



SUBMISSION TO THE AUDITOR GENERAL OF ONTARIO

February 23, 2003

We are Durham citizen volunteers advocating for sustainable regional development. Our goal with this submission is to raise complex local matters that are material to the scope of your audit relating to the removal of the Duffins Rouge Agricultural Preserve (DRAP) from the Greenbelt. We urge you not to examine DRAP's removal in isolation and ask you to take the following into consideration:

1. Enacting Duffins Rouge Agricultural Preserve Repeal Act (DRAPRA) has enabled private interests to benefit¹ from the vast difference in value between land designated as farmland in perpetuity, versus land assigned as unserviced designated growth area.
2. Rouge National Urban Park (RNUP) abuts DRAP and urbanizing the area will have significant impact on the integrity and mandate of RNUP². All levels of government have made substantial investments in the Park; the loss of DRAP compromises the sunk cost of those prior commitments.
3. There are few details³ on how the Province's plans to develop housing in DRAP affects Durham's buildout of existing Designated Growth Areas (i.e., Seaton). In turn, we don't yet know how this affects the 2022 urban expansion decisions as part of the Durham Official Plan Review that accommodates growth projections through 2051.
4. Attention must be paid to whether taxpayers will be burdened by excessive servicing/infrastructure routes⁴ resulting from the Province's accelerated plans in DRAP and other Greenbelt parcels. Scheduling for services in new areas, and associated capital costs, have yet to be contemplated^{5,6}.
5. Lastly, what is the opportunity cost associated with removing the natural assets and ecosystem services of the DRAP area in the context of a changing climate and international food systems and "breadbaskets" under threat?⁷

¹ <https://www.thestar.com/opinion/contributors/2023/01/10/the-truth-about-the-greenbelt-protection-deal-the-ford-government-is-breaking.html>

² <https://www.thestar.com/news/gta/2022/12/05/taking-durham-land-out-of-greenbelt-could-cause-irreversible-damage-says-parks-canada-in-blunt-warning.html>

³ PDF Page 7, Section 4.6 - <https://www.durham.ca/en/regional-government/resources/Documents/Council/CIP/CIP-2023/CIP-02102023.pdf>

⁴ PDF Pages 5, 9, Sections 4.8, 6.3 - <https://www.durham.ca/en/regional-government/resources/Documents/Council/CIP-Reports/CIP-Reports-2022/2022-INFO-91.pdf>

⁵ <https://www.thestar.com/news/gta/2023/01/31/i-dont-know-what-they-are-smoking-durham-was-already-struggling-to-support-growth-then-the-province-opened-up-its-greenbelt-lands.html?rf>

⁶ <https://www.durham.ca/en/regional-government/bill-23.aspx>

⁷ <https://institute.smartprosperity.ca/OntariosGreenbelt?fbclid=IwAR0108SQhHk36LGk9hknih02kWLmlWS5xNerg0e7z6M0UFmw5wOCMR5fCM0>

Due to the quantity of land being released for development in Durham, **we request that you examine the implications of developing approximately 4,700 acres of DRAP, in relation to 9,000 acres of “whitebelt”⁸ proposed by Durham Regional Council as part of the Official Plan Review⁹, to be finalized in Spring 2023.** Within the balance of the document, we will focus on new community lands for housing, as this is stated as the Provincial priority.

DUFFINS ROUGE AGRICULTURAL PRESERVE

As illustrated in Table I below, of the 7,400 acres of land removed from the Greenbelt by the Provincial government, approximately 5,000 acres are located in Durham Region.

Of that, approximately 4,700 acres are located in the DRAP, which is made up of largely prime agricultural land. DRAP is nestled between West Duffins Creek to the east, Rouge National Urban Park to the west and north, and central Pickering to the south.

Given that the DRAP represents the largest of the 15 Greenbelt land removals, it is vital that your investigation give a commensurate level of review to the implications of the Provincial government’s actions in Durham Region, and its critical intersection with the 2021-2051 Durham Region Municipal Comprehensive Review (MCR) - Official Plan.

TABLE I

GREENBELT REMOVALS	ACRES
Ontario Greenbelt Removal	7,400 acres
Greenbelt Removals in Durham Region	5,000 acres
Greenbelt Removal in Pickering (DRAP)	4,700 acres

ROUGE NATIONAL URBAN PARK

As noted earlier, Rouge National Urban Park lies to the west and north of DRAP. Please refer to the letter ¹⁰ from Omar McDadi, Field Unit Superintendent, Rouge National Urban Park, to the Government of Ontario sent on November 29, 2022, calling attention to the risks to RNUP if DRAP is urbanized.

