

## **Comments on Growing Durham, Direction and Incorporation into Official Plan**

We have already responded in some detail to the June 13 2008 Growing Durham Working Paper as well as before Planning Committee in November of 2008.

We remain deeply concerned with Growing Durham's recommendations and the Official Plan Amendments proposed to implement them. Our concerns are all tied to the projected 2868 ha. extension of the urban area boundary in the Lake Shore municipalities into prime agricultural land and environmentally sensitive areas.

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.

Our conclusions and recommendations can be summarized as follows:

### **A With respect to additional Employment Lands beyond current urban boundaries**

Errors in the handling of Seaton have confused the Growing Durham analysis of future employment land needs and very greatly inflated the amount of land required.

Future Employment land needs have been further inflated by the Region's insistence on planning for 25,000 more jobs than the Province has requested and insisted upon.

After including 35,000 jobs within Seaton and planning for 350,000 jobs not 375,000 in the Region, there is sufficient supply within existing boundaries until beyond 2031.

### **B With respect to the need for additional lands for living areas, nodes and corridors**

The handling of Seaton has greatly confused unit mix in the southern municipalities, significantly inflated land needs and masked the lack of progress being made to increase densities and meet Regional and Provincial Policies in areas outside Seaton.

Far too great an emphasis has been placed on meeting demands for low density housing with no analysis of the cost and implications to the municipality of meeting such demand.

Provincial and Regional density and intensification goals are hopes only. There are no proposed action plans, (carrots, sticks, tax incentives etc.), that could turn hope into reality.

Greenfield land requirements are grossly overstated. And overall projected housing unit growth 2006 -2031 could be completely met **within** the existing urban area boundary if low density percentages are somewhat reduced.

There is no effort to avoid prime farmland or quantify the impacts of expanding onto it. No urban expansion should take place until a financial and associated action plan has been put in place, and the percentage of low density housing reduced.

If very limited expansion does take place it should not be on prime farmland.

## Extension of Urban Area to Accommodate Employment lands

In 2006 the Province required the Region to plan for 960,000 people and 350,000 jobs by the year 2031. The Growing Durham recommendations are forecasting 375,000 jobs —an increase of 25,000, plus an additional 5500 jobs on the airport lands themselves.

According to table B20 in the final Growing Durham Report, subtracting the northern municipalities, future employment land need in the southern municipalities is 754 gross ha.\*, (863 -109). According to table B20 Pickering needs 443ha. The latest projection for Pickering at the Nov 25<sup>th</sup> meeting was 437 ha.

In a November 24th letter to the Commissioner of Planning, Provincial officials have made it clear that the Provincial employment forecasts “are to be used as the basis for planning and conformity”. We strongly endorse the Provincial position that the Region should be planning for 25,000 less jobs.

However for the moment let us stick with the 375,000 forecast and look more closely at Pickering. Pickering’s employment in 2006 was 32,000. In the Official Plan amendment pages 12 and 13, employment forecasts are broken into two, a ‘main’ forecast of 350,000 jobs, and an ‘additional’ forecast of 25,000 jobs. Looking at the ‘main’ forecast table we are told that Pickering will have 76,720 jobs in 2031

The ‘additional’ employment forecast then projects that 9090 of those ‘additional’ 25,000 jobs will be in Pickering, which when added to the 76,720 provides a grand total of 86,530 jobs in 2031.

However Pickering plans to accommodate some 88,000 jobs **within** the urban area 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).

So Pickering is saying it can accommodate even its 9090 portion of the 25,000 ‘additional’ jobs **within** the existing urban area. What possible justification was there for Growing Durham’s request for 437 additional hectares of employment lands? The only remotely understandable answer is tied to Seaton.

