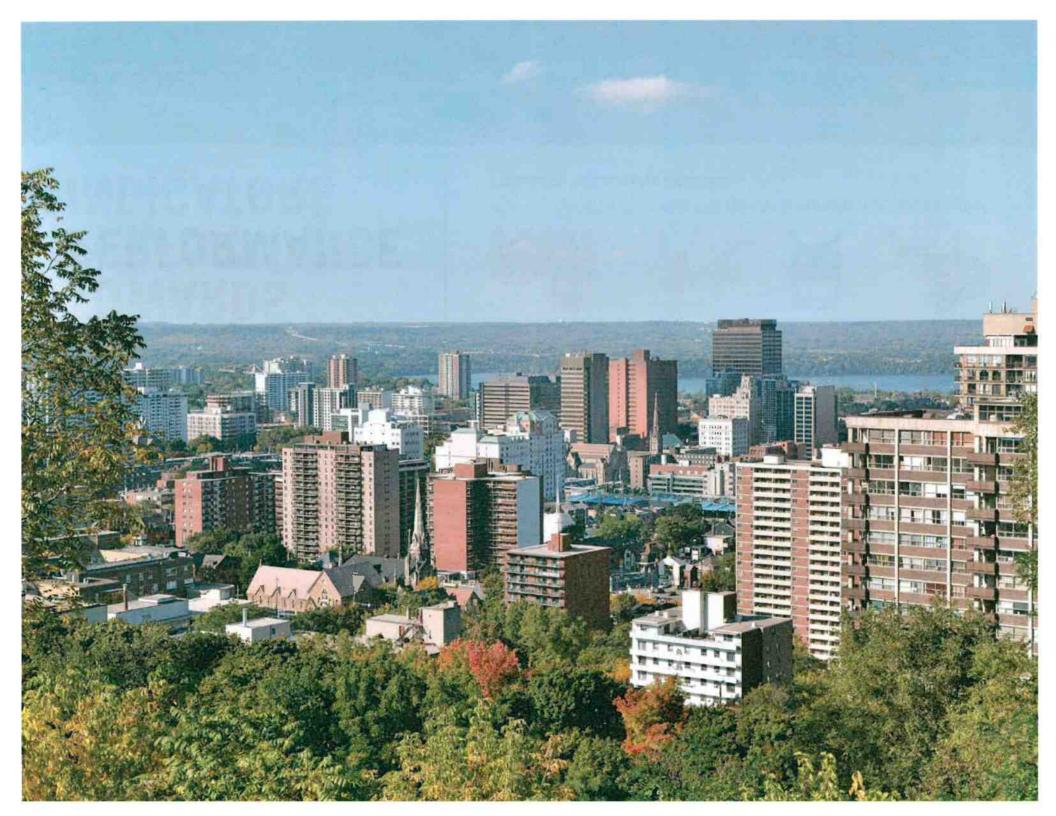


TOWARDS PERFORMANCE INDICATORS



FOR THE GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE, 2006 Preliminary Indicators for Discussion





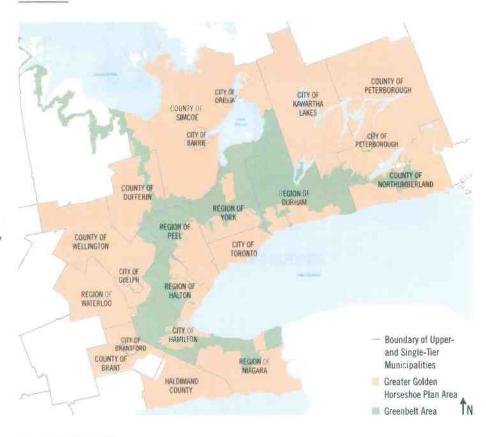


HOW ARE WE DOING?

This document introduces 12 proposed indicators for assessing implementation of the Growth Plan for the Greater Golden Horseshoe, 2006, and where possible includes initial results to help illustrate how each indicator could be used to measure implementation progress. Determining ways to evaluate public policy and the impacts of any policy initiatives accurately and impartially is critically important, yet inherently complex.

This discussion document summarizes work to date and provides a basis for consulting with stakeholders and interested individuals on how to measure effects and progress in implementing the Growth Plan. A more detailed technical report is also available on the **www.placestogrow.ca** website.

GREATER GOLDEN HORSESHOE



Source: Schedule 1 of the Growth Plan

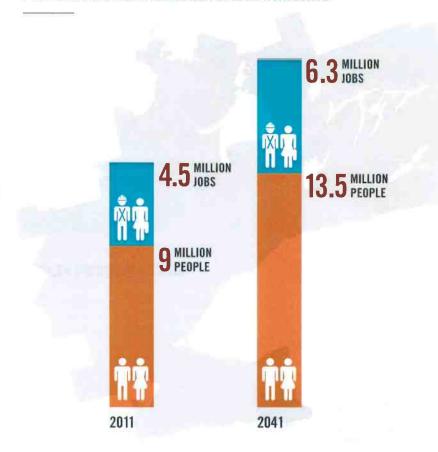


PLANNING FOR GROWTH

The Greater Golden Horseshoe is a dynamic and diverse area and one of the fastest growing regions of North America. The region is critical to the economic success of Ontario and Canada, generating a full two-thirds of the province's Gross Domestic Product and one-fifth of the nation's. It is a leading global nexus for employment, trade, culture and research, and attracts people and jobs partly because of its range of economic opportunities and high quality of life.

People from across the country and from around the world move to communities in the region every day. More than one in every three new immigrants settles in the Greater Golden Horseshoe. In 2011, the region was home to approximately 9 million people and 4.5 million jobs. By 2041, that is forecast to increase to 13.5 million people and 6.3 million jobs – an increase of 50 per cent and 40 per cent, respectively. With such an increase comes a greater demand for supporting infrastructure such as transit, roads, sewers, energy and a full range of community amenities.

PEOPLE AND JOBS IN THE GREATER GOLDEN HORSESHOE





In 2011, the region was home to approximately 9 million people and 4.5 million jobs. By 2041, that is forecast to increase to 13.5 million people and 6.3 million jobs – an increase of 50 per cent and 40 per cent, respectively.

Given this tremendous growth, it is critical that we plan in a manner that builds on the region's successes and takes advantage of its many opportunities. If we do not manage strategically and effectively the growth that the region will attract, the area will experience worse traffic congestion, more pollution, greater infrastructure challenges, lost farm land and green spaces and adverse health impacts.

Guiding Growth

To respond to the challenges presented by extraordinary population growth and the prospect of accelerating urban sprawl, the Ontario government released the Growth Plan for the Greater Golden Horseshoe in 2006. The Growth Plan guides where and how growth should occur in the region and ensures that communities are planned and built to be sustainable and prosperous.

The Growth Plan is an award-winning economic and land use planning initiative that sets a framework for development and environmental

protection for 110 municipalities, and works to integrate not only where growth happens, but how it is best supported through well-informed and forward-looking public infrastructure investments. Built on an unprecedented consensus across all sectors of government, the building industry, environmental groups and other key stakeholders, it has established a new standard for future urban form and more complete communities across the entire region.

The Growth Plan works in tandem with other provincial planning initiatives, such as the Provincial Policy Statement, Greenbelt Plan, 2005, Oak Ridges Moraine Conservation Plan, Niagara Escarpment Plan and Metrolinx's Big Move. Together they set a long-term, strategic approach to guide growth and development, while supporting and promoting economic prosperity, protecting the environment and helping communities achieve their priorities for their residents.



hoto courtesy of lain Myrans





The Growth Plan, and the proposed performance indicators, are very much linked to the province's three key priorities: to invest in our people, build modern infrastructure and support a dynamic and innovative business climate to create Ontario jobs. The plan contains a series of policies and targets and is organized around the following guiding principles:

Build compact, vibrant and complete communities;

Plan and manage growth to support a strong and competitive economy;

Protect, conserve, enhance and wisely use the valuable natural resources of land, air and water for current and future generations;

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Optimize the use of existing and new infrastructure to support growth in a compact, efficient form;

Provide for different approaches to managing growth that recognize the diversity of communities in the Greater Golden Horseshoe; and

Promote collaboration among all sectors

– government, private and non-profit –
and residents to achieve the vision.

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Measuring Progress

The Growth Plan requires a set of indicators to measure implementation of its policies. Once established, the performance indicators will help inform mandated reviews of the Growth Plan, including the upcoming ten-year review.

To develop the indicators, the Minister of Infrastructure asked staff to review national and international best practices, meet with experts and stakeholders and develop a set of evaluation criteria. In addition to measuring the Growth Plan's targets and policies, indicators should measure outcomes, be easily understood, based on credible data sources available across the region, repeated easily, and manageable in scale, scope and cost.

There are indeed challenges in finding readily available data that is consistent and accurate across all 110 municipalities in the Greater Golden Horseshoe and for neighbourhoods and smaller areas. The proposed indicators reflect the data sources that are currently available to the provincial government. The majority of the data comes from four main sources: Statistics Canada, the Municipal Property Assessment Corporation (MPAC), Land Information Ontario, and mapping of Growth Plan geographies from municipal official plans.

The Growth Plan provides policies municipalities must follow and targets they must achieve by specific future dates. The plan was approved in 2006. Its initial implementation through municipal official plans has taken considerable time and effort, and as of late 2013 amendments to many official plans are only now coming into effect. Some development in the region after 2006 has been based on approvals received prior to the Growth Plan. Decisions on other development applications in process at the time of approval of the Growth Plan were transitioned and did not have to conform to the Growth Plan. As a result, accurate or complete assessment of performance is difficult at this early stage. Therefore, many of the proposed indicators establish a baseline and will be used in the years ahead to assess the effect of the plan.

The proposed indicators are intended to be measured over the life of the Growth Plan. Existing and many proposed official plans used the original time horizon, which runs until 2031. In 2012, the Growth Plan was extended until 2041. Municipalities will begin increasingly to incorporate this 2041 time horizon into their official plans and related planning documents.



TWELVE INDICATORS ARE BEING PROPOSED, ORGANIZED AROUND FOUR KEY THEMES:



BUILDING COMPACT AND EFFICIENT COMMUNITIES



CREATING VIBRANT AND COMPLETE COMMUNITIES



PLANNING AND MANAGING GROWTH TO SUPPORT A STRONG AND COMPETITIVE ECONOMY



PROTECTING, CONSERVING, ENHANCING AND WISELY USING NATURAL RESOURCES



The proposed indicators are at various stages of maturation. A few are well evolved and are derived from tools created to assess the Growth Plan as part of its fifth anniversary in 2011. Others are still under development. All will benefit from the input of stakeholders as part of this consultation process.

