

May 16, 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: North-East Pickering Landowners Group Response to Envision Durham –  
Comments on the Draft New Durham Region Official Plan (May 2023)**

Malone Given Parsons Ltd. (“MGP”) is the planning and land economic consultant for the North-East Pickering Landowners Group (“NEPLOG”), who own multiple properties in North-East Pickering. The purpose of this letter is to respond to 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.

We are writing on behalf of the NEPLOG to provide comments on the Draft ROP and re-iterate our previous comments on the Region’s Growth Management Strategy and the identification of a proposed Settlement Area Boundary Expansion (“SABE”) on the NEPLOG lands for Council’s consideration prior to adoption of the Draft ROP. While staff have provided responses to most of our previous comments, some were not addressed, or the responses in our opinion, did not provide the necessary justification for the change or lack of change in the Draft ROP.

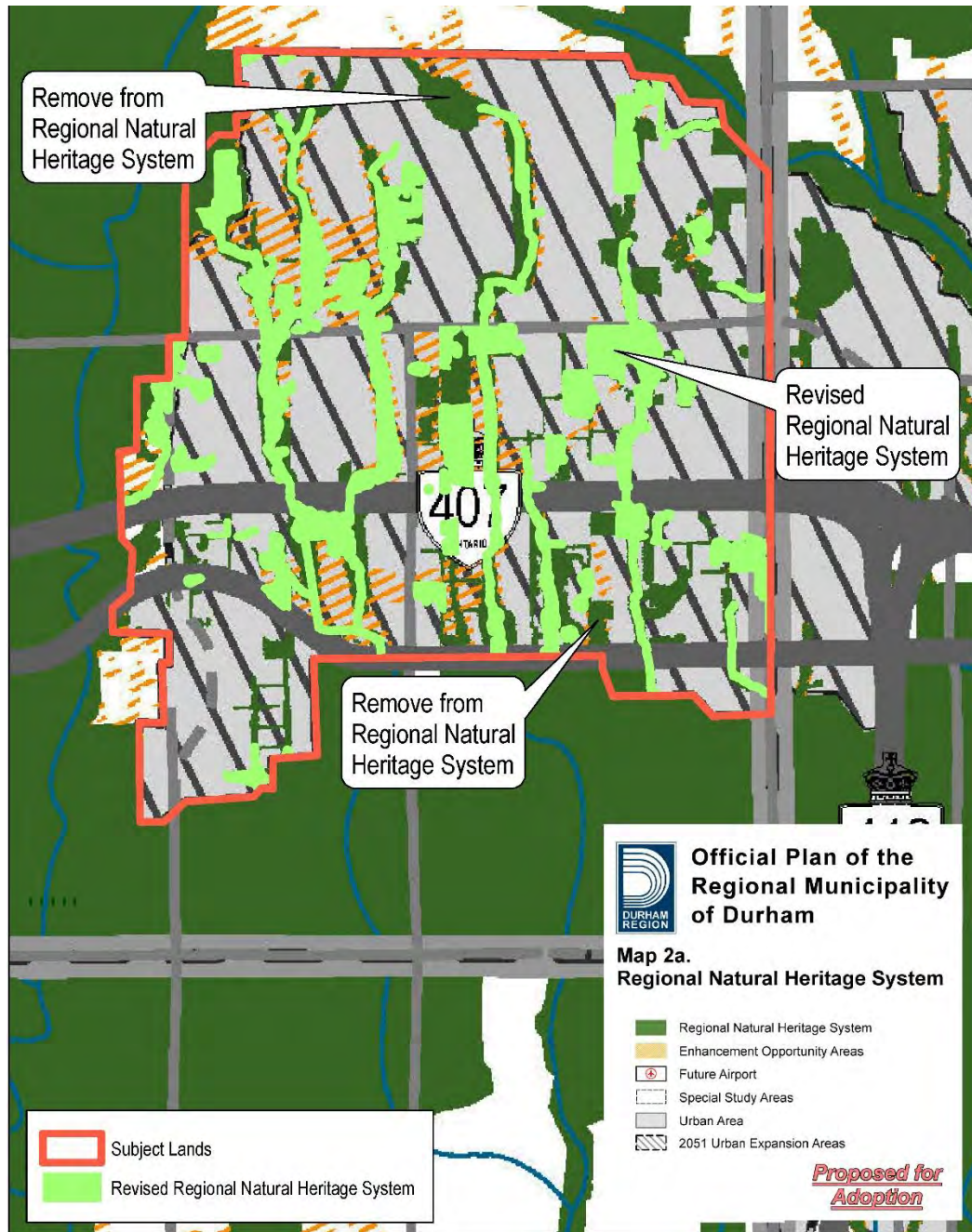
**1.0 North-East Pickering SABE Area and Balance of Community and  
Employment Areas**