⁸ <https://www.durham.ca/en/doing-business/resources/Documents/PlanningandDevelopment/Envision-Durham/Map-1.-Regional-Structure-Urban-and-Rural-Systems-Feb-2023-Accessible.pdf>

⁹ <https://www.durham.ca/en/doing-business/resources/Documents/PlanningandDevelopment/Envision-Durham/draft-new-Durham-ROP-online.pdf>

¹⁰ https://www.stopsprawldurham.com/files/ugd/e74d7e_2296c8974de1452f952d5f3cb2fb63de.pdf

HISTORY OF DUFFINS ROUGE AGRICULTURAL PRESERVE¹¹

The DRAP lands were originally expropriated by the Provincial government in the 1970s as part of a future community associated with the proposed federal airport.

In the late 1990s, the Provincial government decided to sell those 4,700 acres. This matter came before the Ontario Municipal Board (OMB) and in 1999 a memorandum of understanding (MOU) was entered into between the Ontario Realty Corporation (representing the Province), Durham Region, and the Town (later City) of Pickering. Part of the terms of this MOU provided that agricultural easements be placed on these lands before their sale, restricting their use to agricultural purposes in perpetuity.

The lands were then sold at farmland prices initially to former tenants, but over time the bulk of these lands became owned or controlled by a few development interests.

In 2002, the City of Pickering reversed the position it had taken in signing the MOU, and initiated a Growth Management Study on these lands that was funded by a development group¹².

In 2005, after the Province had placed these lands in the newly created Provincial Greenbelt, Pickering released the agricultural easements that they held and that had been placed on the lands prior to their sale.

To further protect these lands in addition to their Greenbelt protection, the Provincial government passed the DRAP Act in 2005 to reinstate the easements by statute.

In late 2022, in furtherance to DRAP's removal from the Greenbelt and to allow for development, the present Provincial government passed DRAPRA and removed these easements.

If the province had wanted to develop housing on these lands, the easements could have been removed after the province had ensured that the public, rather than private interests, received the "development rights" inherent in the publicly held easement.

Instead, enacting DRAPRA has enabled private interests, not the public, to receive all or at least the great majority of the huge difference between these lands valued as farmland, and land valued as unserviced designated urban lands. This difference in value for these lands has been estimated at \$1 billion or more¹³.

This valuable farmland abutting, protecting, and enhancing the Rouge National Urban Park should not be developed. However, regardless of the well-documented agricultural and environmental attributes of these lands and their importance to the Park, this giveaway of public funds is, in and of itself, grounds for censure of this government's actions.

¹¹ <https://www.greendurham.ca/wp-content/uploads/2022/12/GDA-Heritage-Infrastructure-Cultural-Policy-Committee-Bill-39.pdf>

¹² https://www.researchgate.net/publication/321491714_Developers_the_State_and_the_Politics_of_Private_Property_Rights (PDF - Page 185)

¹³ <https://www.thestar.com/opinion/contributors/2023/01/10/the-truth-about-the-greenbelt-protection-deal-the-ford-government-is-breaking.html>

ENVISION DURHAM - REGION OF DURHAM MUNICIPAL COMPREHENSIVE REVIEW PLANNING PROCESS

Like all Greater Toronto Hamilton Area (GTHA) regional municipalities, Durham Region has responsibility for long-range planning, a Regional Official Plan that lower-tier municipal plans must comply with (at least for the time being), and the raising of funds for, and provision of, hard urban services such as water, sewer, transit, and roads. It is based on this combination of obligations that long range infrastructure needs are determined, capital budgets set, and development charges, taxes, and water and sewer rates are set and adjusted over time.

In the fall of 2022, Durham Region was well advanced in its 30-year Municipal Comprehensive Review (MCR) process of reviewing and updating its Official Plan - a process called Envision Durham.