Four of the proposed indicators assess progress towards the targets set out in the plan. Most of these indicators are more refined.

Eight proposed indicators relate more generally to Growth Plan policies and principles and are intended to provide a more detailed picture of how growth is occurring in the region. In some cases, there are technical and methodological challenges with indicators that we hope to resolve shortly, and testing is underway to determine their value.

In this regard, the Ministry is hoping to learn and gain insights from stakeholders on opportunities to enhance or expand these indicators.

Wherever possible, early results or sample results are included with the proposed indicators to help explain how they work. The indicators and initial results are not intended as a report card or comparison chart for municipalities. They are also not meant to assess municipal conformity with the requirements of the Growth Plan. Rather, the indicators are designed as a tool to help evaluate how growth and development in the region are unfolding against the Growth Plan's policies.



BUILD COMPACT AND EFFICIENT COMMUNITIES

The Growth Plan supports the creation of more compact, mixed-use and transit-supportive communities. It also establishes targets for densities and intensification to enable municipalities to plan for and direct the forecast population and employment growth in the most efficient way possible.

The four indicators in this theme will measure progress toward achieving the quantitative targets in the Growth Plan.



ACHIEVING INTENSIFICATION

The indicator

The percentage of new residential units constructed within the built-up area of the municipalities in the region.

Why it matters

The Growth Plan supports making better use of land and infrastructure in the region by directing growth to existing urban areas where the best capacity exists to accommodate the forecast population.

The Growth Plan requires that by 2015 and for each year thereafter, a minimum of 40 per cent of all residential development occurring annually within each upper- and single-tier municipality will be within its built-up area.

Alternative targets have been approved for some municipalities to reflect local circumstances. Some

municipalities in the outer ring have lower intensification targets. This indicator tracks municipal progress toward the Growth Plan's intensification targets.

How was it measured?

The Ministry looked at customized MPAC data, which identified all residential properties developed from 2006 onward, and identified whether they were inside or outside of the built-up area.

Results

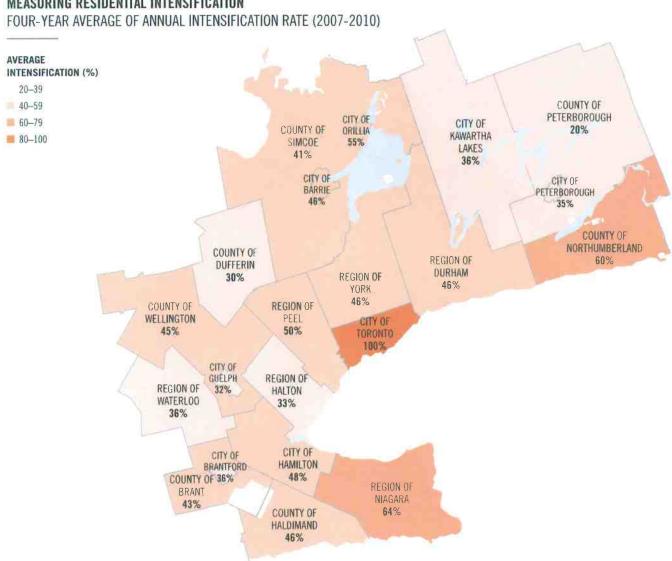
Initial findings, averaged over four years (2007-2010), indicate that many municipalities are achieving or exceeding their required intensification target ahead of the 2015 target date. The average intensification rate across the Greater Golden Horseshoe is 59%.

Considerations

This indicator was measured from 2007 to 2010 due to incomplete data for 2011 and 2012.

BUILD COMPACT AND EFFICIENT COMMUNITIES



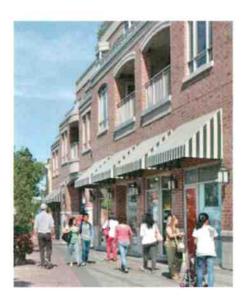


This map shows the four-year average of the percentage of new residential development that is being built within the Built Up Area.

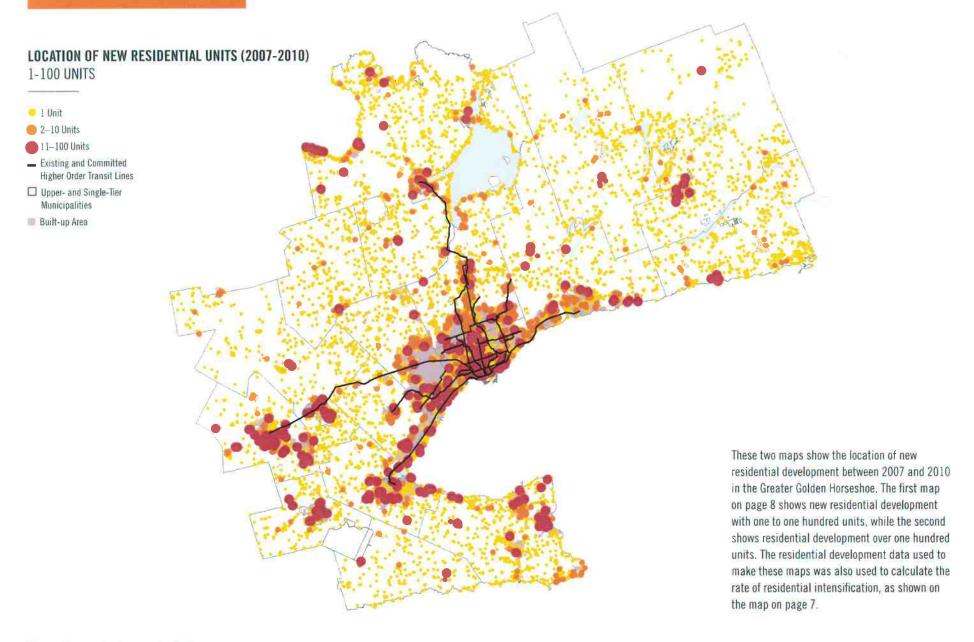
The percentages are based on the Ministry's analysis of MPAC (the Municipal Property Assessment Corporation) data, and the Ministry continues to investigate their accuracy by doing independent analysis on the MPAC data.

Note that alternative targets are in place for some outer-ring municipalities, beyond the Greenbelt.

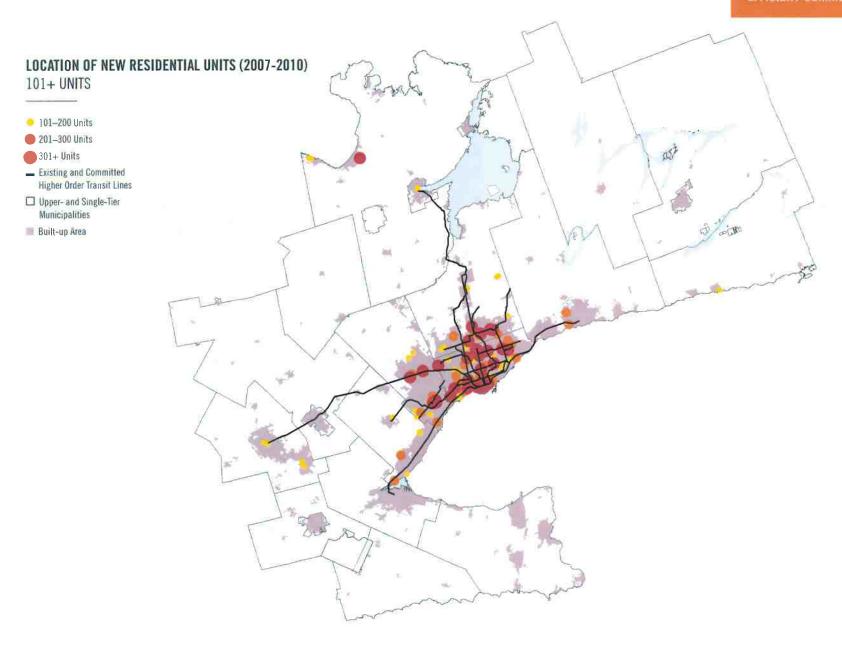
These numbers should be considered preliminary.

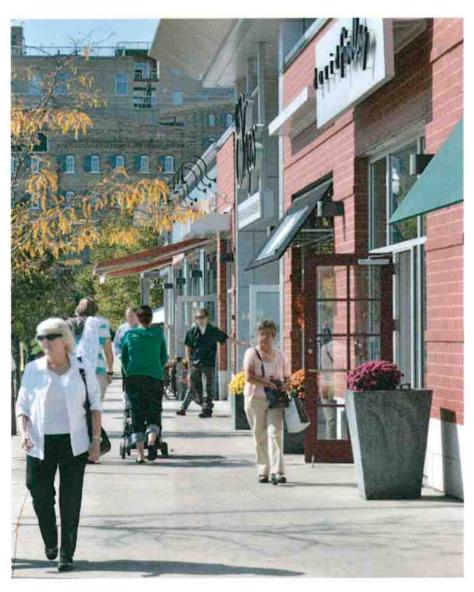


BUILD COMPACT AND EFFICIENT COMMUNITIES



BUILD COMPACT AND EFFICIENT COMMUNITIES





URBAN GROWTH CENTRE DENSITY

The indicator

The number of people and jobs per hectare within each of the 25 urban growth centres identified in the Growth Plan.



Urban Growth Centres

Greater Golden Horseshoe Growth Plan Area

Why it matters

The Growth Plan identifies 25 existing downtowns or emerging commercial centres in the Greater Golden Horseshoe as urban growth centres. Each centre has a gross density target that must be achieved by 2031, ranging from 150 to 400 people and jobs per hectare, depending on the centre. Focusing growth to these areas helps support the creation of regional focal points and more compact, mixed-use and transit-supportive communities in the region.

How was it measured?

The number of people and jobs per hectare for each urban growth centre was measured from customized data that Statistics Canada provided from the last two census periods, 2006 and 2011.

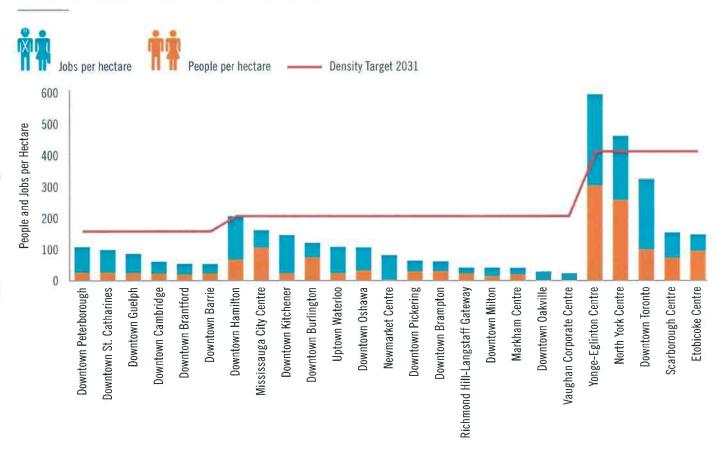
Results

The results indicate that urban growth centres are making progress towards their targets. In Toronto the 2011 results indicate that Yonge-Eglinton and North York Centre urban growth centres have exceeded their targets.

