

**Growing Durham – Response to May 19 Official Plan Amendment No 128
Green Door Alliance /Durham Conservation Association**

We responded in detail to the February 24 Plan Amendment proposals and will not repeat many of those comments. The May 19 proposals are even more troubling. The Region continues to call for a 2868 hectare urban area extension in the Southern municipalities into prime agricultural land and environmentally sensitive areas to support growth to 2031. The 2868 hectare extension is broken up into 1631 hectares for living area, 351 hectares for nodes and corridors, and 886 hectares for employment lands.

1 The Province has been very clear in insisting that the Region use a forecast of 350,000 jobs in 2031. The Plan Amendment states it provides for 350,000 jobs, but also “recognizes the potential to accommodate up to an additional 25,000 jobs”.

The Region continues to stonewall citizens who have continuously asked how much less employment land would be needed and what would the schedule maps showing proposed urban boundaries look like, if the Region met the Provincial requirement for 350,000 jobs and did not attempt to accommodate an additional 25,000 jobs? It cannot be overstressed that even the Province’s 350,000 estimate was made before the economic downturn and the turmoil in the auto sector so key to Durham’s fortunes. And if the Region’s incredibly optimistic forecast looks possible in a few years, as the Province points out, there is ample time to ask for more land then.

To insist on adding 25,000 jobs, and then refuse to confirm - even when asked directly- how much of their projected land requirement is tied to these 25,000 jobs and how the schedule maps would change if the Region met the provincial requirement makes a mockery of the whole public process.

However in Growing Durham’s Final report of November 2008, Table A-1 indicates that Employment land demand would be reduced by 404 net hectares, (540 gross hectares), if the employment forecast was reduced from 375,000 to 350,000 jobs. In other words even using Growing Durham’s own numbers their forecast need for 886 gross hectares would be reduced by 540 gross hectares to 340 gross hectares. Again why can’t the public see what the implications of such a reduction would be on the proposed Official Plan maps?

2 One of our largest concerns has been with Seaton. By averaging in the more compact Seaton development with the less compact green field development elsewhere, future needs for both employment land and living area are greatly inflated; and progress towards planning more compact communities made to look far more positive than they really are.

For well over a year now we attempted to get clarification on Seaton, The February Amendment included the statement “The Population and employment forecasts for Pickering include an allocation of 70,000 people and 35,000 jobs for Seaton, in accordance with the Central Pickering Development Plan”. In our response we pointed how Seaton numbers which comprised 22% of new residents and 28% of new jobs in Durham over the years 2011-2031 weakened the Region’s case for urban area expansion.

The May 19 Plan Amendment response to this issue is to remove all statements about Seaton. Gone is the statement around 35,000 jobs and 70,000 people.

Regarding jobs we pointed out previously that Pickering plans to accommodate some 88,000 jobs **within the existing urban area boundary by 2031**, (2006 level – 32,000; 35,000 added in Seaton; 11,000 added in the major downtown urban centre; and another 10,000 added in corridors and elsewhere for a total of 88,000). Pickering’s employment forecast contained in the Plan Amendment of 76,020 - now revised to 76,720 is well below this 88,000. Seaton’s 35,000 jobs could be reduced by 30% or 10,500 jobs, and Pickering would **still** have enough land within existing urban boundaries to handle all employment needs to beyond 2031.

The May response to our query about why Pickering needed more employment land states “the proposed amendment incorrectly identified the employment forecast for Pickering including 35,000 jobs within Seaton. Upon review of further information provided by the consultant it was determined that all 35,000 jobs are not expected to be generated in Seaton by 2031.” Although the size of the reduction wasn’t mentioned in the response I was subsequently informed by Regional planners that the Region’s consultant is saying that 16,500 jobs are all that is being allocated to Seaton up to 2031 and that 75% of these or 12,375 jobs are projected for Seaton’s 400 hectares of employment lands.

We recognize that the Central Pickering Development Plan for Seaton is a ‘capacity’ structure plan and does not necessarily assume it be fully built out by 2031. However quite apart from when Seaton gets built out the consultant’s extremely low forecast of employment in Seaton would also appear to differ significantly from the opinions reflected in the Central Pickering Development Plan. The Region and their consultant for example indicate that 27 jobs per hectare is the average one should assume on employment lands and tell us they feel it is unlikely that future employment growth will exceed this level. The Central Pickering development plan assumed a higher density is possible. We support that position.

