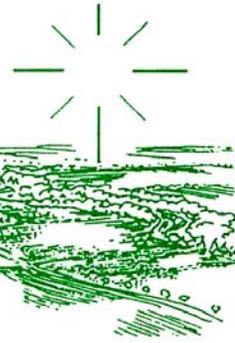


Green Door Alliance



Response to: PLACES TO GROW:
A GROWTH PLAN FOR THE GREATER GOLDEN HORSESHOE
Discussion Paper, summer 2004. By: L.D. Almack

INTRODUCTION

The Green Door Alliance Inc., (GDA), a not-for-profit research group evolved from the People or Planes 1970s opposition to a Pickering airport and new city. POP correctly forecast that a second airport was not needed: forecasts of increasing noise disturbance at Pearson would be mitigated by the US quiet engine program, passenger forecasts were grossly exaggerated and the high cost of fuel would discourage air travel.

The GDA is proud of its roots and its ability to predict future trends supported by on-going research. The GDA continues to be very committed to the monitoring of land use and growth issues. Please refer to: www.greendooralliance.ca for reports and comments since 1992 relevant to “Places to Grow” under the heading: Publications:

- Smart Growth Thoughts and Recommendations June 31, 2001
- Smart Growth – Appendix, June 2001
- Sprawl – Smart Growth, Aug. 2001
- Provincial Policy Statement Review – Comments and Letter, Oct. 2001
- Pickering Growth Management Study, Buckles, 2003
- GDA Comments on Phase 2, Preferred Growth Management Concept
- Pickering’s Agriculture Preserve Easements: A Political History, Apr. 2004
- A Vision for the Agriculture Preserve, 2003
- Letter and Submission to the Green Belt Task Force, July 2004
- Planning Reform Initiative, Aug.31, 2004

Following this introduction is a PREAMBLE that records GDA support for the province’s initiative and provides general comments on concerns, impediments and strategy. The section headed CRITIQUE analyzes statements made in “Places to Grow” and following each quotation provides analysis of the issue raised. Finally there is a SUMMARY OF RECOMMENDATIONS.

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PREAMBLE

The GDA is pleased to note a change from the exploitive non-sustainable planning of the past eight years. The GDA is very supportive of this provincial initiative, brought forward by the current Liberal government. In the Critique that follows we praise the concepts e.g. “building communities” and “proposals for reform” They provide a good starting point but we wonder if the strategies are adequate to meet the serious long term challenges facing our society.

The GDA appreciates the daunting challenge facing the government. The public tends to ignore future threats until forced to deal with reality when a crisis happens. By then it is often too late to soften the effects of change. We are all expert at closing the barn door after the horse has escaped¹. But government has a responsibility to lead – to plan future change for a soft landing. A laissez-faire strategy would let the crisis develop until inefficient, exploitive land use resulted in a high cost, non-competitive and socially debilitating society. This is not the legacy this government intends to pass on to our grandchildren.

This generation of baby boomers does not remember the 1930s when the house building boom of the 20s crashed and suddenly there were high vacancy rates for all shelter. A slowdown in our economy can have a similar impact – dwelling supply could double due to economic necessity. Parents would move in with children or children with parents. Several extended families would share accommodation. This would be forced intensification—better that we plan the future.

The Growth Plan attempts to forecast 30 years into the future. It states:^{*1} *“The Greater Toronto Horseshoe **will** grow by almost four million...and about two million jobs.”* Also: *“The importance and benefits of new growth are clear. Our society and cultural diversity are our strength and will be the source of continuing growth. It is this growth that allows the region to prosper, generating nearly two-thirds of Ontario’s GD....”*

This estimate is not a certainty as implied. Population growth could be larger or smaller Economic/political forces beyond Ontario’s control may inhibit growth and some of the perceived benefit may be illusory. Alternately Ottawa may decide that for humanitarian reasons we should accommodate many more immigrants. Significant recession/depression is not impossible. GDP is not a sound measure of wellbeing. Exploitation and pollution add to GDP but do not enhance our quality of life. The simplistic assumption of a 50% ratio of jobs to population may not arise. To accommodate an unknown future and avoid hardship, planning for economy, efficiency, competitiveness and sustainability should be implemented sooner rather than later.

