

Green Door Alliance / Durham Conservation Association

Response to Durham Official Plan Review Discussion Papers

Overall we found the discussion papers and the information and proposals contained within them to provide an excellent basis for recommending Changes to the Official Plan.

A. Discussion Paper on Population, Employment and Urban land

Urban densities and boundaries

We very much support the Discussion paper proposal to delay any consideration of change to urban area boundaries until 2007.

The discussion paper suggests that in the meantime land needs be monitored with the area municipalities. We recommend a far more intensive study than this comment suggests to enable Region and their municipal partners to have a workable appropriate approach towards achieving greater intensification.

The ROP calls for 20% of all population growth to be accommodated within urban areas through intensification. However there seems absolutely no means of ensuring that even such a goal is met as well as your related “desired (planned) gross density of 17uph(7upa).” As far as actual performance towards intensification is concerned the Section Highlight section, (p-36) which talks of intensification occurring in keeping with the ROP provision, seems over positive. The discussion itself points out that two thirds of the units built within the urban area between 1991 and 2,000 are units produced within plans of subdivision. Only a third really qualify as intensification. This third amounts to some 15.5% of the Plan target of 20%, and while the number has increased in 1999 and 2,000, it was at its lowest levels in 1997 and 1998 so it is hard to see this recent upsurge as a real trend.

The discussion Paper shows an overall land surplus within the urban area until sometime between 2026 and 2031, with Pickering/Ajax running out between 2021 and 2026.

I am particularly interested in the discussion paper comment 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). (My highlighting)

We urge the Region to initiate a much broader study and debate over the next 5 years before considering any expansion to urban area boundaries, about what the most appropriate intensification targets might be and how one can take steps to ensure they are met. Expanding urban area boundaries to cover needs 30 years from now based on making no further improvements to existing intensification targets set in 1993, doesn't

seem the way to approach this issue. Shouldn't for example the southern urban corridor in Durham be approaching the more mature urban state referred to above by 2031?

Overall population Forecasts and Job to Population ratio

The discussion paper tells us that while the reality of location may in the past have hampered Durham's population growth relative to other parts of the GTA, the Region is well positioned to get more growth in the longer term "especially **as available land supply diminishes in other parts of the GTA**".

The way I read this is that a major part of Durham's 'success' in future' will result from the fact that we will be one of the few areas left within the GTA with extensive green fields to sprawl into. Other Regions/municipalities will presumably have to concentrate more on intensification.

We do not suggest that Durham should not grow significantly over the next 20-30 years. However additional residential growth **on its own**, without employment does not add to the Regional/municipal bottom line – Indeed work we have done suggest the reverse.

As the discussion paper points out Durham with a jobs to population ratio of 31.6% lags Halton (45.4%, Peel and York (both 47.7%) and Toronto (52.5%). The discussion paper also indicates that Durham's jobs to population ratio has declined since the late 1980's.

Our question then is – why doesn't Durham take a firmer stand on its urban boundary and decide not to expand it not just over the next 5 years, but the next 30 years, or at least not expand it unless/until Durham's job/population ratio improved significantly?

Taking such action would encourage intensification within urban areas and might not affect population forecasts at all. On the other hand, even if it did affect population forecasts slightly, and for example rather than population more than doubling over the next 30 years, population were to not quite double, wouldn't this aid the Region financially, while at the same time encouraging more efficient use of land?

B. Discussion paper on Protecting our Rural Resources

Scale of Rural Growth

We note the expressed desire to move from the word **target** used in the current Official Plan for things like population, households, employment etc. which implies a desired state, to **forecast** which is the best possible estimate based on historical trends, reasoned assumptions, and anticipated impact of future anticipated policies.

The rationale for change is that the word target in the current Plan has created problems at the OMB where development proponents have argued that their development should be approved because it is needed to help meet the Region's desired objective.

We support this change in some instances. However we wonder whether in other certain instances the use of the word forecast could also create problems. We are particularly concerned with rural population estimates. We feel that in estimates of **rural** population it should be clear that while such estimates are not desirable targets that the Region wants to meet, that **the Region views this as an upper limit and does have a desire to not exceed them** since the objective is to ensure that the great majority of the growth is accommodated within the southern urban corridor where the infrastructure and services can be provided more effectively. If that is not clear in the Plan, development proponents in rural areas will no doubt argue that since the Region has provided no estimate of what it considers to be a desirable upper limit of growth in rural areas, proposals which result in exceeding what is merely a forecast aren't really a problem.

Rural Settlement Policies

We strongly support the discussion paper recommendations that the policies that provide for the consideration of new Country Estate Residential subdivisions; new rural clusters; and rural residential infilling within concentrations of 10 acre lots be deleted; and that no new Hamlets be designated.

As far as hamlets are concerned we concur that hamlets be the predominant location for rural settlement. We have two main issues with respect to hamlet development:

- The Coppins Corners experience adds to our concern that in order to support the ROP goal to “strengthen, preserve and foster the cultural attributes and historic heritage of rural settlements”, there should be limits in the plan to the scale of development that can occur within a hamlet over any say ten year period. Perhaps these limits should be expressed as a % of the size of the hamlet. Certainly historic and cultural attributes aren't supported when developments like the Sandhill proposal at Copins Corners dwarf the existing community in size, and bear no real relationship to it.
- In addition too perhaps limits should be placed on the size of hamlets. What about 1,000 residents? At anything around or even approaching this size, they should be given another designation and be subject to different evaluation.

When hamlets start to reach this size individual services on large lots stop making any sense. If the hamlet is to continue to grow some form of municipal servicing should be required. Unless this happens we could end up with hamlets with residences on 1-2 acre lots that sprawl over the entire countryside and bear less and less resemblance to, and have little in common with the historic central areas on smaller lots.

