

Key Policy Changes

Page in GP	Policy	Topic	Description	Comments	Proposed Alternative, if any, or New Policy
21	2.2.5.10 c)	Employment /MTSA	Policy update would allow conversion of employment areas to non-employment uses within a provincially significant employment zones that is located within an MTSA, outside of a municipal comprehensive review.	<p>Staff have concerns about the implementation of this policy.</p> <p>In general, the City supports the intent of this policy change, but notes, this proposed policy presents challenges related to a municipality’s ability to plan for its MTSAs in a timely manner. This proposed policy is only effective if and when the upper-tier municipality has delineated the MTSAs.</p> <p>Further direction and clarity are needed regarding the appropriateness of employment conversion within MTSAs where a municipality hasn’t identified an opportunity for conversion.</p> <p>While this proposed policy has the potential to create more housing more quickly in MTSAs, it does not provide any further clarity around prioritizing employment uses or mixed-use development within MTSAs to ensure that complete communities can be realized in these areas.</p>	<p><i>Staff Recommendation:</i></p> <p>There are remaining concerns about meeting the objectives of the MTSA and PSEZ and the mechanisms to modify the PSEZ mapping.</p> <p>The Province should ensure that property owners and other stakeholders such as municipalities understand the role and the opportunities presented by the PSEZ. The City expects more guidance from the Province on the PSEZ mapping and may request further modifications as the PSEZ objectives and policy framework become clearer. As noted in previous submissions, the City will respond and adapt to new information.</p> <p>The City needs more tools to ensure the development of complete communities in MTSAs, such as policy direction that requires the retention of a minimum gross floor area and/or minimum employment density for employment uses after an employment conversion has occurred.</p>
48	4.2.8.2 a)	Mineral Aggregate Resources	This revised policy deletes “habitat of endangered species and threatened species” from the list	Staff have concerns with the revised policy. There is insufficient rationale for the removal of this clause.	Staff do not support the revised policy.

			of key natural heritage features and key hydrologic features that no new mineral aggregate operation, new wayside pits and any ancillary or accessory use will be permitted		
--	--	--	---	--	--

Growth Related Policy Changes

Page in GP	Policy	Description	Comments	Proposed Alternative, if any, or New Policy
8	1.2.3	<p>Policy revision to change planning horizon from 2041 to 2051.</p> <p>The Province advises that the proposed change is “to ensure municipalities have sufficient land to support the fostering of complete communities, economic development, job creation and housing affordability. The new horizon is consistent with the long-range planning approach of previous growth plans and better aligns with the land supply requirements of the Provincial Policy Statement, 2020.”</p>	<p><i>Timing of Conformity Exercises:</i> It should be recognized that many municipalities are currently undertaking their 2041 conformity exercises and working towards the July 2022 conformity deadline.</p> <p>Changing the planning horizon in the midst of these exercises, some of which are well underway, has the potential to cause delays to the project timelines. As such, there should be some flexibility or options given to municipalities with respect to the conformity deadlines.</p> <p><i>Impact on Local Planning:</i> Further, continuous changes to Provincial legislation make it challenging for municipalities to develop and implement a local planning vision. This allows</p>	<p>The City of Burlington proposes a policy modification to 2.2.2.1 a) and a new policy to 2.2.2.</p> <p><i>Need for Progressive Targets – Policy Modification:</i></p> <p>2.2.2.1 a) By the time the next <i>municipal comprehensive review</i> is approved and in effect, and for each year thereafter, the applicable minimum intensification target to 2041 is as follows: a) A minimum of 50 per cent of all residential development occurring annually within each of the Cities of Barrie, Brantford, Guelph, Hamilton, Orillia and Peterborough and the Regions of Durham,</p>

