



**Comments on Proposed Policy Directions
for Durham Region's Official Plan
June 30, 2021**

About us

Green Durham Association is dedicated to protecting the forests, farmlands and natural areas which lie northeast of Toronto in Uxbridge, North Pickering and adjacent Greenbelt lands. Our roots lie in the expropriation of 40,000 acres of federal and provincial lands in north Pickering during the 1970's. We have maintained a special interest in these lands but over the years broadened our focus to include nearby lands as well. Incorporated as a charitable organization in the early 1990's, GDA has for many years worked closely with partners such as municipalities, private landowners and conservation authorities to add to conservation land holdings, protected land, creation of trail and natural heritage linkages connecting conservation lands and communities, and the stewardship of these lands.

We appreciate the opportunity to contribute to the Municipal Comprehensive Review. There is much to applaud in the Proposed Policy Directions which have been released for public comment. Our comments are focused on several elements of the proposal, many are inter-related.

The Pickering Federal Airport Lands.

Proposed Policy Directions #4 (p 19) proposes that the Region "*Support the development of an airport on the Federal Airport Lands in Pickering and encourage the Federal Government to make a timely decision to develop an airport on the Lands.* Envision Durham tells us further that "*reports and studies commissioned by the Region demonstrate the need and benefit for an airport.*"

The 2020 KPMG Aviation Analysis of the need for Pickering commissioned by the Federal Government certainly did not conclude that Pickering was needed to meet aviation needs in the GTA in the foreseeable future. Just after that report was completed, Covid struck the world. Air travel has been devastated, and concerns remain with air travel and future possible viruses. A strong push world-wide to deal more

aggressively with climate change is gaining momentum with a supportive new U.S. administration. Proposals for new or expanded airports in other parts of the world are being resisted and fought successfully in the courts on the basis of emissions reduction targets and reducing the impacts created by air travel. Were KPMG to review their 2020 conclusions today, we believe the need for an airport in Pickering to meet GTA capacity needs would in all likelihood be pushed even further into the future. Given the KPMG Report and the subsequent fast-changing reality, we believe it is misleading for the Region in 2021 to inform readers that their commissioned reports “demonstrate the need and benefit for an airport.” It is virtually impossible to forecast what air capacity needs might be in 30 years, and how technology might advance to control carbon emissions, increase existing airport capacity and other aspects of air travel.

It is GDA’s view that no federal government will dispose of the Pickering lands any time in the near future, nor will any current or future government take any actions which would preclude building an airport on these lands. We have also long believed that if the federal government were to take action that would preclude any future airport, the likelihood is that these lands would end up growing houses and not food.

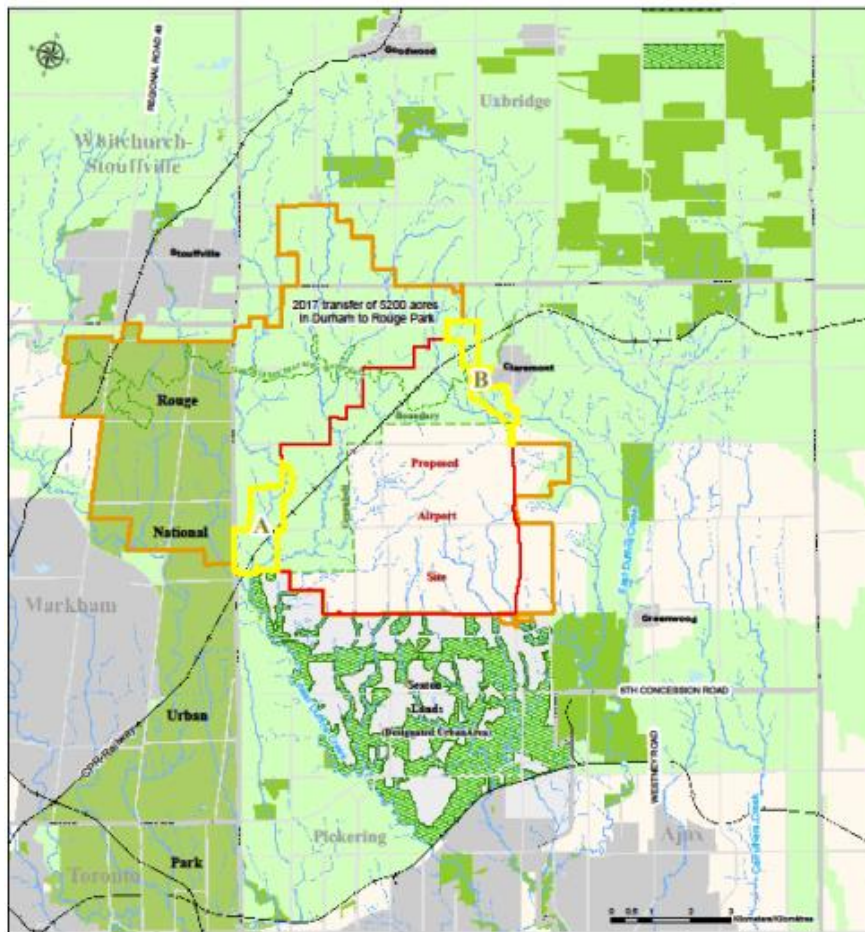
Over the years we have focused our efforts in two particular areas, neither of which preclude the building of an airport should it be demonstrated that it is needed. Rather, benefits could be maximized while these lands wait for a determination. Firstly, we believe that the best way forward is neither to urge the government to commit to never using any of the lands for an airport, nor to urge them to build one when it clearly isn’t needed. The best option is to retain land for a possible future airport, recognize that this need is many years away, and that for the next 20- 30 years at least these lands should be used to their very best advantage for a sustainable agriculture industry.

