



March 30, 2023

Submitted to: Envision Durham

Sent by email: envisiondurham@durham.ca

Draft DROP and Urban Area Expansion in Durham

Introduction

Federal and Provincial Governments expropriated over 43,000 acres for an airport and associated city in the early 1970's. From that time to the present day, Green Durham Association (GDA) members have been deeply involved in the resulting land use struggles, interacting with federal, provincial, regional and municipal governments and many other stakeholders and citizens. This involvement predates the creation of the Green Door Alliance in the 1990's and which later became Green Durham Association.

The Federal Government now recognizes there is still no short or even medium term need for an airport. While not precluding a possible airport if justified in the future, GDA efforts in recent years have turned to working with many others to reduce the size of Federal airport land holdings. The result is that the majority of the original 18,600-acres is now part of the Rouge National Urban Park.

GDA members were also heavily involved with the lands expropriated by the Province, in the creation of Seaton and the Duffin's Rouge Agricultural Preserve in Pickering. When the Province decided in the 1990's to sell the Preserve lands, GDA worked with the Region of Durham to ensure that the Province first placed agricultural easements on the agricultural lands. Before convincing the Province to do so, Ontario Realty Corporation (ORC), the Province's real estate arm, had to be taken to the Ontario Municipal Board (OMB). GDA was one of the parties to that hearing, and the settlement resulted in a Memorandum of Understanding between the Region, Pickering and ORC to place easements held by Pickering on the land before sale. In 2005 we supported the incoming government's decision to place the Preserve lands in the newly created greenbelt. We also supported their decision to pass the Duffins Rouge Agricultural Preserve Act which reinstated the agricultural easements after Pickering had released them.

Strong opposition to development proposals before the OMB in the year 2000 in Richmond Hill and in Uxbridge (where GDA affiliate Durham Conservation Association was a party), caused the Province to halt both hearings, freeze development on the moraine while it implemented the Moraine Plan, and swap developer-owned lands for provincial lands in Seaton. A subsequent government introduced the Greenbelt and Growth Plans creating a much more effective planning framework. In the years following GDA has concentrated on working with the Township of Uxbridge, conservation authorities and other stakeholders to add to the conservation land base and create trail and nature corridors connecting conservation lands and communities.

As these lands are on the urban fringe, GDA has also been a strong advocate of combatting urban sprawl – the greatest danger to these lands - and strengthening Ontario Growth Plan standards. Our comments on the draft Durham Region Official Plan reflect the concern we have for the huge urban area expansion proposed, and for the announced additional expansion in the Greenbelt and the Preserve. We believe the Planning framework which we had been so enthusiastic about a few years ago is now being greatly compromised.

We hope you will answer some of the questions we raise, share our concerns, and reflect on them when making your final recommendations.

1 Draft DROP Urban Area Expansion Recommendations

Durham Region’s Planning and Economic Development Commissioner originally recommended the following urban area expansion 2021-2051:

To meet Community Area land needs	950 hectares	2348 acres
To meet Employment Area land needs	1171 hectares	2894 acres
Total	2121 hectares	5242 acres

However, Planning Committee recommended, and Regional Council approved the following and this is reflected in the draft DROP:

To meet Community Area land needs	2500 hectares	6177 acres
To meet Employment Area land needs	1171 hectares	2894 acres
Total	3671 hectares	9071 acres

The approved 2500-hectare Community Land needs proposal 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. The BILD proposal more than doubled the Community Land needs recommended by the Planning Commissioner.

When the BILD proposal was presented, there were significant concerns expressed by Planning Commissioner Brian Bridgeman as to the methodology used to arrive at 2500 hectares. In his May 24, 2022 memo, he stated that the figures should have produced a land needs outcome closer to 1740 hectares, not 2500 hectares. Further, if the 2500-hectare figure was used it was suggested the Province should be requested to adopt a 45% intensification rate for Durham, in order to enable Durham to meet Provincial Growth Plan intensification standards.

We note as well that the Draft OP reiterates (6.2.8 b iii) that development on Prime Agricultural lands should only occur when “there are no reasonable alternative locations which avoid Prime Agricultural Areas”. By including much of North-East Pickering in the proposed urban area and doubling the Planning Commissioner’s recommendation regarding proposed Community Land needs expansion, on Prime Agricultural land, the Region appears to have somehow concluded that even their own Planning Commissioner’s recommendation did not offer a “reasonable alternative”. This Regional plan, and Provincial plans, to also consider building on prime farmland in the Preserve appear to make the Provincial policy of protecting prime agricultural lands meaningless.