			<p>developers to speculate on how and where growth should be allocated throughout a Region and City and proceed on that basis. The resulting development pressures without local planning being completed puts strain on local infrastructure, services, resources, etc.</p> <p><i>Need for Progressive Targets:</i> The City of Burlington notes that it is not progressive to have the same percentage target of development in the built-up areas over a 31-year period.</p> <p>Progressive target increases to the percentage of units required within the built-up area and progressive density targets for Designated Greenfield Areas should be proposed alongside this modification. In order to manage sprawl, the additional growth post-2041 should have a higher target for development in the built-up areas.</p> <p><i>Recent Policy Directions and Legislative Changes</i> Some recent policy directions and legislative changes have occurred that reinforce transit-oriented communities. As a result of the additional growth allocation and extended planning horizon to 2051, there is an opportunity to align the Growth Plan further by locating Urban Growth Centres along Priority</p>	<p>Halton, Niagara, Peel, Waterloo and York will be within the <i>delineated built-up area</i>; ...</p> <p><i>Need for Progressive Targets - New Recommended Policy:</i></p> <p>The applicable minimum intensification target from 2041 to 2051 for all Upper-tier and Single-tier municipalities is a minimum of 60% of all residential development occurring annually will be within the <i>delineated built-up area</i>.</p>
--	--	--	--	---

			Transit Corridors with Frequent Transit Service, where such corridors and service exist.	
10	2.1	<p>Updated policy language:</p> <ul style="list-style-type: none"> - Replace 2041, with 2051 - Changes to growth forecast numbers for the GGH <ul style="list-style-type: none"> o Delete “13.5 million people” and replace with “at a minimum, 14.9” million people; and o Delete “6.3” million jobs and replace with “7.0” jobs 	<p>The City has concerns with the length of the time frame without an interim step. Thirty years is a long planning horizon.</p> <p>With each Upper and Single-tier municipality able to establish their own growth targets and the forecasts being cast as minimums, there could be decisions made in the coming years that set out extensive urban boundary expansions.</p> <p>Additional guidance is required to ensure that this policy would be used appropriately and would require appropriate planning arguments for increased growth targets beyond the minimums established in <i>A Place to Grow</i>.</p>	
13	2.2.1.1	<p>Additional policy language allows for higher population and employment forecasts than contained in Schedule 3 if established by the applicable upper- or single-tier municipality through a municipal comprehensive review</p> <p>“Population and employment forecasts contained in Schedule 3 or such higher forecasts as</p>	<p>This approach is consistent with the approach to targets in the Growth Plan which are minimums. However, there should be a requirement for those municipalities that establish higher forecasts on Schedule 3: Distribution of Population and Employment for the Greater Golden Horseshoe to 2041, that they are also required to exceed the minimum Delineated Built-Up Area and</p>	<p>The City of Burlington recommends the inclusion of a policy requirement that municipalities that establish higher forecasts than those contained in Schedule 3, should also establish higher Delineated Built-Up Area and Designated Greenfield Area targets, in keeping with the guiding principles of the Growth Plan.</p>

		established by the applicable upper- or single-tier municipality through its municipal comprehensive review will be used for planning and managing growth in the GGH to the horizon of this Plan in accordance with the policies in subsection 5.2.4”	Designated Greenfield Area targets in the Growth Plan.	
56	5.2.4.1	Additional policy language about higher forecasts as established by upper-tier municipalities through MCR.	See comments related to 2.2.1.1	
56	5.4.2.2	Additional policy language about higher forecasts as established by upper-tier municipalities through MCR.	See comments related to 2.2.1.1	
56	5.4.2.3	Revised policy language to provide a placeholder for new date that the Plan will be approved and in effect.	The City of Burlington has no concerns.	
61 & 62	6.1 & 6.2	Removal of policies specifically referencing Simcoe County	This has no impact on City of Burlington.	
91-96	Schedule 3	3 Scenarios: Reference Forecast, High Scenario, Low Scenario See proposed tables on pages 91-96	The City of Burlington has no comments on the scenarios, but defers to the Region of Halton.	

Definitions

Page in GP	Definition	Description	Comments	Proposed Alternative, if any, or New Policy
68	Cultural Heritage Landscape	Deletion of existing definition and a proposed new Cultural Heritage	The City of Burlington is supportive of this change.	