As detailed in our letters dated January 18, 2023 and April 3, 2023 (Attachment A to this letter) on the Region’s proposed SABEs, we request that the Region amend the North-East Pickering SABE areas in the Draft ROP to be consistent with the mapping and calculations prepared by MGP on behalf of the NEPLOG to correct discrepancies in area and mapping calculations for land area exclusions, avoid irregular and awkward shaped parcels, establish logical boundaries for Community and Employment Areas, respect the updated boundaries of the Natural Heritage System (“NHS”), and avoid non-developable lands used for infrastructure.

While the NEPLOG 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, the NEPLOG 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. It remains our opinion that the delineation of the NHS within North-East Pickering on Map 2a of the Draft ROP should be consistent with that of GeoProcess Research Associates' environmental fieldwork, as shown in Figure 1 below.

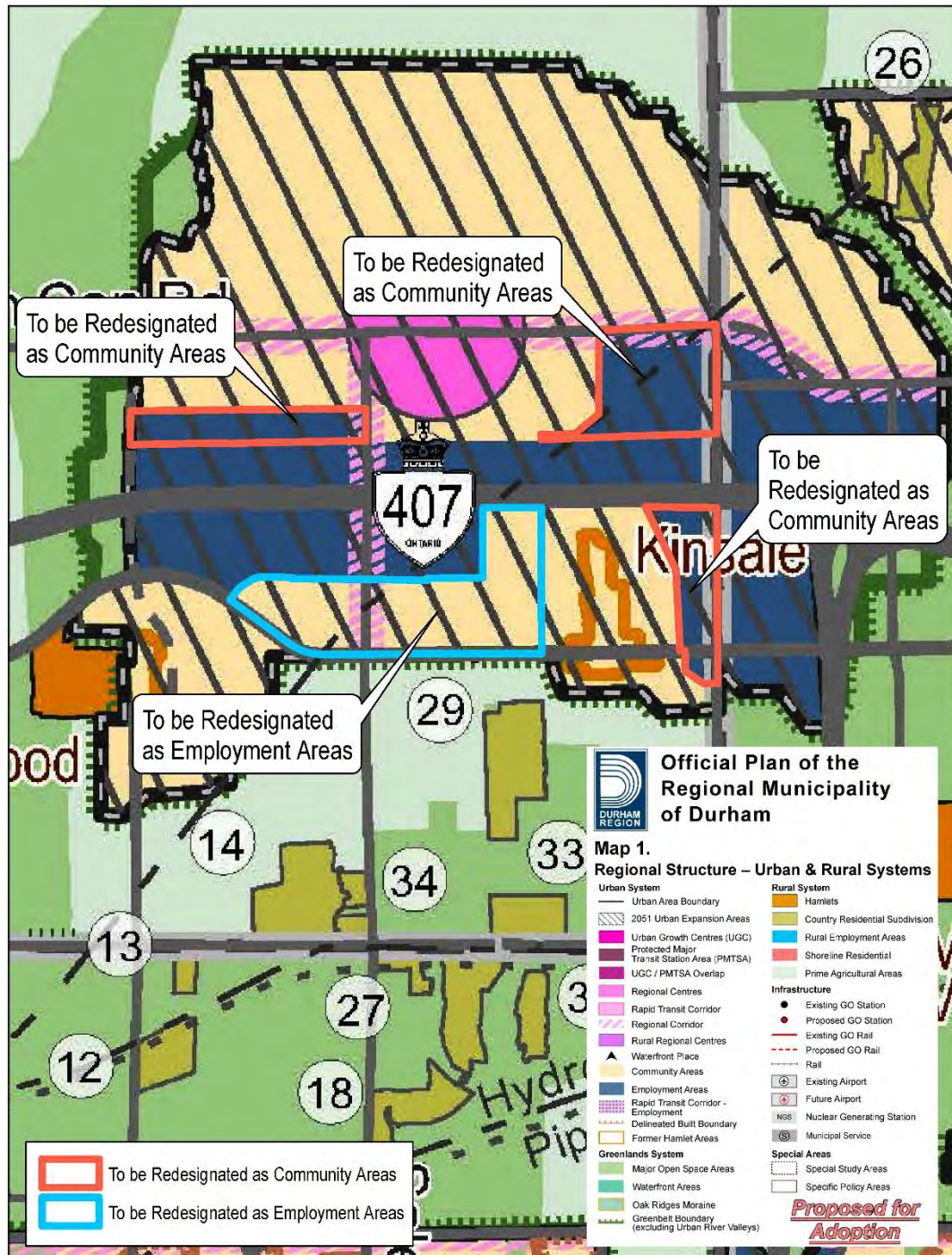
Figure 1 NEPLOG Proposed Amendments to Map 2a, Regional Natural Heritage System



