

Regional Council - June 3rd comments on Plan Amendment 128

Thank for the opportunity to speak. Given time constraints I'll focus on the major issues.

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.

We have asked for a year and a half now for a breakdown between Greenfield population and employment forecasts for Seaton and greenfield forecasts outside Seaton.

We were unable to get any information until the Region's February 24 plan amendment which stated clearly that the that the Regional forecasts for Pickering "include an allocation of 70,000 jobs people and 35,000 jobs for Seaton, in accordance with the Central Pickering Development Plan."

In our comments on the Feb amendment we pointed out that if the Region stuck with the 350,000 employment forecast the Province requires, and Seaton took 35,000 of those jobs, there was absolutely no requirement to expand urban area boundaries to include **any** additional employment land – the Regional case went up in smoke!

The revised May 19 proposal's response has been to state that the feb amendment incorrectly identified 35,000 as the employment forecast for Seaton by 2031 – its now apparently considered to be only 16,500 less than half the previous number. I haven't yet had the time to explore the rationale for this greatly reduced number since I just got it at the last minute. It seems awfully low to me and inconsistent with previous studies but until I have the chance to study earlier forecasts I won't comment further.

On the people side Growing Durham agrees Seaton will handle 70,000 residents by 2031. **70,000 is at least 32% of all new greenfield residents in the southern municipalities in the period 2011-2031.**

Seaton's 70,000 residents are being housed on 850 gross hectares of land in Seaton. This is a gross density of more than 82 persons per hectare - far far higher than the provincial Greenfield requirement of 50 persons/jobs per hectare.

One can see then 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?

Growing Durham refuses to provide any information on the density being planned on the new urban lands they are requesting be added to the urban area. They continue to lump it in with Seaton so no one can see exactly what density is being planned.

We were delighted by the Province's May 25th comments. They mirror many of our key concerns. With respect to employment lands how clear does the Province need to be. They state clearly that any request for future employment lands, "**must be revised**" to match their 350,000 and not be based on the additional 25,000 the Region wants to include. They said essentially the same thing last November but the Region ignored it.

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.

However from one of the tables in Growing Durham's Final report of November 2008, Table A-1 one can calculate that under the 350,000 job estimate even Growing Durham indicated their forecast need for 886 gross hectares of employment land in the southern municipalities would be reduced by 540 gross hectares to 340 gross hectares. That's without raising Seaton and other issues.

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 their own 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.

Along with the Province we are very concerned with the high % of low density being proposed on Greenfield. 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.

Many groups and individuals voiced strong concern about the loss of prime farmland.

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 this massive proposed addition to the urban area even more overwhelming.

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.

Brian Buckles, Phone – 905 649 3331, buckles@zing-net.ca
For the Green Door Alliance and the Durham Conservation Association