Considerations

Statistics Canada cautions against comparing 2006 and 2011 employment data. In 2011 employment data was collected through a voluntary National Household Survey; prior to this date, the data was collected through the mandatory Long Form Census.

POPULATION AND EMPLOYMENT DENSITY FOR 25 URBAN GROWTH CENTRES (2011)



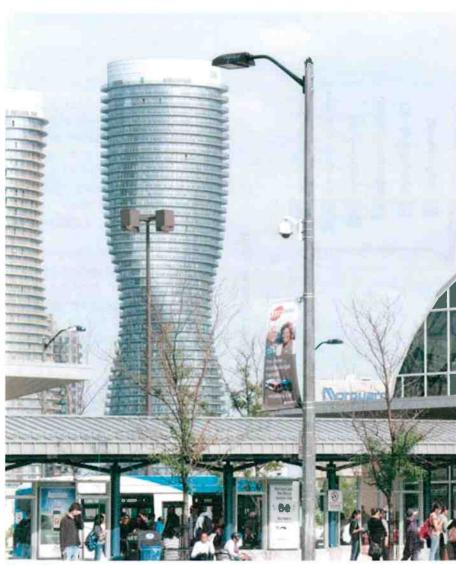


Photo courtesy of MilVia

MAJOR TRANSIT STATION AREA DENSITY

The indicator

The number of people and jobs per hectare within major transit station areas.

Why it matters

Ensuring that existing and future transit is viable is critically important to the Growth Plan. The Growth Plan calls for increased residential and employment densities and a mix of uses in major transit station areas. These are defined in the Growth Plan and mean in part the land in and around planned or existing transit stations served by frequent transit in a dedicated right of way. To achieve this, the Growth Plan requires municipalities to plan for a mix of uses and set minimum population and employment density targets in these areas.

How was it measured?

A total of 343 major transit station areas were identified in the Greater Golden Horseshoe. The areas were mapped, and then corresponding Statistics Canada data was used to estimate the population and jobs per hectare in each major transit station area.

Results

This indicator provides a baseline for measuring further changes to densities in major transit station areas going forward.

Considerations

Many municipalities have not yet identified the exact boundaries of their major transit station areas. When these boundaries are formalized, the results for this indicator will be recalculated. In cases where an exact boundary was not available, the density was calculated for a 500-metre radius around the major transit station.

MAJOR TRANSIT STATION AREA DENSITY SNAPSHOT



PEOPLE AND JOBS PER HECTARE

- Jobs per hectare

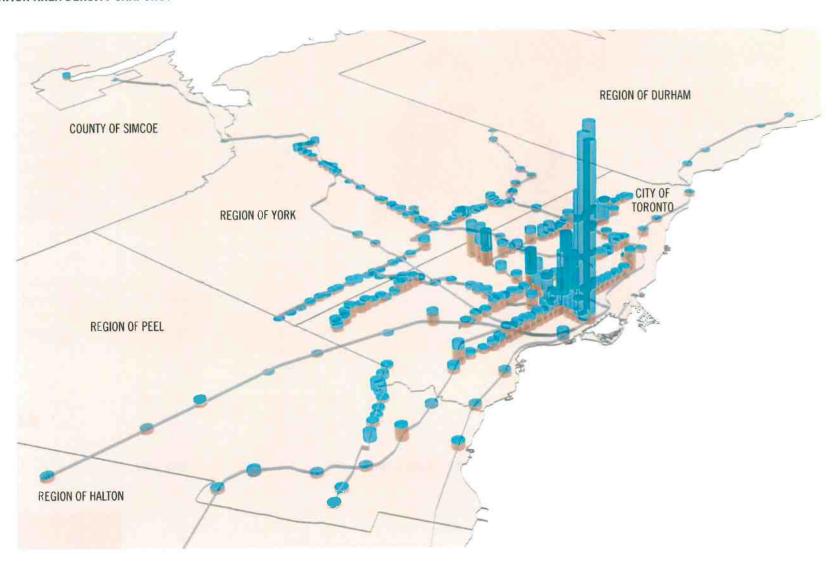
 Height of the column
 represents the density value.
- People per hectare
 Height of the column
 represents the density value.

EXISTING AND COMMITTED HIGHER ORDER TRANSIT LINES

= Existing and Committed

UPPER- AND SINGLE-TIER MUNICIPALITIES

Boundary



DESIGNATED GREENFIELD AREA DENSITY

The indicator

The number of people and jobs per hectare in built portions of the designated greenfield areas and the characteristics of development that has occurred in these areas.

Why it matters

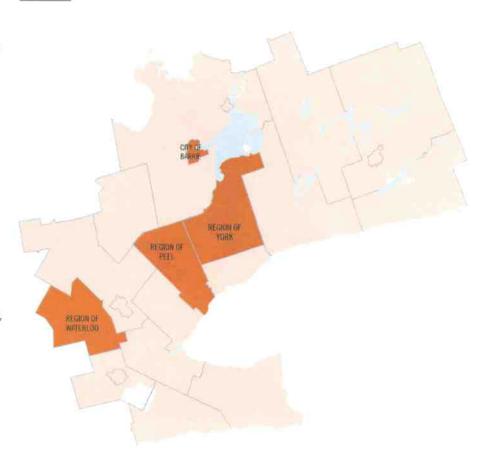
While much of the region's growth is being directed to existing urban areas, there is still a need for some new development in designated greenfield areas. It is required that designated greenfield areas be planned to achieve a minimum density target of not less than 50 residents and jobs per hectare within the life of the Growth Plan. The plan also requires that these developments be planned to support walking, cycling and transit, a diverse mix of land uses and high quality public space.

How was it measured?

To establish and test the indicator, four municipalities – the City of Barrie, and Regions of Peel, Waterloo and York – were selected as pilots. The built portion of the designated greenfield areas in each municipality was identified. Development within these areas was assessed using MPAC data, which identified the year a property was developed and the number of occupants per property. Roads were also included in the estimation of the built area. Population density was then calculated for each area.

Additional information was collected about the housing type of developed parcels within each area. MPAC information on building type and year built was used to calculate the percentage of single-detached dwellings, semi-detached dwellings, row houses and apartments in the built portion of the designated greenfield area.

PILOT MUNICIPALITIES





Results

In the four pilot municipalities, there were relatively low residential densities within the built portions of the designated greenfield areas. This could reflect early stages of development in these areas.

Considerations

There are significant limitations with the estimation of area and residential population that may result in densities being inaccurately estimated. For example, it was not possible to exclude all natural heritage features from the calculations of the built designated greenfield area. It is also not clear if MPAC residential occupancy data is as accurate as Census data.

Also, the Growth Plan target of 50 people and jobs per hectare is meant to be calculated across the entire designated greenfield area, but the densities calculated here are for just the areas that were built between 2006 and 2011. The indicator is therefore a measure of progress towards achieving the minimum target of 50 people and jobs per hectare over the life of the plan.

SAMPLE RESULTS: NEW DEVELOPMENT IN YORK REGION DESIGNATED GREENFIELD AREAS. OUT OF 17,761 NEW UNITS:

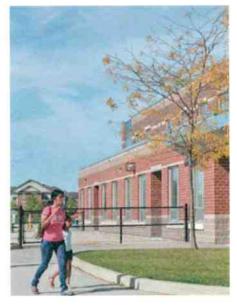


Single houses 13,778 units

Row houses 2,318 units

9.3%

Semi houses 1,653 units







CREATE VIBRANT AND COMPLETE COMMUNITIES

The Growth Plan promotes the development of complete communities where people can live, work, shop and access services in close proximity. The Growth Plan requires municipalities to plan for a mix of housing types, land uses, employment opportunities and an urban form that supports walking, cycling and transit. These goals are not always associated with specific targets, and in many cases they are to be implemented through official plan policies that are tailored to fit local circumstances.





MIX OF HOUSING TYPES

The indicator

The range and mix of housing types (single-detached dwellings, semi-detached dwellings, row and town houses and apartments) that have been completed each year in upper- and single-tier municipalities across the Greater Golden Horseshoe.

Why it matters

A mix of housing types is a component of vibrant and complete communities, and helps to meet the needs for people's daily living throughout a lifetime. The Growth Plan requires municipalities to plan for a range and mix of housing. This indicator monitors the change in the mix of completed housing units by structure type since 2006.

How was it measured?

Housing completion data from CMHC Housing Starts and Completions Survey was examined to measure the mix of new housing units that are being provided annually in municipalities across the Greater Golden Horseshoe, and how this mix is changing proportionately since 2006.

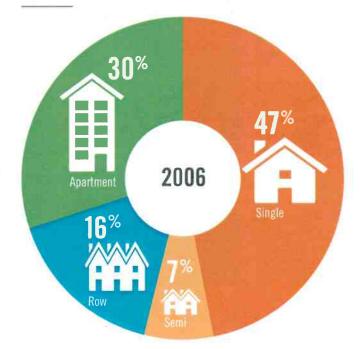
Results

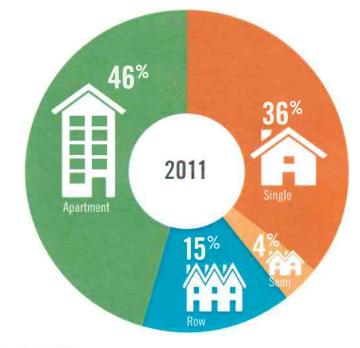
Between 2006 and 2012, there was a shift toward higher density development formats across the region. The shift toward more compact housing types is influenced by the strong performance of the condominium sector in the City of Toronto, particularly downtown.

Considerations

The CMHC dataset is limited to new housing completions, so it does not capture conversions, demolitions or other changes to the existing housing stock.

NEW HOUSING UNITS IN THE GREATER GOLDEN HORSESHOE





Adapted from Canada Mortgage and Housing Corporation (CMHC) Housing Completions Data. NOTE: Data has been rounded and may not add up to 100%.



Photo coursesy of Waterfrunt Foronto

DIVERSITY OF LAND USES

The indicator

The diversity of land uses within areas where the Growth Plan directs intensification, including urban growth centres, major transit station areas and the built-up area. This indicator uses the Simpson Diversity Index.