CURRENT DESIGNATED GROWTH AREA (DGA)¹⁴

Prior to considering new community land needs within Durham Region, Envision Durham identified that Durham Region currently has a total existing Designated Growth Area (DGA) of 6,363 ha. (15,699 acres) of which 1,496 ha. (3,697 acres) has been developed, 2,490 ha. (6,153 acres) was classified Category 1 (registered but unbuilt or in the process of being built out), and finally, 2,367 ha. (5,849 acres) was classified as Category 2 (remaining DGA lands outside of Category 1) land that could become available for community area development as needed.

Together, Category 1 and 2 DGA areas total 4,857 ha. (**12,002 acres**) suggesting there is no shortage of designated community land in the short term for the building of housing.

MCR PHASE 1 – LAND NEEDS ASSESSMENT PROCESS¹⁵

After an exhaustive analysis of five Land Need Assessment (LNA) Scenarios against the pre-established best practice criteria, in early May 2022 Regional Planning staff recommended that Durham Regional Council approve Scenario 4 for housing. Scenario 4 supported a Community Area Urban Land need of 950 hectares (2,348 acres). As such, Regional Planning staff recommended that in addition to the 4,857 ha. (12,002 acres) DGA, an additional 950 ha. (2,348 acres) should be added outside the current urban boundary to meet community land needs in the period 2021- 2051, which will allow for a total of **14,350 acres for residential development.**

¹⁴ <https://www.durham.ca/en/doing-business/resources/Documents/PlanningandDevelopment/Envision-Durham/Land-Need-Summary-Appendix-A.pdf>

¹⁵ https://icreate7.esolutionsgroup.ca/11111068_DurhamRegion/en/regional-government/resources/Documents/Council/Reports/2022-Committee-Reports/Planning-and-Economic-Development/2022-P-11.pdf

BILD SCENARIO 2A

However, on May 3, 2022, the Durham Planning & Economic Development Committee did not adopt the Regional Staff recommendation of Scenario 4, instead approving the BILD Scenario 2A, which called for an urban area extension of 2,500 hectares (6,177 acres) for community/residential growth.

It is important to note that the BILD Scenario 2A was *not* one of the five Envision Durham LNA Scenarios that were assessed through the pre-established criteria; it was *not* presented to the public with the other Land Needs Scenarios; and, it was *not* fully scrutinized by Regional Planning staff before approval.

After the May 3, 2023, Durham Region Planning and Economic Development Committee meeting, Planning Commissioner Brian Bridgeman prepared a lengthy response to Regional Council¹⁶ in which he pointed out that BILD Scenario 2A, “detracts from the achievement of Regional sustainability policies and obligations”; and, “deemphasizes Regional priorities that focus growth on existing communities, where services and infrastructure are either already in place or can be provided more efficiently.”

Once adopted by Regional Council on May 25, 2022, the BILD Scenario 2A had the effect of putting about 6,000 more acres of new community land into the future planning pipeline. Combined with the existing DGAs, Durham Region would have a new **future growth area of 18,179 acres of prime farmland and natural heritage areas**.

At this date, there isn't a final approved number for future growth areas, as Envision Durham will be finalizing the Official Plan in the Spring of 2023.¹⁷

INTRODUCTION OF BILLS 23 / 39

In the fall of 2022, the Province introduced Bills 23 and 39, Greenbelt carve-outs, and DRAPRA. These actions were supposedly required by the Province to pursue the “More Homes Built Faster Plan,” which seeks to build 1.5 million homes over the next 10 years.

As illustrated in Table II below, with the addition of an additional 5,000 acres of Greenbelt carve-outs, Durham Region will now have a total of **11,177 acres of new land for community/housing**. Contrast that with the original staff recommendation for future housing needs, of 2,348 acres.

¹⁶ <https://calendar.durham.ca/meetings/Detail/2022-05-25-0930-Regional-Council-Meeting/e2dfbaaf-1233-42e2-b4ba-ac9f014f8b10>

¹⁷ <https://www.durham.ca/en/regional-government/resources/Documents/Council/CIP-Reports/CIP-Reports-2022/2022-INFO-91.pdf>

TABLE II: SUMMARY – DGA + BILD2A + DRAP

		Residential
A	Existing vacant DGA	12,002 acres
B	BILD Scenario 2A	6,177 acres
C	Greenbelt Carve-outs	5,000 acres
	TOTAL	23,179 acres

It is important to note that the lands ultimately designated by Durham for future urban boundary expansion will have some level of study of natural heritage significance, agricultural land quality, and constraints on servicing. However, the former Greenbelt lands, including the DRAP, had been assumed to be protected in perpetuity and not slated for urban development. Accordingly, preliminary study work has not been prepared or scheduled. Now that the Provincial government has mandated that planning and servicing (and all other work required to issue building permits) be completed by 2025 or the lands will be returned to the Greenbelt, developers who own Durham’s former Greenbelt lands will exert extreme pressure on the municipalities to ensure that their former Greenbelt lands go to the head of the queue in order to meet the 2025 deadline.

