

*Green Door Alliance
Durham Conservation Association*



Response to June 13, 2008 Growing Durham Working Paper
Green Door Alliance / Durham Conservation Association / Rouge Duffins Greenspace Coalition

When the process for revising the Durham Official Plan began some 5 years ago the Region prepared a number of discussion papers – one dealing with Population, Employment and Urban Land. In this discussion paper the forecast for 2031 called for 1,054,060 residents and 422,655 jobs. The current forecast used in the Working Paper, (960,000 residents and 350,000 jobs) is considerably lower.

However even with higher population and employment estimates the Regional Planning Department at that time forecast a land deficit by 2031 at the Regional level of only 474 ha. Not only that, they stated that “If the Region were to develop at a higher density of 24.7 uph (10 upa) consistent with a more mature urban state, it would not need additional land to accommodate forecasted residential growth for approximately 35 years (i.e. approximately 2036).”

We are strong supporters of creating firm urban growth boundaries that only get changed after all reasonable efforts have been made at intensification within existing boundaries. This is particularly important where urban boundary expansion is on prime farmland and land with sensitive environmental features such as the Caruthers Creek watershed. Easy access to more and more green field land shields decision makers from facing up to the need to impede sprawl and work toward sustainability.

Therefore we are dismayed by the Growing Durham Work Paper. The Regional Growth outlook we are told, will require an additional 2169 ha to accommodate residential growth alone to the year 2031. And by the time individual municipal needs are considered; employment lands are added; and some further adjustments are made, the working paper talks of a need for an additional 4294 ha for the recommended 3rd scenario. The Working paper even illustrates (Table O-2), a few further additions to scenario 3, (which add land for future centers, contiguous living area, and strategically located employment land), which raise the overall land total beyond the urban boundary to 4670 ha.

We have the following comments.

Directors

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Intensification in Built Up Area

The Working Paper limits intensification within the built up area to Regional Corridors and Centres, and Potential Activity Areas. A whole series of adjustments are then made – many of them highly questionable which further reduce the land available for intensification. The land available is first netted down by 25% to provide for infrastructure; Land in Regional Corridors is reduced by a further 25% and Regional Centers and Potential Activity areas reduced by a further 50% on basis that intensification would not occur before 2031; and finally a further overall reduction of 20% in land is applied to reflect non residential uses.

At the end of the day after all these adjustments the Working paper concludes that the total land available for intensification is only 327 ha. This appears to be less than 1.5 % of the area. And so much for any other intensification in other parts of the built up area! There is not even consideration given to obvious approaches such as assessing and encouragement in house suites.

As a result of this reluctance to really tackle the issue of intensification it is no wonder then that even the Province's minimum 40% intensification target may not be met. And even if after further refinement, a plan is developed to barely meet this standard we hope the Province will demand much more.

Greenfield Development

The Provincial Growth Plan sets out a series of policies governing urban area expansions. One requires that Provincial intensification targets are being met. As mentioned above the Working Paper may not meet the 40% minimum target related to built up areas. In addition the minimum 50 person/job per ha. greenfield target is not being met.

It may well be that the Region will be able to slightly modify this projection to meet the Provincial minimum target of 50. However we have doubts that this minimum is sufficient to meet other provincial greenfield requirements to for example, “ create(s) street configurations, densities, and an urban form that support walking, cycling and sustained viability of transit services.” We would also point out that the Provincial minimum was set a few years ago before skyrocketing gasoline prices, and increasing concerns about climate change and car dependence created added impetus to more aggressively change the way we plan communities. In addition creating a long term projection which shows one meeting a minimum provincial target more than 20 years in the future provides little assurance that even this minimum will be met.

As a result we feel the Province should require the Region to not only develop plans to meet and exceed provincial standards but also achieve some actual results before any urban area expansion is approved.

We would also make the following points:

- Considerably more Greenfield land is needed if needs/availability are calculated at a municipal as opposed to Regional level and a surplus of land in one municipality is not used to offset a deficit in another. We find the Provincial Growth Plan wording a bit confusing here and would hope that the Province would very largely if not completely apply their standards based on Regional - not individual municipal plans.

We are also concerned that the need for additional greenfield is driven too much by current market demand. For example if in a particular municipality there is a 10,000 unit deficit in low density housing and a surplus of 3,000 in medium density, the Working Paper projections of land needs calculate a Greenfield requirement for 10,000 low density units not 7,000.

- Successful implementation of the Smart Growth Policies will involve imposing some limits on the supply of low density housing . The issue is not what the market wants but what is affordable in the future.. Over the years this has happened with respect to 10 acre lots; 1-2 acre estate residential; and now imperatively to the percentage of low density housing forms that are made available and affordable...

We recognize the complexity of moving in this direction but the need to do so is becoming increasingly necessary and the Working Paper is far too hesitant here.

What is the downside even if the residential growth in Durham slowed slightly because some of the low density supply was limited and other more compact mixed use community forms encouraged? Taking tracts of prime farmland for low density housing does not add to the long term financial health of either the Region or the Municipality. And increasingly given gasoline prices and lack of transit in such areas it is becoming more costly for individuals as well.