It is conceivable that future demand for housing could plummet, particularly for high-priced commuter-shed dwellings. Economic necessity could double the supply of single family housing when families double up and extended families share accommodation. Gardner Church, a Deputy Minister in the Government of Ontario, warned some 15 years ago that some day the 5-bedroom mansions being then built in Markham would by necessity become fourplexes. To avoid obsolescence and waste infrastructure should only be built incrementally to respond to an obvious, immediate need.

The objective of the “Places To Grow” document is educational – to convince the public of the need for change. Hopefully a final policy will be more specific. Ontario needs a new vision of the good life: a vision that explains that the citizens of the Netherlands are not deprived, are not less happy and are in fact more healthy and grow taller than the more sedentary Ontarians despite living in compact communities, conserving foodland and travelling by foot, bike and transit. We

^{*1} Page 7 Para 1

• Authors emphasis

need to dispel the myth that the good life is a multi-room energy inefficient dwelling build on a recent farm that wastes 2 hours every day trapped in gridlock.

Green field developers promote this myth by advertising and lobbying municipal councils. Municipal councils frequently reject smart growth proposals in support of neighbours NIMBY protests. Councils welcome developers proposals and the cash flow provided by lot levies – the costs come later.

The government’s strategy will require incentives for smart growth. Municipal co-operation will not be forthcoming in many municipalities unless developer influence over Councilors is mitigated. As long as campaign financing is mostly provided by developers doing business with the municipality, reform will be difficult. Developer dollars talk louder than environmental and social groups. The media and citizens have trouble getting the complete picture.

CRITIQUE

The Critique is presented in the order provided by the “Places To Grow” discussion paper. Each comment starts with a quotation from “Places To Grow” followed by GDA observations, expressions of concern or suggestions to consider.

1. *“More compact development could save about 20% in infrastructure costs compared to existing growth patterns.”*²

The 20% figure may be a reasonable first phase goal based on a modest strategy to curb urban sprawl. The impending crises demands a far more ambitious goal over a longer time frame.

2. *“Throughout the region, municipalities have generally designated the places where growth should occur within the 20 year time span of the official plans....”*³

The 20 year or 10 year land supply referred to is a quantity as accurate as defining distance as the length of a piece of string. Municipalities, excepting Toronto, have traditionally designated future urban areas based on traditional low density, existing building codes and publicly funded infrastructure for new bedroom developments. They have assumed that almost all growth would be new green field subdivisions. There has been little serious study of intensification potential. Pickering, in co-operation with two developers, recently completed a “Growth Management Study” that ignored the potential for smart growth redevelopment, infilling and intensification opportunities. During the public meetings the GDA repeatedly asked that the potential of existing inner urban serviced land be evaluated before deciding on the amount of new land that would be consumed. The city and its developers were only interested in developing open space.

3. *“Various studies suggest that that there is sufficient land available within the currently designated urban envelope to accommodate the majority of growth over the next 15 to 25 years.”* and *“... by being more efficient and developing primarily within existing urban areas*

² Page 5 para 8

³ Page 9 para 2

we can build upon the business and investment attractiveness of existing communities, support our key economic and employment centers and enhance our economy's competitiveness.”⁴

In the GDA comment on the Greenbelt proposal we quote a Durham Region Discussion Paper that: “if the Region were to develop at a higher density of 24.7 uph consistent with a more mature urban state, it would not need additional land to accommodate residential growth for approximately 35 years.” But this is without pursuit of intensification – infilling and redevelopment. The statement above, “...to accommodate the majority of growth over the next 15 to 25 years” does not agree with the proposal on page 21 to accommodate only 40% by intensification.

