

# Green Door Alliance



## **Green Door Alliance (GDA) - Greenbelt Draft Plan Response**

December 19, 2004

Victor Doyle, Manager  
Provincial Planning and Environmental Services Branch  
Ministry of Municipal Affairs and Housing  
777 Bay St. 14<sup>th</sup> Floor  
Toronto, Ontario, M5G 2E5

### **Re: EBR Registry No PF04E0006 – Draft Greenbelt Plan**

Dear Mr. Doyle;

As mentioned in our July response to the Greenbelt task force we are highly supportive overall of the provincial initiative to establish a central Ontario Greenbelt and have actively participated in the recent workshops.

Among other things we are delighted that the Duffin Rouge Agricultural Preserve forms part of the area designated for protection; that estate residential will not be allowed anywhere in the greenbelt; and that modest expansion of settlement area boundaries will only be considered at the 10 year review of the Plan; and that no 'big Pipe' great lake sewer/water extensions would be allowed - only local sewer and water services.

However we do have some significant concerns and recommendations.

### **The Greenbelt Boundaries**

Our greatest concerns remain the following:

- that the Plan could encourage leapfrog development
- that prime farmland south of the Moraine and north of existing urban growth boundaries has been excluded from the greenbelt in order to satisfy perceived future growth needs.

We continue to believe that the best way to deal with this issue is as Ontario Nature, has suggested to expand the greenbelt to at the least include south Simcoe County, the prime farmland south of the Moraine and the lands south of the Moraine at its eastern end in Northumberland county north of Port Hope.

It should be noted that recent discussion papers produced by Durham Planning indicate that Durham has sufficient land within existing boundaries to handle projected growth until the years 2026 – 2030. These studies point out as well that if densities more reflective of more mature urban areas were reached the land supply would last many years longer.

It is not only Durham that has a large supply of greenfield within existing urban area boundaries. The Neptis foundation has identified more than 1,000 square km. within existing settlement area boundaries within the broader GTA region that is already zoned for development – land which they conclude would satisfy future housing and employment requirements for the next 20-30 years even at existing development densities.

Given this, to designate additional areas for future growth sends exactly the wrong signal. It will encourage speculation and dissuade policymakers from tackling intensification and redevelopment.

**Other concerns:**

- The **implementation process seems incredibly rushed and untidy**; we are pleased a few more months should be added to the implementation to enable the Municipalities to work with the Province to see if some of their concerns can be accommodated without impairing the overall intent of the Plan and to give the Province more opportunity to thoughtfully consider suggestions made.
- The **Greenbelt Plan, the growth Plan for the Greater Golden Horseshoe and the Provincial change to the Planning Framework are all highly interconnected** elements in developing a new land use regime in south central Ontario. Until the whole package is known it is hard to assess the appropriateness of individual elements. We gather the Draft Growth Plan and the revised Provincial Policy statement will be circulated for further comment in the next couple of months and it would make great sense for the Province to receive at least some comment on these initiatives before finalising the greenbelt plan.

We hope for example that the growth plan along with Plan and PPS reform changes will result in the creation of firm urban growth boundaries along with further policies requiring municipalities to develop plans to build more compactly within these boundaries, not just continue to use greenfield as they have in the past and gain access to more prime farmland north of urban boundaries when they want it. However without knowing how the Growth Plan, and plan reform initiatives will unfold we remain uneasy.

One cannot overemphasize the fact that the Greenbelt Plan will only be effective in the longer term if it is coupled with a clear direction from the Province requiring intensification and more compact development.

- **Transition rules** governing current development applications are unclear, (applications are grandfathered but the Province reserves the right to intervene). We believe that it should be made clear that applications which have not received favourable decisions by Dec 2004 will be governed by the greenbelt plan.
- The Greenbelt Plan will use the same mapping of prime agricultural areas as presently included in Official Plans with one difference – **municipalities will be given an opportunity to review the prime farmland and rural designations when they bring their plans into conformity with the Greenbelt Plan.** We hope this will not be significantly used to reclassify prime farmland and we hope as well that lands adjacent to prime farmland that are considered important in supporting overall agricultural viability will be included within the Prime Agricultural Area. In order to support these efforts the Province needs to oversee and provide direction in this designating of prime agricultural lands.

### **The Greenbelt Plan and its impact on foodland and farmers**

The green belt Plan offers permanent protection to specialty crop areas – notably the Niagara tender fruit and grape lands, and the Holland marsh.

Beyond that the Greenbelt Plan does protect prime farmland against fragmented development like estate residential and golf courses but does little beyond this to protect prime agricultural land and those adjacent lands which support the farm economy and which also merit protection:

- As already mentioned it excludes a vast block of primarily prime farmland south of the Moraine and north of existing urban boundaries from the greenbelt presumably because the intent is to consider them ‘future growth area’.
- As also already mentioned, the designation of prime agricultural lands will be as described in Official Plans, and as modified by Municipalities during the conformity exercise - with no further direction provided by the Province.
- At the 10 year review, settlement area expansion into Prime agricultural lands is not prohibited.
- Severances are allowed for surplus farm dwellings.

We recognize that the greenbelt Plan cannot solve all the problems faced by the farm economy. However unless more is done to create the sense that prime agricultural areas will remain permanently farmland, and unless the incentive system is reworked to support farmers who want to invest in their farms, not provide tax breaks to make it cheaper to hold land for future development, the Greenbelt Plan will not achieve its overall objective over time.