Why it matters

A richness and diversity of land uses is an important component of a complete community that enables people to live, work and play in vibrant neighbourhoods.

How was it measured?

Four pilot municipalities were selected to test this indicator – the City of Barrie and Regions of Peel, Waterloo and York. MPAC data was used to identify eight categories of land uses in the built-up area, urban growth centres and major transit station areas. Then the Simpson Diversity Index was calculated and a diversity score generated for each area.

Results

The map opposite is of the City of Barrie's built-up area. It provides an example of how the underlying land-use categories were grouped, as well as test results.

Considerations

MPAC property codes were used to identify land uses. They may not capture the most recent or actual land use on a property.

Land-use diversity alone does not express the vibrancy of a neighbourhood. This would require assessment of a broader range of factors, such as population density, the types of commercial and entertainment uses and pedestrian networks. The Simpson Diversity Index should be used with other indicators to develop a more accurate assessment of the area under consideration.

CREATE VIBRANT, COMPLETE COMMUNITIES

LAND USE CATEGORIES BARRIE

- Delineated Built-up Area (BUA)
- Major Transit Station Area (MTSA)
- Urban Growth Centre

LAND USE CATEGORIES

- Open Space
- Residential Single
- Residential Multi
- Commercial
- Office
- Mixed Use
- Industrial
- Government Institutional and Recreation

SAMPLE RESULTS -SIMPSON DIVERSITY INDEX:

Built-up Area: 0.67 Urban Growth Centre: 0.86 Barrie GO Bus

Terminal: 0.84 Barrie South GO

Station: 0.0





Photo courtesy of Jain Myrons

This map of Barrie's built-up area shows how MPAC property codes were grouped into general land use categories. Grouped land use categories were used to calculate the Simpson Diversity Index (SDI) values for the built-up area, the urban growth centre, and the two major transit station areas. An SDI value closer to 0 means less diversity, and an SDI value closer to 1 means more diversity. Sample SDI values are shown at left.

COMMUNITY INFRASTRUCTURE

The indicator

The percentage of the population in an urban growth centre, major transit station area, and the built-up area within walking distance of a community centre, park and school.

Why it matters

The Growth Plan encourages the development of complete communities that can meet residents' needs for daily living throughout a lifetime. This includes providing convenient access to an appropriate mix of jobs, local services and a full range of housing, transit and community infrastructure. This indicator measures the percentage of the population that lives within a 10-minute walk of a community centre, park and a school.

How was it measured?

In the four pilot municipalities, community centres, parks and schools were identified in the built-up area, urban growth centres and major transit stations areas and mapped.



Photo courtesy of the City of Brampton

An 800-metre buffer was drawn around each type of community infrastructure, and then the number of people who live within 800 metres of all three types of community infrastructure was calculated and converted into percentages.

Results

The map opposite is an example from the City of Barrie that shows the location of community infrastructure and its associated buffers within the three geographies specified. Test results are also included.

Considerations

The indicator does not measure the quality of the walking environment, therefore it should be considered in tandem with other indicators that measure aspects of the urban form, such as street connectivity and landuse diversity.

This indicator also includes only three types of community infrastructure. Options to include other types of community infrastructure, such as libraries or cultural facilities could be explored.

CREATE VIBRANT, COMPLETE COMMUNITIES

COMMUNITY INFRASTRUCTURE
BARRIE

- Delineated Built-up Area
- O Major Transit Station Area
- Urban Growth Centre

COMMUNITY INFRASTRUCTURE

- Community Centre
- Park
- School
- 800m Community Centre Buffer
- 800m Park Buffer
- 800m School Buffer
- Area of Overlap of All 3 Buffers

Preliminary analysis based on MPAC data

SAMPLE RESULTS -PERCENT OF POPULATION WITHIN 800M OF COMMUNITY INFRASTRUCTURE:

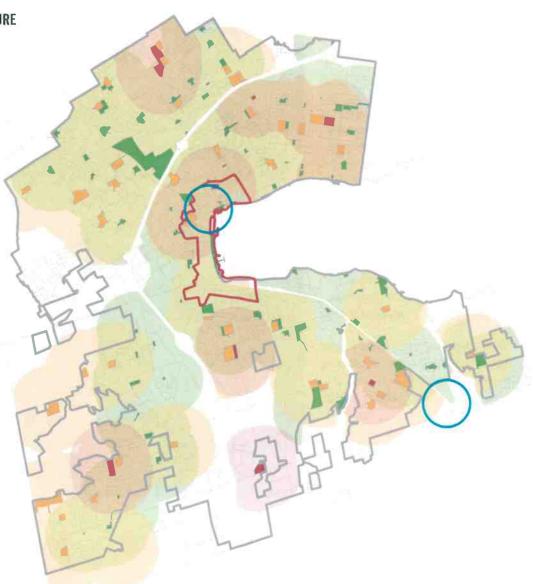
Built-up Area: 37% Urban Growth Centre:

53%

Barrie GO Bus

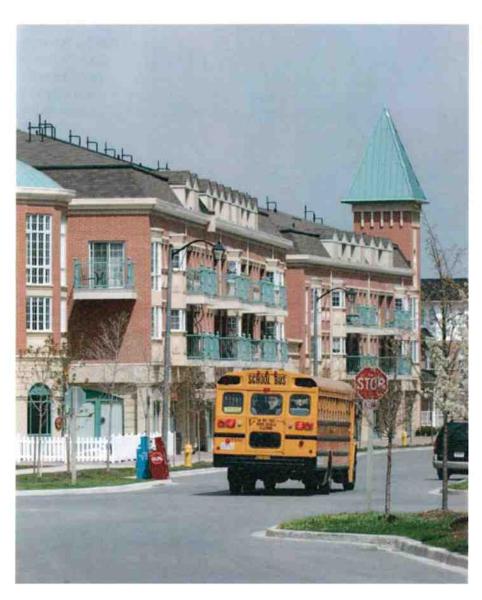
Terminal: 100% Barrie South GO

Station: 0.0%





This map of Barrie's built-up area shows the location of schools, parks and community centres, and the areas within an 800 metre radius of each facility. The areas shown in brown are served by schools, parks, and community centres. This map was used as the basis for determining the percentage of the population that is within walking distance of all three facilities. The text at left shows sample results for the built-up area, the urban growth centre, and the two major transit station areas.



STREET CONNECTIVITY

The indicator

The number of intersections per hectare in urban growth centres, major transit station areas and the built-up area.

Why it matters

The Growth Plan requires planning for the development of communities that are transit supportive, pedestrian-friendly and provide a mix of amenities to which residents can easily walk or cycle. Street connectivity is fundamental to neighbourhood walkability, as it supports a well-connected network of pedestrian routes that efficiently link destinations. The number of street intersections per hectare is calculated to measure street connectivity, as areas with more intersections tend to be more pedestrian-friendly.

How was it measured?

In the four pilot municipalities, the number of intersections for the public street network was calculated.

Public lanes and alleys were included in the calculation. However 400-series highways and other limited access highways that are barriers to pedestrians and cyclists were excluded, as were informal pedestrian pathways, such as those cutting through parks, small laneways or walkways between streets.

Results

The map opposite is a sample from the City of Barrie's built-up area and the underlying data used to calculate the number of street intersections.

Considerations

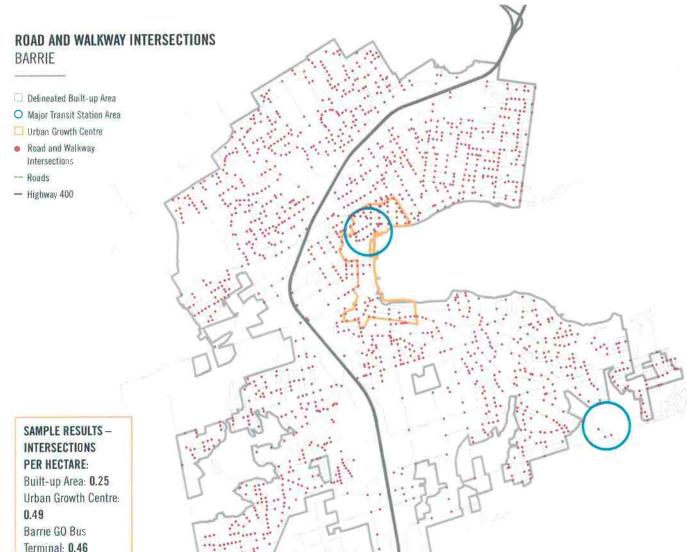
This method assumes that every intersection would be a suitable place for a pedestrian to cross the road. Additional information is required to assess actual pedestrian connectivity as data on the location of sidewalks or crosswalks is not available.

CREATE VIBRANT,



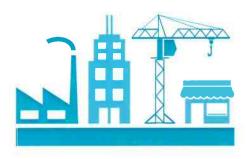
Photo courtesy of Jain Myrams

This map of Barrie's built-up area shows street and walkway intersections, which were used to calculate the number of intersections per hectare in the built-up area, the urban growth centre, and the two major transit station areas. Sample intersection density values are shown at left.



Barrie South GO

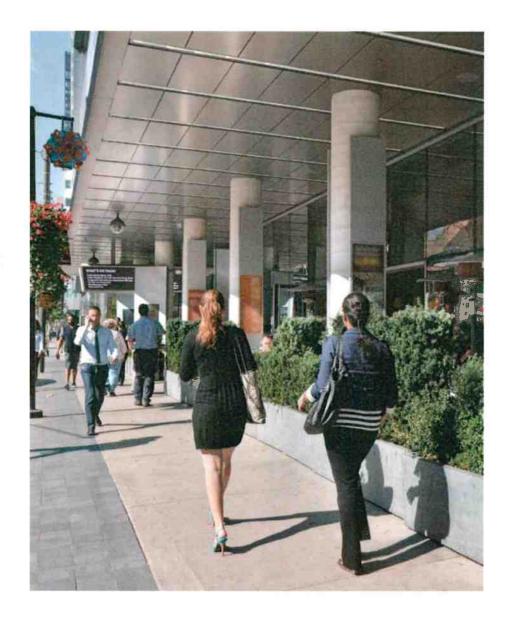
Station: 0.06



Strengthening the economy of the Greater Golden Horseshoe through better integration of land-use planning and infrastructure investment is a key Growth Plan objective, and consistent with the government's broader commitments. The plan includes policies requiring municipalities to plan for all types of economic activity – industrial, office, retail and other services to support economic development.

The Growth Plan also recognizes that urban sprawl can affect regional competitiveness. It contains policies that direct some forms of employment to locations that support land-use and transportation objectives. Providing opportunities to use a variety of transportation modes to access employment will help reduce traffic congestion and free up the road system for goods movement and other economic activity.

