

November 30, 2023

Submitted by email to: greenbeltconsultation@ontario.ca

Re: ERO numbers 019-7739 and 019-7735

Response to proposals to continue Duffins Rouge agricultural easement protection (ERO 019-7735) and to return lands to greenbelt, (ERO 019-7739) and comments on issues in Durham related to changes in public ownership of Greenbelt lands and extent of urban area expansion.

In reversing the Greenbelt removals Premier Ford stated on September 21, 2023, “I made a promise to you that I wouldn’t touch the Greenbelt. I broke that promise. And for that I’m very, very sorry.” He went on to say, “As a first step to earn back your trust, I’ll be reversing the changes we made and won’t make any changes to the Greenbelt in future”.

We recommend the following to meet the Premier’s commitment to reverse the changes of late 2022 and in Durham to further protect Greenbelt lands and re-evaluate urban area expansion.

1 In addition to restoring the agricultural easements in the Duffins Rouge Agricultural Preserve (DRAP), transfer the easements to an entity not controlled by the Province.

In the fall of 2022, recognizing that the lands in the Durham Rouge Agricultural Preserve could not be developed, even if they were removed from the Greenbelt, unless agricultural easements publicly held by Pickering on these lands were removed, the Province passed DRAPRA removing those easements. The Province has recognized it wouldn’t be keeping the Premier’s promise and reversing the changes they made to these lands in the Greenbelt if they didn’t also put those public easements back in place. Once restored, these easements would again, as they did in the past, further restrict development on privately owned land currently held/controlled primarily by development interests.

However, over the past 20 years these easements have been released on two occasions, so there remains strong public concern that given the inevitable pressures from powerful development interests, and regardless of the promises being made now, any future government could once again release the easements. Adding to this concern there has been recent reporting that government may be keeping the door open to allow lower tier municipalities to request certain Greenbelt parcels be considered again for development.

In order to allay any such concerns, we believe it would be in the Province’s interest to not only restore the easements, but to also transfer the easements to an entity that the Province does not control, such as the Rouge National Urban Park, (RNUP) or Parks Canada. The RNUP has a vested interest in what happens in Duffins Rouge Agricultural Preserve bordering the RNUP.

2 Reinstate and then review the Central Pickering Development Plan (CPDP)

The Province revoked the CDCP because at the time it planned to develop in the Preserve. Now that the Premier has promised to reverse these changes, his promise will not be met if the CDCP is not reinstated. This comprehensive document covers many issues and interplays in the Seaton, Agricultural Preserve, and Cherrywood complex. This does not mean that changes to it should not be made, but not to reinstate this comprehensive plan would raise serious concerns, in addition to being inconsistent with the Premier's promise to reverse all the changes. It is worth noting also that the draft Durham Region Official Plan states that its one objective for the Seaton community is "...to support and enable development within Seaton in accordance with the vision for the former Central Pickering Development Plan as a sustainable urban community." Our organization was involved in the creation of the plans for Seaton and in the CPDP and we have many thoughts on the numerous issues covered in the Plan. However, those comments are better made later as part of a review of the CPDP itself.

There is one issue that merits some further clarification. It would be helpful to get more information on the discussions currently underway between Parks Canada and Toronto and Region Conservation Authority regarding the possible conveyance of some TRCA lands to the RNUP. The TRCA has stated that there is "particular interest in TRCA's westernmost parcels in Uxbridge and Pickering", and "Parks Canada and TRCA are targeting to have a land transfer agreement in place by December 31, 2024 or earlier if possible" (TRCA Board of Directors meeting March 24, 2023).

IF the very extensive TRCA lands in Seaton are being considered for possible conveyance to the RNUP this could have a very significant and we believe very positive impact on these CPDP lands. It also ties into comments made below regarding other Greenbelt lands which could benefit from becoming part of the RNUP in future.

3 Benefits of transfer of some of the Federal airport lands that fall within the Greenbelt to the RNUP, particularly lands that provide connections to Seaton and Claremont.

In 2017 we recommended to Transport Canada that just under 1,000 acres of Federal Airport lands bordering Seaton and Claremont be transferred to the RNUP. Such a transfer we pointed out would not compromise any possible future decision on an airport and would also provide better trail/nature corridor connections between these communities and the RNUP. A small transfer of Federal lands to the RNUP north of Seaton would provide a good connection between the RNUP and the TRCA lands in Seaton they might want to acquire.