The Region should be urging the federal government to do everything possible to encourage investments in agriculture and agri-tourism use of these lands through such options as longer-term agricultural leases. The advantages of this approach were investigated in a study commissioned by Land Over Landings a few years ago and which GDA financially supported ([A Future for the Lands: Economic Impact of Remaining Pickering Federal Lands if Returned to Permanent Agriculture | Land Over Landings](#)). Of note, the study demonstrated that encouraging such actions has multiplier effects and financial benefits could be realized almost immediately. This strategy could be included in the Envision Durham plan even if the Region supports an airport.

Secondly, GDA’s position has always been that the 18,000-19000 acres expropriated by the federal Government was far more land than would ever be needed for an airport. Over the years we have worked hard to reduce the amount of land set aside for a possible airport through various avenues. The permanent protection of the Moraine and

Rouge corridor portion of the federal lands, the creation of the Rouge National Urban Park, and the recent addition of 5200 acres of federal lands in Durham to the Park are three such areas where we have had involvement.

Unfortunately, this most recent addition of lands in Durham to the RNUP did not provide direct links to nearby communities of Seaton and Claremont, despite the goal of Parks Canada that communities be connected to greenspace. We have been urging the federal government to add another 959 acres of land to the RNUP, leaving 7800 acres for a future airport should it be required (see map below). The land proposed for addition to the RNUP includes the Reesor Creek stream corridor north of Seaton and the Michel Creek corridor directly south and west of Claremont.



See areas A and B on this map for locations of land we would like transferred from federal land holdings to facilitate public access to RNUP for communities of Claremont and Seaton.

We believe that as the RNUP implements plans for its Durham lands, there will be substantial economic and social benefits for the Region, particularly if the RNUP lands can be directly linked to communities in Durham. We note (page 104), the

recommendation to “Add the Rouge National Urban Park (RNUP) as a new Specific Policy Area and encourage land uses to be consistent with the Greenbelt Plan, the RNUP Management Plan and for adjacent land uses (outside the park) to have consideration for the RNUP.” We believe our proposal for an extension of the RNUP to these two communities would be consistent with this Regional initiative. We hope this strategy is added to the document. Again, this would not jeopardize an airport should it be determined that there is a need, and furthers the Goals for a Thriving Rural System (Proposed Policy Directions p 99).

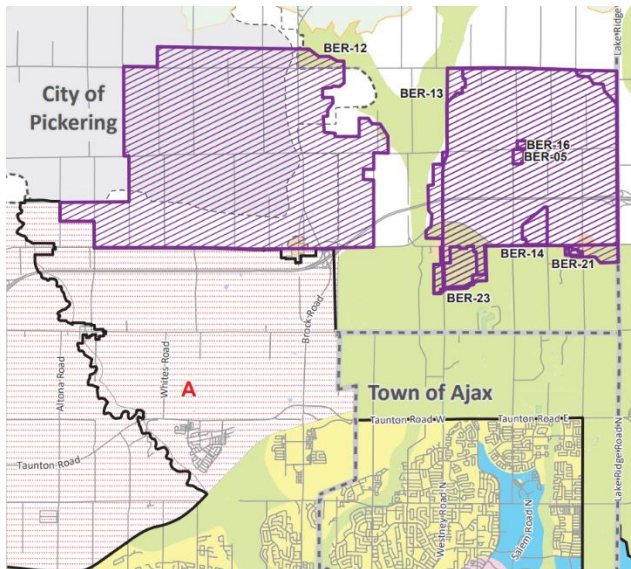
Durham now has a national park within its borders and has yet to capitalize on the many potential economic benefits offered by RNUP. There is little Canadian data about the benefits to communities near national parks, but a very good American reference **2019 National Park Visitor Spending Effects**, released by the US National Park Service, outlines the possibilities Durham could be reaping. As our country and our Region recovers from the Covid restrictions, GDA plans to resume pursuit of this proposal. We hope that the Region, Pickering and others in Durham will join us in support of this proposal.