Regarding employment densities, Growing Durham uses an employment land density of 27 jobs per gross hectare in projecting employment land needs. As far as Seaton is concerned Seaton is planning some 35,000 jobs. Using the Growing Durham overall estimate, 58% of these or 20,300 jobs would be on employment lands. Durham planners have indicated to us that 400 gross hectares of employment lands are assumed for Seaton. Dividing 20,300 jobs by 400 hectares gives us a gross density of 50.75 much higher than Growing Durham’s overall estimate of 27 used to calculate the need for employment lands.

*\*It should be noted that in a November 25<sup>th</sup> presentation to Council, Growing Durham forecast an additional 132 gross ha. additional to future employment lands for the southern municipalities, (an increase from 754 gross ha. to 886 gross ha.) This increase was largely a result of not subtracting the 119 ha. Employment land surplus in Clarington before calculating the need for new employment lands in the southern municipalities. The Province’s Nov 24<sup>th</sup> letter to the Region clearly states this 119 ha. supply in Clarington needs to be factored in before considering urban area expansion. Therefore we have continued Durham’s Final Report factored in before considering urban area expansion. Therefore we have continued to use the estimate of 754 ha. contained in the Growing Durham’s Final Report*

We have been asking for nine months now to have numbers for Seaton separated because we were convinced that higher planned densities in Seaton were masking under achievement elsewhere. This seems exactly what has happened in this instance. As the note below indicates, the only logical explanation for requesting an additional 437 hectares in Pickering is because Seaton's greater employment density was used to justify additional employment land beyond Seaton.\*\*

Lets go back now to the 754 hectare estimate highlighted in the second paragraph of this section which is the projected employment land need of the southern municipalities after following the Province's instruction to utilize surplus lands in Clarington (see note p-1). And let's deal only with the 'main' forecast using the 350,000 jobs the Province has requested, and eliminate the 25,000 jobs in the 'additional' employment forecast – 9090 of them in Pickering and 14320 of them in the other southern municipalities.

As already indicated Pickering, has absolutely no need for the 437 hectares of employment land proposed by Growing Durham.

Next take the 14,320 job portion of the 25,000 'additional' jobs in the other southern municipalities. Lets take Growing Durham's forecast that 58% or these or 8306 jobs which would be placed on Employment lands requiring some **308 hectares** assuming again Growing Durham's 27 jobs per hectare estimate.

To conclude then by removing Pickering's unneeded **437** hectares and removing also the **308** hectares associated with meeting the 'additional' 25,000 jobs – a total reduction of **745** hectares, one completely is left with a projected total land need in the Region of only 9 hectares, ( 754-745)!!!

However there is really a surplus not a deficit since Pickering tells us that they can still accommodate those 9090 jobs that were eliminated as part of the overall 25,000 job reduction. We conclude then there is absolutely no need for additional employment lands in the southern municipalities.

We point out in addition that forecasting employment is an extremely difficult exercise particularly given current economic trends. Going beyond this to separate those forecasts by type of employment and whether it will be located on employment lands, central areas, living areas or at home is doubly difficult. And then one has to further estimate the employment land density which again can vary greatly.

Furthermore adjustments not only have to be made between gross and net developable employment land to estimate reductions due to environmental and natural heritage concerns. In addition some further reduction has been made to the net developable land supply to reflect land vacancy - land which due to marketability issues has not been considered developable in the 2006-2031 time frame. The Growing Durham June Report, (see appendix M), estimates this at 20%. We have no way to assess the appropriateness of this reduction.

*\*\* If one assumes one has to plan for 35,000 jobs in Seaton and say an additional 4,000 jobs in Pickering ; assumes 58% of these 39,000 jobs or 22,620 jobs need to be housed on employment land; divides this by 27, their estimate of average employment density; one gets a forecast employment land need of some 837 hectares; subtract Seaton's 400 hectare employment land supply and voila – one is left with 437 hectares – Growing Durham's actual request for additional employment land in Pickering! No doubt we don't have the numbers exactly right but this appears to be the type of calculation Growing Durham made.*

And as appendix M points out as well, one of the factors affecting marketability of some of these parcels is current lack of servicing and one of the possible ways to address this is the introduction of a Regional industrial development charge as recommended in the Region's DC background study. A portion of this charge would be used to cost share with non residential developers wanting to extend sub-trunk services to their property. Again we would ask the question - If such a system were implemented, how much additional land might become developable before 2031 and would not that further reduce the need for new employment land?

