



November 2, 2021

Lakeridge Health Site Selection Committee  
Submitted by email: [siteselection@lh.ca](mailto:siteselection@lh.ca)

Dear Committee Members

I write on behalf of Green Durham Association to express our opposition to the City of Pickering's proposal that Lakeridge Health's new hospital be located on prime farmland adjacent to the Oak Ridges Moraine and within the Carruthers Creek watershed.

GDA is a charitable organization concerned with land stewardship, land conservation and public access to trails and green space. We have long had an interest in "smart growth" approaches which ensure that development which is needed to house our growing population is efficient in its use of land and uses existing infrastructure wherever possible. Our aim is to protect, preserve and enhance the forests, farmlands and natural areas which lie northeast of Toronto in Uxbridge, north Pickering and adjacent Greenbelt lands. Since 1998 we have worked in partnership with municipalities, conservation authorities, private landowners, the aggregate industry and others to plan for, acquire and manage trail networks, nature corridors and conservation lands. Over this time we have also supported research about and have commented on policies and decisions affecting land use.

We have been following the site selection process for a new hospital in Durham Region with interest. We understand there are three potential sites under consideration: in Whitby, in Oshawa and on donated land located in Northeast Pickering.

The current offer of land in northeast Pickering upon which to situate a hospital is the latest in a series of attempts by the owners of some of these lands to bypass the normal planning process. Last year we were delegates to the Region of Durham when a Minister's Zoning Request was being considered for development on these same lands. In previous years we have submitted comments to the Region of Durham and the City of Pickering about proposed development of these lands.

The Toronto and Region Conservation Authority recently completed the Carruthers Creek Watershed Plan, and in June of 2021 the Region of Durham adopted the plan. The report shows that this watershed is stressed and that there is a serious problem with flooding and erosion. The report indicates that urbanizing the Carruthers Headwaters will dramatically increase flooding hazards (p 38, Carruthers Creek Watershed Plan 2020-2030, [www.trca.ca](http://www.trca.ca)). The TRCA Report makes it clear that under no circumstances should the Carruthers Headwaters be urbanized. Durham Region has identified flooding as a major threat from climate change and outlined numerous direct and indirect costs and disruptions to local governments and homeowners (Durham Community Climate Change Adaptation Plan, [www.durham.ca](http://www.durham.ca)). The possibility of future flood risk for the citizens and businesses who are downstream is significantly increased if development occurs on this land.

These lands are adjacent to the existing Greenbelt and are valuable for agriculture, one of Durham Region's most important industries. These lands are part of the Agricultural System which has been mapped and which we hope will be adopted as part of the Greenbelt expansion. Earlier this year we submitted comments to the Province's initiative "Growing the Size of the Greenbelt" suggesting that these lands become permanently protected for agriculture and added to the Greenbelt. Rather than donating these lands for development, we would prefer that the landowners donate these agricultural lands to the Ontario Farmland Trust to ensure they are permanently protected for agriculture.

We are concerned there will be serious consequences which will occur as a result of accepting this land donation. It will be in the interests of the donors to ascribe a high value to their donation of land. The stated value will automatically increase the value of adjacent lands they own, contributing to land speculation. Should the necessary servicing of these lands occur, the value becomes still higher. Inflated farmland prices prevent new, younger farmers from entering farming, and will discourage active current farmers from continuing to farm.

Another concern we have is the impact a hospital would have on nearby agricultural lands. Building a hospital – even if it remains solely a hospital (which is highly unlikely) would disrupt the valuable connections these actively farmed lands have with other nearby lands used for agriculture. Fragmenting the agricultural land base can significantly impede agricultural activities such as safe travel between farms with agricultural equipment and make it more difficult for nearby farmers to plant, grow and harvest crops. These lands are part of a larger agricultural land base which should be kept intact to support agriculture.

A new suite of services including water, sewage, electricity and transit will be required on this land in order to build a hospital. If a hospital is built on these lands, we believe that other development will surely follow. The selection of an appropriate site for a new hospital has been initiated before the release of Review of the Official Plan, due in 2022. The Review Process weighs information and should inform decisions about where population growth should best occur, whether any existing urban boundaries need to be expanded to accommodate growth forecasts, and where development is needed and is feasible. It seems reasonable that the selection of a new hospital site be informed by these considerations, rather than in advance of them; to do otherwise is to make a mockery of the planning process. We hope the committee will consider the revisions outlined in the 2022 Official Plan before making a final selection of a new hospital site.

The site selection criteria for a new hospital which are listed in the Proposal Call issued September 21, 2021 mention the following evaluation criteria:

- “Not be located in a Key Natural Heritage and or have Hydrologic Features on lands”
- “Not be characterized as part of the Greenbelt Area which includes the Oak Ridges Moraine”
- “Be already serviced, or serviceable, by natural gas, electricity, Regional water, Regional wastewater, and communications infrastructure, including high speed internet, and site has potential redundancy for essential servicing (e.g., electricity, natural gas, communications)”.

While the donation of the lands for a hospital site in northeast Pickering may be tempting, there will be a financial burden to the Region of Durham and to its citizens. We recognize that another hospital is needed in our Region. We believe the site in northeast Pickering is not suitable, and we hope the committee considers the soon-to-be-released Official Plan before making a final choice for a new site. We thank you for considering our comments as part of your deliberations.

Yours truly,



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