Central Pickering Development Plan Area (Seaton and the Duffins Rouge Agricultural Preserve)

We are pleased with the Proposed Policy Direction (P-158) to “Add support to the goals of the Duffins Rouge Agricultural Preserve.” The GDA with the support of the Region has a long history of involvement with creating the Preserve and supporting its preservation, beginning with collaborating as parties in opposition to the Province in an OMB hearing many years ago. GDA has also in past years been very involved with the early development of Seaton. A key element in the design of that community has been the idea of creating increased urban density, but as an offset creating thousands of areas of conservation land within Seaton. These thousands of acres of conservation lands within Seaton could directly link with the conservation lands on the border of Seaton and which we propose be included in the RNUP as described above, are critical to the development and quality of life in Seaton. Have decisions been arrived at between The Province, the Region, Pickering and the Toronto and Region Conservation Authority as to how these lands will be funded and managed?

Settlement Area Boundary Expansion

Important as the other issues mentioned above are, far and away our largest concern with Envision Durham, are the 2 urban area expansions being proposed in Pickering. First there is BER -13, which proposes to urbanize 1650 ha. composed of lands in North East Pickering “generally bound by Highway 7, Concession Road 8, Westney Road and Lake Ridge Road, that would accommodate approximately 60,000 residents and 10,500 population related jobs, as well as 33,000 employment related jobs.” Equally concerning and even more bizarre is BER – 12 which is described as “All Lands in North Pickering that meet a certain set of criteria” without any of these criteria listed, and no land area provided. It would appear from the map to include all non-greenbelt lands either owned by the federal government or contiguous to the Federal lands and east of the Brock Road, and visually appears to be a larger area than the 1650 ha. which comprise BER – 13.



Portion of map taken from “Requests for Boundary Expansion – Ajax and Pickering”, Proposed Policy Directions March 2021. Durham Region Planning and Economic Development Department.

The Pickering lands proposed for settlement area boundary expansion are easily more than twice the land area proposed for expansion in all of the rest of Durham Region combined, which totals 1326 ha..

Regarding BER – 12, we assume the Region has no power or mechanism to rezone federal lands. In recent years a developer group and the Municipality of Pickering have repeatedly attempted to force development in northeast Pickering, BER -13. The developer’s own agricultural assessment report, prepared by DBH Soil Services in October 2019 for Dorsay Development Corporation, is damning. Submitted to the Municipality of Pickering, the consultant’s report concludes that the soils here are “good soils with high soil capability” and notes that the lands are actively used for agriculture.

It is troubling that the Region's invitation for Boundary Expansion Requests are occurring before first incorporating the OMAFRA agricultural mapping protections for valuable agricultural lands outside the Greenbelt into the ROP. It seems the Region is putting "the cart before the horse" and is ignoring the urgent need to protect Durham's prime agricultural lands and an industry which is "*one of the largest primary goods producing sectors within the Region* (p. 97, Proposed Policy Directions). Would the Region please confirm that the revised ROP will introduce these protections for all prime farmlands. If this is not the case then we could be approving developments on prime farmland that may not take place until the 2040's that will not have to comply with protections first introduced by OMAFRA in 2018. Our concern that there may be a loophole here is heightened by Pickering's attempt to urbanize virtually all of its remaining prime farmland north of Highway 7.

Our farming friends in Durham Region who are educated about soil capability tell us that the band of rich soil which stretches along the southern slope of the Moraine between Highway #7 and Concession 9 is the last big contiguous section of high quality Class 1 farm soils in eastern Canada. Other than pockets which occur sporadically as one continues east through Quebec and New Brunswick, the next stop for such good growing soil is across the ocean in Europe. The two enormous settlement area boundary expansion requests in Pickering are also on some of the best farmland in Durham Region.

One final point on settlement area Boundary Expansion. GDA has always opposed fixing on a date like 2050 that is so far in the future. It almost inevitably leads to overestimating land needs, stimulates land speculation, increases land prices and encourages sprawl. The Envision Durham report lists areas proposed for employment area conversions. Some 890 ha., already within the urban area boundaries and which were previously zoned for industry are now being proposed for the most part for residential zoning. Surely this is also an illustration of the difficulty and inaccuracy of long-term forecasting.

