

Green Door Alliance



Green Belt Task Force
Ministry of Municipal Affairs and Housing
14th floor, 777 Bay Street,
Toronto Ontario M5G 2E5

Dear Task Force Members;

July 2 2004

Attached are our comments on the Greenbelt. We are highly supportive of the Province's initiative to establish a south central Ontario greenbelt.

As no one I'm sure knows more than the task force members establishing such a Greenbelt is a daunting challenge. It has been attempted before. In the late 1960's the Province's Toronto Centred Region Plan, announced with much fanfare, ended up just withering away in a few short years.

In order for the Greenbelt initiative to be successful, the Greenbelt Plan and the implementation framework must provide strong, clear and permanent protection. We urge you to resist the strong pressures to water down your recommendations.

And although it may not be directly within your mandate we urge you as well to make recommendations to the Province with respect to the related issues of Growth Management; Plan and OMB Reform; farm support; removal of subsidies for sprawl; etc. If these issues are not tackled with some success, the Greenbelt initiative itself will be jeopardised.

In this regard we were pleased to note that you have already recommended that the Province create a Task Force aimed at developing agricultural policies with an interim Report dealing with greenbelt issues by October 2004.

We appreciate the chance to comment and look forward to a further opportunity this fall when firm recommendations are made.

Sincerely,

Brian Buckles, on behalf of the Green Door Alliance,
Phone 905 649 3331, e-mail buckles@total.net

Directors

Dr. Paul Thompson, Mr Brian Buckles, Mr Lorne Almack, Ms Kathryn Dean, Ms Marion Thomas, Dr Bruce Flattery,
Mr Tommy Thompson, Mr William Wilder, Mr Edward Falkenberg

Green Door Alliance Inc., PO Box 97586, 364 Old Kingston Road, Scarborough, On., M1C 4Z1
www.greendooralliance.ca

Greenbelt Task Force Submission – Green Door Alliance

Greenbelt Boundaries / Tie in with Growth Management Approach.

We share the concerns expressed by many about the dangers of leapfrog development to the north of the Greenbelt area. This problem must be dealt with or the whole exercise could end up being counter productive. In order to avoid this we would prefer to see the Greenbelt extended to include the GTA commutershed.

Alternatively, this concern could be dealt with as part of the Growth Management initiative, PPS and Plan Reform initiatives – more about this later. Like many we find it very difficult to comment on the Greenbelt without knowing what the Government's recommended growth management approach will be.

Implementation Approach

We assume that it makes sense to leave the existing Niagara Escarpment and Moraine Frameworks in place. We favour using the approach taken in the Moraine Plan to the remainder of the Greenbelt area. This entails a framework of legislation within which there is specific regulation, (like the Moraine Plan), that land use decisions must conform to, that again like the Moraine Plan, supersedes the PPS and is only subject to revision every 10 years.

Furthermore, principles are not enough. As with the Moraine Plan these principles need to be translated onto maps. Such maps would contain natural heritage features and might well have a similar breakdown to the core and linkage designations in the Moraine Plan. These areas should be permanently protected from urban development. Included in such areas as well would be areas like the Duffin Rouge Agricultural Preserve and the Federal Green Space lands to the north (more will be said about these lands later), as well as other public natural areas and parkland.

We don't support a commission approach and feel that Planning should be left to lower tiers after this overarching framework is created. However we do feel that the Province needs to be actively accountable for the success of this venture and in doing so is likely to want to appoint an ongoing advisory body to assist them. They are also going to want to fix overall accountability at a senior level within a Ministry – presumably MMA, and assign dedicated staff to monitor and research issues affecting the Greenbelt.

Settlement areas and boundaries (urban and rural)

This is an area in which planning for the Green belt overlaps with growth management and other Plan Reform. We strongly support the proposed PPS changes which require

settlement boundaries to only be modified at the time of a comprehensive plan review, and only then under certain circumstances. Frequent official Plan amendments erode the integrity of the Official Plan.

Within the Greenbelt, we'd go a step further. As contained in the Moraine Plan we strongly favour a situation requiring firm settlement boundaries that are not even considered for adjustment until the ten year review of the Plan. This not only lengthens the period within which urban boundaries within the Greenbelt would remain firm, it requires the Province to sign off on any expansions, and removes it from the realm of the OMB. Given the intense green field development pressure, these steps are necessary.