Severances

We support the discussion papers approach towards severances.

C. Discussion Paper on Sustainable and healthy Environment

We are generally supportive of the policy direction proposed and will focus our comments on the following:

Land Securement Strategy

Members of the Green Door Alliance and the Durham Conservation Association have been very supportive of land securement initiatives. Members of these groups raised over \$ 100,000 some five years ago to assist the TRCA to acquire a 90 acre largely mined Aggregate pit adjacent to TRCA lands. More recently Environment Canada officials tell us that our members and friends have donated conservation easements on more land than has been donated across the entire Moraine.

Over the past few years, in partnership with the Municipality of Uxbridge and other conservation/trail organizations we have been involved in Uxbridge *Naturally*. The main aims of this group are natural heritage protection, and the creation of a trail network within our countryside and our communities that is second to none.

We have plans to build on the existing ORM and Trans Canada Trails, and trails in Conservation and Regional Forest lands and connect them to the communities and particularly the Town where a major portion of Uxbridge residents live as well as to other lands such as the 7500 acre Federal Green space lands.

This effort has received terrific leadership and support from the township of Uxbridge. The TRCA, developers, aggregate producers and business owners have also provided great support... We have also received financial support from the Trillium Foundation in support of trail initiatives, and hope to receive support in future from the Oak Ridges Moraine Foundation and others. We also recognize that we need to raise further significant support from individual citizens.

Naturally then we enthusiastically endorse the suggestion that the Region develop a land securement strategy along with a fund to support that strategy. We would hope that this strategy can be developed quickly so that the overall intent and focus of that strategy could be reflected in the ROP itself. We are also concerned that delay in developing such a strategy may result in missed opportunity.

The Financial support of the Region is critical here. We can raise some private funds, and the municipality and conservation authorities has been very supportive, but organizations like the Moraine Foundation along with other potential donors will only give one dollar if at least two and probably three dollars are raised to go along with it. The Region's financial support will be critical here.

Trails

It would also be helpful in this respect if the Regional Official Plan made some more specific mention of support for recreational trails in addition to natural area conservation.

As the discussion paper points out (p-32) ,”The ROP designates a continuous open space system To protect and connect the Oak Ridges Moraine, environmentally sensitive areas, waterfronts, valleylands, wooded areas and wildlife sanctuaries ‘for their special natural and scenic features, their roles as predominant landscape elements in the Region, and the recreational opportunities they facilitate.’”

One of the key recreational opportunities is passive recreation – hiking, bird watching, outdoor education, cross country skiing, mountain bike riding, horseback riding etc. The provision of trails and facilities to support these efforts is critical. The Moraine Plan has a specific section, (39), dealing with trails, and stressing the importance of establishing a trail system across the Moraine. It would be helpful if the ROP supported trails in a similar fashion, particularly trails like the ORTA and Trans Canada Trails that link the Region or other trail links that connect communities and other public lands like the federal Green Space lands.

Surely too since the ROP discourages growth in the countryside, and wants the focus for growth to be predominantly in the urban areas, with the predominant location for growth in the countryside to be in the hamlets, it is important to make the countryside as accessible as possible to its citizens and to provide recreation and tourism opportunities for the broader public.

Support for trails is not merely financial. Provisions in the plan such as the ability to create lots for conservation purposes (see below) is essential. Other kinds of support are also helpful. As a member of both the Uxbridge and Pickering/Ajax chapters of the Trans Canada Trail Committee involved in locating and implementing the trail, the Regional concerns around trail routing and liability issues in relationship to use of Regional Forest lands and crossing of Regional roads has dragged out the process greatly. A strong commitment to trails in the ROP itself would help in sorting out such issues.

Lot Creation for Conservation Purposes.

We very strongly support amending the ROP to allow consideration of a severance aimed at facilitating conveyances to public bodies or non profit entities for natural heritage conservation/trail purposes.

Without being able to create a severance in certain limited instances, it will not be possible to raise the public funds necessary to create the desired natural heritage/trail linkages.

Even the Moraine Plan (section 32 (1) 5 specifically indicates a lot may be created for the purpose of “facilitating conveyances to public bodies or non-profit entities for natural heritage conservation”

It is important to be clear about the various forms such a severance should be able to take:

- An individual with say a 100 acre property could donate a portion of it to a conservation body or non profit entity.
- A conservation body or non profit entity could acquire say 100 acres; retain say 90 acres for conservation purposes, and sell the remaining 10 acre lot of record.
- An individual could donate 50 acres of a 100 acre property splitting the remaining acreage into two lots of records; say one of 40 acres the other 10 acres which the individual retains.

In the first two instances above, one could argue that no additional lot of record would be created. In the last instance a second lot of record is being created and retained by the original owner. However if in this example, getting hold of the 50 acres met an important public conservation objective, then we feel strongly that such a severance should be allowed. Clearly the best alternative would be to try to get someone to donate the land. However many people just can't afford that level of generosity. And if a public body had to pay market value for such land it could be worth hundreds of thousands of dollars in an area like south Uxbridge, and other locations in the Region.

We feel very strongly then that the ROP should state it supports the consideration of lot creation where it facilitates conveyances to public bodies. The wording should be broad enough to support the above mentioned examples.

Clearly as well, the Region would want to consider many other factors before any such approval. These would range from environmental considerations; the appropriateness of any specific lotting proposal relative to other Regional policies; the degree to which the proposal will indeed have public benefit etc. We completely agree such an approach should be used sparingly and only where there is a significant public conservation/recreation benefit.

We appreciate the opportunity to comment and look forward to further opportunity for involvement as the Plan Review process unfolds.

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On behalf of the Green Door Alliance and the Durham Conservation association