		Landscape definition to align with the PPS, 2020 definition		
70	Ecological Function	Revised definition to remove “including <i>hydrological functions</i> and biological, physical, chemical and socio-economic interactions.” and replace with “These may include biological, physical and socio-economic interactions.”	<p>The City of Burlington is supportive of this change for consistency with the PPS, 2020, which provides separate definitions for ecological function and hydrologic function.</p> <p>However, the City of Burlington notes that most policies throughout the plan already appear to note both ecological and hydrologic function but this should be reviewed for consistency given the change in definition, i.e. ensure hydrologic function is added where it may have previously been addressed under ecological function. Should also ensure all instances of ecological function have been italicized appropriately.</p>	<p>4.2.2.2 ...and the long-term ecological <u>ecological functions</u> or <i>hydrologic functions</i> of the features and areas as set out in the policies in this subsection and the policies in subsections 4.2.3 and 4.2.4.</p> <p>The City of Burlington recommends an examination of 4.2.4.5 b) to determine if it is appropriate to include hydrologic function, as it was previously included through the former definition of ecological function.</p> <p>4.2.4.5(b) restore, to the maximum extent possible, the ecological features and functions <u>ecological functions and features</u> in developed shoreline areas; and</p>
72	Habitat of Endangered Species and Threatened Species	Deletion of existing definition and replaced with “Habitat within the meaning of section 2 of the Endangered Species Act, 2007 (PPS, 2020).”	The City of Burlington is supportive of this change for consistency with the PPS, 2020. We have worked with the Region to incorporate this definition into the adopted Burlington Official Plan via the approvals process.	
73	Impact of a Changing Climate	New definition: “The present and future consequences from changes in weather patterns at local and regional levels including extreme weather events and increased climate variability. (PPS, 2020)”	The City of Burlington is supportive of this change for consistency with the PPS, 2020. We have worked with the Region to incorporate this definition into the adopted Burlington Official Plan via the approvals process.	

77	Municipal Water and Wastewater Treatment	<p>Additional language to sub-bullet d) of the existing definition (new language shown in bold):</p> <p>d) that is in a prescribed class of municipal drinking-water systems as defined in regulation under the Safe Drinking Water Act, 2002, including centralized and decentralized systems.</p>	<p>The City defers to Region of Halton comments, if any, on this definition. The adopted Burlington Official Plan does not contain a definition for Municipal Water and Wastewater Treatment.</p>	
79	On-Farm Diversified Uses	<p>Additional language to existing definition (new language shown in bold):</p> <p>Uses that are secondary to the principal agricultural use of the property, and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agri-tourism uses, and uses that produce value added agricultural products. Ground-mounted solar facilities are permitted in prime agricultural areas and specialty crop areas only as on-farm diversified uses. (PPS, 2020)</p>	<p>The City of Burlington is supportive of this change for consistency with the PPS, 2020. The City has worked with the Region to incorporate this definition into the adopted Burlington Official Plan via the approvals process. However, this additional content should have been included in policy throughout provincial documents, rather than tacked on to a definition where it may be overlooked.</p>	
80	Public Service Facilities	<p>Addition of “long term care services” to the existing definition.</p>	<p>The City of Burlington is supportive of this addition to the list of Public Service Facilities.</p>	

Other Issues

Page in GP	Policy	Topic	Description	Comments	Proposed Alternative, if any, or New Policy
22	2.2.6.1 d)	Housing	New policy that directs Upper- and single-tier municipalities to “address housing needs in accordance with provincial policy statements such as the Policy Statement: Service Manager Housing and Homelessness Plans”	<p>The City of Burlington is supportive of this change for consistency with the PPS, 2020.</p> <p>The City also requests that the Province provide stronger tools to assist municipalities in delivering more housing to a broad range of demographics and income levels.</p>	
22	2.2.6.1 e)	Housing	New reference to new policy 2.2.6.1 d)	See comments for 2.2.6.1 d)	
55	5.2.3.3	Co-ordination	Removal of “First Nations and Metis communities” from list of groups that municipalities are encouraged to engage with in local efforts to implement the Growth Plan. Engagement with Indigenous communities is now specifically referenced in new proposed policy 5.2.3.4.	<p>The City of Burlington supports additional policy language to strengthen requirements to engage with Indigenous communities.</p> <p>As outlined in the joint Halton Area Planning Partnership (HAPP) submission, the City of Burlington requests that the Province provided additional guidance to municipalities on what constitutes “appropriate engagement” in various planning contexts and/or geographic areas of the Province. There is a pressing need for Provincial</p>	