In conclusion eliminating the 25,000 jobs and using 35,000 jobs for Seaton more than meets employment Land estimates until 2031. In addition given the great uncertainties in forecasting future employment land requirements and existing supply noted above, and the likelihood that supply within the existing urban boundary has been underestimated; and given the Provincial Growth Plan itself is subject to a ten year review, and the Region plans to update its forecasts every five years, there seems no earthly reason to expand urban areas in the southern municipalities to designate more employment lands at this time. And **if** for some unknown reason it is felt necessary to add a small amount of additional employment land, an alternative that does not use prime agricultural land should be pursued instead.

### **Extension of urban area for living space**

#### **a) Sorting out the impact of Seaton**

Table 8 in the updated Growing Durham November submission provides a breakdown by municipality of projected urban housing unit allocations within the built up and Greenfield areas 2006-2031. We have asked for nine months now to have numbers for Seaton broken out on this same basis so we can see the overall impact Seaton is having. We have yet to receive an answer. More recently we have also asked to see a similar Greenfield unit mix breakdown which separates estimates for living areas from nodes and corridors. Again we have been told this breakdown is unavailable.

Since Growing Durham's table 8 separates figures for Pickering, one way to get some handle on what some aspects might look like without Seaton is to take Growing Durham's numbers and subtract Pickering. This we have done in table 1 below.

Another way of doing it is to use the one reference to Seaton we have found in the Growing Durham material – a foot note to table B-9 which states "*the assumed unit supply in the Seaton lands is the following: low density – 7517; medium density 8,901, high density 6932, total 23,350.*" We recognize that by relating these supply numbers for Seaton into a table outlining Growing Durham's recommended unit growth scenario we are mixing two somewhat different elements. Accordingly any Seaton related numbers in table 1, Page 5 are in italics to highlight the difference.

**Table 1 – Urban Housing Unit Allocations on Greenfield 2006-2031**

	Total	Low Density		Medium Density		High Density	
		Number	% of Total	Number	% of total	Number	% of total
Seaton	23,350	7,517	32.19%	8,901	38.1%	6,932	29.68%
Pickering Incl. Seaton	32,020	15,496	<b>48.39%</b>	11,563	36.11%	4,961	15.49%
Ajax	8,574	5,229	60.9%	2,196	25.61%	1,150	13.41%
Whitby	19,886	14,343	72.13%	3,060	15.39%	2,483	12.49%
Oshawa	17,978	14,245	79.23%	1,373	7.64%	2,361	13.13%
Clarington	17,746	14,224	80.15%	2,557	14.41%	965	5.44%
Total (excl Pickering)	64,184	48,040	<b>74.85%</b>	9,186	14.31%	6,959	10.84%
Total ( excl. Seaton)	72,854	56,019	76.89%	11,848	16.26%	4,988	6.85%
Total	96,204	63,536	<b>66%</b>	20,749	21.57%	11,920	12.39%

We have been told 70,000 residents are being planned for Seaton and they will be accommodated in 23,350 units. The proposed amendments to the Official Plan project housing unit growth in Pickering for the period 2011-2031 of 42,265. After subtracting Seaton units (23,350), plus intensification units planned for 2015-2031, (14,354 - see Plan Amendment p - 42 ), one is left with 4,561 new units.

Since realistically no units built before 20011 could be located on new, yet to be approved greenfield, and because it is highly likely that at least some of these 4561 units will be built **within** the existing urban boundary in the years 20011-2015, 4561 is the absolute maximum number of units that according to the plan amendment would be built on **new** greenfield until after 2031.