In recommendations we made to Envision Durham (review of Durham Region's official plan) in May 2022, we commented among other things on better protecting conservation lands in Seaton, and better protecting natural heritage values on the Federal airport lands. ([GDA-May2-NHS-final.pdf](#) (greendurham.ca)). The map GDA presented as part of that submission outlines the extensive Greenbelt lands that fall within the Federal Airport lands boundary. On the airport issue, GDA has always expected that the Federal Government would want to retain enough lands to build an airport in future should it ever be necessary. However even if, rather than transferring under a thousand acres to the RNUP, one transferred all or virtually all of the Federal airport lands that also fall within the provincial Greenbelt to the RNUP, the federal airport lands would still be greater in size than Pearson.

For all the above reasons then, and particularly given the public concern about preserving Greenbelt lands, and if the RNUP Is also considering expansion to include some of the TRCA lands in Seaton and elsewhere, it would seem an ideal time for the Federal Government to also consider transferring sensitive Greenbelt lands within the possible airport to the RNUP provided it did not compromise any future ability to build an airport should that be deemed necessary.

4 The Creation of the Uxbridge Urban Provincial Park

We are delighted that the Province has taken this initiative and GDA is actively involved as one of the organizations the Province has selected to further this effort. The initiative will result in the preservation of more conservation land, further trail/nature corridor connections between conservation lands and communities, while also creating tourism opportunities, and community health benefits. We are hopeful that further financial support will be available to support these efforts to better maintain and also expand the public conservation land base within the Greenbelt.

5 Re-evaluation of the Region's planned urban area expansion in North Pickering

Durham Region has approved a very significant increase in urban area **none** of which would have been justified if provincial growth plan standards had not been weakened in 2020. In 2022 Durham Region's Planning Commissioner recommended an increase in urban area to support community land needs of **2348 acres** but his recommendation was overruled by Council in order to support an increase of **6177 acres**. This increase was put forward by the Building Industry and Land Development Association, (BILD) and was not one of the proposals presented to the public as part of the Envision Durham exercise. Much of this acreage was on prime farmland. So even though the Draft Official Plan reiterates that development on prime agricultural lands should **only** occur "*when there are no reasonable locations which avoid Prime Agricultural Areas*", the Region somehow concluded that their Planning Commissioner's recommendation **did not offer** a "*reasonable alternative*".

We point out as well that this area of North Pickering is also falls within the Carruthers Creek watershed that many feel should be placed in the Greenbelt. Furthermore, the Province has extended the planning period for urban area expansion from 20 years to 30 years. What possible objective is being served by locking in urban area expansions that can at best be charitably described as "guesstimates"? To anticipate appropriate housing density standards, employment land requirements and standards for protecting important agricultural and environmental land so far into the future is pure speculation and serves none other than land speculators.

The Province has yet to approve the Durham Region Official Plan. At a time when there is a strong public perception in Ontario that development interests have far too great an influence on government decisions, we believe it would be wise for the Province to review the matter to ensure that the PPS and other Provincial standards are still appropriate and being followed, to carefully and with public input reassess whether prime farmland is being appropriately protected, and whether the Provincial growth plan requirements should be strengthened rather than being further greatly weakened as the government now proposes. It is also worth noting that policies that reduce required density also encourage sprawl, which as virtually any planning study would point out is much more costly.

6 Greenbelt expansion and control over future removals

We welcome the steps proposed by government to ensure that the total Greenbelt Plan area will not be reduced, and their openness to expanding it. The proposal to require any change to Greenbelt boundaries require changes to the Greenbelt Act or the Oak Ridges Moraine Conservation Act rather than through regulation is also a very positive improvement. We leave it to others with more legal expertise to suggest additional ways to oversee future changes to Greenbelt boundaries.

As mentioned in 5 above, inclusion of the Carruthers Creek watershed in the Greenbelt would be applauded and should be given careful consideration. Important areas of prime farmland should also be evaluated for inclusion in the Greenbelt unless other means for better protecting them can be put in place.

We appreciate the opportunity to comment.

On behalf of Green Durham Association'

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