We emphasize that all settlement boundary expansions need to be included here be they extensions to urban area, hamlet expansions, estate residential etc. If one only includes urban area expansion this would have the effect of making other less favoured expansions easier to pursue and this is the last thing one wants to do. We have had a number of 500 - 1,000 home development applications in Durham on communal next to smaller centres, or associated with golf courses. These can't be given an easier ride than urban area extensions if we want to contain sprawl.

Again this is the area where policies outside the Greenbelt have to be co-ordinated with policies inside the green belt to ensure leap frogging doesn't occur. Certainly tightening up the PPS with respect to settlement area expansions would help. Perhaps something needs to be added to the PPS that is more specifically directed at discouraging the creation of leapfrogging bedroom suburbs within the south central Ontario commutershed beyond the Greenbelt.

Greenbelt countryside areas not forming part of the natural heritage system

Specialty areas like the Niagara fruit lands and the Holland marsh can and should be afforded special protection.

With respect to other prime farmlands (class 1-3 and associated lands), these areas should be mapped and receive a special farmland classification. In considering these lands it is important to consider more than just class 1-3 lands. There are associated lands necessary for buffers, connectors between prime lands and farm support services or areas next to more prime areas where extensive farming is taking place which add to the sustainability of the whole, that must be taken into account for farmland to remain viable. In the past in too many areas developments on farmland have been allowed to proceed based on arguments that the land on a specific site, although within or directly adjacent to prime agricultural areas, is not of quite as good capability.

Intrusions into these agricultural areas, other than urban area expansion and infrastructure should be excluded entirely. No golf courses, no estate residential or other non farm related development of any sort. These restrictions should be spelled out in any greenbelt Plan. In addition and again to avoid leapfrogging, the PPS needs just as strongly to protect prime lands and agricultural areas beyond the green belt.

As far as infrastructure planning is concerned, one can't have a blanket prohibition. However the impacts of infrastructure in fragmenting prime agricultural areas and otherwise negatively impacting them has to be far more carefully evaluated than in the past. This could result in some initiatives not being allowed to proceed and in others, rerouting and other mitigation alternatives considered.

As far as urban area expansions are concerned, since many large urban areas are surrounded by prime farmland, to talk of an outright prohibition on any future expansion would be tantamount to saying virtually all urban area expansion has to cease. How one could take this position and do so without creating leapfrogging, some of it into equally valuable farmland is the question.

However looked at more pragmatically there is a solution. If I look at Durham alone – an area we are more familiar with, Durham Planning staff in Discussion Papers forming a prelude to the Official Plan review indicate that Durham has enough land within existing urban area boundaries to handle growth till sometime between 2026 – 2031. The Discussion Paper states further that “if the Region were to develop at a higher density of 24.7 uph (10upa) consistent with a more mature urban state, it would not need additional land to accommodate residential growth for approximately 35 years.”

Here's where green belt considerations overlap with the yet to be communicated approach to growth management. Our position would be that in Durham at least there is no need to approve any expansions into Greenbelt for at least the next 20 years. The key issue in the meantime is to use that time to begin to plan to intensify within existing boundaries and begin the process of doing so.

Therefore as far as Durham is concerned we suggest the Green belt task force take an approach similar to the one taken in the Moraine Plan and allow no expansion of settlement areas into countryside for the 10 year life of the Plan. Although there might be the very odd exception, I suspect that in other areas within the Greenbelt a similar insistence on staying within settlement area boundaries for at least the next 10 years, coupled with a real effort in the interim to for the first time really deal with the issue of intensification would make the most sense. If there isn't a tremendous effort to stay within urban boundaries the Greenbelt exercise will come to naught.

Down the road there may need to be some expansion onto farmland but surely at that point we would have a better sense of where in the GTA that might be best allowed.

One final comment here. There will be some land within the Greenbelt that does not require protection for natural heritage reasons and also may not form part of the agricultural areas mentioned above. We see the same kinds of uses allowed in these areas as allowed in the countryside classification in the Moraine Plan – including major recreation uses like golf courses. With regard to estate residential, in Durham discussion papers prepared in advance of the Official Plan Review are suggesting country estate residential not be allowed. The Moraine Plan also does not allow estate residential within

its countryside designation. We strongly recommend that any Greenbelt Plan not allow country estate residential anywhere within the Greenbelt.