Yet Growing Durham has asked for an urban area extension in Pickering of 797 hectares, (630 hectares of living area plus 167 hectares for nodes/corridors), to provide for what at most could be 4561 units. This is an unbelievably low density! Section 8B.2.3 in the consolidated amendment to the Official Plan states that Greenfield living areas should accommodate a minimum average density of 50 residential units per hectare. This translates into 23 units per gross hectare. Using the Region’s own proposed policy then, these 4561 units should be housed on 198 gross hectares – 599 hectares less than the Growing Durham projection of what they require! And remember - as explained above even this is almost certainly an overestimate.

Again, as with employment projections, the only logical explanation for such an extravagant projection of land is that a lower density was assumed for Seaton.

Let's assume the 4561 units on average house 3 people for a total of 10,683. Durham Planning has told us that Seaton's population of 70,000 will be accommodated on 850 hectares a density of 82 people per hectare, far in excess of the provincial target of 50. However if one adds Seaton's population to the 10,683 for a total of 80,683 and then divides this by 1647 hectares – Seaton's 850 and the 797 being requested – one gets a combined density of 49 persons per hectare – very close to the provincial standard of 50.

I have done this analysis quickly and stand corrected if I have made a mistake, but can come to no other conclusion than higher densities within Seaton have been mistakenly averaged into the equation resulting in large overstatements of land requirements beyond Seaton.

### **b) Clarifying density levels and Regional targets/Policies beyond Seaton.**

As table 1 indicates if one excludes Pickering, 75% of Greenfield growth in the other southern municipalities is low density, and excluding Seaton 77% is low density.

Many of us have been closely involved with Seaton for many years and enthusiastically supported it, provided it was used as a more compact mixed use model for greenfield development. We are dismayed that it appears to be being used not as a model but a cover for underachievement elsewhere.

Also excluding Seaton, what is the density being planned within the other green field lands in the southern municipalities? Also it is hard to believe that excluding Seaton the Region will meet the Provincial minimum density of 50 persons/jobs per gross hectare, since they just barely planned to meet it with Seaton included.

We note that unlike the Growing Durham Report, the Plan Amendment itself makes no mention of the actual size in hectares of the urban area expansion but talks instead about policies such as meeting the overall provincial **50 persons/jobs per gross hectare target**. Section 8B.2.3 in the consolidated amendment to the Official Plan states *“Green field living areas not subject to the higher density provisions for centres and corridors should accommodate a minimum average density of 50 residential units per net hectare”*, (my highlighting). To compare this with the Provincial Standard, if one assumes say 2.7 persons per unit and expresses it in gross hectares rather than net hectares, 50 units per net hectare translates into some 62 persons per gross hectare – enough when combined with the employment density of 27 jobs per gross hectare to meet the province's intensification target of 50.

Is this approximately the number that was used in drawing up the maps that show living areas and appear as schedules in the Official Plan Amendment? Since there have been many changes and adjustments in future land requirements over the period of the Growing Durham process it would be very helpful to be able to confirm the gross hectares projected on the map for future living, nodes and corridors, and employment.

Our chief concern with the Growing Durham study is that apart from Seaton, it goes far too far in striving to meet the demand for low density housing, and does far too little to encourage higher densities. The study even goes counter to Provincial requirements and does not even make use of an available supply of some 1529 units in Oshawa before calculating their future Greenfield requirements because they feel there would be lack of demand. Assuming 13 units per hectare, greenfield needed would be reduced by 118 hectares.

Yet the Growing Durham Study itself recognizes that one of the key factors in making it more difficult to make the shift to medium/higher densities is the availability of the urban land supply. They state, (p-36), “ *the long term shift towards a greater mix of medium and high density housing forms is anticipated to be driven by a combination of housing price/affordability, demographics (i.e. population age structure),and the diminishing availability of future land supply in Durham Region and the Greater Golden Horseshoe*”, (highlighting added) . So the Region seems to be shooting itself in the foot. Its strategy to meet demand for low density ends up making it more difficult to encourage their goal of medium/high density. As a result, as long as land continues to be made easily available, infrastructure is provided, and sprawl costs ignored to meet almost all demand for low density housing, it will be very difficult to change the percentage of low density built on greenfield land.

