

May 15, 2023

MGP File: 23-3261

Envision Durham  
The Regional Municipality of Durham  
Planning and Economic Development Department  
605 Rossland Road  
Whitby, ON L1N 6A3

via email: [EnvisionDurham@durham.ca](mailto:EnvisionDurham@durham.ca)

Attention: Envision Durham

**RE: Trinipark Development (BT) Corp. Response to Envision Durham –  
Draft New Durham Region Official Plan (May 2023)**

Malone Given Parsons Ltd. (“MGP”) is the planning and land economic consultant for Trinipark Development (BT) Corp., (“Trinipark”), the owner of the lands municipally known as 4100 Sideline 2 in North-East Pickering (the “Subject Lands”). Trinipark is a participating landowner and member of the North-East Pickering Landowners Group (“NEPLOG”), who have filed numerous submissions to the Region with respect to the Envision Durham Process.

Trinipark fully supports the comments submitted by the NEPLOG regarding the Region’s proposed settlement area boundary expansions (“SABE”) and the refinement of the natural heritage system (“NHS”) mapping. We write further to those submissions specifically on behalf of Trinipark to reiterate comments dated April 3, 2023 (attached hereto for reference as Attachment 1) submitted by Trinipark through the Envision Durham process that the NHS mapping on the Subject Lands be removed in the Region’s SABE mapping.

We have reviewed Report #2023-P-15, Recommendations on the new Regional Official Plan (“Draft ROP”), File: D12-01, released on May 3, 2023 and scheduled for adoption at the Regional Special Council meeting on May 17, 2023. The NHS mapping in the Draft ROP continues to show the Subject Lands designated entirely as NHS. For the reasons identified in Trinipark’s previous submissions, we request that the proposed NHS be removed from the Subject Lands and the wooded and planted areas on the Subject Lands be more thoroughly evaluated through the City’s Secondary Plan process.

As detailed in our letter dated April 3, 2023 on the Region’s proposed SABEs, we request that the NEPLOG’s detailed NHS mapping (GIS shapefiles provided under separate cover) be utilized in the delineation of the NHS within North-East Pickering in the Draft ROP for the reasons contained in Attachment 1, and in particular given that they are the result of detailed environmental study and a NHS recommended by the NEPLOG environmental consultant, GeoProcess Research Associates, which proposes a NHS which provides the appropriate protection for significant natural heritage features and hydrologic features.

While Trinipark believes that its NHS mapping (prepared by GeoProcess Research Associates and provided previously to Envision Durham) should be used as a basis for the NHS on Map 2 of the Draft ROP because it has been the subject of detailed environmental study, Trinipark does appreciate and agree with the modifications to the latest version of the Draft ROP in which Policy 7.4.2 acknowledges that refinements to the regional NHS outside of provincial NHS areas are permitted through both secondary planning processes and/or approved planning applications without an amendment to the Draft ROP.

We thank you again for the opportunity to provide input into the Region's MCR process and look forward to continuing to work with the Region in the development of lands within North-East Pickering.

If you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,  
Malone Given Parsons Ltd.



**Matthew Cory, MCIP, RPP, PLE, PMP**

**Principal, Planner, Land Economist, Project Manager**

cc. *Client*

April 3, 2023

MGP File: 20-2918

Envision Durham  
The Regional Municipality of Durham  
Planning and Economic Development Department  
605 Rossland Road  
Whitby, ON L1N 6A3

via email: [EnvisionDurham@durham.ca](mailto:EnvisionDurham@durham.ca)

Attention: Envision Durham

**RE: Trinipark Development (BT) Corp. Response to Envision Durham –  
Draft New Durham Region Official Plan**

Malone Given Parsons Ltd. (“MGP”) is the planning and land economic consultant for Trinipark Development (BT) Corp., (“Trinipark”), the owner of the lands municipally known as 4100 Sideline 2 in North-East Pickering (the “Subject Lands”). Trinipark is a participating landowner and member of the North-East Pickering Landowners Group (“NEPLOG”), who have filed numerous submissions to the Region with respect to the Envision Durham Process.

