



January 18, 2023

To: Envision Durham Planning Team; Brian Bridgeman, Commissioner of Planning and Economic Development; and John Henry, Regional Chair and CEO

Re: STOP SPRAWL DURHAM SUBMISSION TO ENVISION DURHAM PHASE 2

Stop Sprawl Durham was formed in 2021 to engage Durham Region residents in the Municipal Comprehensive Review process, known as Envision Durham, that would shape the future of our Region. Our mandate was, and is, to demand that Durham Region leaders deliver sustainable neighbourhoods *within our existing urban boundaries* that benefit all of us—enabling affordable housing options, protecting farmland and natural areas, promoting viable public transportation, creating neighbourhoods that are safe for walking and cycling, and reducing our Region’s carbon footprint.

We fully supported Envision Durham’s goal to “plan for **fundamental change** by replacing the current ROP and establishing a **progressive and forward-looking planning vision** for the Region to 2041 [amended to 2051]” (Source: [Climate Change and Sustainability Discussion Paper, May 2019](#), p. 1). However, the goal of the Envision Durham exercise was undermined on May 3, 2022, when the Planning Committee recommended a scenario that had not been part of the formal Land Needs Assessment Public Consultation process, BILD 2A—subsequently adopted with a vote of 16/11 at Regional Council.

On October 25, 2022, the Province unveiled the profound changes of Bill 23. On November 4, it further announced the Greenbelt land removals, which amounted to approximately 5,000 acres in Durham Region. Six days later, on November 10, Envision Durham released Phase 2 documentation that had been prepared without addressing these new land-use directions (i.e., Bill 23) and the Greenbelt land removals.

The public is challenged to understand why the Region would continue with Settlement Area Boundary Expansions (SABEs) given that, at some future date, the Regional Official Plan will cease to exist and will be subsumed into lower-tier municipal Official Plans, as stated in [Report #2022-COW-33](#).

Durham Region is hurtling towards a plan for boundary expansion that is seriously flawed and lacking adherence to the policy considerations and supporting data that are crucial to a livable future for residents of Durham Region.

There is irrefutable evidence that what is contemplated by the BILD scenario (2A) and the Province’s new housing policy reflects the most **regressive** land-use and environmental

planning agenda in Ontario's history (see [Doyle, 2023](#)). The impact of Scenario 2A was described in the [May 24, 2022, Planning Staff memo to Council](#) (p. 15 of 18), as outlined in the chart below.

Goal	Objective	Description	Commentary
Goal 1 – Environmental Sustainability	1.3	Protect, preserve, and restore the natural environment, including greenspaces, waterways, parks, trails, and farmlands (intensification targets, preservation of natural green space)	The BILD Scenario would include additional farmland within the urban area beyond what is required to achieve the provincial forecasts.
	1.4	Demonstrate leadership in sustainability and addressing climate change (net-zero targets)	The BILD Scenario moves further away from achieving net-zero.
	1.5	Expand sustainable and active transportation (prioritizing active transportation and pedestrian oriented public realms)	By providing for less compact communities, the BILD Scenario places higher priority on automobile travel.
Goal 2 – Community Vitality	2.1	Revitalize existing neighbourhoods and build complete communities that are walkable, well-connected, and have a mix of attainable housing (compact, walkable/bikeable development in proximity to transit infrastructure)	The BILD Scenario assumes future communities will be: spread further afield, less compact, where proximity to transit and cycling facilities are likely to be more remote and less economical.
Goal 3 – Economic Development	3.3	Enhance communication and transportation networks to better connect people and move goods more effectively (transit-oriented development planning)	The BILD Scenario would require transportation networks to connect at greater distances, moving people less effectively while making transit use less efficient.
	3.5	Provide a supportive environment for agriculture and agri-food industries (preservation of farmland in Durham)	The BILD Scenario would place more farmland under pressure for urbanization than is necessary to achieve the Region's population forecast to 2051.

Durham Region Planning staff and Regional Councillors know that there is sufficient land already allocated to meet the need for housing and employment development within existing urban boundaries. There are significant housing units draft approved and in the processing pipeline; however, provincial and municipal governments must use all policy levers available to ensure these houses are built in a timely manner (see the below data on subdivision and condominium applications and approvals and on building permit activity in Durham from [Planning and Economic Development Committee Report #2022-P-20](#)).

Subdivision and Condominium Applications and Approvals, 2018–2021

Durham wide Indicators	2018	2019	2020	2021
Applications Received	42	23	31	43
Applications Draft Approved	37	30	23	16
Plans Registered	44	28	40	38
Active Applications	366	369	345	346
In Process Residential Units	27,787	25,863	25,714	28,476
Draft Approved Residential Units	30,075	34,788	33,257	33,433

Envision Durham must be paused and a realignment of land inventory, housing targets, policy goals, and funding capacity should be undertaken. Given the lack of clarity about the full extent of Development Charge changes, the Region must undertake fiscal impact studies to understand the implications of servicing of all SABEs. It is wholly irresponsible to proceed with these expansion scenarios without a clear timeline and financial plan for infrastructure and services, among other complex and significant new realities. If locked in, these future growth areas will undermine the long-term financial health, agricultural wealth, environmental health, and well-being of Durham residents. Envision Durham’s Phase 2 draft settlement boundary expansions and area municipal growth allocations are based on out-of-date information and should not be moved ahead and accepted into the ROP—proceeding with this draft will lead to an inherently bad plan that wasted a lot of time and money and that does not live up to Envision Durham’s foundational visions and goals.

Thank you for considering the details of this submission.

Stop Sprawl Durham
StopSprawlDurham@gmail.com

cc: Walter Schummer, Mayor; Michael Jubb, Regional Councillor; Adrian Foster, Mayor; Granville Anderson, Regional Councillor; Willie Woo, Regional Councillor; Dan Carter, Mayor; Bob Chapman, Regional Councillor; Rick Kerr, Regional Councillor; Tito-Dante Marimpietri, Regional Councillor; John Neal, Regional Councillor; Brian Nicholson, Regional Councillor; Kevin Ashe, Mayor; Maurice Brenner, Regional Councillor; Linda Cook, Regional Councillor; David Pickles, Regional Councillor; Wilma Wotten, Mayor; Ian McDougall, Regional Councillor; Dave Barton, Mayor; Bruce Garrod, Regional Councillor; Elizabeth Roy, Mayor; Chris Leahy, Regional Councillor; Rhonda Mulcahy, Regional Councillor Maleeha Shahid, Regional Councillor; Steve Yamada, Regional Councillor; Shaun Collier, Mayor; Marilyn Crawford, Regional Councillor; Joanne Dies, Regional Councillor; Sterling Lee, Regional Councillor