

July 26, 2003

**Green Door Alliance Comments on Growth Management Study  
Phase 2 Booklet.**

The Green Door Alliance has a long history of involvement with the Federal and Provincial lands stretching back to People or Plane's days. Regarding Seaton, in the 1990's, members were involved in the Seaton Community Group; in subsequent planning efforts by the Liberal Government, and as members of the Seaton Advisory Committee, under the NDP. With respect to the Agricultural Preserve lands we have worked for many years to preserve these lands; were very involved with the Provincial decision to preserve these lands in the early 1990's, and subsequently involved in recommending that easements be placed on these lands before sale. We continue to oppose development on the Ag. Preserve.

After examining the Phase 1 background studies, and the phase 2 booklet we have the following comments on the options being presented:

**1 Land ownership has an immense financial impact and must be evaluated.**

The Provincial environmental mapping of the Seaton lands indicates that some 52.5% of these lands are environmental and protected from development. These lands are fairly similar to the lands classified as Natural Heritage by the Growth Management Team in Option 1 – The Seaton Focused Option. The Province has also promised to protect additional cultural heritage and buffer lands.

No one then is talking about developing on the more environmentally sensitive lands in Seaton – all options preserve more than 50% of Seaton. The issue becomes one of comparing options which save even more land in Seaton for environmental reasons, with options which preserve more farmland, support a more sensible urban shape, or cost less.

It is critical that any such comparison factor in the significant added cost of developing on private land in the Agricultural Preserve rather than on public land in Seaton. To use a rough example, if one of the options envisaging development in the Agricultural Preserve - say option two or five, removes from development an additional 1,000 acres in Seaton than option 1, then if one were to assume such developable land is worth \$100,000 per acre, this would have the effect of lowering Provincial revenue by some \$ 100 million, while generating enormous windfall profits to developers owning Ag. Preserve land sold a few short years ago

by the Province for about \$ 4,000 per acre. And even if these estimates were greatly reduced, they would still have an immense impact on any comparison of alternatives.

And some of the public money received by keeping development in Seaton could be used to make it a real transit friendly model rather than feathering developer's pockets.

Recommendation: The public cost of options which remove more lands from development in Seaton, than Option1 – the Seaton Focused Option, must be evaluated.

## **2 The overall size of the urban footprint should not be increased.**

The urban footprint which is the sum of residential and employment areas is smallest under the Seaton development only option by 578 acres compared to option 2; by 1260 acres when compared to option 3; by 1379 acres when compared to option 4; or by 808 acres when compared with option 5.

We have always suspected that including the Ag. Preserve in the Growth Management Study wasn't just aimed at examining where best to encourage development, but would result in far more land being developed. And our fears have been realized. Indeed the most likely options such as options 3 or 4 appear to develop almost as much land in Seaton as option 1 - the Seaton focused option, as well as significant portions of the Ag. Preserve. We are very concerned by the overall increased acreage falling within the development envelope in options 2-5.

Recommendation: The overall size of the urban footprint needs to be evaluated and should be included in the evaluation criteria. Given the tremendous need in the GTA to encourage smart growth and firm urban growth boundaries, the greenfield development footprint should not be increased as presently contemplated in options 2-5.

## **3 The urban boundaries chosen should remain permanently in place**

The Province wants to maintain the Ag. Preserve in perpetuity and has indicated its willingness to transfer some 52.5% of the Seaton lands that are environmentally sensitive to a conservation body. Not only are options 2-5 which involve development on the Ag. Preserve from the outset expected to result in urbanizing considerably more land, what guarantees exist that in future even more land will not get developed? Take option 2 for example which provides a major buffer to the east of Whitevale, or option 5 which basically limits all living areas to very much south of Whitevale road? What guarantees will there be that there will not be urban encroachment into these areas in future? Will for example the City transfer all easements on land in the Ag. Preserve which are shown under the option chosen as not being developed, to an independent conservation body? Will the Province be prepared to do the same within Seaton? If not, option 1 offers more of a bird in the hand – the other options may be absolutely meaningless – just phases in the development of most of the entire area.

Recommendation: The permanence of the option is vital and should form part of the evaluation criteria.

#### **4 An informed comparison of the options is needed before any decision making.**

Unfortunately the phase 2 Booklet does not contain any comparison of the various options from an environmental point of view other than a few cursory ( 2-3 word) comments on the various maps indicating that in some options the opportunity for natural corridors in a particular area may be limited, or in others enhanced or in some an additional corridor created. Furthermore there is no evaluation of urban form considerations, farmland considerations, or financial considerations, or as mentioned above the degree of permanence of the boundaries being proposed.

Individuals are asked to comment on which options they like while receiving almost no additional information to make any judgment, other than the odd phrase plugging options other than option 1.

Recommendation: Before decisions are taken the public deserve much more and better information and a less slanted framework within which to comment.

#### **5 Ag. Preserve and corridor considerations are very cursory and one sided.**

The phase 1 agricultural report is a weak and biased study. The phase 2 study does not offer a one word mention of the benefits of maintaining the Ag. Preserve for agriculture. And the criteria and measures chosen to evaluate agriculture imply farming this very fine agricultural land may not be important or feasible anyway. The Ag. Preserve is dismissed as a near urban area not suited to corporate cash crop or industrial agriculture. The benefits of near market farming and new market demands are ignored. What a contrast to the final report of the East Markham Strategic Review Committee in reference to the Markham portion of the Ag. Preserve which states, “East Markham has a rich agricultural heritage and the potential to support agriculture over the long term with its excellent soils, long growing season and proximity to diverse markets.” Why are opportunities so different across the Town line?