We also do not know what is happening in nodes and corridors. As already noted table 1 above shows that excluding Pickering, 75% of all greenfield growth in the southern municipalities - **in living areas and nodes/corridors combined** - is low density. If 10% of the units were comprised of medium/high density growth in nodes/corridors as opposed to living areas, then the % of low density in living areas outside Pickering would move from the 75% shown above to 83.5% very far removed indeed from the proposed policy stated in Plan Amendment 8B.2.3 of a 70% maximum for low density in living areas alone.

As mentioned we have asked Durham planning staff if they could break out by density type, how much green field growth is occurring in nodes and corridors as opposed to living area and would like to plug in their projections rather than our speculations. How can the stakeholders of Durham be expected to evaluate the merits of the plan without basic information like this?

Granted the low density is a bit denser than in the past from a unit density point of view. The Growing Durham report talks of 23 units per net ha. as a current low density level- some 20% lower than the Growing Durham assumption of 28uph. However as the Growing Durham Report indicates, with reductions in family size, persons per unit are decreasing by some 11% over the period and much of this gain in density disappears.

**It is critical to stress that the need for more Greenfield for housing in the southern municipalities is Not because there is a shortage of potential supply to house people; it is because the supply has a deficit of low density and a surplus of medium/high density.**

As table A-1 in the final Growing Durham Report points, in conjunction with supporting supply and demand tables that break out units by municipality, if one excludes the northern municipalities there is a unit deficit of some 15-16,000 low density units within the existing urban area in the southern municipalities, but a surplus supply of medium/higher density units in Greenfield and within the built up area that matches this deficit.

The sole reason then for needing more Greenfield land in the southern municipalities is to satisfy this 15-16,000 unit low density deficit. If instead of catering so much to low density demand, as reflected in table 1, the southern municipalities outside Seaton could plan for a Greenfield target of say 60% low density instead of 77%, the number of low density units would be reduced from 56,019 to 43,712 a reduction of 12,307 units about 80% of the greenfield deficit mentioned above.

Looked at another way, **assuming the Regional growth plan assumption of 13 units per hectare this would result in 946 less hectares of land being required! This combined with the reduction already mentioned of 599 hectares to correct for the handling of Seaton, and the 118 hectare reduction noted re Oshawa on page 7, amounts to a reduction of 1663 gross hectares more than the 1631 hectare extension for living area being requested!** And as for the additional 351 hectares requested for nodes/corridors it is useful to keep in mind as table 9 in the Growing Durham report points out much of this is an oversupply that will not be used till beyond 2031.

So if a target of 60% low density was struck beyond Seaton there would likely be **no need for any additional Greenfield beyond the existing urban area boundary.** We stress that we are talking of a 60% greenfield average combining living area and nodes/corridors. In order for the Region to meet its own proposed policy of having a maximum 70% low density residential within living areas, if even 10% of overall growth was in nodes/corridors, they couldn't meet their 70% target without also meeting the 60% overall Greenfield target we mention above.

Alternatively, some of this low density could be accommodated in Clarington where the issue of expanding on to prime farmland could be avoided while also reducing environmental concerns.

Furthermore no effort is made to improve upon the Provincial **minimum** intensification and greenfield density targets. Given the available opportunity in places like Oshawa, a higher intensification target should be required. As indicated in past comments in 2008, the area even considered for intensification is a very small fraction of the overall existing built up area, (479 ha for the region as a whole – see table B-7).

We also understand that Growing Durham has unrealistically assumed Seaton will be built out by 2021. Since a faster build out makes it easier to meet the Province's intensification standard which beginning in 2015 requires 40% of new residential units be built within built up areas. Seaton phasing should be assessed and its impact on intensification targets assessed.\*

Reading the Report one gets absolutely no sense that the number shuffling the Growing Durham study goes through in order to change unit mixes, and project intensification levels in order to barely meet the Provincial standard, is at all likely to take place.