Three indicators are proposed to explore progress toward a strong and competitive economy.



TRANSPORTATION MODAL SPLIT

The indicator

The percentage of trips to work made by car, bike, transit or walking for each Census Division in the Greater Golden Horseshoe.

Why it matters

The Growth Plan promotes complete communities that are well served by transit, and the development of integrated transportation networks. It requires the region's transportation system to be planned and managed to offer a balance of transportation choices that reduces reliance upon any single mode by promoting transit, cycling and walking. This indicator provides a baseline of the different modes of transportation that people in the region use to get to work. Over time, this indicator will show if there is an increase in sustainable modes of transportation.

How was it measured?

Statistics Canada Journey to Work data for 2006 and 2011 was used to establish the modal split for each Census Division in the region.



Photo courtesy of the Region of Durham

Results

The results provide a baseline of information that will allow comparison over time.

Considerations

Statistics Canada cautions against comparing 2006 and 2011 Journey to Work data. In 2011 data was collected through a voluntary National Household Survey. Prior to this date, the data was collected through the mandatory Long Form Census.

The data is also limited to journey-to-work information and does not include data for other activities such as travel to school, visiting friends, shopping and picking up children from daycare. It also does not account for commutes that use more than one mode of transportation.

MODE SHARE IN GREATER GOLDEN HORSESHOE

PERCENTAGE OF DIFFERENT MODES FOR THE GREATER GOLDEN HORSESHOE (ALL TRIPS) - 2011

	-		d 10	六
	Car, truck, van	Public transit	Bicycle	Walk
INNER RING	72 %	21%	1%	4%
OUTER RING	90%	3%	1%	5 %
ENTIRE REGION	77%	17%	1%	5 %

Source: Statistics Canada National Household Survey, 2011

This chart shows the transportation choices people made for their journey to work in 2006 and 2011, summarized for four main transportation modes: automobile, public transit, cycling and walking. The chart contains totals for the entire Greater Golden Horseshoe region, but also breaks out the information for the Greater Toronto and Hamilton Area (inner ring) and the rest of the region (outer ring).

COMMUTE TIME BY MODE

The indicator

Commute time by Census Division in the Greater Golden Horseshoe by mode of transportation, broken into 30 minute intervals.

Why it matters

An integrated and efficient transportation system is needed to support a vibrant economy and high quality of life. When housing, jobs and services are located in proximity to each other, it reduces the need to commute long distances and ultimately helps free up space on roads and reduce congestion and greenhouse gas emissions. Over time, monitoring commute times will help demonstrate whether the Growth Plan and related transportation investments are giving people viable alternatives to commuting by car.

How was it measured?

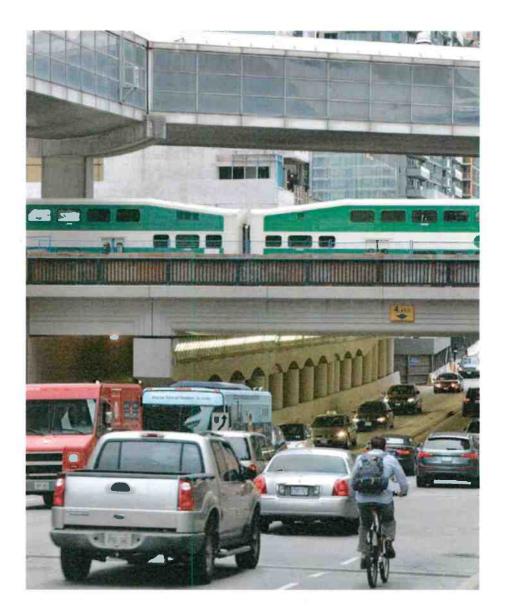
Average reported commute times to work by mode were taken from Statistics Canada's 2011 National Household Survey.

Results

The results provide a baseline of information that will allow comparison over time.

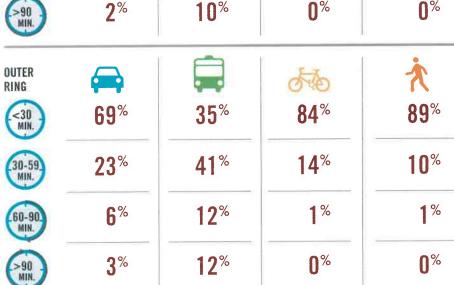
Considerations

The data is based on self-reported commute times, and it is not clear whether the data is reported accurately. It also does not account for commutes that use more than one mode of transportation.



COMMUTE TIMES JOURNEY TO WORK, 2011

OUTER			1 18	
>90 MIN.	2 %	10%	0%	0%
60-90 MIN.	9%	27%	3%	1%
30-59. MIN.	38%	45 %	27%	11%
<30 MIN.	52 %	18%	70%	88%
INNER RING	Car, truck, van	Public transit	Bicycle	Walk





This chart shows reported commute times to work by mode of travel. The chart contains totals for the entire Greater Golden Horseshoe region, broken down by the Greater Toronto and Hamilton Area (inner ring) and the rest of the region (outer ring).

Note: percentages may not total 100% due to rounding

LOCATION OF MAJOR OFFICE SPACE

The indicator

The percentage of major office space that has been developed inside urban growth centres and major transit station areas since 2006.

Why it matters

New office buildings are a key measure of economic health. Major office developments also play a key role in the vitality of urban growth centres and major transit station areas, helping generate the jobs and necessary density to support transit. Proximity between transit stations and office space can enhance employers' access to workers. The Growth Plan directs major office space to urban growth centres, major transit station areas, or areas with existing or planned frequent transit service.

This indicator measures the amount of office space developed or under construction from 2006 to 2012 and whether it was built inside or outside urban growth centres or major transit station areas.



Photo courtesy or the City of Pickering

How was it measured?

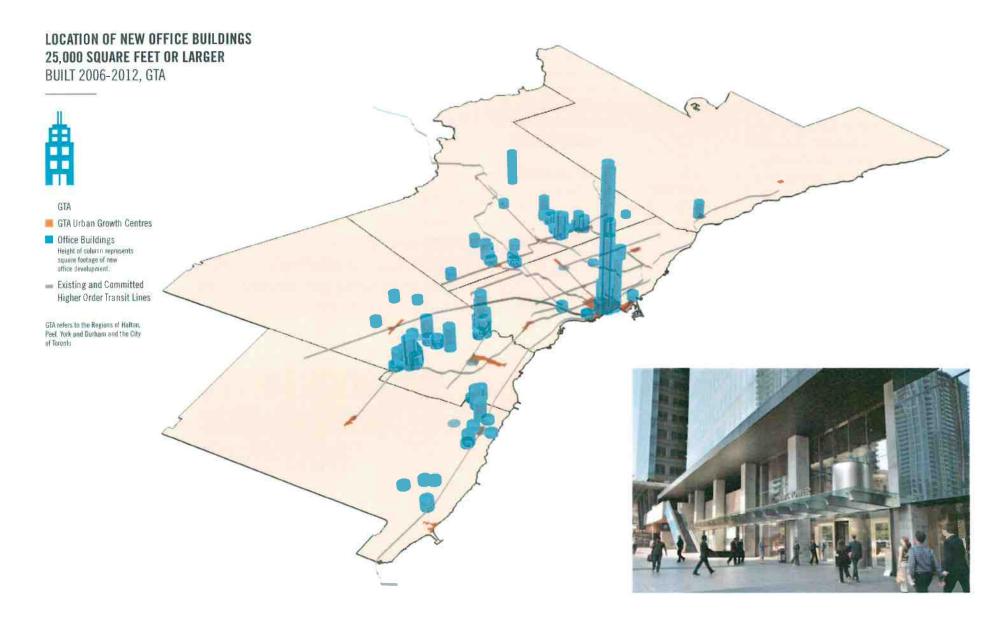
Data from the Real Estate Search Corporation from 2006 to 2011 was used to determine the size and location of all new major office buildings that are larger than 25,000 square feet (approximately 2,322 square metres) in the Greater Toronto Area (GTA). The location of these office buildings was overlaid with urban growth centres and major transit station areas to determine the floor area of new office space built inside of these Growth Plan geographies.

Results

Findings indicate that since 2006, 16.9 million square feet (1.6 million square metres) of office space was built or under construction in the Greater Toronto Area. Of this total, approximately 59 per cent was located within urban growth centres and major transit station areas. Much of this new office space (47 per cent) is located in urban growth centres and major transit station areas in the City of Toronto.

Considerations

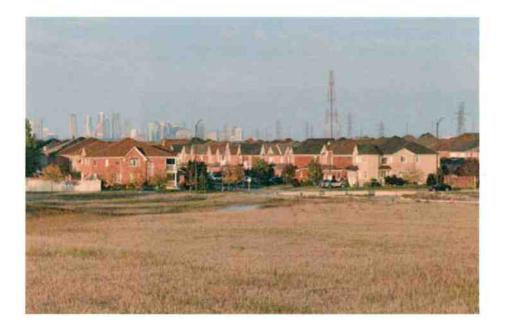
The data only captures activity in the Greater Toronto Area and not the entire Greater Golden Horseshoe.





PROTECT, CONSERVE, ENHANCE AND WISELY USE NATURAL RESOURCES

The Growth Plan works in collaboration with the Greenbelt Plan and other provincial policies and plans to protect, conserve and wisely use natural resources. The policies in the Growth Plan call for the development of more compact and complete communities, which will use land more efficiently and reduce development pressures on important natural areas outside of settlement areas.



LAND CONSUMPTION

The indicator

Ratio of percentage change in planned population and employment to percentage change in amount of settlement area.

Why it matters

The Growth Plan aims to reduce sprawl and support the wise use of land and resources by requiring intensification and a more compact urban form. Making efficient use of land and reducing the per-capita urban footprint should help achieve this objective. The indicator will help determine whether municipalities are planning to use land more efficiently.

How was it measured?

To establish a baseline against which to measure future changes, approved official plans were used to determine the settlement areas and planned population and employment numbers for each upper- and single-tier municipality.

In the future, as municipalities undertake reviews of their official plans, the percentage change in planned population and employment and the percentage change of land added to designated settlement areas, will be calculated to determine a ratio for the efficiency of land use.

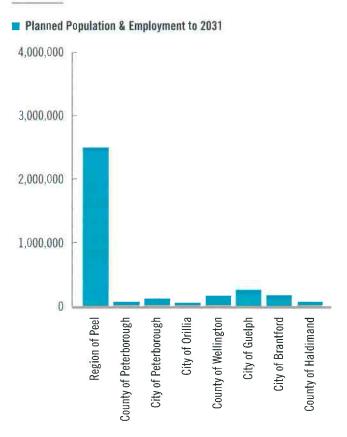
Results

Baseline data measures the population and employment forecasts and the corresponding settlement areas contained in approved upper- and single-tier municipal official plans. When municipalities undertake their next official plan review and have it approved, this indicator can be calculated to provide the first ratio of the efficiency of land use.