GDA’s May 2, 2022 submission to Envision Durham recommended no urban area increase particularly on the prime farmland and environmental land in north east Pickering – we have included Item 7 of that submission in the Appendix (see page 10.)

Questions:

- i) We ask the Regional Chair and Regional Council to publicly explain why they did not support the proposal of their own Planning Commissioner and planning staff.**
- ii) Planning Commissioner Bridgeman raised many concerns regarding the BILT proposal (#2022-P-11). Have these concerns been resolved, and can the public be informed regarding how they have been dealt with.**
- iii) In preparing the Draft DROP how does the Region interpret the Provincial Policy to only develop on Prime Agricultural Lands when there is “no reasonable alternative”.**

2 The draft Official Plan is unclear about the impact development in the Duffins Rouge Agricultural Preserve (DRAP) will have on population forecasts and urban land needs included in the Plan.

The draft OP outlines in 5-year increments over the period 2021-2051, population, household and employment forecasts for each municipality in Durham and states on page 12 that Official Plan forecasts “do not assign population, households or employment to the provincial Greenbelt removals in Pickering, Ajax, and Clarington.” This might imply that if these Greenbelt removals proceed and households, population, and employment are accommodated there, they will be in excess of the Official Plan forecasted requirements until 2051.

Furthermore page 209 of the draft OP states: “Special Study Area 6 applies to the lands removed from the Greenbelt Plan Area by the Province of Ontario within the City of Pickering, Town of Ajax and Municipality of Clarington. In accordance with the Province, the following conditions must be addressed to the satisfaction of the Province, or it will initiate the process to return the lands back to the Greenbelt Plan Area:

- i) Significant progress on approvals is to be achieved by the end of 2023;*
- ii) Construction of new homes is to begin on these lands by no later than 2025; and*
- iii) Proponents will fully fund the necessary infrastructure upfront.*

If these conditions are met to the satisfaction of the Province, the lands may be included within the Urban Area Boundary, and the population, household and employment forecasts may be revised to reflect the provision of additional housing supply in these areas.”

This could imply either of two things: that if these lands are included in the urban boundary, draft OP forecasts could be underestimated and will be increased to reflect a higher overall projection which includes the DRAP, or the draft OP land needs forecast should be decreased so as not to double-count the development need that would be provided in the DRAP. We need to get clarity here.

Question: Could the Region clarify whether if the DRAP is developed, draft DROP forecasts outlined on page 12 of the draft DROP will be increased to reflect growth in the Preserve, and if so by how much, or if instead if the Preserve is developed and becomes a part of the urban area, overall population and household forecasts outlined on page 12 will not change but instead will be reallocated by area and 5-year time increments.

3 The Impact of developing in the DRAP on the Provincial Growth Plan

To meet one of the Provincial Growth Plan targets, 50 % of all new residential units have to be built within the built boundary as it exists at the time in order to justify building on greenfield lands. The Planning Commissioner's November 10, 2022 report- 2022 INFO 91 has already told us that the OP Growth Plan targets are close to the minimum targets of the Provincial Growth Plan. In order to just meet this standard, the draft OP appears to have already taken into account all the applicable residential units in southern Durham within the existing built boundary.

If the Province proceeds to develop in the DRAP, in addition to the growth outlined in the draft DRO, there would then be virtually no housing within existing built-up areas in Durham that could be used to meet Growth Plan Intensification requirements that 50 % of the development occur within existing urban boundaries in Durham. So the Province would effectively have to virtually eliminate any growth standard for the Preserve, or instead greatly reduce the size of the new developments planned elsewhere in the draft OP in order to continue to meet the Provincial Growth Plan standard.

Question: If the DRAP lands are also developed, how will this affect Ontario Growth Plan Standards for the lands in Durham?

4 The Province states intrusion into the DRAP lands is necessary to meet the overall Provincial target of building 1.5 million homes by 2031.