				<p>guidance to support the implementation of these policies by providing municipalities with clear direction on what will be expected through consultation and which applications will require consultation with Indigenous communities. The City of Burlington also recommends that the Province develop consultation guidelines so that there is a mutual understanding of what constitutes meaningful engagement.</p>	
55	5.2.3.4	Co-ordination	<p>New “shall” policy regarding engagement with Indigenous communities in local efforts to implement the Growth Plan.</p>	See comments for 5.2.3.3	-
56	5.2.3.7	Co-ordination	<p>Revised policy changes the co-ordination of planning matters with Indigenous communities from an encourage to a shall.</p> <p>Revised policy also removes specific language regarding building relationships and facilitating knowledge sharing in growth management and land use planning processes.</p> <p>The Province has explained that these proposed policy changes are “to ensure that</p>	<p>The City of Burlington is supportive of the proposed change that strengthens the policy from “encourage” to a “shall”, however, the policy should maintain the specific language regarding building relationships and facilitating knowledge sharing in growth management and land use planning processes.</p> <p>Further, as outlined in the joint Halton Area Planning Partnership (HAPP) submission there is a</p>	-

			appropriate engagement is undertaken”.	need for the Province to both provide resources to Indigenous communities and guidance to municipalities on how to fulfill this policy direction.	
--	--	--	--	---	--

General Changes throughout proposed Growth Plan Amendment 1

Page in GP	Policy	Topic	Description	Comments	Proposed Alternative, if any, or New Policy
3 15 52	1.1 2.2.1.4 f) 4.2.10.2	Climate Change	Updated policy language to replace “climate change impacts” with “impacts of a changing climate”	We acknowledge that this change is proposed to bring the plan into alignment with the PPS 2020 and given that the City of Burlington has no concerns.	
6 12 14 18 22	1.2.1 2.1 2.2.1.4 c) 2.2.4.9 a) 2.2.6.1 a) i)	Housing	Updated policy language to replace “second units” with “additional residential units”	We acknowledge that this change is proposed to bring the plan into alignment with the PPS 2020 and given that the City of Burlington has no concerns.	
6	1.2.2	Legislative Authority	Additional language to acknowledge proposed Amendment 1 to Growth Plan, 2019	The City of Burlington has no concerns.	
8-9	1.2.3	Consider Specific Policy Language	Additional text to provide further clarity on specific policy language used throughout the Plan such as “will” and “shall”, as well as “is not” and “will not be”.	We acknowledge that this change is proposed to provide further alignment with the PPS 2020 and to provide additional clarity. Given that, the City of Burlington has no concerns.	

34 58 65	3.2.6.2 c) ii) 5.2.5.7 7.0	PPS Reference	Updated reference from PPS, 2014 to PPS, 2020	We acknowledge that this change is proposed to bring the plan into alignment with the PPS 2020 and given that the City of Burlington has no concerns.	
57 64	5.2.4.6 6.5.2	Schedules references	Deletion of Schedule 7 reference	Technical comment – as this policy is referencing the forecasts in Schedule 3, it should also include a reference to higher forecasts established by municipalities through their MCR; consistent with policy 2.2.1.1.	The following language should be included following the reference to Schedule 3: “or such higher forecasts as established by the applicable upper- or single-tier municipality through its municipal comprehensive review”.