- Seaton is projected to have 70,000 residents and 35,000 jobs, and is planned to be completely built out by 2031. It is planned as a compact model as opposed to the typical Greenfield development. The Growing Durham Working Paper provides no information with respect to the actual low/medium/high density estimates for Seaton that have been used in the paper. Knowing these numbers would be very helpful since to the extent that they are well in excess of the 50 person/job provincial green field intensity target they might provide some insight into what may be possible elsewhere. And if they are not much higher then we would be most concerned that the vision of Seaton as a model is being undermined.

Also although we have been told that Seaton does not distort the overall 47-48 person /job per ha green field intensity projection referenced in the working paper, until we know the actual projection we cannot confirm this. Since Seaton is supposed to be a model and since it comprises more than 25% of all Greenfield residential growth in the Region to 2031, it is a critical omission not to clarify what the person/job targets are not only for Seaton but for Greenfield development apart from Seaton.

- 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 and recommendations around alternatives.

We are particularly concerned about extending the urban area boundaries into the prime farmland that is also within the headwaters of the Caruthers Creek watershed.

With respect to environmental considerations, the Toronto and Region Conservation Authority has recently prepared a report outlining their concerns with respect to the Caruthers Creek watershed, as well as recommending steps for further study to better inform any decision making in this area before the Official Plan update is completed. We strongly endorse completion of these studies.

As far as prime farmland is concerned, 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 and more obvious.

Again we would ask both 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 communities, and stay within existing urban boundaries? 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 alternative that conserves foodland and provides housing at an affordable price without huge Municipal/Provincial infrastructure subsidies.

We very strongly believe that given the ever changing reality, the Province should require that this continuing loss of prime farmland throughout the white belt be studied before any inroads contemplated by Durham are ever given consideration.

We note that the Provincial Growth Plan requirements for settlement area expansion suggest any expansion make land available for a period not exceeding 20 years. 2031 is some 23 years away. Given the very uncertain times we are in, economically and environmentally, at the global, national and regional level, we would recommend that if a decision were ever made to expand urban boundaries, that the expansion only make new land available where no alternative is possible. We are entering a fundamentally new era requiring conservation of energy, land and infrastructure. Past planning criteria such as a 20 year supply of green lands at obsolete densities are no longer valid

Conclusion

We are told that the next phase of the Growing Durham Study will involve refining the preferred growth scenario. We feel **'refining'** is not nearly enough.

We seem to be going down a track where even looking optimistically, all that refining might accomplish is to enable the Region to create a plan – a plan that may or may not ever be met - that at best will barely meet minimum Provincial intensity standards. This would involve a 3500-4500 ha addition to the urban area and all the whitebelt lands in West Durham would be used up – lands that are primarily prime farmland and among other things involve urbanizing the headwaters of Caruthers Creek. And once all the whitebelt lands in west Durham disappeared great pressure would once again build up to modify the greenbelt boundaries and urbanize the Pickering Agricultural Preserve.

We note that one of the Province's criteria for allowing settlement area expansion is that such expansion would not "adversely affect achievement of the intensification target and density targets, and other policies of this plan". If after slight refinement the Province were to approve the Working Paper direction it would largely remove any pressure to change development patterns. It would largely be more of the same until we approached 2031 and significantly water down the Growth Plan policies.

We urge the Region and the Province before any decisions are made to introduce a fourth scenario that assesses the implications of essentially maintaining existing urban growth boundaries until the year 2031, (perhaps a few

very small modifications could be given consideration). Under this scenario the issue of intensification would really have to be addressed not sidestepped as is now being done. And if as a result of maintaining boundaries, residential growth in Durham slowed slightly for a few years while demand for more compact housing alternatives increased, by all means compare all the financial and other implications within Durham and the broader GTA.

Our organizations have for years been interested in fully costing out alternatives by introducing all costs associated with land use alternatives including so called ‘external’ costs – costs borne by the public such as air pollution and its health and environmental impacts, land loss, congestion, accidents etc. This link within the GTA between patterns of development and such costs was quantified by the GTA Task Force in 1995, which concluded that half the costs of sprawl were external costs.

Compare two alternatives – one, the Growth Plan scenario which results in a larger more car dependant urban envelope, and second, an alternative that stays within a smaller, less car dependant urban envelope, while saving thousands of hectares of adjacent farmland. Make an effort even on a simplified basis, to include an assessment of these ‘externalities’— the broad public impacts of these alternatives. If that were done we have no doubt that the Working Paper approach would be very significantly modified. The Provincial Policy Statement, (PPS), which governs land use decisions, references these broad public impacts.

The PPS places great stress on approaches, “which efficiently use land and resources ... minimize negative impacts to air quality and climate change, and promote energy efficiency efficiently use infrastructure and public service facilities”, and only use prime agricultural land when “there are no reasonable alternative locations”. We propose that comparing the above mentioned alternatives, and bringing in and attempting to quantify these broad public impacts referenced in the PPS, should actually be a requirement in order to ensure that the PPS is being complied with.

We appreciate the opportunity to comment.

Sincerely,

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