Despite widespread agreement that opening the DRAP lands to development is totally unnecessary to meeting Regional and Provincial housing objectives¹⁸, the Provincial government has proceeded to do so. This has caused great uncertainty and chaos in the ongoing Regional Official Plan review process and orderly planning queues.

At least two Durham municipalities, Clarington¹⁹ and Pickering²⁰, have taken the position that the Provincial government’s Greenbelt actions have necessitated a total review of the Region’s settlement boundary expansions and density targets in existing urban areas. The net effect will likely result in delays in the normal planning process, and unwarranted and unnecessary confusion and waste of taxpayer resources. In turn, this negatively impacts achieving affordable housing goals.

DRAP IN THE CONTEXT OF PICKERING PLANNING

¹⁸ <https://www.durham.ca/en/regional-government/bill-23.aspx> - Importance-of-Regional-planning

¹⁹ <https://weblink.clarington.net/weblink/0/edoc/402409/PDS-005-23.pdf>

²⁰ <https://corporate.pickering.ca/WebLink/0/edoc/247495/January%2023,%202023.pdf>, pages 159-161

PICKERING'S NEW HOME PLEDGE FOR 2031

As noted in the February 6, 2023, Pickering Executive Council Agenda²¹, as part of Steve Clark, Minister of Municipal Affairs and Housing Provincial goal of building 1.5 million homes by 2031, Pickering has been asked to take the necessary steps to reach their assigned target of 13,000 new homes by 2031.

This municipal document notes that the City is experiencing significant growth, particularly within the Seaton community and in the City Centre Neighbourhood. This reinforces the City's ongoing efforts to increase housing inventory within *existing* designated growth areas.

“The total number of proposed units for the Seaton Community (at full buildout) is approximately 18,682 units, based on existing plans of subdivision. This total is projected to be reached by the 2041 timeframe. Furthermore, the City Centre Neighbourhood is forecasted to have an additional 4,310 units by 2031 (see Table below for approved development applications as of the end of 2022).”²²

As indicated in the City's table and document, the overall total housing unit count is projected to be 15,021 by 2031, which exceeds the Province's 13,000 homes target for Pickering. **As such, Pickering can clearly meet their assigned target without DRAP and within its existing urban boundaries.**

Neighbourhood	Units in 2022-2026	Units in 2027-2031
City Centre	1,203	2,433
Duffin Heights	1,104	1,007
Seaton(Lamoureaux)	1,826	1,654
Seaton(Brock-Taunton)	0	0
Seaton(Mount Pleasant)	150	300
Seaton(Wilson Meadows)	906	523
Seaton(Thompson's Corners)	530	750
Remaining Pickering	1,614	1,021
Total	7,333	7,688

*Note that the unit count for 2022-2026 excludes units built and occupied in 2022

²¹ <https://corporate.pickering.ca/WebLink/0/edoc/247720/February%206,%202023.pdf>, (pages 53-74)

²² <https://corporate.pickering.ca/WebLink/0/edoc/247720/February 6, 2023.pdf>

SEATON COMMUNITY - NORTH PICKERING DEVELOPMENT (Sourced in April 2022)

The City of Pickering describes the Seaton Community as “one of the largest combined residential, employment and commercial developments in Canadian history. Seaton is designed to develop a complete community, offering a range of housing types, employment lands and land densities.”²³

“City staff has worked closely with the Province to ensure that Seaton is designed to be a sustainable, urban community, with a strong focus on economic development, livability, and the protection of the natural heritage system.”²³

“Sustainable Development Guidelines help create a walkable, transit-supportive community with an active street life, including neighbourhood shops, social facilities and parks. All future neighbourhood plans must meet the minimum standards set out in the guidelines in order to move forward with development.”