The Duffin Rouge Agricultural Preserve and the Corridor north to the Moraine

This is an issue near and dear to our hearts. Many of us have been involved in protecting these lands since the 1970's. Our organization was instrumental in getting easements placed on the Pickering Ag. Preserve lands before they were sold, and in initiating the process with the Federal Government to permanently protect 7500 acres to the north.

We feel very strongly for the following reasons that the Greenbelt legislation and Plan should make it absolutely clear that these lands will be permanently protected.

- The Duffin Rouge Agricultural Preserve is in and of itself not a small piece of land but comprises some 4700 acres in Pickering as well as up to 3,000 acres in Markham. Not only that, these prime farmlands are buffered from current and future urbanization on the east by the Duffin Creek valley, and on the west by the Rouge and the Rouge Park.

Within the Seaton lands, regardless of whose Plan is followed, at a minimum more than half of these lands will be saved for natural heritage reasons with additional lands saved for cultural heritage and other reasons. The lands that are being saved permanently within the Seaton land holding should also be included in the lands to be permanently protected under the Greenbelt plan.*

*It is also important to point out that the City's Growth management Plan may save a bit more land in Seaton than contemplated by the Province, but that in total between Seaton and the Ag. Preserve proposes an urban envelope that is some 1,000 acres larger than contemplated by the Province.

By adopting the Growth management study the City is proposing an extension in urban area at the very time the Regional discussion papers mentioned above indicate the Region has enough urban land for at least the next 20 years and really the next 30 years if further intensification to a level reflecting a more mature urban state was planned for.

Furthermore by proposing to develop in part of the Ag. Preserve the City is renegeing on an agreement between the Province and the Region that the City place agricultural easements on these lands when they were sold at some \$ 4,000 per acre protecting them 'in perpetuity'. Not only that, the City who hold these easements which are effectively the development rights on the 1500 or so acres proposed for development, has been silent on whether, when these easements are released to allow development, developers/owners will reap all or much of this \$ 200 million plus windfall even though they bought the land stripped of development rights, or whether the public will get compensated for the value of this public asset! (We conservatively assume that 1500 acres if approved for development would be worth \$ 150,000 per acre).

Some Councillors suggest this is a detail that can be worked out later. We believe the Ag. Preserve should not be developed. However we believe that if a portion of it were developed, it would be absolutely unconscionable for public bodies to allow this to happen in a fashion that involved the transfer of all or even some of the value of this public asset to private interests. And we believe that given the amounts could dwarf the entire sponsorship scandal, it is an issue that should be clarified as part of any evaluation of the

appropriateness of considering the development of any of the Ag. Preserve lands on which there are easements- not avoided and left till later.

- To the north of the Duffin Rouge Agricultural Preserve are the 7500 acre Federal Green Space lands. These lands which contain a significant amount of prime farmland, include a corridor extending south to the Duffin Rouge Ag. Preserve lands. Furthermore it is clear that even if an airport were built in future the GTAA will have no need for land in the Federal land holding west of the Markham Pickering town line and in all likelihood have no need for land west of the main branch of the east Duffin. This will greatly broaden the corridor linking the Duffin Rouge Agricultural lands with the Moraine to the north. It will ensure the Ag. Preserve lands large as they are in and of themselves, are not an isolated pocket. Furthermore it is likely that significant portions of land to the north of concession 8 and across the entire northern boundary of the more than 11,000 acre airport site will also not be needed for any future airport. Again this provides a link to prime farmland south of the Moraine on the east side of any future airport site.

When one considers that the most that is being planned on the federal lands is a Regional airport, and the fact that even Pearson is only some 4400 acres in size, there is every likelihood then that many thousand additional acres of prime farmland buffered to the east and south by a future airport could also be permanently preserved.

One final point. In the 1970,s we were able to convince the Province that an airport was not needed. As a result the federal Government was forced to abandon their project when the Province withheld infrastructure. In hindsight, even though many experts and consultants were lined up on the other side the right decision was made one that saved Canadian taxpayers billions of dollars and left a very large undeveloped greenbelt.

It may well be that a much smaller regional airport will be able to be justified in future. However we would hope, as with any future infrastructure project affecting the Greenbelt that the Province and those responsible to the Province for maintaining the integrity of the Greenbelt will take an active and critical interest in ensuring that such developments can be justified, and that if justified they are proceeded with in a fashion that best protects the integrity of the Greenbelt. It would be a large mistake then if the Greenbelt task force were to uncritically assume that once the 7200 acre green space lands were removed that most of the rest of the land remaining within the federal Government's 11,000 acre airport holding cannot remain agricultural.