This again highlights the inadequacy of the current Growing Durham process. Little information is provided to the public on the truly important issues and when it is, it is at the last minute with little opportunity to ask questions and clarify differences of opinion.

3 With respect to residential land needs Pickering is projected to need 797 hectares beyond the existing urban area, (630 ha. of living area plus 167 ha. for nodes/corridors).

We pointed out in our earlier submission that according to the February Plan Amendment total housing units/households in Pickering was planned to grow from 34,860 in 2011 to 77,125 in 2031 – an increase of 42,265 units. The Plan Amendment tells us, (Exhibit 11), 14,354 of these units are intensification units built between 2015-2031 within the existing urban area. In addition the Growing Durham submission indicated that the number of units planned for Seaton is 23,350 about 3 people per unit for a population of 70,000 – again within the existing urban area boundary. Subtracting these two totals one is left

with 4561 units as the maximum number of units that could be used to justify urban area expansion in Pickering. We said maximum because surely some of these units would be built between 2011- 2015 outside Seaton within the existing urban boundary.

However even assuming one needs to accommodate 4561 units, this in no way justifies such a huge 797 hectare expansion in urban area. A small fraction of this amount would be all that would be necessary.

The Region has not responded to our above comment. And unlike the employment numbers for Seaton, the Region doesn't appear to be arguing that Seaton will not house 70,000 people by 2031 since in response to the Town of Ajax they state, regarding Seaton that "it is expected that the rate of development will be very high ... it is reasonable to assume that Seaton will build-out within the planning horizon."

4 Another of our concerns in our response to the February amendment was that the Region would not meet either their own policies or the Province's.

The May amendment deals with this issue by deleting and watering down a whole variety of policies aimed at encouraging density.

The policy that stated that Greenfield living areas not subject to the higher density provisions for centres and corridors should be planned to accommodate 50 residential units per net hectare, as well as the policy that stated that Living areas should be planned to accommodate a **maximum** of 70% low density residential have both been deleted from the plan, (8B.2.3). Similarly policies encouraging higher densities in Centres (8A2.3), and Regional and local Corridors, (8A.2.12), have also been dropped. And in addition the policy requiring Secondary plan areas to develop a **minimum** of 25% of the medium high density units, prior to approval of development in adjacent secondary plan areas has been dropped, (7.3.16). In addition whereas in the February amendment the secondary Plan area had to be contiguous to an existing urban area – the weasel words 'where possible' have now been added, (7.3.15)

The elimination of all these policies removes the key structural elements from the Plan – the very elements the Growing Durham has argued all along are necessary to help ensure the structure is developed in a fashion that meets Provincial Growth Plan objectives.

The only specific Growth Management objectives left in the Plan are in 7.3.10. These include the Provincial requirements of 40% intensification by 2015 and thereafter, and the provincial requirement that Greenfield areas in the southern municipalities be developed at a minimum gross density of 50 persons/jobs per hectare.

Even here though the Plan Amendment inserts a change regarding these objectives to clarify that they **only** apply on a Region-wide basis. Interpreted this way even areas as large as municipalities need not comply with the 50 person/job minimum density targets as long as the Region as a whole does. Seaton which offered a unique situation and an

opportunity to create a model for compact development then becomes part of this average and is being used not as a model but as a cover for underachievement elsewhere.

Seaton's 70,000 residents – as well as 4125 jobs planners have just told us are forecast outside employment lands - are being housed on 850 gross hectares of land in Seaton. This is a gross density of more than 82 persons per hectare if one looks at residents alone and more than 87 persons/jobs per hectare if one throws in jobs as well - far far higher than the provincial Greenfield requirement of 50 persons/jobs per hectare.