Status update on development progress:

- The full buildout of Seaton was originally planned to be 20,989 units.
- Over past 5 years, only 1,549 permits have been issued (to the end of 2021) this represents an average consumption rate of 310 units/year.
- The 2021 projection was that 6,320 units would have been permitted by now.
- The actual progress in Seaton is 4,771 fewer units than projected.
- Only 7.3% of Seaton has been completed in 5 years.
- The remaining number of units for Seaton is 19,440.
- For Seaton to be fully built by 2051, an average of 648 permits would need to be issued every year; **more than double the historical rate to date.**

Compare this against current trends: labour shortage, materials shortage, input cost increases, sustainable building standards, carbon budgets. While demand for new homes may be indeed be high, supply will struggle to keep up with demand based on labour, legislation, wastewater servicing, and increasing cost of material inputs. **It is reasonable to conclude that there is no danger of Seaton being full before the current MCR growth timeline ends in 2051.**

SEATON COMMUNITY – CRITICAL SERVICING QUESTIONS

The initial projected cost of Regional services (water, sewer, roads) was set at approximately \$1 billion. This was divided into an undefined number of future phases:

Phase 1 = 9800 units (Previously projected to be complete by 2031, but based on the above pacing of the project, these are unlikely to be achieved by that date.)

²³ <https://www.pickering.ca/en/city-hall/seatoncommunity.aspx>

Costs for Phase 1 = \$442 million (\$120 million for water + \$262 million for sewer + \$60 million for roads)

Phase 2 = 11,189 units

Cost for Phase 2?

- Background work is ongoing, with a goal of a Phase 2 (or possibly more phases) agreement in place by 2023.
- A new development charges bylaw will be required with the goal of wrapping the Seaton requirements into a comprehensive development charges bylaw when the present one expires in 2024. This may be impacted by Bill 23.
- There is uncertainty around the capacity, timing, and cost associated with expansion/upgrades to the Duffins Creek Water Pollution Control Plant.

LOWERING THE DENSITY TARGETS FOR THE SEATON DGA

In December 2021, Planning Staff at the City of Pickering made the following request to Envision Durham, exhibiting a desire to reduce the density of the Seaton Community from 89 people and jobs per developable hectare (P&J/ha)²⁴:

“The recommended DGA density target for Durham Region is 64 people and jobs per developable hectare (P&J/ha) for all designated DGA lands. To achieve this average DGA density target of 64 P&J/ha, the Seaton Community will need to develop at a density of 89 P&J/ha by 2051, whereas it is currently being developed at a density of 81 P&J/ha, and the rest of the Durham Region DGA lands will have to be planned at an average density of 60 P&J/ha.”

“Staff note that there is a significant difference between 89 P&J/ha projected for Seaton and the minimum of 50 P&J/ha required by the Growth Plan for DGAs, and recommended new targets of 64 P&J/ha for areas outside of Seaton. Contextually, Seaton is similar to much of the other DGAs in the lakeshore municipalities in Durham. Expecting this average density to further increase to 89 P&J/ha is questionable given the preference for lower density housing forms, lack of higher order public transit, and direction for 50% of new growth to be within the built boundary, which make increased densities in Seaton less palatable. Accordingly, staff recommend that the Region review this projection. Realization of the long term P&J/ha for Seaton as well as the housing mix, and updating of the data to take into account development that has occurred since 2019, will likely result in the need for additional DGA lands.”

As per the Alternative Land Need Scenario Assessment Summary Report, part of the Region of Durham Growth Management Study: Land Needs Assessment March 2022²⁵, Envision Durham staff have reduced the projected density of Seaton from 89 P&J/ha to 83 P&J/ha.

²⁴ https://corporate.pickering.ca/weblink/1/edoc/242037/December_13_2021.pdf

“Before the Scenario modelling and analysis was undertaken, adjustments were made to reflect the current context across the Region to create a refined baseline of existing settlement patterns and supply of urban land available for development (greenfield). Input from stakeholders and consultation has also informed the adjustments. These adjustments are as follows”:

“c. Reassessment of the current active development applications and developable land area within Seaton.”

CONCLUSIONS FROM SEATON

There are a number of very significant financial and capacity issues that remain outstanding and need to be resolved before the timing of the ultimate buildout of Seaton can be projected with any accuracy. There also appears to be an attempt to reduce the number of people projected to make Seaton home which impacts the densities required to support frequent and convenient transit. In light of the above, there are a great many questions about the Seaton buildout and how it might impact the DRAP development progress, the sustainability of the planning, and vice versa.