Trinipark fully supports the comments submitted by the NEPLOG regarding the Region’s proposed settlement area boundary expansions (“SABE”) and the refinement of the natural heritage system (“NHS”) mapping. We write further to those submissions specifically on behalf of Trinipark to reiterate comments dated April 29, 2022 and January 18, 2023 (attached hereto for reference as Attachment 1) submitted by Trinipark through the Envision Durham process that the NHS mapping on the Subject Lands be removed in the Region’s SABE mapping.

We have reviewed Report #2023-P-6, Release of the Draft New Regional Official Plan (“Draft ROP”), released on February 10, 2023 and the Draft ROP policies and mapping. The NHS mapping in the Draft ROP continues to show the Subject Lands designated entirely as NHS. For the reasons identified in Trinipark’s previous submissions, we request that the proposed NHS be removed from the Subject Lands and the wooded and planted areas on the Subject Lands be more thoroughly evaluated through the City’s Secondary Plan process.

As detailed in our letter dated January 18, 2023 on the Region’s proposed SABEs, we request that the NEPLOG’s detailed NHS mapping (GIS shapefiles provided under separate cover) be utilized in the delineation of the NHS within North-East Pickering in the Draft ROP for the reasons contained in Attachment 1, and in particular given that they are the result of detailed environmental study and a NHS recommended by the NEPLOG environmental consultant, GeoProcess Research Associates, which proposes a NHS which provides the appropriate protection for significant natural heritage features and hydrologic features.

Further, we request that proposed Policy 7.4.2 be clarified to include lower-tier secondary plans as well as planning applications as vehicles for amending the regional NHS without the need for amendment to the ROP. The ability to achieve refinements should be possible with each more detailed stage of planning, which inevitably provides more detailed information and fieldwork to appropriately define the NHS.

We also request that Policies 7.4.2 and 7.4.4 be modified to reference both provincial plans and policy statements to ensure that development/site alteration continues to be permitted in a manner consistent with the Provincial Policy Statement (“PPS”) (generally outside of significant features), which could include portions of stormwater management facilities, grading areas, trails, and other public uses.

We thank you again for the opportunity to provide input into the Region’s MCR process and look forward to continuing to work with the Region in the development of lands within North-East Pickering.

If you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,  
Malone Given Parsons Ltd.



**Matthew Cory, MCIP, RPP, PLE, PMP**

**Principal, Planner, Land Economist, Project Manager**

cc. *Client*

January 18, 2023

MGP File: 20-2918

Envision Durham  
The Regional Municipality of Durham  
Planning and Economic Development Department  
605 Rossland Road  
Whitby, ON L1N 6A3

via email: [EnvisionDurham@durham.ca](mailto:EnvisionDurham@durham.ca)

Attention: Envision Durham

**RE: Trinipark Development (BT) Corp. Response to Envision Durham –  
Comments on the Draft Settlement Area Boundary Expansions**

Malone Given Parsons Ltd. (“MGP”) is the planning and land economic consultant for Trinipark Development (BT) Corp., (“Trinipark”), the owner of the lands municipally known as 4100 Sideline 2 in North-East Pickering (the “Subject Lands”). Trinipark is a participating landowner and member of the North-East Pickering Landowners Group (“NEPLOG”), who have filed numerous submissions to the Region with respect to the Envision Durham Process.

Trinipark fully supports the comments submitted by the NEPLOG regarding the Region’s proposed settlement area boundary expansions (“SABE”) and the refinement of the natural heritage system (“NHS”) mapping. We write further to those submissions specifically on behalf of Trinipark to reiterate comments dated April 29, 2022 (attached hereto for reference) submitted by Trinipark through the Envision Durham process that the NHS mapping on the Subject Lands be removed in the Region’s SABE mapping.

As discussed in the April 29, 2022 submission and in the NEPLOG submission dated January 18, 2023, GeoProcess Research Associates (“GeoProcess”), the NEPLOG and Trinipark environmental consultant, has undertaken detailed environmental work to delineate the boundaries of the NHS that informs the NEPLOG’s proposed SABE and NHS area calculations.