The Plan amendment tells us that the southern municipalities plan to add 305,560 new residents in the period 2011-2031. The amendment also plans 44,775 units allocated to intensification within existing built up areas in these municipalities over the period 2015-2031. Assuming an average per unit occupancy of 2 persons, 89,550 new residents would reside in intensification units. Subtracting this from the 305,560, the maximum number of new residents being added in Greenfield in the southern municipalities in the period 2011-2031 is 216,700. **Seaton at 70,000 is projected to comprise at least 32% of all new greenfield residents in the southern municipalities in the period 2011-2031.**

My point here isn't to make an exact calculation. I know the Region is assuming a density on employment lands of only 27 jobs per hectare so it will have to exceed the target of 50 in living areas and nodes/corridors in order to meet the provincial greenfield intensification requirement of a **minimum** of 50 persons/jobs per hectare overall. Rather it is to show how much results in Seaton can mask performance in greenfield beyond Seaton. Looking at persons alone, if approximately 32 % of new residents are being added at a density of 82 persons per hectare in Seaton, then in order to meet the overall provincial greenfield intensification target of 50, the remaining 68% of new residents in all Greenfield area in the southern municipalities outside Seaton would only have to achieve an average density of **only 35 people per hectare**. Surely the Province wouldn't want to let the Region to hide behind Seaton in this fashion.

We ask again the question we asked previously but did not get an answer to - excluding Seaton is the Region meeting the Provincial Greenfield target?

5 Durham's response to our concerns about the high % of low density was to state "*The Growing Durham Study proposed a region-wide housing unit mix of 50% low density, 25% medium and 25% high density on greenfield*".

This statement is a tad misleading! Growing Durham's plan in terms of built/occupied units over the period 2006-2031 is to actually achieve a low density % on Greenfield of 66 %, (see Growing Durham Report, Table 8.) We are also told the 'complete communities' that are being planned could at some point well beyond 2031 accommodate a supply of 50% low density and 25% of both medium and high. However all we'll see in 2031 is a huge potential oversupply of medium/higher densities so its hard to see why the Region should somehow get credit for something that may never impact actual housing unit mixes for the foreseeable future.

And as pointed out in our previous comments if one removes Seaton the low density % in the southern municipalities in greenfield rises from 66% to 77%. And if one now takes into consideration the fact that the May 19 Plan Amendment removes all density policies within living areas, centres, corridors etc. it is inevitable that the percentage of low density on greenfield will be much higher again - closely approximating current reality.

Much is made of planning 'complete communities'. What it means in terms of urban expansion is that not only is additional land being requested to meet **all** low density demand, in addition **even more land** is being requested to create a structure that might better accommodate medium and higher densities in living areas, nodes and corridors many years from now. The Region's approach in meeting virtually all low density demand, combined with gutting the 'complete community' structure policies contained in the February amendment aimed at increasing densities between now and 2031 will result in Durham making little progress in the next 20 years towards greenfield intensification.

6 Many groups and individuals voiced strong concern about the loss of prime farmland. The standard response to these concerns was to say that given the need to accommodate growth, and given the majority of the land south of the Moraine in Durham is class 1-3 little is gained by attempting to prioritize between local areas.

As pointed out in our earlier report there is no need to extend urban area boundaries to provide more medium or high density housing. The only need to expand into prime farmland is to provide for more low density housing. And as we also pointed out if the % of low density housing provided on Greenfield in the southern municipalities outside Seaton was reduced to 60% of the total housing mix, after correcting for the mishandling of Seaton, and using the available lands in Oshawa as requested by the Province, no expansion of urban area to accommodate more housing would be required.

Does anyone believe the Region or any municipality will end up with a better bottom line over the medium/longer term if almost 2,000 ha. of prime farmland is used to provide for **more than** 60% low density housing, rather than leaving it in farmland. And can **any** financial case be made that an urban area extension to create an isolated urban housing pocket in Pickering can be cost justified? Furthermore pricing in externalities - air quality, CO2 emissions, foodland security etc. makes the case against overwhelming.

We also note that although most of the land south of the Moraine is prime farmland some isn't. How much is there? Where is it located? If a little bit of land were needed why isn't it being considered?

To conclude we are disappointed that none of our concerns was addressed in the proposed Amendment. Our previous conclusions and recommendations remain unchanged and our overall concerns are increased by the decision to delete density policies, and the inadequacy of the process to support debate on the important issues.

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