Not only that, the narrative highlighting options 2-5 all mention that a favorable part of these options is that they include an enhanced southern Duffins – Rouge natural corridor. The implication is that putting houses in the Ag. Preserve but running a nature corridor through it, is an environmentally superior solution to the existing farm countryside. This completely ignores the environmental compatibility that exists between farmland and natural areas. Many of the environmental values in the Rouge for example would be degraded if the Ag. Preserve was replaced by urban settlement. And leaving the Ag. Preserve as countryside and undeveloped has other environmental advantages. We are told for example that the recharge rate in the Ag. Preserve is just as high as it is in Seaton.

Furthermore if erecting a corridor across the Ag. Preserve lands is all that important, I suspect if it were clear to all that the Preserve was going to remain undeveloped over the

very long term, that developer interest and ownership would wane, and one would be easily able to negotiate the creation of a corridor with some of the private farmer/owners. And I doubt that under such circumstances the incentive needed to achieve such an agreement would need to be very significant. And surely an Ag. Preserve which included a corridor, and included no urbanization is the best solution of all.

In addition future land use considerations beyond the Growth Management Study boundaries are not discussed; nor is the relative importance of corridor connections. One would think for example that a very robust Duffins corridor running north across Federal lands to the Moraine, west of any possible future airport, would be very important. However option 2 which blocks such a corridor by locating industrial development west of Whitevale receives positive comment for creating an east west corridor below this industrial area, and no negative comment for limiting a more vital north south corridor.

The measures proposed to evaluate environmental integrity make no mention of recharge rates; water quality; the overall size of the urban envelope being considered; the importance of strengthening North-South corridors; the beneficial environmental impact on both the Rouge and Duffins Corridors of not developing portions of the Ag. Preserve; etc. Two of the four environmental measures focus on streams and a third on ‘achieving’ a corridor within the proposed urban area across the Ag. Preserve seem pre selected to favor development on the Ag. Preserve as opposed to Seaton. We do not downgrade the importance of protecting streams on the Seaton Lands. We just ask that the overall choice of environmental measures be science based and not slanted to justify a particular result.

Recommendation: A broader, more complete, and less one sided view of agriculture and environmental evaluation needs to be developed.

## **6 Urban design considerations need careful evaluation**

An option like option 5 results in a very large separation between employment areas to the North and other urban areas to the south. Option 2 has absolutely no development along the Brock Road even though this is a major artery and one that would connect urban areas to the south with any possible future airport. Are these practical designs?

Recommendation: A far more complete understanding of the urban design considerations of the various options need to be provided.

## **7 The Municipality should receive full value for any easements they release.**

We oppose development of the Ag. Preserve. The Preserve was created to buffer Toronto from Durham. The Preserve is rare countryside adjacent to Toronto and is a unique GTA asset that is Provincially protected – Toronto’s last Green Door, (see satellite view at [www.greendooralliance.ca](http://www.greendooralliance.ca)). In addition to its value as farmland, and its environmental values, retaining this area as countryside forms an essential part of the cultural heritage of the area more important than many of the cultural heritage measures proposed in the Growth Management Study.

However if development occurs, it is absolutely essential that the Municipality get full value for their interest in the land. The public through the Municipality holds the easements and the related development rights and the entire value of these rights should accrue to the public via the Municipality.

The Ag. Preserve land was sold for about \$ 4,000 an acre. If no development value is attributed to this land, it is very difficult to see how today it could be worth even double that or \$ 8,000 an acre. However it will be up to an appraiser to decide its value, both as agricultural land and as developable land with an approved Secondary Plan in place. And if such land without easements was valued at more than \$ 100,000 an acre, then the public not a speculator should benefit from that 20 fold or greater increase in value. The Province has promised any land swapped in Seaton will be transferred to a developer at fair market value. If this is not the case they will justly face great criticism. Surely the same should hold true with the easements the Municipality holds. They should never be removed unless the developer is prepared to pay fair market value for them.

This point cannot be overstressed. The public currently sees a process that is becoming tremendously politicized, where if portions of the Ag. Preserve are developed, the very developer/speculators who are funding the Growth Management Study stand to make an immense speculative gain. If the Municipality were to commit to a transparent process where the easements were only released on the condition that all speculative gains accrued to the public, while we would still oppose removing the easements, the broad public concerns about the integrity of the process, would in part at least have been addressed. Such an approach would also largely address the issue of the huge additional public cost of developing on private versus public land.

Recommendation: The evaluation criteria should specify that public bodies be they the Province or the Municipality get fair value for the interest they hold in land or easements.

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In conclusion we feel the Growth Management Study process has been aimed at marshaling facts and arguments to support at least some development on the Ag. Preserve. The case for development has been ‘sexed-up’ by downplaying any present or future agricultural value and feasibility, and through one sided environmental arguments that turning the Ag. Preserve into an urban area with a corridor is a better environmental solution than leaving it in countryside. There has been no financial evaluation of the tremendous potential impact of building on private rather than public land. And while legitimate arguments have been made about the environmental sensitivity of the Seaton lands, there has been no effort to objectively balance the benefits of protecting even more environmental lands in Seaton than already contemplated by the Province, against other public cost, farmland preservation, and environmental considerations.

We urge you to seriously examine the recommendations we have made. We believe strongly that if you do so, the Seaton Focused Option will not be so easily dismissed.

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