4. Referring to the “*designated settlement areas*” (purple on Map 2) “...*about one-third of the designated GTA has yet to be developed*”. We wonder why, with smart growth being implemented, this is not sufficient new land to accommodate all growth for the next 35 years while the province is in transition to a stable, sustainable society.

Why on Map 4 are thousands more acres, extending almost to the Oak Ridges Moraine, designated “Future Growth Area–Conceptual” – most of this area is Class 1 foodland. We suggest that the “Designated Settlement Area” (purple) be the ultimate growth boundary. This will provide more land than the province can ever possibly/reasonably allocate to urban uses.

At Pickering the Seaton land intended for the “Designated Settlement Area” should only be fully developed after infilling and intensification measures are implemented.

It should be noted that these lands came under public ownership as part of a huge Pickering international airport dream. This will not be – the GTAA will have difficulty economically or environmentally justifying any airport in the foreseeable future.

Designating so much land for “Future Growth Area–Conceptual” encourages speculation and inhibits smart growth. Seaton should be incrementally developed as a model community while the remainder of Pickering is redeveloped under smart growth principles.

Map 4 does not show the Green Belt except for the Agriculture Preserve. Where is the federal greenspace joining the Rouge Park to the Oak Ridges Moraine?

5. “*The province will work with rural communities to ensure that new development reflects local goals and supports the viability of rural communities.*”⁵

Without the Green Belt Task Force conclusions it is difficult to comment. The enumeration that follows is sufficiently benign to please everyone. But a word of caution – rural communities should not become bedroom communities for commuters. They should not add to sprawl, infrastructure demands, pollution of headwaters and development alien to existing heritage values, even when local residents may think any growth is progress.

⁴Page 9 para 5& 9

⁵ Page 25, para 2

They should welcome farm-support business and be local destinations for hikers/bikers. The GDA very much supports trails linking rural communities because this open space amenity offsets more compact urban living and makes smart growth attractive.

6. *“To insure value for money, use of existing infrastructure must be optimized. Ideally, investment in new infrastructure should be paid for by those who benefit from it” and “How we grow also affects the cost of growth. It is estimated that over twenty per cent of infrastructure cost could be saved...”*⁶

The GDA suggests that 20 % is too modest except for a first phase.. Following eight years of induced sprawl a far more progressive goal is warranted. If we are serious about redevelopment and intensification there should be very little extension of sewers and water into the countryside. No more sprawl subsidizing highways should be built. Existing urban schools should be filled by children from redeveloped urban communities. Most infrastructure dollars should be for public transit. Intensification will only happen by government refusal to subsidize sprawl. Financial incentives are essential. Developers of new greenfields should pay all infrastructure costs – highways, schools, sewers, water, pollution mitigation and a levy for lost natural capital of foodland, greenspace and air and water degradation.

Pearson International should be the only hub airport relieved by existing Hamilton cargo/charter facility. If Oshawa and Buttonville airports were closed then a General Aviation airport at Pickering for Sunday pilots, corporate jets, flight training and special cargo might become financially viable. To replace Buttonville’s 160 acres and Oshawa, a thousand acre airport would seem adequate and leave ten thousand acres of the GTAA planning area conserved for farming, water quality regeneration and a network of recreation facilities along the Duffins valleys for fishing, hiking and nature appreciation for the enjoyment of near urban communities.

The 407 highway that now services sprawl developments at Brooklin should be routed south and east to join 401 between urban Whitby/Oshawa and Ajax/Pickering at the new 401/Salem Road interchange. This would support the government’s goals for intensification, save infrastructure dollars, and aid these centres to become “priority urban centers” while curbing more Brooklin-type sprawl commuter developments.