Proposed New Land Needs Assessment Methodology

Section		Comments
Purpose and Objectives	<p>The proposed Methodology outlines key steps for assessing community and employment land needs to the Plan horizon year. Municipalities must follow the steps of this methodology as part of the municipal comprehensive review to ascertain the amount of land required to accommodate the amount and type of additional housing units and jobs required to meet market demands in conformity with the Plan. The methodology is also used to determine whether there is a need for a settlement area boundary expansion for employment area or community area, which is all other settlement area land outside of employment areas.</p> <p>Recognizing that local needs are diverse, the proposed new Methodology aims to provide the key factors to be considered as municipalities plan to ensure that a sufficient and appropriate mix of land is available to: accommodate all housing market segments; avoid housing shortages; consider market demand; accommodate all employment types, including those that are evolving; and plan for all infrastructure services that are needed to meet complete communities objectives to the horizon of the Plan.</p> <p>It will do so by presenting a simplified approach to land needs assessment that reduces the overall complexity of implementation of the Plan. The proposed Methodology will provide more flexibility to municipalities. It will also be forward-looking and account for demographics, employment trends, market demand, and concerns related to housing affordability in the Greater Golden Horseshoe.</p> <p>Schedule 3 is the baseline to be used by municipalities. Lower forecasts for population, dwellings by type or employment are not permitted as this would lead to land supply issues which would lead to</p>	<p>The City of Burlington generally supports the simplified Land Needs Assessment methodology.</p> <p>As noted in the joint Halton- Area Planning Partnership (HAPP) submission, the City of Burlington reiterates earlier comments to the Province with respect to the introduction of “market demand” to the PPS, 2020, the 2019 Growth Plan, and now the proposed LNA methodology. It is critical to emphasize that “market demand” is only one consideration amongst many considerations such as protecting natural hazards and natural heritage with respect to implementing the Growth Plan, and, in particular, planning for settlement area expansions.</p>

	<p>housing affordability issues and land shortages. Municipalities may develop alternative assumptions about growth to the horizon of the Plan if they demonstrate they can provide a range of housing to achieve market-based demand. This includes meeting the projected needs of current and future residents and providing the basis for realizing employment opportunities in labour markets of the Greater Golden Horseshoe.</p>	<p>Further, the City of Burlington notes that the proposed new Land Needs Assessment methodology has been provided for review with high level information, which makes it difficult for municipalities and stakeholders to provide detailed comments. Some concepts have been introduced which require more clarity, such as “market contingencies”. The City requires more information from the Province in order to better understand the implications of the proposed Land Needs Assessment methodology.</p> <p>The City requests that the Province provide more funding as well as tools to support municipalities in their ability to plan for and provide public infrastructure such as schools, community centres, libraries, etc. over the long term to meet complete communities objectives to the 2051 planning horizon.</p>
<p>Implementation and Conformity</p>	<p>The proposed Methodology does not preclude municipalities from considering alternate assumptions about population and employment growth to the horizon of the Plan. A municipality may test alterative growth assumptions to establish the case for a higher density target. Assumptions that include density targets lower than those required in the Plan would require Minister’s approval.</p> <p>Land needs assessment is an iterative process involving dialogue between upper-tier and lower-tier municipalities, stakeholders, the public and the Province. The proposed Methodology will continue to be implemented through a new upper- or single-tier official plan or an official plan amendment that is subject to approval by the Minister of Municipal Affairs and Housing. Municipalities have the choice of phasing their municipal comprehensive review or achieving conformity as part of one single new official plan or a plan amendment.</p>	
<p>Timeframes</p>	<p>Municipalities must plan to accommodate forecasted growth to the horizon of A Place to Grow. Land supply to meet the full horizon of a Place to Grow is essential to ensuring consistency with the Provincial Policy Statement (PPS). Planning authorities need to ensure an appropriate range and mix</p>	