This whole stretch of land then from the Duffin Rouge Agricultural lands north through the federal lands to the Moraine, and beyond should receive special attention and protection by the Greenbelt task force.

Realistically, particularly given history, uncertainty and current ownership issues, it is likely to take years for the Duffin Rouge Agricultural Preserve to evolve and develop the appropriate blend of traditional, and niche market agricultural and countryside opportunities. However if it is absolutely clear that this land will be permanently protected, along with lands to the north, and if Governments encourage such transition,

this area can be preserved as an essential ‘Green Door’ linking metropolitan areas to countryside. We urge you to implement the commitment of all three provincial parties and virtually all commenting environmental organizations - to conservation of the Duffin Rouge Agricultural Preserve ‘in perpetuity’.

Infrastructure Planning and other Action to discourage sprawl

Many elements need to come together if the Province is going to effectively address the issue of sprawl. The Greenbelt initiative, Growth Management, Plan Reform etc. Infrastructure planning is obviously a key component here and we are sure all would agree, land use planning should drive infrastructure not the other way around.

Clearly decisions to extend 400 series highways in the GTA can encourage sprawl. We urge the task force to recommend to the Province that no final terms of Reference for such highways be considered for approval until such projects can be evaluated in the context of the soon to be released Growth Management Study.

Sprawl and leapfrogging can also be discouraged by making individuals pay more of the total costs of commuting longer distances. Higher development charges, more user pay, etc.etc. We feel strongly that government must take action to ensure that when individuals make decisions on where to live and work, it is within a framework that more closely aligns their interests to the broad public interest.

Top down policies which discourage sprawl within a framework in which sprawl continues to be subsidized at an individual level, when viewed from a total cost to society point of view, are ultimately doomed to failure.

We recognize that these issues fall beyond the mandate of the Greenbelt task force. However it would not be beyond your scope to add your voice in reinforcing to the Province that action is required on a variety of fronts outside the Greenbelt initiative in order for the Greenbelt initiative to be truly successful and not end up even in some instances being counter productive.

Culture, Recreation and Tourism

We very strongly support passive recreation alternatives within the Greenbelt and are highly involved in working with Municipalities and Conservation bodies in securing additional land and linkages; further improving the existing trail Oak Ridges and Trans Canada trail networks and developing off road connections between these networks and local communities and conservation lands (Authority lands, Regional forests, Municipal lands, Federal Green Space lands etc.). In this regard we are working particularly closely with the Municipality of Uxbridge as part of the ‘Uxbridge Naturally’ initiative.

Even more success could be achieved locally, given further Provincial encouragement and even modest matching of locally raised financial contributions. We believe there is a tremendous opportunity here. If we wish to discourage sprawl and encourage more compact urban form – it is essential that we develop easily accessible recreation opportunities in nearby greenbelt areas.

Infrastructure can also impact greatly on recreation opportunities. For example if the 407 is continued east through Durham and the Greenbelt, every effort should be made by the Province and those bodies with responsibility for protecting the Greenbelt to ensure the 407 doesn't become a huge barrier, and that important trail and natural area corridors are maintained across it. One area of real importance in our area is the corridor of the east Duffin running south from the Claremont Conservation lands to Greenwood. This is not only an important nature corridor; it is also the route of the Trans Canada Trail and every effort should be made during any process of highway land acquisition and construction to ensure there is a broad overpass enabling a viable off road connection linking hamlets and urban areas to the south with natural and recreation areas to the north. Unless the Greenbelt mechanism is structured to actively support upper and lower tier municipalities and other stakeholders in advancing greenbelt protection in a whole variety of such areas, much of the potential of the greenbelt will be lost over time.

Possible future infrastructure impacts related to a the already mentioned Pickering airport are another example of a situation where the Greenbelt will need strong champions in order to protect and where possible enhance greenbelt interests related to agriculture, natural heritage and recreation.

Aggregates

We agree that a more rigorous approach to rehabilitation need to be taken and a greater incentive for owners to complete their operation and return the land to its natural state rather than stretching things out, using the land for industrial and staging purposes after the aggregate has been largely removed, and then attempting to segue into other uses, (estate residential etc, golf courses etc.).