7. *“Agricultural lands are a finite resource and agricultural lands such as these are relatively rare. Less than 12 per cent of the province is suitable for agricultural production and only 5 per cent of Canada’s total land base is considered prime agricultural land”*⁷
*“Protecting these lands is an important part of sustaining Ontario’s agriculture and agri-food industry and ensuring a healthy viable agriculture sector for the region.”*⁸

⁶ Page 26, para 3& 4

⁷ Page 43,para 11

⁸ Page 43 para 12

The authors could have added that only half of one per cent of Canada is CLI, Class 1 cropland. There is no significant Class 1 land east of Durham Region or north of the Oak Ridges Moraine. We agree with the government's concern for the vital role of this natural asset in our economy. But are concerned that already half of the tender fruitland – Stony Creek, Winona, Grimsby and St. Cathrines have been lost to urban sprawl. Commendably, the 4,700 acre Agriculture Preserve in Pickering together with 3,200 acres in Markham and Provincial planning for Seaton proposes saving over 50% for greenspace.

But the 407 sprawl subsidy has encouraged bedroom developments on Class 1 foodland surrounding the historic village of Brooklin. Also there is an application before the OMB to develop on Class 1 foodland within Durham's "Permanent Agriculture" zone immediately south of Greenwood, an historic mill town on the East Duffins in Pickering. We trust this application will be put on hold until your planing is complete and the OMB are appraised that such a development is not compatible with Ontario policy.

Resulting from the federal expropriation of 1975, development north of highway 7 has been blocked except for Cornell in Markham. More recently the federal Greenspace Project protects some 7,500 acres of the Oak Ridges Moraine and a corridor south to the Rouge Park.

Ottawa is retaining 11,000 acres for GTAA planning purposes. Most of the 11,000 acres cannot conceivably be needed for an airport (The GTA Pearson hub airport is only 4,400 acres). No authority is recommending a second international airport. The GDA proposes that the surplus lands, (as much as 10,000 acres), be committed to agriculture and open space in perpetuity and preferably sold in 100 acre farm units with conservation easements registered on title so over the long term a permanent agricultural community will evolve. These lands along with the north of Seaton should be part of the Golden Horseshoe Greenbelt.

The strategies (page 45) seem too permissive: "*finding a balance*"... "*flexibility to change their operations over time.*" In planning Highway 407 no effort was made to mitigate the damage to farming operations – the right-of-way did not border farm lots resulting in fragmentation of farms. The plans for 407 east, if implemented, will further fragment hundreds of farm operations and create many forced separations. It will also nurture speculative expectations.

Farm owners near urban areas who have seen their neighbours become instant millionaires believe they too have a right to sell for development and generally oppose permanent agriculture zoning of their farms. They argue that freezing land for agriculture is confiscation of their future retirement.

They will oppose any restriction on their right to sell to developers unless there is an offsetting benefit. The Canadian/Provincial property law does not affirm a right to develop farm lands or to profit inordinately from their sale. The fact that most Ontario farmers are not on some urban fringe and have no prospect of participating in the bonanza of becoming instant millionaires is disregarded.

The GDA suggests that following on the experience of a previous government with the Niagara tender fruitland, that farmers on the urban fringe be offered compensation for voluntarily registering a conservation easement on their property. The funds for purchasing conservation easements could come from a capital assessment (levy) paid by developers who build on greenfields. This will provide a

stewardship incentive to farmers and help ensure that sprawl urbanization bears some of the cost of lost natural foodland capital. It will be a great challenge requiring both sticks and carrots to realize sustainable agricultural land use.

7. *“The Greater Golden Horseshoe region produces and consumes more than 90 million tons of aggregate annually.”⁹*

But is this necessary or desirable? Gravel is a finite resource. Consumption of 90 tons annually is not sustainable and comes at a high land-use cost.

There are alternatives to open pit mining of aggregates in South-Central Ontario. A smaller sprawl highway budget will reduce the demand for Aggregate A road ballast.

The GDA suggests:

- Increase the per ton levy to pay for and enforce adequate pit rehabilitation;
- Salvage and crush all demolition concrete;
- Impose a highway haulage fee sufficient to pay for haulage route damage by heavy-truck traffic and to encourage rail haulage from beyond the GTA.