The Community Land needs for total designated growth areas publicly presented in the Envision Durham exercise was calculated as 6363 hectares, of which 1496 hectares was already developed, 2490 hectares was classified Category 1 (registered but unbuilt or in the process of being built out), and 2367 hectares was classified as Category 2 (remaining designated growth area lands outside of Category 1 that could become available for community area development). Together the areas yet to be developed totalled 4857 hectares so there appears to be no short-term community land needs in the short to medium term to provide land for housing. The draft OP adds an additional 2500 hectares to these 4857 hectares of yet to be developed land within existing urban land areas.

The Planning Commissioner's November 10, 2022 report (# 2022-INFO-91), states that "It is not anticipated that any of the SABE areas will develop prior to 2031." So, in effect the Planning Commissioner is stating that no new urban area lands be they in the SABE, **or in the Preserve** are needed to accommodate growth until after 2031.

This appears to conflict with the Province's statement that intrusion into the Greenbelt lands is necessary to meet the Provincial target of building 1.5 million homes by 2031, unless the Province is projecting population and housing forecasts for Durham that are larger than the forecasts presented in the draft DRO,

In order to meet Housing needs by 2031 Minister Clark has also given large and fast-growing municipalities a housing target. As but one example, Pickering was given a target of 13,000 homes. Pickering has indicated it will exceed this target by building 15,021 homes by 2031. However, Pickering's response appears quite consistent with the projected increase in households 2021-2031 shown on page 12 of the draft DRO of 16,930 homes.

We understand that regarding development on the DRAP lands there is a Phase 1 component of approximately 1500 units that could be serviced without the need for plant expansions to enable housing starts by 2025. However, beyond that, although the development proponents are required to fully fund the infrastructure up front, for a full build out of the DRAP additional plant capacity and wastewater servicing will be required. We are unsure of the timelines connected to that expansion, and whether there will be contention from developers from outside the DRAP for who gets the servicing?

Questions/Comments:

i) Are the draft DROP population and household forecasts the same forecasts the Province is also using to project housing needs in Durham by 2031 to meet its target? Or instead, is the province assuming a higher population and housing need for lands in Durham, and if so, what numbers are the province using?

Durham, Pickering, and other municipalities need to know what the Province is assuming in order to plan the water, sewage etc. to meet these needs, and address issues of timing, priority etc. and to evaluate whether there are opportunities within this 4857 ha. yet-to-be-developed existing urban area in order to build more homes faster.

ii) If the Province is using the same population and housing forecasts as the draft DROP, is the Planning Commissioner then wrong in assuming that no growth will need to be provided on any new urban lands by 2031. Or is he correct, and can the Planning Commissioner again confirm there is no need to develop housing in any new urban area to accommodate growth in Durham by 2031? (Such a confirmation of no need for new urban land before 2031 would of course cover the Preserve as well).

5 The Seaton Community

The draft DROP states the Seaton Community is *“planned to develop as an urban community surrounded by a protected natural heritage system”*, with the *“Objective: 1. Support and enable development within Seaton in accordance with the vision of the Former Central Pickering Development Plan as a sustainable urban community.”*

However, the Central Pickering Plan has been revoked by the Province, and in addition Bill 23 now limits the role of conservation authorities to focusing on a narrower definition of natural hazard concerns and not on broader environmental considerations, and allows the sale of conservation lands. It is our understanding that the TRCA owns thousands of acres of lands set aside for natural heritage protection within Seaton. Therefore, the Provincial intentions regarding Seaton seem far from clear.

Adding to the uncertainty, the development of Seaton which is adjacent to the DRAP has been very slow and, as is occurring in other areas it has nothing to do with the amount of land available for development. The full buildout of Seaton was planned at 20,989 units. We are told that up to the end of 2021, 1549 permits, only 25% of the 6320 permits planned for have been issued during that period. A number of significant financial and capacity issues are contributing to the delay.

The vast majority of planners would agree that in order to build more affordable and diverse housing options quickly, it is far better and more quickly done within the great many other areas close to employment and amenities, and by removing impediments that might prevent or delay it. Surely that is where the priority should

be. As the Province's Housing Affordability Task Force has clearly said, "a shortage of land isn't the cause of the problem".

Question/Comment: Will Seaton be built out by 2051? If not, why not? Why doesn't speeding up developing housing quickly in Seaton, and concentrating on development there and not on new urban lands in the Preserve or elsewhere offer a better solution?