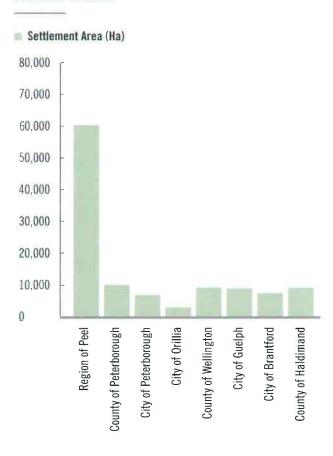
Considerations

Results include information only from official plans that are in effect. Results do not include information from official plans that have been adopted by council but not yet approved by the Province, or official plans that are before the Ontario Municipal Board. Municipalities will also review and update their official plans at different times. Therefore, this indicator will not be updated for all municipalities across the region at the same time.





SETTLEMENT AREA



^{*}Official plant for the Regions of Durham, York, Hallon: Waterloo and Niagara, the Cities of Toronto, Hamilton, Kawartha Lakes and Barrie, and the Counties of Northumberland, Suncee, Dufferin and Brant are not yet in effect, either because they have not yet been approved or because they have been appealed in whole or in part to the Ontario Municipal Board, Information for these municipalities will become available as the settlement area designations and related population and employment forecasts are approved.



NEXT STEPS

These proposed indicators are being shared for your input and ideas. Please send us your comments by April 30, 2014. These indicators will be finalized following discussions with other ministries, municipalities, stakeholders and other interested individuals.

For more detailed information, please review the Technical Report on Preliminary Performance Indicators for the Growth Plan for the Greater Golden Horseshoe, 2006. The report can be accessed on the Places to Grow website at www.placestogrow.ca.

Planning for growth means carefully looking ahead and better informing our decisions and actions. It's a broad partnership, involving many diverse and interested parties.

Contact:

Ontario Growth Secretariat Ministry of Infrastructure 777 Bay Street, 4th Floor, Suite 425 Toronto, ON M5G 2E5

Tel: 416-325-1210 or 1-866-479-9781

TTY: 1-800-239-4224

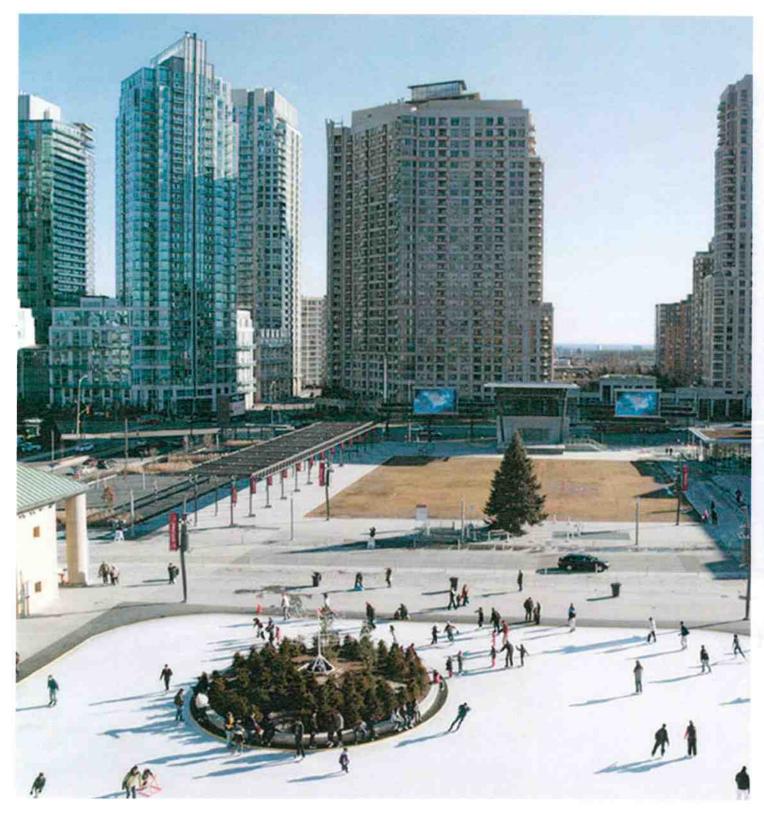
Email: placestogrow@ontario.ca Website: www.placestogrow.ca

Notice to Organizations and Businesses

Any comments or submissions that are made on behalf of an organization or business may be shared or disclosed. By submitting comments you are deemed to consent to the sharing of information contained in the comments and your business contact information (the name, title and contact information of anyone submitting comments in a business, professional or official capacity).

Notice to Individuals about the Collection of Personal Information

Personal information you provide is collected by the Ministry of Infrastructure under the authority of the Ministry of Infrastructure Act, 2011 s. 7(1) (c), to establish policies and undertake programs for the purposes of growth plans and growth management. Your personal contact information will only be used to contact you and will not be shared. Please be aware that any comments provided may be shared or disclosed once personal information (your name, home address and personal email address) is removed.



Note **regarding** graphic maps on pages 1, 7, 8, 9, 10, 13, 14, 19, 21, 23 and 29:

The information displayed in these maps is for illustration purposes only, may not be to scale, and may not accurately reflect approved municipal boundaries.

General Note:

This document has been prepared solely for the purpose of consulting on performance indicators being proposed by the Minister of Infrastructure to measure implementation of the Growth Plan for the Greater Golden Horseshoe, 2006. The information set out in the report does not represent the policy of the Government of Ontario. Reference should be made to the Growth Plan for the wording of approved policies including defined terms.

Photo courtesy of the City of Mississaugo





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April 30, 2014

Mr. Larry Clay Assistant Deputy Minister Ontario Growth Secretariat Ministry of Infrastructure 777 Bay Street, 4th Floor, Suite 425 Toronto, ON, M5G 2E5

Sent via email to PlacesToGrow@ontario.ca

Dear Mr. Clay:

Re: York Region Staff Comments on the Draft Growth Plan Performance Indicators

Thank you for the opportunity to comment on the Draft Performance Indicators for the Growth Plan for the Greater Golden Horseshoe. To meet your feedback deadline of April 30, 2014, this letter and attachment currently contain York Region staff comments. These comments will be brought to York Region's Committee of the Whole and Council for endorsement on June 12 and June 26, respectively. Any resolution related to this report will be forwarded to the Minster of Infrastructure following those meetings.

Regional staff support the goals of the Growth Plan and the need for performance indicators to evaluate the effectiveness of Growth Plan policies. These proposed performance indicators will provide a solid foundation for an evidence-based approach to policy development. The indicators and accompanying results are needed to ensure that future reviews of the Growth Plan create meaningful changes in policy direction.

As requested, Regional staff have reviewed the *Draft Performance Indicators for the Growth Plan for the Greater Horseshoe* and have responded to the three feedback categories outlined in the Province's *Discussion Guide*: the performance indicators, data sources, and reporting program. Key comments are included in this letter. Additional detailed comments are included in the attachment to this letter, with notation as to which area of the discussion guide they respond.

Performance Indicators

 Regional staff are generally pleased with the proposed performance indicators and believe they represent a good start at evaluating Growth Plan policies, particularly its explicit targets for growth and intensification. However, there are a number of policy directions from the Growth Plan that are not yet addressed. We suggest additional

- indicators be created to evaluate these policy directions. Some examples include affordable housing and employment land conversions.
- Presently, the indicators that evaluate Growth Plan policy directions (as opposed to explicit targets) are only tracked for the Urban Growth Centres, Major Transit Station Areas and Built-Up Areas. We believe it is important that these policy directions also be tracked and evaluated in the Designated Greenfield Areas.
- The "Urban Growth Centre Density" and "Major Transit Station Area Density" performance indicators currently measure the density across all lands within these areas, as opposed to just the lands that have been developed to date. This is problematic for Urban Growth Centres or Major Transit Station Areas that currently contain large amounts of undeveloped land, as it skews the density calculation. By using the entire land area to calculate density, the current methodology underrepresents the density in the built portions of these areas. This can lead to incorrect conclusions that new development in these areas are not meeting the targets of the Growth Plan, when this development may actually exceed these density targets. The methodology should be modified to track both the gross density and net density for development in these areas.
- The Growth Plan policies related to the density targets in the Urban Growth Centres, Major Transit Station Areas and the Designated Greenfield Areas state that these areas should be "planned to achieve" the density targets. The proposed performance indicators for these targets currently go beyond the planned densities, and speak to the actual densities in these areas. While this is a good measure of what is on the ground, both the planned and achieved densities should be tracked through these indicators to provide a more fulsome vision for these areas. The planned densities can be determined through municipal Official Plans and/or Secondary Plans for these areas.
- The "Designated Greenfield Area Density" performance indicator is problematic in its current form and should mirror the other target-based performance indicators by speaking directly to the population and employment density target in the Growth Plan. Presently, this performance indicator has been unnecessarily complicated by including an analysis of the mix of housing types in municipalities, which is already evaluated as its own separate performance indicator ("Mix of Housing Types"). Housing mix is not an appropriate measure of population and employment density. The Province should revisit this proposed indicator to determine how to include and measure employment density, and ensure that the overall population and employment density is calculated over the developable area of the Designated Greenfield Area, which excludes lands located within certain features such as wetlands and woodlands.
- The two performance indicators related to transportation patterns ("Transportation Modal Split" and "Commute Time by Mode") need to be linked to the distance of these commutes to properly evaluate this policy direction from the Growth Plan. Distance is one of the major contributing factors to why individuals choose to use a particular mode of transportation or the length of their commute. Additionally, commute distance is needed to better understand whether individuals are living close to where they work.

Data Sources

• Based on the information provided in the Printed Brochure and Technical Report, Regional staff have a number of questions surrounding the raw data, methodology and calculations that were used for each performance indicator. The Province should work

- more closely with municipalities to identify inaccuracies in the source data and calculations by reviewing the data and methodologies.
- Regional staff recognize that it is challenging to measure these indicators across all
 municipalities in a streamlined and consistent manner. However, if the indicators are
 only meant to be compared within a municipality over time (meaning municipalities are
 not to be compared to one another), then the Province should focus on using the best
 available datasets for each municipality, for example York Region's annual employment
 survey.