When Chief Planner Brian Bridgeman was asked: What are the possibilities of 90% buildout of Seaton by 2051? His answer was “There is a realistic possibility of substantial buildout by 2051 and no possibility by 2041.”

Note section 7.3.11(p)(1) of the current Durham Region Official Plan²⁶ states, in considering an urban boundary expansion involving northeast Pickering (see also: TRCA’s Carruthers Creek Watershed Plan²⁷), Regional Council must consider “the amount and rate of development in the Seaton Community.” Given the risks inherent in the above projections and uncertainty of major servicing constraints, it is reasonable to question whether Seaton will be full by 2051. **If it will not be full by 2051, there is no need to consider urban boundary expansion into Carruthers Headwaters in northeast Pickering, or to entertain the urbanization of DRAP.**

Projections become more difficult to predict the longer the timeline involved. Official Plans are required to be reviewed every five years for precisely this reason - to assess and correct inaccurate projections. If the evidence suggests that an urban boundary expansion is not needed before 2051, Durham leaders can safely make that decision knowing it can be corrected it at the next MCR if more accurate information becomes available. However, if there is an unnecessary expansion of the urban boundary and subsequent information makes clear that there should not have been, there is no process to take the land back. The consequence is unnecessary and irreversible sprawl for present and future taxpayers to pay for.

²⁵ [https://corporate.pickering.ca/weblink/1/edoc/242037/December 13, 2021.pdf](https://corporate.pickering.ca/weblink/1/edoc/242037/December%2013,%202021.pdf)

²⁶ <https://www.durham.ca/en/doing-business/resources/Documents/PlanningandDevelopment/Official-Plan/2020-Durham-Regional-Official-Plan-Consolidation--Revised-1.pdf>

²⁷ <https://trcaca.s3.ca-central-1.amazonaws.com/app/uploads/2021/10/01101913/Carruthers-Creek-Watershed-Plan-2021-2031-10-1-2021.pdf>

KEY QUESTIONS

Based on the analysis illustrated above, we believe the following key questions must be answered:

1. How will the Province's actions of effectively forcing new sprawl on Greenbelt lands affect Durham taxpayers?
2. How much Durham funding will have to be dedicated to planning and servicing the Greenbelt carve-outs?
3. How much viable and more readily serviced urban land will not be developed because of this?
4. What is the total projected cost to Durham Region and the municipal taxpayer through the 2051 planning horizon if all of these parcels are zoned for future residential growth?
5. What will be the opportunity cost to the Region in lost agricultural and natural heritage lands and compromised water assets by being forced to be developed unnecessarily?
6. What are the increased costs to reach net-zero due to excessive sprawl?
7. Overall, does the Region of Durham have the fiscal ability to service new housing areas of, not 2,348 acres as recommended by Durham Planning Staff, not 6,177 acres as Durham Regional Council approved, but a whopping **11,177 acres** when the Durham Greenbelt carve-outs are added in. (These figures do not include the existing *vacant* DGA of 12,002 acres, nor the areas designated for future employment growth of 2,894 acres.)

The Province is pushing vast boundary expansions and Greenbelt development at the very time when the real housing need is to greatly increase the amount of affordable diverse housing in existing urban centres close to jobs, transportation, and other amenities.

We need to examine whether it is in the public interest to encroach on the Greenbelt and remove a public asset (the DRAP agricultural easements), rather than just allowing a similar urban area expansion to have happened elsewhere in Durham to meet housing needs.

As small volunteer organizations, we do not have the resources to answer these and many interrelated questions. But these questions need to be both asked and answered.

We highly suspect that the Provincial government's Greenbelt decision in Durham Region will wastefully divert tax dollars from logical, planned and sustainable development to implement illogical and environmentally damaging development of the 4,700 acres Duffins Rouge Agricultural Preserve. We further suspect the cost of this to the Durham Region taxpayer through 2051 and beyond will be measured in the billions of dollars.

We thank you in advance for receiving our submission and trust you will thoroughly look into the matters we have raised.

For further questions, please contact Stop Sprawl Durham volunteers at stopsprawldurham@gmail.com

This submission is supported by:

- Blue Dot Whitby
- Climate Justice Durham
- Environmental Action Now Ajax Pickering
- Green Durham Association
- Land Over Landings
- Rouge Duffins Greenspace Coalition