



Plan Amendment 128; the Province's Draft Decision; and the Region's response
June 4, 2010

We have responded in detail to Plan Amendment 128 in 2009 as well as to the February draft amendment that preceded it.

As that response indicated we had serious concerns. The amendment called for a 2868 hectare urban area expansion in the southern municipalities, 1631 hectares for living area, 351 hectares for nodes and corridors, and 886 hectares for employment lands. We did not believe, and continue to believe that none of this expansion is justified.

The Province's Draft Decision – March 12 2010

In particular we were delighted then that the Provincial Draft Decision response refused the 1234 hectare expansion proposed in Pickering as well as some much smaller expansions planned elsewhere.

The Provincial Response indicated the Region's employment numbers were too high and with less employment planned for Seaton than contained in the Central Pickering Development Plan – all resulting in the inclusion of employment lands 'without justification'; that existing designated and approved residential lands were excluded from the analysis, and certain infrastructure inappropriately netted out of the Greenfield density calculations; and that the proportion of single and semi detached housing in designated green field areas appeared too high (around 70%).

Given these Provincial comments which we fully support, we were surprised then that while cutting back significantly on the urban area expansion, the Province appeared however to be supporting the urban area expansion in Whitby of some 1222 hectares.

In our analysis after adjusting the Region's employment figures, the handling of Seaton and other adjustments mentioned by the Province, if the Region were to reduce the proportion of single and semi detached housing on Greenfield outside Seaton to 60%, no expansion of urban area would be required. We also stress the importance of removing Seaton from Greenfield density targets. Rather than the 70% mentioned by the Province above we had calculated that the % of low density in Greenfield in the southern municipalities excluding Seaton was actually an abysmal 77%! So much for transit supportive communities!

Interestingly, and as pointed out in our comments in 2009, the initial February 2009 Regional Plan Amendment contained, (section 8B.2.3.), stated “Greenfield living areas not subject to the higher density provisions of section 8A for centres and corridors should be planned to accommodate” a “ **maximum** 70% low density residential.” (My highlight) Most unfortunately this section, plus the section dealing with policies to require higher densities in nodes and corridors were both dropped in Plan Amendment 128.

Had these targets been included and met, the higher densities required in nodes and corridors would have increased the overall percentage of higher density in Greenfield – and could well then when averaged with the maximum of 70% low density in living areas alone – have reduced the overall low density percentage in Greenfield areas as a whole to something like 60%.

We hope it is not too late for the Province then to reconsider at least the extent of urban area expansion in Whitby particularly when it appears to be at such a high % of low density. And equally important we urge the Province to reinstitute in the Regional Plan Policies requiring density targets to be met within areas, and not allowing the Region to meet one overall greenfield target, piggyback on Seaton, and basically put off the requirement to build more compact greenfield communities for another generation, greatly hastening the time when they will be asking for further expansion onto prime farmland.

Report to June 8 Planning Committee re response to the Province’s Draft Decision

We have read the Report to Planning Committee and have the following additional comment:

1 The Report seems to suggest, (see page 7), that “based on further discussions with the Province”, the Province is willing to go along with allowing the Region to only have to meet a gross density target of 50 persons and jobs per hectare for the entire Region.

Members of our Organization have been involved with the planning for Seaton for the past 20 years and more. We would be completely dismayed if the vision of developing a compact Greenfield model at Seaton ends up having the completely perverse effect of enabling **all** other Greenfield developments throughout the Region beyond Seaton to avoid meeting Provincial growth standards aimed at creating compact transit supportive communities. Surely the Province does not want to achieve an objective in which its own planned community fuels continued sprawl throughout greenfield in the rest of Durham. What a legacy that would be!

2 With respect to employment forecasts the Region is finally prepared drop their plan to include 25,000 more jobs than agreed to by the Province. Having done that however, in Seaton in the planning period to 2031, they continue to plan for 70,000 residents but only for 16,500 jobs, rather than the 35,000 planned for by the Province.

There seems absolutely no justification for such a low job number. According to the 2007 Hemson study 58% of the jobs in Durham in the period to 2031 are projected to be on employment lands. This would place some 15,000 of the 35,000 jobs in Seaton outside the employment lands, with the employment lands at full build out accommodating according to the Hemson report between 16,700 and 20,000 jobs depending on achieved density and developable site area.

One can debate then whether by 2031, 35,000 jobs in Seaton may or may not be achievable but to drop that number to 16,500 seems very self serving indeed. Use of such a low number is being used as an attempt to demonstrate the need for additional urban area expansion in North East Pickering. Growing Durham's plan Seaton in the year 2031 is for 70,000 residents and 16,500 jobs – an abysmal people/jobs ratio of 4.2/1! Is this the Region's and the City of Pickering's vision for Seaton in 2031?

3 Finally the Report to Planning Committee asks for authorization to take the Province to the OMB if the Province doesn't back off on key issues among them allowing for urban area expansion in North East Pickering.

So what this report is proposing is that taxpayer's money be squandered by the Region and the Province in a battle to promote unneeded urban area expansion and unconnected sprawl development in Pickering before any fiscal and environmental studies are completed. Such development would not on its own meet Provincial Greenfield development standards; and is on prime farmland, in the environmentally sensitive Caruthers creek area.

In conclusion we urge Planning Committee to:

- Reconsider its vision for Seaton in 2031 of 70,000 residents and 16,500 jobs - a people/jobs ratio of just 4.2/1!
- Reconsider meeting the Province's Greenfield density standard without including and piggybacking on Seaton.
- Reconsider its opposition to the Provincial draft decision not to allow urban area expansion in Pickering.
- Change its view and not squander public money by threatening the Province with an OMB challenge.

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