Reporting Program

- The Province has emphasized that the results from these performance indicators should only be used to compare a municipality to itself over time; not against other municipalities. The reporting program for the performance indicators should be structured in this way, by separating the data for each municipality and encapsulating it in separate chapters or appendices. Formatting the data in such a way will have a number of benefits:
 - The document will be more accessible and easier to understand for the public, who may be interested in only reviewing the results of their own municipality.
 - The graphics and tables associated with each municipality will be easier to read and will better illustrate the trends within that municipality over time.
 - The document will make an explicit connection between when the Growth Plan
 policies came into effect at the municipal level, and when the results of a
 performance indicator can transition from baseline data into the actual results of
 the Growth Plan policies.
- It is important that the performance indicator results are available and utilized during the Province's mandated reviews of the Growth Plan, which are scheduled to occur at least every 10 years. However, in order to have a transparent and fulsome dialogue on the performance indicators, the monitoring program should report on results more frequently than the mandated reviews. Regional staff suggest that the Province develop the Growth Plan reporting program on a five-year cycle and ensure that the results are available for each mandated Growth Plan review.

Finally, Regional staff wishes to remind the Province that the Region is currently developing a monitoring program to evaluate the success of the York Region Official Plan – 2010 targets and policy directions, identify emerging trends, and inform the next five year review of the Official Plan. Many of the indicators developed for this program have a direct link to the Growth Plan, particularly the population and growth forecasts, intensification targets and density targets. The Province should work closely with all upper and single-tier municipalities that are developing monitoring programs to identify the most appropriate Growth Plan performance indicators, consistent methodologies and high quality, reliable data sources. The Province would benefit from the wealth of detailed knowledge and expertise that municipalities have about the on-the-ground results in their geographies.

Thank you again for this opportunity to comment on the Draft Performance Indicators for the Growth Plan for the Greater Golden Horseshoe. We trust that you will find these comments strengthen the connection between the Performance Indicators and the goals of the Growth Plan. We would be pleased to discuss these recommendations with Provincial staff, and welcome the

opportunity to work with the Province in the future as these indicators are finalized, measured and reported on.

Sincerely,

 $Valerie\ Shuttleworth,\ M.C.I.P.,\ R.P.P.$

Director

Long Range Planning

Karen Whitney, M.C.I.P., R.P.P.

Director

Community Planning

vs/kw/tye

Attachment: 1) Additional Detailed Staff Comments

eDOCS #5478820

Proposed Performance Indicators for the Growth Plan: Additional Detailed York Region Staff Comments

The following comments offer detailed and sometimes technical feedback on the Proposed Performance Indicators for the Growth Plan. It should be noted that these comments are in addition to those included in the covering letter, and must be read together to reflect the complete set of Regional staff comments. Minor technical issues in the Printed Brochure and Technical Report, such as typos or incorrectly referenced text, are not addressed through these comments.

General Comments:

Performance Indicators

While the Growth Plan policies will influence the kind of development that occurs in the Greater Golden
Horseshoe, development will also be influenced by market conditions. It may be worthwhile for the Province to
investigate how to illustrate this context and connect the results of the performance indicators with the market
conditions at the time.

Data Sources

- We are pleased to see the Province recognize the limitations of some data sources, such as the voluntary National Household Survey.
- The Province should investigate using the "Transportation for Tomorrow Survey" as a data source for indicators related to travel patterns and behaviour. This relates to the proposed indicators 9 and 10, as well as potential new indicators that could be developed from this data.

Reporting Program

- The Province has expressed that these indicators are not meant to measure policy conformity, but are to track 'on the ground results'. However, the current reporting program does not acknowledge the timing of when municipalities have updated their official plans and other planning documents to conform with the policies of the Growth Plan, which has large implications for when results can be expected. The final reporting program needs to clearly identify that any data from 2006 and 2011 are "baseline" years only. In addition, there needs to be a clear link between the year that these policies were approved/implemented in municipalities and the year that the data transitions from baseline into something reflective of the effectiveness of the policy.
- Through the reporting program, it may be useful to identify the indicators that measure a specific target in the Growth Plan, as opposed to those that are more qualitative in nature. E.g. the indicator that measures the Growth Plan's specific target for intensification; and the indicator that measures the walkability of a community, which his part of the Growth Plan but contains no specific/numerical targets.
- Presently, the raw data used for these performance indicators and some of the assumptions/calculations used to determine key pieces of data (e.g. land areas for Urban Growth Centres) have not been published in the

- Printed Brochure or the Technical Report. This information needs to be made available to municipalities to ensure that the data, assumptions and calculations can be peer reviewed for accuracy and consistency with other municipal reports. Further, it would be beneficial to make this information available to the public for greater transparency.
- Through the reporting program, many of these indicators would benefit from including associated maps. An interactive web-mapping tool would assist the public and stakeholders in better understanding the locations of key areas, and would assist in cross-comparisons between the results of indicators. E.g. the map could make the connection between the location and densities of Major Transit Station Areas (Indicator 3) and the pedestrian network and connectivity of these areas (Indicator 8); or visually identify gaps in the overall transportation system that could factor into the results of indicators 9 and 10.

Detailed Comments:

			nme Type	
Indicator	Comments	Indicator	Data Source	Reporting
Theme 1: Building Compact and Efficient Communities				
1.Achieving Intensification	 The two infographics titled "Location of New Residential Units" in the Printed Brochure are very difficult to interpret and do not assist with explaining the overall trend. The purpose of this indicator is to measure intensification, so it is important that the associated infographics clearly illustrate whether development is occurring inside or outside of the Built-Up Area. As currently presented, the boundaries of the Built-Up Area have been obscured by the dots. This makes it difficult for the viewer to interpret where development is occurring. 			
2.Urban Growth Centre Density	- The infographic used in the Printed Brochure only shows 2011 data. Looking at one year in isolation does not provide the results of this indicator as quoted in the Printed Brochure: "that urban growth centres are making progress". This infographic should also include the 2006 data to illustrate the trend.			
3. Major Transit Station Area Density	 It is unclear whether the densities of this indicator were calculated using the gross area, or if only the developable lands were considered. There is no reference to this consideration within the Technical Report. 			
	 An important explanatory piece of information associated with this indicator is the status of each transit station. Whether a station already exists or is only proposed may begin to tell the story behind why the area has a certain amount of density around it. Newer stations are likely to have less density if the area is just beginning to be developed. While this information is included in Appendix 4 of the Technical Report, it may be useful to include a classification of station 'status' in the Printed Brochure and any associated infographics. The Growth Plan itself does not provide specific numerical density targets for 			

Major Transit Station Areas, If municipalities have formally established targets for Major Transit Station Areas, this indicator could include references to these targets. 4. Designated Greenfield Area Density - The hypothesis proposed in the Technical Report for why Housing Mix was combined with Density for Indicator 4 is flawed. The Technical Report notes "that an increase in the percentage of row houses, apartments and semi-detached dwellings would suggest that the Built Designated Greenfield Area is seeing higher density developments." However, the baseline data within the Technical Report has proven this to be incorrect: in three of the four pilot municipalities, having a high proportion of apartment, row or semi units did not predict the Gross Built Designated Greenfield Area Density (page 19 of the Technical Report). - If the calculation of this indicator is purposefully just for the "Built" Designated Greenfield Area, vacant parcels should be excluded. The Technical Report notes that (based on MPAC data) vacant parcels smaller than 0.7ha were included, as these would be developed in the short term. Yet the Occupancy Count was also MPAC data and it would stand to reason that if the parcel data and occupancy count were for the same time period, that the occupancy count would not include population for these vacant parcels. These parcels should be excluded until they are built on and the population data reflects the occupancy. - Policy 2.2.7.3 provides a number of land area exclusions to be used when calculating the density target measured in this indicator. The Technical Report identifies that these land areas were not excluded from the density calculations; resulting in a gross density as opposed to a net density. This indicator should track the net density to align with the Growth Plan targets. - Suggested additional indicators for consideration: - Availability of affordable housing. - Una variety of data (housing mix) has a tendency to fluctuate when compared on a very by basis, especially due t
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- Many municipalities have an inventory of their existing housing stock. It would be
useful for this indicator to not just measure the trend in new builds, but to make
the connection between the overall stock and its change over time.
6. Diversity of - The first "Consideration" listed in the Technical Report for this indicator is a key
Land Uses issue. As municipalities continue to intensify and grow, a key principle is the co-
location of services. If the MPAC codes cannot distinguish between multiple uses
on a property, then the results from this data source will not accurately reflect
some of the intensification and co-location that occurs in the future.
- More information should be provided about what uses are captured by each land
class. E.g. Are parks included in "Government, Institutional and Recreation" or
"Open Space"?
- The Technical Report states that the land classes of Vacant, Agricultural and
Undevelopable Parcels were not used in the analysis. It is unclear why this
assumption was made.

	 Some consideration should be given to whether Agricultural land uses should be factored into the SDI calculation as a measure of community vitality. The inclusion of agriculture into an urban environment may improve community vitality in the same way that green/open space or recreational spaces provide a sense of place for residents. Additionally, a close proximity to agricultural lands might improve community vitality through access to locally grown food. The Technical Report mentions that the number of parcels was a factor in the SDI calculation, yet the mathematical formula provided to explain this calculation does not include parcels. Clarification is required. 	
	 The "Unknown" land use displayed on the Tech Report's map legend should be updated with on-the-ground data. Empirical evidence should be used to properly categorize anything that might be identified as unknown. In the example provided in the Technical Report (the City of Barrie's Built-up Area, Urban Growth Centre and two Major Transit Station Areas), the analysis appears to be incomplete. The SDI score for the Barrie South GO Station is 0 and the map is missing data for this Station Area. The land area in this map is white/missing; but since there are land use colours for Vacant, Agricultural, Undevelopable, and Unknown land uses, it appears that the data for this area has been erroneously clipped. 	
	 Since SDI is not explicitly included as a measurement in the Growth Plan, it would be beneficial if the description of this indicator provided some sort of recommendation or target that identifies what the Province believes is the 'desired range' for this measurement. Currently it only identifies that values closer to 1 have more diversity; but having thresholds will assist in identifying areas that are in need of improvement (and would warrant additional assistance), in comparison to areas that are in an 'acceptable range' and do not need to greatly modify their policies. 	
7.Community Infrastructure	 See additional comments on Appendix 5 (below). Community Infrastructure is a defined term in the Growth Plan. The land uses and facilities that service communities and make them liveable go beyond what is included in this proposed indicator, e.g. social and medical services, retail, personal service shops. Indicator 6 appears to provide the beginning of this analysis, through the diversity of land uses, yet is missing the element of walkability. We are unsure whether this indicator, as proposed, is an effective measure of community infrastructure, from the perspective of residents. 	
	 This indicator is focused on what is within walking distance to the population. Whether lands in the measured areas contain residences is an important factor to speak to why community facilities may or may not be located in an area. For example, employment lands should not be used for this calculation, as residences will not be located in this area and it is not appropriate to use these lands for community facilities. With the current calculation method, it appears that employment lands would negatively impact the result of this indicator. An 800m radius buffer was used for this exercise to represent "walking distance". 	
	 In the Growth Plan, the closest reference to walking distance is in the definition of Major Transit Station Area, which equates a 500m radius as representing about a 10-minute walk. The indicator should either be consistent with this measurement or provide background as to why this needs to be modified. The current analysis limits results to the percentage of areas that are serviced by all three community facilities. This is too limited in scope and should be expanded to identify the hierarchy of service availability; i.e. areas within walking distance to 0, 1, 2, and 3 types of facilities. This analysis would allow results to better measure change and improvement. E.g., Community A begins with 60% of the population 	