More people may in the future be able to work from home. If so, what impact will that have on where people choose to live, and how far they may feel they can be from places of employment that they may only need to commute to a few days a week? What implications could these potential changes have not just for housing but for infrastructure such as public transportation? Recent reductions in immigration numbers, housing preferences of newcomers and the desires of coming generations may alter housing patterns as well. Co-habitation of multiple generations or families may become the preferred housing option. This is a terrible time to embark down this forecasting path

- the pandemic crisis has created a situation where no one can predict what the impact will be on future housing needs and preferences.

Aggregate Rehabilitation

Many GDA members live on the Moraine where there are numerous aggregate pits. We recognize and support the need to extract aggregates close to where they are needed. However, aggregates are described as an interim use, so after an average 30-35-year pit life, residents are eager to see the Oak Ridges Moraine policies respected and protected, pits rehabilitated, and the lands returned to a natural state and to passive recreation purposes consistent with those policies. One of Envision Durham's proposed policy directions is to Enhance aggregate resource rehabilitation requirements and incorporate relevant Greenbelt Plan rehabilitation policies. We applaud this direction and hope that Regional aggregate policies will discourage any uses on these former aggregate lands that support continued industrial use, importation of fill, and truck traffic.

Environmental Stewardship,

Policy Proposal #9 states "*Encourage the Stewardship of natural features as part of trail building and maintenance*" (p 135). This is the only mention of the word "Trails" we can find in the entire Proposed Policy Directions document. GDA has a strong interest in public access to trails, the development and maintenance of trail networks, and in stewardship of land upon which trails are situated. The recent pandemic has demonstrated the importance of trails. Parking lots have been busy, and trail visitors routinely park on the roadside because there is often no room in the parking lots. Where parking areas were once filled only occasionally, on weekends and for certain events, it is now normal to see the parking lots over-flowing every weekend, and they are almost never empty. We talk with people as we encounter them on the trails. They are travelling from far and wide. They are universally grateful for the trails and tell us without prompting that it is important to their mental health.

Investing in trails, especially near densely populated and growing urban areas, represents a good bang for the buck. Anyone can use the trails, at any time of the year, without any special equipment, and experience the benefits, especially to their mental health. The lands where trails are situated generally perform multiple functions of cleaning our air, protecting against flooding, protecting sources of drinking water and providing tree cover and habitat.

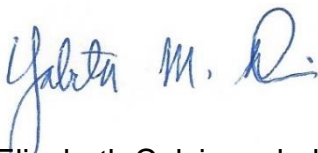
TRCA is a large landowner in Durham Region where the largest and densest network of trails in the Region are situated, in south Uxbridge Township. In 2009 TRCA installed trail visitor counters and completed surveys of trail users of the East Duffins Headwaters properties (Walker Woods and Glen Major Forest). These two methods estimated 53,000 trail visits in 2009 and found that trail visitors travelled from across the GTA – Oakville, Toronto, Whitby, Ajax, Stouffville – and occasionally from beyond – Peterborough, even Ottawa.

Funding challenges for TRCA’s management of properties within Durham Region mean that surveys and trail counters have not been repeated here since 2009. Acting Manager Deanna Cheriton suggests that trail counters installed at other key locations across the north part of their jurisdiction can be considered a proxy: 59,400 trail visits in 2018, 89,491 visits in 2019, (a 60% increase from the prior year). She notes that for 2020, **a further 237% increase in the number of trail visits occurred.**

Support for trails helps meet policy directions for climate resiliency, healthy communities, creates opportunities for tourism, complements agri-tourism, and contributes to Tree Canopy Targets and a Thriving Rural System all at once. We have worked closely with the TRCA for many years now and increasingly are subsidizing their efforts to address the public demand for trails. We partner with TRCA to help maintain the trails, we subsidize a local liaison position so that TRCA can better respond to local needs, we’ve contributed significant funds to help build parking lots and repair trails. We need the Region of Durham to recognize the contributions made to Durham by these trails. We direct you to a report released in 2020 by the Conference Board of Canada entitled [Trekking Our Trails: The Benefits and Significance of Canada’s Trail System \(conferenceboard.ca\)](#)

We would like to see a Policy Proposal which explicitly mentions trails - fostering support for trails, recognizing their importance, capitalizing on the opportunities for tourism presented by trails, providing financial support, either directly or through better funding for the TRCA for their maintenance, and working with the many groups which are already supporting trails through significant donations of time and money.

Thank you for providing an opportunity to comment.



Elizabeth Calvin on behalf of Green Durham Association

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