Many of our members have placed easements on their lands. Many also have significant acreage in agriculture. We are strong supporters of the use of easements and feel that farmers within the greenbelt who are prepared to donate easements on their lands ensuring no future development will ever take place, should be offered significant incentives to support farm viability. This is just one of many actions that

would be helpful in supporting farmers. We do not believe however that government should go down the road of compensating for so called loss of development rights. It rightly wasn't done on the Moraine, and shouldn't be considered in the greenbelt. It should be further pointed out that farms in the greenbelt are within the GTA commutershed and don't have to be sold at fire sale prices at a farmer's retirement. Even if these farms cannot be subdivided or severed they are still worth considerable sums, because of that proximity, unlike farms further from urban areas.

We also are in general support of the broad ranging recommendations the Christian Farmers Federation of Ontario have recently made to the Province.

### **The Public Lands in Markham, Pickering and Uxbridge**

Our organization is an offshoot of People or Planes and has been involved for many years in protecting the more than 40,000 acres of land expropriated by the federal and provincial governments for an airport and adjacent city.

With respect to the lands that formed part of the original Provincial expropriation we are delighted that the green belt Plan includes the Duffin Rouge Agricultural Preserve within the 'protected countryside' designation. (See our July submission for further detail on this issue).

Given the tremendous financial windfall that would result were the government to ever change its mind, and given the need make it completely clear that this land will remain permanently protected we would like to see this land given a more special status in the Plan and perhaps in the legislation so that no future doubts will exist.

The Province is currently developing more detailed Plans for both Seaton and the Pickering portion of the Preserve. As long as there is any thread of hope in the minds of those who have an interest in Preserve lands that this government or future governments will change their minds, the less possible it will be to implement the Provincial Plan and encourage farm investment and the development of near urban agriculture in the area.

Granted future governments can always change current plans and legislation. However the more difficult that this is to do, and the greater the political price any future government has to pay to undo it, the less likely there will be any change and the more likely it will be that the Province's plans to make this a truly viable and exciting area can slowly start to bear fruit.

With respect to the 18,000 acre Federal Land holding, we urge the Province to look critically at the GTAA's Draft Airport Master Plan proposal. Even if a Regional airport were able to be justified at some point in future there is no reason why the Federal Government could not commit to saving more than double the 7200 acres it has already committed to greenspace and still have plenty for an airport.

As we stated in an earlier submission this land combined with the Duffin Rouge Agricultural Preserve directly to the south would create a corridor extending from the Moraine almost to Lake Ontario well in excess of 20,000 acres.

We urge the Province to work closely with the Federal Government to ensure that the vast bulk of this land form part of the Greenbelt. These and abutting lands contain the largest block of predominantly class 1 agricultural land to the east of Toronto anywhere else in Canada! This could be a tremendous asset to the Greater Golden Horseshoe area. Because of the quality of land and the stake the public has either through direct ownership, or in the case of the Ag. Preserve through publicly held easements, this land could be used to explore approaches towards supporting and encouraging the development of more viable approaches to near urban agriculture.

### **Infrastructure**

We continue to recommend a moratorium on 400 series highways until the Growth Plan, the Greenbelt Plan and the revamped planning and policy framework is in place. (See additional comments in our submission on Places to Grow.).

### **Stewardship, Parkland, Trails and Greenbelt Advisory Council**

The vast bulk of the greenbelt lands are and will remain in private ownership. Yet only one line in the draft plan mentions the promotion of good stewardship practices. This is an area where small amounts of provincial financial support and incentives, in close co-operation with Conservation Authorities, could have a major positive impact.

There is also an opportunity here to compensate farmers for undertaking stewardship actions on their land.

We are currently very highly involved with the Toronto Region Conservation Authority, the twp. of Uxbridge and other local municipalities, the Trans Canada and Oak Ridges Trail Associations, and the Oak Ridges Moraine Land Trust to promote strategic land securement and trail initiatives. We are members of '*Uxbridge Naturally*' a partnership between conservationists and the municipality, who among other things focuses on the creation of a network of in Town and off road countryside trails linking communities, conservation lands and existing trail networks.

The Provincial Greenbelt initiative could assist such efforts in a number of key ways:

- The provision of matching funds. Small municipalities have very limited funds as do Conservation Authorities. Relatively small financial contributions in support of local efforts would help tremendously.
- We are pleased that the greenbelt Plan makes allowance for lot creation for purpose of "facilitating conveyances to public bodies or non-profit entities for natural heritage conservation, provided it does not create a separate lot for a residential dwelling in Specialty Crop or Prime Agricultural Areas".

This flexibility should be used very sparingly but in certain instances it is the only practical and affordable way to make strategic additions to conservation land and create important trail and natural heritage linkages.

- There are important potential trail linkages in Uxbridge, Pickering and Markham running south from the Moraine to major urban areas. One of these is the Trans Canada Trail which currently runs south along Paddock Road in the East Duffin valley from Claremont Conservation area to the Greenwood Conservation area. The future 407 corridor runs just north of Greenwood. If / when land is expropriated for this purpose we strongly urge that the Duffin be broadly spanned and a robust natural heritage and off road trail corridor be created.

In addition further to the west trail and natural heritage linkages can be created from the Oak Ridges trail through the Federal Greenspace lands and the western end of the Federal lands south to Seaton, the Ag. Preserve, and the Rouge Park

Rather than broad words we need active Provincial support in promoting and implementing such options. We have an absolutely terrific opportunity here but without the energetic support of the Province it will likely come to naught.

For all the above issues, active involvement and financial support from the Province is required. It is possible a Greenbelt Advisory Council could help in such initiatives. It is possible as well that an entity like the Oak Ridges Moraine foundation with a broader mandate and funding to support stewardship, securement and trail initiatives might be able to bring more focus to these issues.

Sincerely,

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