	<p>of housing options and densities are provided to meet projected requirements of current and future residents of the regional market area. This means:</p> <ul style="list-style-type: none"> • Municipalities must, at all times, have enough land with servicing capacity to provide at least a three-year supply of residential units available through lands suitably zoned in lower-tier municipalities. <p>Municipalities shall also plan to maintain the ability to accommodate residential growth for a minimum of 15 years.</p>	
<p>Testing Alternate Growth Assumptions</p>	<p>This methodology does not preclude municipalities from considering future economic, social and policy directions where these are known, particularly in between Censuses or mandatory reviews of A Place to Grow.</p> <p>Municipalities may develop alternate growth assumptions provided the population and employment forecasts of A Place to Grow are implemented in municipal official plans. Municipalities must be able to demonstrate that assumptions utilized in their land needs assessment conform with the Plan and are justifiable in light of both general trends in the province and specific conditions in the municipality.</p>	
<p>Components</p>	<p>The Methodology has various components that need to be considered when assessing local land needs. The first is the community area land needs assessment used for housing, population-related jobs and office jobs. The second is the employment area land need assessment for all various types of employment.</p>	<p>Cohort survival data (which includes deaths) is already utilized to forecast “Total Number of Housing Units Required to Accommodate Population Growth in Each Planning Period”. Why doesn’t the Land Needs Assessment Methodology incorporate forecasting for cemetery land needs as a component of complete communities?</p> <p>Municipalities are required to accommodate cemeteries to meet long-term needs (PPS, 2020) yet there is no consistent methodology to forecast demand and allocate lands accordingly. Without intentional long-range planning, cemeteries will be accommodated in a reactive manner that is likely to increase pressure on prime agricultural lands as settlement areas become built-out.</p>

		<p>See p. 30-31 of 2018 Land Needs Assessment Methodology, “Inputs / Data Sources” for Step R2: <i>Completion of this step relies upon data from two sources: Statistics Canada Census data and a municipally prepared age-structure forecast. The base year population age structure data is available directly from the Statistics Canada website. The private households by age of household maintainer data, used to calculate the household formation rates is also available from Statistics Canada, but as a special run. There are standard methods for preparing age structure forecasts based on a cohort survival model that accounts for births, deaths and migrants by age. These methods are described in more detail in the background reports that support the Schedule 3 forecasts and the Ministry of Finance’s regular demographic forecast updates.</i></p>
<p>Community Area Land Needs Assessment</p>	<p>The community area land needs assessment is based on the population forecasts from A Place to Grow – from which, upper and single-tier municipalities shall estimate households by type and housing need, then allocate the projected need among lower-tier municipalities, where appropriate. The projected need for each local municipality is translated into applicable densities and separated into housing within the delineated built-up area and designated greenfield area.</p> <p>The community area lands are where most housing required to accommodate forecasted population will be located. It also includes most population-related jobs, office jobs and some employment lands jobs. The result of the assessment is the amount of additional land required for new community area land to accommodate these homes and jobs to the horizon of A Place to Grow.</p> <p>This part of the Methodology involves components such as population forecasts, housing needs analysis, housing allocation and supply inventory and community area jobs analysis and reconciliation. These components are used to determine where and how the forecasted community area people and jobs growth will be accommodated within the upper- or single-tier municipality to</p>	

	<p>meet the intensification and density targets in the Plan and the amount of community area land needed (in hectares) to accommodate that growth.</p>	
	<p>When planning for community areas, municipalities will address policy requirements of A Place to Grow to:</p> <ul style="list-style-type: none"> • Use the population and employment forecast contained in Schedule 3 for planning and managing growth, as a minimum; • Direct development to settlement areas, except where the policies permit otherwise; • Plan to achieve minimum intensification and designated greenfield area density targets; • Support the achievement of complete communities that offer and support opportunities for people of all ages and abilities to conveniently access most of the necessities for daily living, including an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities; • Consider the range and mix of housing options and densities of the existing housing stock and plan to diversify housing options in the future, including additional residential units and affordable housing, to serve all sizes, incomes and ages of households; and <p>Plan for a more compact built form that reduces the rate at which land is consumed and supports the integration and sustained viability of transit services.</p>	
	<p>A Place to Grow requires that upper-tier municipalities, through a municipal comprehensive review, identify minimum intensification and designated greenfield area density targets for lower-tier municipalities and allocate the Schedule 3 forecasts to lower-tier municipalities. The PPS requires upper-tier municipalities to allocate the land and housing unit supply to be maintained by lower tier municipalities. In practice, the assessment will entail consultation between different tiers of government, including public consultation.</p> <p>As part of the land needs assessment process, the four components identified below provide minimum requirements to be considered when completing local land budgeting processes as part of the municipal comprehensive review.</p>	
Population Forecasts	<p>Using population forecast by age group for the housing market area, municipalities may calculate how many additional people a municipality needs to house to the Plan horizon. This involves an examination of the minimum forecasts in Schedule 3 in terms of total population, Census population and household population.</p>	<p>The City of Burlington would prefer the term “housing market area” be replaced with “Regional Market Area” to align with the PPS, 2020.</p>
Housing Needs Analysis	<p>Housing need can be broken down by type of dwelling to include age-specific household formation rates in order to forecast growth in the number of households to the Plan horizon, categorized by</p>	