6 The draft DROP doesn't accurately reflect the impact that development in the DRAP could have on the Rouge Park.

On page 212 referencing Policy area D – Rouge National Urban Park the draft DROP states *"it is the policy of Council to:*

9.2.8 Recognize this site as the Rouge National Urban Park (RNUP), which is owned and operated by Parks Canada. The boundaries of Specific Policy Area D are shown on Map 1.

9.2.9. Permit land uses within the Rouge National Urban Park in accordance with the greenbelt Plan and the RNUP Management Plan.

9.2.10 Encourage adjacent land uses outside the park to have consideration for connections to the active transportation network, compatibility with the RNUP Management Plan. And support identified actions related to planning along the park periphery.

The Province and the Region are no doubt aware of Parks Canada's Nov. 29, 2022 "Technical Response to the Proposed Development of Greenbelt lands Adjacent to Rouge National Urban Park". That letter outlined the Province's consultation requirement under the MOA, and the very negative environmental impact Parks Canada states development on these lands would have on the Park and nearby environment, as well as the impact it could have on agriculture in the Park. Parks Canada states *"the park includes large tracts of Class 1 farmland, which is the rarest, richest, and most fertile in the country. The proposed development may negatively impact the maintenance of a vibrant and viable agricultural community within the Rouge National Urban park and in this part of the Greenbelt. Along with the local farming community, the government of Ontario was one of the most significant contributors to the agricultural vision for the Rouge National Urban Park and identified that a vibrant farming community requires dedicated agricultural land inside and outside of the Park in order to be economically viable."*

And of course, Federal Environment Minister Steven Guilbeault's recent announcement of a study on the Rouge National Urban Park that will assess the negative impact of the development on biodiversity and at-risk species could affect Provincial development plans on the adjacent Preserve.

The draft DROP reflects a collaborative relationship with the Park that differs completely with the possibility of development in the Preserve also referenced in the draft DROP, action which Parks Canada, and the Federal Minister have indicated could greatly harm the Park. The DRAP of course also contains Prime Agricultural Land, so if the Province decides to include it in the urban area, they will have concluded there is no reasonable alternative for building houses more quickly in Durham in the next 10 years than building on Prime Agricultural lands in the DRAP.

Question/Comment – Shouldn't the current strong and very real tension between Parks Canada, the Federal Government and the Province be accurately reflected, not papered over in the draft DROP?

7 There is a housing crisis in the GTA but Regional and Provincial Plans in Durham to expand the urban area do not address it and in many respects make it worse.

There is close to unanimous agreement among experts that indeed there is a housing crisis in the GTA and certain other major urban areas and that in order to deal with it, much more affordable diverse housing needs to be created. Introducing right of use zoning on a much broader basis, accompanied by many other changes will provide more affordable housing much more quickly in existing urban areas. The Globe and Mail summed up this assessment in its Jan 23, 2023 editorial stating *"the long term solution to Canada's housing crunch is to build a lot more homes – and to build those homes on vastly underutilized lands in city centres"*.

In its 2020 review of the Ontario Growth Plan, the Province chose to significantly reduce greenfield minimum density requirements from 80 to 50 residents and jobs per acre, and to reduce the previous requirement, that a minimum of 60 % of all residential development occur within the existing built-up area, to 50%. **In Durham Region, with which the GDA is most familiar, there would have been no need for urban area expansion to meet community land needs had the previous density requirements been maintained.**

The solution is not to reduce Growth Plan Standards as the Province did, or pursue the strategy reflected in the draft DROP, which the Region's own planners did not support. And it is not, as the Province is proposing, by justifying possible development on Greenbelt lands as a means of dealing with this urgent housing need over the next decade. Instead, the solution is to take action to increase Growth Plan Standards and density in existing urban areas in order to create much more affordable diverse housing, including rental housing close to employment and amenities.