Source: MGP (2023)

As outlined in our submission in Attachment 1 and the associated SABE map, we requested that the delineation of Community and Employment Areas in North-East Pickering in the Draft ROP be amended to reflect a more appropriate balance of land uses appropriate for the context in this part of the Region, as shown on Figure 2 below.

Figure 2 NEPLOG Proposed Amendments to Map 1, Regional Structure

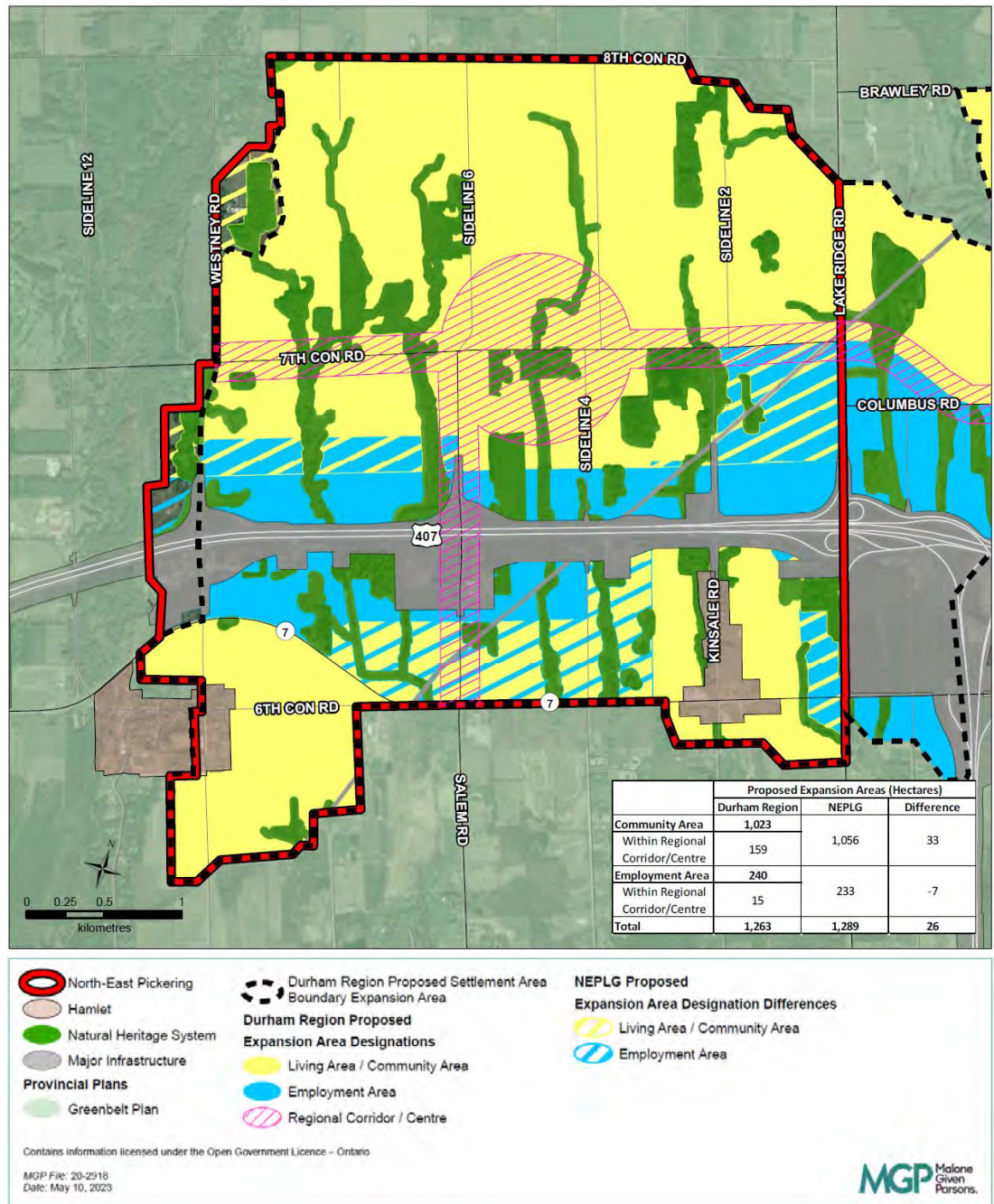


Source: MGP (2023)