We recognize that wooded areas do exist on a portion of the Subject Lands; however, the proposed NHS should not arbitrarily designate the entirety of the Subject Land as NHS. The wooded areas on the Subject Land include planted trees (hedgerows and plantation trees) and need to be more appropriately evaluated through a future Secondary Plan process.

We thank you again for the opportunity to provide input into the Region’s MCR process and looks forward to continuing to work with the Region in the development of the North-East Pickering lands.

If you have any questions, please do not hesitate to contact the undersigned.

Yours very truly,  
Malone Given Parsons Ltd.

A handwritten signature in blue ink, appearing to read 'Matthew Cory', enclosed within a blue oval scribble.

**Matthew Cory, MCIP, RPP, PLE, PMP**

**Principal, Planner, Land Economist, Project Manager**

cc. Client



April 29, 2022

Envision Durham  
c/o The Regional Municipality of Durham  
Planning and Economic Development Department  
605 Rossland Road East, PO Box 623  
Whitby, ON L1N 6A3

**RE: Envision Durham – Identifying a Regional Natural Heritage System, File D12-01  
Comments from Trinipark Development (BT) Corp.**

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Trinipark Development (BT) Corp. (“Trinipark”) owns the lands located at 4100 Sideline 2 in the City of Pickering (the “Subject Land”). The Subject Land is located in Northeast Pickering, and Trinipark is a participating member of the North East Pickering Landowners Group (“NEPLOG”). GeoProcess Research Associates Inc. has made a separate submission on behalf of the NEPLOG which Trinipark fully supports.

Given that Trinipark is also directly impacted, we, on behalf of Trinipark, have reviewed Durham Region’s proposed Natural Heritage System (“NHS”) Mapping as it relates to the Subject Land specifically.

The entirety of the Subject Land is proposed to be put into the Region’s NHS. Trinipark strongly objects to this proposed designation over the entirety of its land for the following reasons:

- 1) The 2020 Durham Regional Official Plan which is currently in effect does not consider any part of the Subject Land as part of its NHS area, and more specifically on Schedule A Regional Structure, the Subject Land is located within the Future Urban Area Boundary Expansion of North East Pickering with a site specific policy reference to Policy 7.3.11p).

This Policy states that:

*where a comprehensive review of this Plan includes consideration of lands for Urban Area expansion within the City of Pickering east of the Pickering Airport lands, outside of the Greenbelt Plan, the following additional matters will be assessed and evaluated at that time:*

- i) the amount and rate of development that has occurred in the Seaton Community; and*
- ii) the preparation and completion of a watershed plan update for the East Duffin and Carruthers Creek watersheds.*

The policy does not require additional lands to be put into the NHS without proper justification. Therefore, the wooded areas that exist on the Subject Land should be appropriately evaluated at the Secondary Plan level.

- 2) The City of Pickering Official Plan Edition 8 which is currently in effect designates the Subject Land as Prime Agricultural Area with only a small portion along the western boundary as Natural Area, as shown on Schedule I. There are no significant features identified on the Subject Land.
- 3) The proposed City of Pickering Official Plan NHS Mapping does not consider the Subject Land to be part of the NHS.
- 4) The Subject Land is located outside of the Central Lake Ontario Conservation Authority (“CLOCA”) Regulated Area.
- 5) The former owner of the Subject Land planted trees in order to obtain a tax credit from the province. Therefore, the majority of trees that currently exist on the Subject Land are not natural features but rather anthropogenic, as confirmed by our ecologists.

It is our opinion that the Region’s proposed NHS designation on the Subject Land is inappropriate and inconsistent. The Subject Land does not include naturally regulated features as defined by the Provincial Policy Statement (2020). The wooded areas on the Subject Land need to be more appropriately evaluated through a future Secondary Plan process. We recognize that wooded areas do exist on the Subject Land; however, the proposed NHS should not arbitrarily designate the entirety of the Subject Land as NHS as there are areas that are open both outside of and within the wooded areas.

Respectfully Submitted,

**TRINIPARK DEVELOPMENT (BT) CORP.**



Per: Lisa La Civita  
Development Manager  
Armland Group