One of the most pernicious elements of the current system is to require that urban area expansions be planned and locked in for the next 30 years based on existing density standards – standards which are likely to be greatly changed over the next decade. Given the uncertainty about how future needs will evolve, surely it is not in the public interest to make decisions now which lock in urban area boundaries, based on low Provincial Growth standards for the next 30 years. Locking in land needs in that fashion also makes it much more difficult to make the necessary changes required to address the real housing crisis. As but one example, in the Envision Durham exercise which examined urban area expansion alternatives: while residents polled, and many other groups including GDA, preferred the no urban area expansion Scenario 5 to meet Community Land Needs, a primary reason why Regional Planning opted for some urban area growth and Scenario 4, was a concern around current buyer acceptance. Even if that was a reasonable assumption at the time, it is surely not reasonable in planning future urban area expansion to base such expansion on Provincial Growth Plan standards that lock in low densities until 2051.

Similarly, forecasting and locking in employment land needs for the next 30 years, given fast-changing technology and particularly given the uncertainty post-Covid around the future of home or differently located employment makes no sense, if these needs are over-estimated, and subsequently converted from employment to housing lands as has happened frequently in the past, this greater supply of housing lands will further dampen any pressure to use land more efficiently by increasing density.

Is it really in the public interest to plan and lock in urban area expansion for a 30 year period from 2021 to 2051, as opposed to a 20 year period from 2021 to 2041, as has been done in the past? As already

referenced, Durham planners tell us that there is enough land in the existing urban area to handle community land needs until at least 2031. **To cover these community land needs for the ensuing 10 years to 2041, as opposed to 20 years and 2051, would cut by more than half the planned community land needs projected in the draft DROP.**

Question/Comment:

Does the Region or at least its planners agree that Provincial Growth standards should be strengthened, not weakened, and that the current 30 year planning time frame should be reduced to avoid locking in urban area expansions for so long at this uncertain time? We recognize that this is the Province's decision but if there was some expressed support at the Regional level for such change it could have a positive impact.

We further urge the Region or at least its planners to change course and reject the BILD scenario or at least as some planners have already done, continue to speak and write strongly against the current absolutely huge planned urban area expansion particularly in Northeast Pickering and on prime farm and environmental land.

8 Provincial action to repeal DRAPA and develop in the DRAP is not in the public interest.

The Preserve consists of approximately 4950 acres of Prime Agricultural land situated in North/Central Pickering, nestled between and abutting West Duffins Creek to the east and the Rouge National Urban Park to the west. The Preserve lands were originally expropriated by the Provincial government in the 1970's as part of a future community associated with the proposed federal airport. In the late 1990's the Provincial government decided to sell these lands.

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/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 which was funded by developers. 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 re-instate the easements by statute.

In late 2022, in furtherance to removal of these lands 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 should only 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 un-

serviced designated urban lands. This difference in value for these lands has been estimated at 1 billion dollars or more.

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, given the Province had an alternative even if it wanted to pursue development, this giveaway of public funds is in and of itself, grounds for censure of this government's actions.

Question/Comment: We recognize the Province has indicated it is reducing the Regional Role but particularly given the Region has indicated in the recent past it did not support the removal of the Agricultural easements in the Preserve,(DRAPRA), rather than just saying nothing about development in the Preserve, we hope the Region, or at least the Region's Planning Department before their role is reduced, will frankly express their own views on the Provincial approach. Do the Region or its planners feel that the Province's plans for the Preserve are in the public interest?

Submitted by:

Elizabeth Calvin President GDA elizabethcalvin1@gmail.com

Brian Buckles Vice-president GDA buckles@zing-net.ca

***Item 7 from GDA's May 2, 2022 Envision Durham Submission is included on the following pages because it deals directly with the urban area expansion issues under consideration.**

Appendix

7) Protect the Whitebelt lands in Northeast Pickering

GDA has a long history of fighting to preserve the prime farmlands and environmental valley lands in northeast Pickering. We were a party at the Cherry Downs Ontario Municipal Board hearing many years ago fighting a development that the Region at the time also opposed. We have also been very involved in opposing previous efforts to expand the urban area into northeast Pickering. We have strongly supported changes to Ontario's Growth Plan calling for greater urban area density, and were dismayed when instead, in the more recent 2020 review, the Province chose to significantly weaken greenfield minimum density requirements from 80 residents and jobs per hectare to 50, as well as other standards including reducing to 50% the previous requirement that a minimum of 60% of all annual residential development had to occur within the delineated built up area.

The Regional Planning Commissioner has just released a document endorsing Scenario 4 of the 5 scenarios presented to the public. This scenario calls for a community land needs expansion of 950 hectares (2348 acres), plus an employment land need of 1171 hectares (2894 acres). The location of such urban expansion has yet to be decided.