serviced by 3 facilities	and the remaining 40% serviced by 0 facilities. If this	
•	insition into having 60% serviced by 3 facilities and the	
	d by 2 facilities; that would be a great improvement.	
	eporting system would only identify that the 60% had not	
changed.		
	may be problematic, especially due to the "Consideration"	
	ical Report that notes that it does not account for multiple	
·	unicipalities continue to intensify and grow, a key principle	
	rvices. In particular, the three facilities currently tracked	
	ntre and park) are very often co-located. For example,	
	munity centres include parks on their properties. This	
	errepresentation of the community facilities available in that	
area.	facilities tracked through this indicator should be expanded	
	facilities tracked through this indicator should be expanded	
_	facilities insinuated in the Growth Plan definition for ure, including places of worship, daycares and	
medical/health facilitie		
	s located outside of the Built-up Area have been excluded	
	n if their "800m buffers" would overlap with areas inside the	
•	laries of the study areas of this indicator (e.g. Built-up Area)	
-	dent that may live near the boundaries and would not	
	y located outside of the study area if it was within walking	
,	were located on a parcel outside of, but close to, the	
	Jp Area, residents near this boundary would still use this	
park if it were within w		
- See additional commer	nts on Appendix 5 (below).	
8.Street - The Technical Report s	tates that "over time, [this indicator] will create a picture of	
Connectivity whether growth is occi	urring as envisioned by the Growth Plan." However, this	
	ake an assumption that as the Built-up Area is intensified,	
·	nange. This is not necessarily the case, as parcels with low-	
· · · · · · · · · · · · · · · · · · ·	nay be redeveloped with no impact to the road network	
	tached homes along a street are replaced with a mid-rise	
	of smaller townhouses). While there may be some	
·	number of intersections per hectare in the Built-Up Area, it is	
-	improvements will be noticed when comparing the existing	
	new communities in the Designated Greenfield Area that	
, , ,	nd built with increased densities and street connectivity. s unclear as to what pedestrian or cycling paths and trails	
•	culation. The Methodology mentions that street	
	uded in the calculation, yet walking and cycling routes are	
	xclusion (only "informal pedestrian pathways"). This should	
	ysis, and many municipalities have this information	
	e made available to the Province.	
	pployment development is characterised by larger	
	erent requirements for the street network. If employment	
	ne study area, this consideration should be factored into the	
	cator. E.g. a large amount of employment land might skew	
the calculation of the c		
	nts on Appendix 5 (below).	
Theme 3: Support - Suggested additional ir	ndicators for consideration:	
	d amount of land for, employment land conversions	
Competitive o Number of, and		

Economy	 Jobs/employment by sector 	
9.Transportation	- The use of 'Carpool' as a mode of transportation has not been included. While this	
Modal Split	is not explicitly an element of the Growth Plan, it might prove beneficial to	
iviodai Spiic	measure this as it speaks to travel patterns and behaviour, which is at the root of	
	this indicator.	
	- The Technical Report acknowledges the limitation of this data source with regards	
	to suppressing multi-mode trips into one mode. If this information was available,	
	it would provide a more accurate picture of the alternative modes of	
	transportation used by the population.	
	- This indicator currently tracks "trips to work", but does not monitor other trip	
	purposes (e.g. entertainment, shopping). If this information was available, it would	
	be useful to show the proportions for each transportation mode for the type of	
	trip.	
10. Commute	- Commute times, as presented, does not speak to whether the average commute	
Time by	time by people is decreasing. As well, any change in commute time (or lack of	
Mode	change) should also be cross referenced with whether people are changing their	
	travel mode to be accurate. For example, Commuter A can get to work in 30	
	minutes by travelling by car or 45 minutes by transit, so they opt to take a car. In	
	the future, investments in rapid transit may decrease the amount of time this	
	would take from 45 minutes to 30 minutes, so Commuter A begins taking transit.	
	Even though the length of their commute has not changed, they have switched	
	their mode from car to transit and this improvement is not currently captured in	
	this indicator.	
	- The Technical Report states that this indicator will help demonstrate whether	
	transportation investments are resulting in better alternative transportation	
	options. As currently presented, this indicator does not make any connection to	
	investments/improvements in transportation infrastructure.	
	- The way that this indicator is currently reported, it does not adequately explain	
	that the commute times in a specific area (e.g. outer ring or inner ring) does not	
	necessarily represent the amount of time people spend commuting within that	
	area, since the data is recorded based on the starting point of the trip and the trip	
	may end in another municipality. Associated text should be included that cautions	
	viewers about this and makes the link to an additional indicator (proposed above)	
	of the distance between home and work.	
11. Location of	- This data is currently presented for 2006 and 2012. If this data is available on an	
Major Office	annual basis, analysis could show all years of data or the trend line. If reporting	
Space	remains as snapshots of particular years, this indicator should be consistent with	
	Census years (2006 and 2011).	
	- The infographic used in the Printed Brochure does not illustrate this indicator (the	
	percentage of major office space in Urban Growth Centres and Major Transit	
	Station Areas). It is not obvious which blue columns are in the Urban Growth	
	Centres because they partially obscure the orange colouring on the map.	
	- Within the Technical Report, the choice of rows/categories used in the Table for	
	this data seems skewed towards the activities in the City of Toronto. In addition to	
	making the distinction between major office locating within Toronto vs. other	
	municipalities, it would be useful to provide the data (perhaps in an appendix) for	
	all municipalities.	
Theme 4: Protect,	- Additional indicators should be developed that speak to the key elements of this	
Conserve,	theme: protecting, conserving, enhancing and wisely using natural resources.	
Enhance, and	- Suggested additional indicators for consideration:	
Wisely Use	Amount of prime agricultural land	
Natural	 Amount of land actively farmed 	
Natural	 Amount of land actively farmed 	

Resources	 Amount of green space and naturel features acquired for public ownership An indicator that speaks to the enhancement of green spaces or natural features 	
12. Land Consumption	- The infographic in the Printed Brochure does not display the analysis of this indicator, just the raw data. While the change over time will not be displayed until more data is available, the two charts should be combined to provide better analysis – comparing the population/employment with the settlement area.	
	 This indicator tracks the 'planned' growth, but this indicator should also provide a check to measure the 'actual' growth, as this could end up being different. Alternatively, a second indicator could be created to show the actual growth that could then be compared with this indicator. E.g. this would identify if land has been over designated in one Municipal Comprehensive Review, and explain why less is required for designation through the next Municipal Comprehensive Review. 	
	- This indicator needs a baseline, which cannot be measured from any municipal comprehensive reviews resulting from the Growth Plan forecasts. This needs to be established for each municipality. Historic land consumption rates compared to land consumption rates post-Growth Plan will also be informative of achievement of the Growth Plan goals.	
	The table in the Technical Report is missing a number of critical pieces of information. It is important that the year to which the projected population & employment numbers are forecasted be recorded. It is also important that the date that the forecasted population, employment and settlement modifications were approved be recorded in this table. One of the primary reasons why the Growth Plan indicators cannot be compared between municipalities is because the Growth Planrelated policies have not been in force and effect in all municipalities for the same amount of time, and it is inappropriate to compare their progress with what is on the ground on the same date. For the purposes of reporting on this indicator, this date is important for assisting readers in understanding why some municipalities are beginning to show the impacts of the Growth Plan policies and why others are not; and to provide justification as to whether it is because the policies are ineffective or whether municipalities do not have them in force yet. In addition, the table is missing the numerical calculation between the change in the population and employment, and the change in the settlement area based on the approval that brought municipal official plans into conformity with the Growth Plan.	
Appendix 4	- Appendix 4 shows the "Status" of the station. However, it is unclear what the asterisk beside some records is meant to denote. The asterisk is explained at the bottom of the table to be a legend for all of the status types, but this does not account for why some records would explicitly show the asterisk and others would not.	
	- The explanation of "Status" appears to be oversimplified or inconsistent. Some of the transit stations in York Region are noted as "Future" or "Committed", when they already exist as VIVA stops. If this is to denote a distinction from being "Rapid Bus Transit" vs. "Dedicated Lane", then the list is also inconsistent, since some of these stations are included, yet will never be on a dedicated lane (e.g. in Downtown Aurora).	
	- In addition to the current status of a Station, it would be useful if the year that each Station was built was included in the data. This date could represent the year the Station was established and/or the year it was converted to 'dedicated rapid	_

transit'; which could help to explain the results of the indicator.	
transit, which could help to explain the results of the indicator.	
- The location of the transit station should be noted, e.g. the Built-Up Area, Urbar	า
Growth Centre or Designated Greenfield Area. While the targets for the Major	
Transit Station Area themselves will affect future growth, its current location wi	II
help explain the kind of development that is currently around the station and	
whether future growth will be through intensification or new development.	
- Appendix 4 should be reviewed with Regional staff to ensure that all of the	
appropriate stations are included and duplicates are removed.	
Appendix 5 - Appendix 5 identifies the Built Up Areas in York Region as "Aurora/Oak Ridges",	
"Markham/RH/Vaughan", "Newmarket" and "Stouffville". It is unclear whether	
the Built-Up Areas in the Town of East Gwillimbury, King Township and the Town	n
of Georgina have been missed or if they are included in an existing category.	
- In addition, the details of what is included in the Built-Up Area categories is	
unclear. The definition for Built-Up Area includes Towns & Villages and Hamlets	5,
yet based on the names of these categories, it is unclear if they were captured.	
Appendix 6 - Indicator 5 and Appendix 6 are currently only analyzing the Urban Growth Centr	e,
Major Transit Station Area and Built-Up Area. This should be expanded to analy	ze
all areas of importance within the Growth Plan by also including the Designated	
Greenfield Area, or at a minimum, the Built Designated Greenfield Area	