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2016-03-17

Mr. Dennis Kelly
Regional Clerk
Regional Municipality of York
17250 Yonge Street, 4th Floor
Newmarket, Ontario, L3Y 6Z1

Re: York Region Cemetery Needs Analysis (LEES + Associates)

Dear Sir,

We represent Arbor Memorial Services Inc. ("AMI") on land use planning matters in regards to their interests in cemeteries. On their behalf, and as a result of our considerable experience in matters related to cemetery development, we participated as a stakeholder in the York Region Cemetery Needs Analysis undertaken by LEES + Associates ("LEES") on behalf of the Region.

Further to the Committee of the Whole Meeting held on Thursday, March 10, 2016, we provide the following comments on the above-noted study and ask that these be considered at Regional Council on Thursday, March 24, 2016 under the relevant item.

LARKIN+ and our wider project team, Cosmopolitan Associates and urbanMetrics, have been actively involved and engaged as part of the preparation of the Needs Analysis undertaken by LEES + Associates, on behalf of our mutual client, AMI. This included attendance at two workshops, as well as written submissions to Staff.

We have now had an opportunity to review the Needs Analysis and note that the LEES study does recognize a number of specific aspects important to planning for new cemeteries, including:

- ✓ Recognition that York Region's cemetery needs will be driven to a large extent by inflow from other areas in the GTA, and specifically the City of Toronto that is currently exhausting its supply of cemetery land. LEES recognizes that this inflow could be as high as 66%;
- ✓ That ethnic and religious factors do have an important impact on both the demand for and available supply of cemetery land;
- ✓ The impact of an aging population on future death rates in York Region;
- ✓ Increases in cremation compared with in ground burials as a preferred means of interment;
- ✓ The significant lead time required to plan for new cemeteries, some 5 to 20 years in advance of actual need, due to the time required to gain approval, design and actually bring a cemetery to market; and
- ✓ Most importantly, to examine a planning horizon of up to 100 years when determining cemetery need in a Region or smaller community.

Although the LEES study noted the importance of these factors, most have not been incorporated into the needs analysis and hence LEES' conclusion that at least to 2041, the study period prescribed in the Region's Terms of Reference, there is no need for additional cemetery land in York Region. It is the opinion of the AMI consulting team that had LEES built all of these factors into their analysis they would have come to a very different conclusion. For example:

✘ **The Planning Horizon used in the Analysis is 2041 (25 years):**

In their analysis LEES notes in a number of instances that a suitable horizon for cemetery planning is more appropriately 100+ years, notwithstanding the horizon used in the Analysis of 25 years. This is apparently due to the input of Regional Planning Staff that the planning horizon must conform to the Provincial Policy Statement, which is interpreted to impose a 20 year Planning Horizon: We do not share this interpretation. Whereas for "traditional" or "conventional" development forms the Planning Horizon presented in the PPS may be reasonable, in cemetery planning it is not. This is because cemetery planning is multi-generational. Cemetery operators try to accommodate four+ generations, which statistically translates to 112+ years (a generation replaces itself statistically every 28 years). Therefore, the horizon for cemetery planning should be 100+ years, as recommended by LEES in their report, not 25 years.

✘ **Consideration of Religion on Disposition Preferences and Cemetery Supply**

Whereas the Analysis recognizes that religious affiliation (burial practices) influences the applicability of the overall supply of burial space to the overall population, it does not take into consideration the type of cemeteries by religion within the key findings for supply, nor the religious demographics of the Region. It is reasonable to expect that the Analysis would take into account the religious affiliations of existing cemeteries in order to determine the genuine capacity available, and determine how these relate to the Region's demographics. Unfortunately it appears that the Analysis considers all burial plots to be equal, and thus available to all denominations. For example, survey results showing capacity within a Catholic cemetery does not equate to a supply that is available to all residents. Catholic, along with Muslim and Jewish cemeteries, are largely restricted to those denominations.

Religious affiliation continues to be a critical factor in the uptake of cemetery supply, particularly when we consider the limited supply of non-denominational cemetery plots in certain York Region communities, and its omission within the conclusions of the Analysis results in an inaccurate conclusion respecting the amount of cemetery space available to serve all of York Region's population.

The foregoing represents two examples of factors that, although acknowledged, were omitted from the conclusions and recommendations of the LEES report, but should not be considered an exhaustive list of the report's limitations. We recognize and support the Region's efforts to understand the complex land use planning challenges of providing a policy framework to ensure that the burial needs of the Region's population are addressed. Unfortunately, we do not believe that the Cemetery Needs Analysis accomplishes this due to its inherent and unnecessary limitations.

Sincerely,

LARKIN+



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