



Jade Schofield
Town of Whitby
575 Rossland Road East
Whitby, ON L1N 2M8

May 24, 2022

Re: Draft 1 – Whitby Climate Adaption Plan

Thank you for reaching out to the Durham Region Home Builders' Association (DRHBA) for our comments on Draft 1 of the Whitby Climate Adaption Plan.

As evidenced by our partnerships with the Region of Durham and local municipalities, our work with NRCan and their LEEP (Local Energy Efficiency Partnerships) programs, and our participation with various advisory and working groups on energy efficiency, the Durham Region Home Builders' Association is committed to working collaboratively with all levels of government to create an effective path for a greener future.

We appreciate the expertise from those who specialize in sustainability, energy efficiency and environmental sciences, and appreciate the opportunity to share our expertise in any way we can.

While we can agree that climate change is happening and steps need to be taken to reduce greenhouse gas emissions and to improve sustainability, we also need to recognize that as an industry these changes cannot happen overnight and that there are real obstacles that need to be overcome before some changes can be implemented.

The plan prepared by Whitby contains a very broad, and very false and misleading statement that urban flooding is the direct result of development. This statement is based on an assumption that new developments are built with completely unmitigated storm controls. This is not true. In fact, all new developments come with very strict storm control measures that not only protect these new developments from flooding, but actually ameliorates floods in adjacent and surrounding areas. These storm control measures can be anything from stormwater management ponds, stormwater conveyance piping systems, stormwater retention tanks, overland flow routes and conveyances and low impact development initiatives throughout developable parcels of land. Engineers working through development approvals in conjunction with the conservation authorities and Town staff are required to safeguard the public and property, and as such, there is extreme care to ensure that

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all development occurs in a safe manner, which includes the prevention of flooding. The statement that new developments result in urban flooding, would insinuate that none of the foregoing occurs and that developments are approved haphazardly.

With respect to Low Impact Development initiatives (LIDs), we as an Association have been in support of the use of these within development plans. However, as an industry, there is a constant struggle with municipalities to allow the use of these LIDs within municipal properties, whether they be in right of ways or park and open space blocks. To date, Whitby has taken the stance that these LIDs can only be placed in private property. This creates situations where future homeowners will need to be responsible for maintenance of these LIDs if they are included within their lots. Furthermore, it restricts homeowners from the ability to ever complete any landscape or pool project in their backyards. If the Town really wants to advocate for green initiatives and assisting with the flood proofing of future communities, the town must allow these LIDs within current and future town properties.

The plan also speaks to the increased desire for more street trees to be planted in new developments. The boulevards where these trees would be planted are already congested with street furniture such as transformers, utility boxes, light poles, etc. and in order to build more trees, a larger right of way would be required. As this larger right of way requires more land, it would substantially increase the cost of homes in the Town of Whitby. As affordability is already a major point of concern in our society, driving up the price of homes in order to allow a few more trees to be planted, would fly in the face of affordability and the dream of home ownership.

DRHBA would also like some clarity with respect to the zoning that the Town is proposing to implement to prevent development in potential flood zones. In Durham Region, all development plans must be approved by CLOCA. Does the Town feel that CLOCA is not meeting its mandate on protecting environmentally sensitive areas? If that is not the case, the Association feels that these Town-imposed restrictions would simply be redundant – a duplication of standards that already exist.

As a general note about the adaptation plan, it is difficult for DRHBA to provide feedback on the plan as a whole without more information, especially with respect to the derivation of the costs included in this plan. We would appreciate if the Town could provide us with some of the costing information used to create this plan. The numbers associated with many of the plans do not appear to be accurate and appears to be either inflated or deflated in order to sway opinion on the issues that the Town may have experienced. Furthermore, we believe that some of the costs of the solutions are not accurate as well. Additionally, some of the solutions presented in the report come with a large price tag, however, no commentary is provided with

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respect to where these funds will be coming from. The benefits identified in the report are also based on assumptions, which we believe have not been appropriately vetted. As a result, there is no guarantee that any of the anticipated benefits will actually be realized.

The Association would like to also note that the report states that the future scenarios are using an RCP 8.5 climate model to predict the scale of climate changes impacts, however RCP 8.5 is a model that utilizes coal energy, which is a source of energy that is not used in Ontario. By using a model that does not reflect the reality of the energy sources that are being used in this province, the predictions and assumptions will be skewed and inaccurate.

We would like to ask that Town staff reach out to us and our team to further discuss our points of view that we have presented. We look forward to working with the town collaboratively and look forward to reviewing the next draft of Whitby's Climate Change Master Plan and working with you to create a greener future for the next generation.

Sincerely,



Stacey Hawkins
Executive Officer
Durham Region Home Builders' Association

Cc:
Tiago Do Couto, President, DRHBA
Emidio Di Palo, Chair, GR Committee, DRHBA
DRHBA Membership

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