As the Growing Durham Report suggests in order to be realized, even their estimates of planned housing Unit allocations and efforts to shift to higher densities are going to need to be supported by tax incentives, Revised approaches to development charges etc. (see Growing Durham Report p-54 and as discussed earlier with respect to employment lands). We are very concerned that if the Province approves the massive projected expansion of urban area, before a financial analysis has been conducted and development charge changes and other carrot and stick incentives implemented to encourage demand for higher density, we will be sitting here decades from now with an even higher percentage of low density than is being projected making it unlikely that even provincial minimum targets can be met. Without this detail Growing Durham isn't presenting a plan. All they are presenting is a vague hope exactly akin to the Federal Governments's commitment to lower greenhouse hugely by 2050 – without any action in place to bring it about!

\*As an example if Growing Durham were to assume the Seaton build out is spread equally over the 12 year period 2010 -2021, then some 9729 units would have been built before 2015. If the more realistic build out before 2015 was half that, 4805 units would be shifted to 2015 and beyond, resulting in a requirement that 40% of this amount or 1946 additional units would have to be built within existing built up areas.

We note also that as both the Provincial letter referenced earlier, and comments from Ajax point out, the Growing Durham report in netting out land that it considers inappropriate for development is doing so in a manner inconsistent with the Province's growth plan.

Moving now to financial considerations we ask - 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 for low density housing rather than leaving it in farmland?

In this regard the Report prepared for the Environmental Commissioner of Ontario in June of 2008 on the Economic Implications and Consequences of Population Growth, land use trends and Urban Sprawl references a US. Study that states "**new residential developments result in a net increase in property taxes for existing residents because the public costs associated with residential development exceed the public revenues that accrue from it**". It is hard to believe that housing developments north of the existing urban boundary particularly like the proposed new living area in Pickering in the isolated location and the density being contemplated, would ever be financially self supporting. Shouldn't we investigate this before including it in the urban area boundary?

As futurist and author Richard Florida, puts it in his report Ontario in the creative Age, *"the mega-region is our main source of connection to the world economy and main competitive asset. The stronger it gets the stronger the province will be in the global competition for talent, creativity, investment and jobs."* He stresses we can dramatically improve productivity by encouraging density, and concentrating development, and cutting out commuting time by improving connections within the mega region – new subway lines, high speed rail etc.

And of course evaluating whether to replace prime farmland with housing is far far more than just a question of municipal bottom line. Does the Region attribute any additional value to maintaining more farmland and countryside? Agriculture in Durham is also one of our largest employers. if one factors in all of these considerations as well, where is the financial justification for replacing farmland with housing?

The Province requires that boundary expansion in prime agricultural areas can only occur when there are no reasonable alternatives to avoiding them. Yet agricultural and environmental considerations are not even referenced in the Growing Durham Scenario evaluation. Yet as every year passes, and the likely impacts of global climate change on food production become better understood, the importance of retaining such land becomes more obvious.

There are also environmental values to consider. We support the other requests that the carrying capacity of the Caruthers creek watershed be assessed before any decision to expand urban area boundaries and not at the secondary planning stage.

We would ask the Region, and the Province. What possible case can be made that it is in the interest of Canadians, Ontarians or Durham residents to pave these lands, rather than take more aggressive efforts to modify the housing supply, create more compact, efficient communities, and stay very largely within existing urban boundaries and if/when one has to go outside them consider less valuable land that is available? On what basis is this an unreasonable alternative?

We are not talking of not providing homes for people. We are talking about offering a more compact affordable alternative particularly when the option is to squander farmland. And even if for a short period growth in Durham slowed slightly because of the lower supply of low density housing until the more compact forms on offer gained in popularity what possible problems does this create? When will we get the point —as long as subsidized greenfield is on offer it is very difficult to influence demand to higher densities.

We again summarize our conclusions and recommendations:

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We appreciate the opportunity to comment

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