SUMMARY OF RECOMMENDATIONS

1. Build a consensus for change:
 - Make sprawl developments pay full costs;
 - Make inner urban living more saleable by reducing the cost of shelter, providing urban amenities, transit and recreational opportunities from funds saved by eliminating sprawl subsidies
 - Remove the undemocratic influence of developers over municipal officials by restricting developer financing of municipal elections. Make it an offence for developers doing business with the municipality to donate more than a single personal donation to any candidate for office at any time. Consider setting term limits for councilors.
 - Mount a public relations campaign to explain the financial and social benefits of building compact communities. Consider setting term limits for Councilors.
 - Support countryside recreation – hiking trails, cycling, fishing and nature study accessible
 - Assure the public that money saved by curbing sprawl will be used for health services and tax reduction.
2. Require municipalities to set firm urban boundaries and that can not be appealed to the OMB.
3. Implement reform sooner rather than later. Ontario requires an efficient, competitive economy in place to offset possible international economic problems and to ensure a high quality of living in the future.
4. Disregard obsolete concepts such as the 20-year land supply because it encourages speculation on a finite natural asset that government has to allocate to future uses. The concept is flawed because a municipality cannot indefinitely supply new land.

⁹ Page 46 para 4

- 5 Do not make decisions based on the assumption that growth forecasts are facts. Plan growth incrementally as the need become reasonably apparent. A five-year forecast adjusted annually would be more accurate, helpful and businesslike. Do not assume that 50% of the population will have jobs. Monitor job creation and encourage live/work communities and discourage bedroom developments through infrastructure supply and Official Plan approval.
- 6 Within the OMB establish a simple appellant-friendly appeal system for small entrepreneur developers who apply for redevelopment/intensification projects that are blocked by NIMBY objectors (usually with council support).
- 7 Require all Official Plans to include pro-active targets for redevelopment and intensification.
- 8 Where the planned urban envelope is excessive do not consume land prematurely. Build incrementally at smart growth densities to extend supply , perhaps indefinitely.
- 9 Remove the “Future Growth Area– Conceptual” from the “Plan To Grow” concept because it encourages speculation. There is no proven need to ever urbanize these lands. These lands including the Rouge Duffins Agriculture Preserve should be agricultural greenbelt in perpetuity
- 10 Make Seaton a model community that demonstrates smart growth is desirable, affordable and provides the highest quality of living.
- 11 Discourage rural communities from becoming bedroom developments through the PPS and Planning Act,, OMB and development fees for water taking and storm drainage. Support recreation projects in rural hamlets.
- 12 .Stop infrastructure subsidies that allow (encourage) sprawl. Cut the highway budget. Fund transit. Require developers (future owners) to pay full capital and operating costs of roads, sewers, schools, security and for lost foodland and greenspace capital. Minimize development levies for inner urban perhaps indefinitely
- 13 Protect agriculture by enforcing urban boundaries, buying conservation easements, reducing developer influence over municipal councils and possibly pass a foodland protection Act or Ministers Zoning Order that sets out very clearly that prime (Class 1 2 & 3) foodland are excluded from urban uses. Ensure that land now in the public domain (federal Pickering land) is added to the agricultural greenbelt.
- 14 Route 407 east from Brougham (Durham 1) south and east to merge with 407 between Ajax/Pickering and Oshawa /Whitby. This will inhibit further sprawl east, save hundred of farms and support the government’s goal of encouraging growth at the “Priority Urban Center” of Oshawa.
- 15 Reform the Pits and Quarries Act to make rehabilitation effective and raise fees to provide funds for rehabilitation, public amenities on the Moraine and ultimately to encourage unit train transport of less gravel from remote locations.

The above recommendations are suggested by the “Places To Grow” Discussion paper.

Lorne D. Almack, for Green Door Alliance Inc., September, 2004