Regarding urban area expansion anywhere in the Region's whitebelt lands we wish to make the following points:

- (a) It appears that if the Region had stayed within the previous minimum density requirements outlined above, and still not even met them completely, there would have been no need for any expansion to meet community land needs.
- (b) Due to Covid, and fast-moving changes in technology, we are in an unprecedented time where prediction is difficult, even in the near future, about whether future employment will be much more home-based, or located in different areas. Therefore, projecting employment land needs in specific areas 20 – 30 years from now seems likely to bear no relationship to what actual needs are likely to be. In addition, in the past when forecasting future land needs was easier than it is now, that need was over-estimated. This planned need is likely to be even more over-estimated resulting in many more conversions of employment lands to community lands.
- (c) The land needs scenario poll conducted by Envision Durham indicates residents preferred Scenario 5 - the no expansion for community needs scenario. Given mounting concerns about climate change, losses of farmland, natural habitat and species, it seems likely that polls in the next 10 years will even more strongly support intensification over urban area expansion. There will be even more acceptance of high-density housing, still many years in advance of the 2051 planning window. The lack of current buyer acceptance appears to be a primary reason the Region did not recommend Scenario 5. Since community acceptance is highly likely to move in a more accepting direction, should this not be one more reason the Region should be opting for no expansion?
- (d) Scenario 5 is the least costly option, as well as the option which most reduces carbon emissions. Is the Region treating these issues, and DRCC, DAAC, and DEAC support for Scenario 5 as seriously as it should?

Regarding the lands in northeast Pickering: If the Region decides on expansion, such expansion should not be on prime agricultural and environmental lands.

(a) The Provincial Growth Plan is very clear: prime agricultural and key hydrological areas and the natural heritage system “should be avoided where possible”. How can it be argued that expansion onto lands such as those in north east Pickering is needed, and that it is simply not possible to expand elsewhere?

(b) Prime agricultural land is a key component in the Greater Golden Horseshoe food and farming cluster – a cluster which is one of the largest in North America, and when combined with food processing, and after taking account of the multiplier effect annually generates many billions of dollars to the Canadian economy. The region’s success results, we are told, from its excellent farmland, and its moderate climate and abundant water, in combination with excellent research capabilities, and a diverse, large and educated workforce, and market. In Durham, the eastern end of this cluster, agriculture and agri- food production are one of the top economic drivers for Durham Region, according to Region’s own website. Using such land for expansion of employment lands defines logic.

(c) We remain confused about how OMAFRA’s mapping will be applied in the decisions about whether and where urban boundary expansion will take place, and whether this mapping will come into effect before or after the Regional Official Plan has been finalized. It is depressing to think that decisions could soon be made which will determine how much prime farmland will be urbanized over the next 30 years and the most up to date information may not even be taken into account.

(d) Again, does the Region not determine that a decade from now due to climate change including lack of water in many current huge farming clusters (Prairie provinces, California), wars (Ukraine), and growing negative attitudes towards global trade, that food security and the preservation of agricultural land will be viewed as a far bigger priority than it is now. If that is a real risk, why would we want to commit ourselves to continuing to deplete this resource for the next 30 years? Given such uncertainty, and knowing there is real cause for concern, committing now to developing on prime farmland for the next 30 years appears very short-sighted and reckless.

(e) In addition to the importance of prime farmland in supporting the critical farm cluster of which Durham is part, agri-tourism is a fast-growing tourist draw and could become far larger. A 2018 economic study commissioned by Land over Landings estimated the very large agri-tourism benefits that could affect the local economy if the Federal Lands in Pickering were returned to vibrant farm use, and local control. As they pointed out in the years prior to their report, one agri-tourism operation at Whittamore’s on Steeles Avenue attracted 300,000 visitors annually! In recent years there has been a huge increase in agri tourism establishments like Willow Tree Farms in Scugog Township, and nearby at Hy Hope Farm Market. Agri-tourism and the Recreational Tourism node in the East Duffins Headwaters and its links complement and support each other. If, as we very much hope, urban area is not expanded into Northeast Pickering, there is every likelihood that agri-tourism could become positive factor there as well.

For our entire submission: [GDA-May2-NHS-final.pdf \(greendurham.ca\)](#)