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## **Submission re. Envision Durham**

### **Growth Management Strategy report and Housing Intensification study technical report**

**October 4, 2021**

#### **About the Rescue Lake Simcoe Coalition**

The Rescue Lake Simcoe Coalition (RLSC) is an umbrella organization representing 28 groups that empowers local groups to take action to protect Lake Simcoe's health. We focus on promoting dialogue between citizens and their governments around the lake. One of RLSC's primary objectives is to encourage land use planning decisions that will protect the lake as well as forests, wetlands, and working farms within the Lake Simcoe Watershed. Currently, our work centers on maintaining or improving the Lake Simcoe Protection Plan (LSPP) and ensuring its full implementation.

Regarding the Growth Management Strategy report and Housing Intensification study technical reports, we wish to thank staff for presenting information in a helpful manner, with reasonable timelines for public input. The reports referred to here make the case for intensification to meet both demographic and affordability realities witnessed today. Our comments are summarized here, and a few points are elaborated on below.

## SUMMARY OF COMMENTS

- Council's declaration of a climate emergency compels action on intensification, the protection of farmland, and responsible planning of new communities that minimizes the need to drive for day-to-day services and shopping.
- We would like to see no boundary expansions that would harm the strength of the Region's agricultural sector, the integrity of the Rouge watershed, or the Rouge Watershed management plan.
- It appears that impact to Lake Simcoe should be minimal and we appreciate that. May it continue!
- We are pleased that staff have articulated that the minimum intensification rate of 50% is achievable, and that it is being framed such that it supports the provision of more affordable housing, a greater range of affordable housing options, and an aging population. We note that it also reduces strain on the environment and farming, and supports fiscal sustainability at the municipal and regional levels. We would like to see those arguments presented in future reports. We support a higher intensification rate, however, with a minimum of 60% intensification.
- We urge caution about building extensively where new GO stations are going to be built but do not exist today. Building permits for new housing should be provided after the station building has begun. We have seen examples of housing developments being built with GO stations promised and the station does not materialise. Clearly, this is no way to reduce vehicle emissions from commuters.
- We note that both population and employment projections are aspirational, as noted in the reports, and urge caution about oversupplying land for building. Strong phasing policies are necessary.

Further detail on select points:

### Gentle intensification

While there is plenty of rationale in the reports for intensification and high and middle density structures, there is ample opportunity to consider leveraging private capital held in the middle class by supporting the development of secondary suites in existing homes. We feel that assuming that only 3% of appropriate units buying into Ontario's "Add a second Unit in your House" program offering up to \$30,000 for homeowners renovating to build a second suite, is low. More could be done to bump this number up. It is the lowest cost, the more re-distributive option, takes advantage of provincial funding for now at least, and helps to integrate low-income people into stable communities rather than ghettoizing them. See page 38 of the Housing Intensification Report.

### People per unit

The people per unit (PPU) rate in Fig 5-12 shows PPU in 2016 of 2.92, and the PPU projection for 2051 is 2.77. The assumption that people per unit will go down over time, and the low 2.43 average across the different housing types is an assumption that could result in oversupply of housing, given the risk to existing employment. The report states that "over the next 10 to 20 years, 42% of the Canadian labour force is at high risk of being affected by automation, either through significant task restructuring or elimination," (p. 61). In times of economic uncertainty, more people live in a home, stay at home longer, or bring aging parents into their home to save on costs. One could easily form an argument that there would be more people per unit in 2051, not less. While we too want the Region to attract jobs and for people to be employed, we are

concerned that the assumption about employment is flawed, and that still, in 30 years, there will be an unsustainable rate of commuters using Durham as a bedroom community for areas of high employment (Toronto, Peel, and Hamilton primarily), and related GHG emissions.

#### Population forecasts

As shown in the GM study, Figure 4-1: Historical and Forecast Population Growth for the Greater Golden Horseshoe (GGH), 2001 to 2051, there is a glaring discrepancy between statistically accurate annual population growth in the GGH Outer Ring 2000 - 2016 (20,600) and the Growth Plan's forecast (38,500). The forecast is almost double the historical trend. "The 2020 MOF population growth projection for Durham Region for the year 2046 is 913,200 (or approximately 280,000 persons lower than the Growth Plan forecast)". P. 66. Employment growth is equally distorted at 9,600 from 2000 - 2016 vs. 17,600 looking to 2051 through the 2020 Growth Plan lens. (Figure 4-2) As noted in the report, the population projections are aspirational and caution must be exercised in response.

Many critics of the province's LNA methodology have pointed to the risk of oversupplying land based on "ambitious" rates of growth that are unlikely to pan out. No compelling rationale has been presented that substantiates the assumption that more people will be able to work where they live. Businesses have continued to predominantly set up shop in Toronto, Peel and Hamilton, and in the absence of programs that require employers to set up in the outer ring there is no reason to think that the employment targets and land allocations for employment land in this report are more realistic than the historical pattern which says otherwise.

We urge staff and Council to use the advice presented here, and for staff to continue planning in 5-year increments, with a lot of attention paid to phasing controls. Avoiding overbuilding infrastructure is key to Regional financial sustainability.

Thank you for the opportunity and time to comment on these pieces of your MCR. We will analyze and provide comments on the Community Area Land Needs soon.

Sincerely,

Claire Malcolmson



Executive Director, Rescue Lake Simcoe Coalition