	<p>dwelling type (i.e. ground-related versus high-rise). It should consider both historical and future trends for household growth by units by type.</p> <p>Municipalities may refer to background information on housing growth by type prepared as part of the review and update of A Place to Grow’s population and employment forecasts.</p> <p>Household demand can be adjusted for factors such as changes in vacancy rates, market contingencies, additional housing needs for post-secondary students, temporary workers, or units that will be lost over time for various reasons.</p>	
<p>Housing Allocation and Supply Inventory</p>	<p>Municipalities, in consultation with the public, allocate the forecasted housing need for the housing market area using factors such as past and future market shares, planned urban structure, housing affordability, and a mix of housing forms and intensification. This includes preparing an inventory of housing in the delineated built-up area, designated greenfield area, and other areas including rural settlements and rural area outside of settlement areas.</p>	
<p>Community Area Jobs Analysis and Reconciliation</p>	<p>In addition to the housing units that need to be accommodated, municipalities will need to assess the community area jobs to be allocated to the designated greenfield area to determine density targets. Estimations of persons per unit for the different housing types coupled with the projected housing units needed to accommodate growth will provide, along with the community area jobs, the amount of land needed in this area to the Plan horizon.</p>	
<p>Employment Area Land Needs Assessment</p>	<p>This part of the Methodology involves components such as employment forecasts, employment categorization and needs analysis, and employment allocation and reconciliation, to determine where and how much land is needed to accommodate the forecasted growth in jobs in both the employment areas and the community areas.</p> <p>When planning locations for employment, municipalities will address the following Plan requirements:</p> <ul style="list-style-type: none"> • Within settlement areas, make more efficient use of existing employment areas, vacant and underutilized employment lands, and increase employment densities; • Direct major office and appropriate institutional development to urban growth centres, major transit station areas and other strategic growth areas with existing or planned frequent transit service; • Direct retail and office uses to locations that support active transportation and have existing or planned transit; • Prohibit or establish a size and scale threshold to prohibit any major retail exceeding this threshold in employment areas; and 	

	<ul style="list-style-type: none"> • Provide for economic activity on rural lands that is appropriate in scale and type to the rural context. <p>As part of the land needs assessment process, these three components provide the minimum requirements to be considered in completing local land budgeting processes as part of the municipal comprehensive review.</p>	
<p>Employment Forecasts</p>	<p>Using the minimum employment forecast in Schedule 3, municipalities may establish the employment growth rate from the base year to the Plan horizon. This can involve an examination of other data sources as well such as Statistics Canada’s labour force surveys, local employment surveys, and provincial fiscal updates.</p>	
<p>Employment Categorization and Needs Analysis</p>	<p>Municipalities should categorize the total forecasted jobs in four types based on the primary land use: employment lands, population related, major office, and agricultural/rural, which are outside the settlement area. It should consider both historical and future trends for employment growth by type.</p> <p>As part of the needs analysis, employment growth by type can be adjusted for factors such as changes in economic activity, market disruptors, infrastructure and investment strategies, and other business environment impacts.</p>	
<p>Employment Allocation and Reconciliation</p>	<p>Municipalities can allocate the categorized forecasted jobs with the understanding that community area jobs are to be located within settlement areas but outside employment areas while employment area jobs are located in the employment areas. In addition, community area jobs in the designated greenfield area may be counted towards the minimum density target.</p> <p>Through allocations municipalities can determine whether there are sufficient employment area lands in the municipality to accommodate the employment growth established.</p>	