We note that the Region has revised its draft Map 1, Regional Structure, since our last submission, with the staff report indicating that “Regional staff continue to support the distribution of proposed Employment Areas in northeast Pickering as shown in the recommended ROP, except however that a small portion of employment area between Sideline 4 and Kinsale Rd to the south of Hwy. 407 has been shifted. The lands north of Hwy. 407 are particularly well suited for employment use, given they are large, contiguous, and relatively free of environmental constraints.”

While the new draft Map 1 is a positive step in the right direction, with a small portion of lands north of Hwy 407 being re-designated to Community Areas, we believe that the Employment Area on the north side of Hwy 407 west of Salem Road can also be reduced in width to allow a depth of employment uses separated by an east-west service road parallel to Hwy 407 in the approximate location as the northerly extent of Employment Lands between Salem Road and Sideline 4 to serve as a physical separator and boundary to the employment uses from the proposed Community Area to the north. We continue to believe that the proposed NEPLOG boundaries of the proposed designations on Map 1 are more appropriate, generating a larger Employment Area south of Hwy 407 to establish a full range of employment uses with visibility and convenient access to the highway system. An updated comparison map of the NEPLOG proposed designations with the Region’s proposed designations is found in Figure 3 below.

Figure 3 NEPLOG Comparison Map – Map 1, Regional Structure



Source: MGP (2023)

The proposed reconfiguration of employment lands better implements provincial, regional, and local planning policies to protect and integrate employment areas with planned or existing infrastructure corridors and major goods movement facilities. Further, the NEPLOG-proposed breakdown maximizes the potential for community building around future potential transit along Seventh Concession Road that can be realized in North-East Pickering to establish a new residential and mixed-use community in this part of the Region. In this regard,

limiting the direct interface of employment areas and mixed-use communities can prevent compatibility issues and concerns which allows both areas to best achieve their planned function.

Planning new employment areas in a corridor approach north of Highway 407 provides employment adjacent to the highway, but limits the extent of this area, which can facilitate the Secondary Plan process planning for these areas as business parks and with compatible uses to the Community Areas to the north. If the area was larger, it would support the planning and location of larger and potentially more noxious uses, which is not desirable next to a future transit corridor and related transit-oriented, mixed use development. A corridor approach to employment will also enable the provision of commercial and institutional uses in the Community Areas near to interchanges at Westney, Salem and Lakeridge Roads.

A larger and consolidated employment area south of Highway 407 provides for an area of concentrated and more intensive employment uses within limited exposure to surrounding residential communities. Proposed Community Area lands surrounding the villages of Greenwood and Kinsale will provide an appropriate interface between the employment uses and existing communities.

## **2.0 General Comments**

### **2.1 Policy Requirements are Too Onerous**

While we appreciate the efforts to provide guidance for land use planning in lower-tier municipalities, we believe that many of the policies in the Draft ROP are overly prescriptive, which may impede the implementation of the Draft ROP at a local level. We suggest that the Recommended ROP adopt a more general tone that provides flexible guidance on land use and development matters.

In this regard, numerous policies within the Recommended OP are excessively onerous or prescriptive, particularly in relation to reports or studies that are required for the development approvals process. Given the recent changes to the planning framework in Ontario brought about by Bills 23 and 97, we urge the Region to reconsider the Recommended OP policies that identify hard requirements through the use of the words “shall”, “will”, or “require”, and replace them with “should”, “may”, and “encourage” together with “where appropriate”. Such changes would enable greater flexibility and better align with the new provincial priorities and directions being undertaken, including through the initial release of the 2023 Provincial Planning Statement, which draft is currently available for public consultation.

As the lower-tier municipalities will be ultimately responsible for the implementation of the Draft ROP, we note that where required, such policies may be re-assessed at the time of implementation into the lower-tier municipality’s planning policy framework, and be more restrictive, as necessary, for each municipality.

Furthermore, a number of policies in the Draft ROP identify requirements to be completed “prior to development” (e.g. Policies 3.3.47, 3.3.50, 5.7.8). We request that all references to this language be replaced with “during the development approvals process”.

It is inappropriate to require any studies, background work, or consultation prior to any development (which is defined generally as any lot creation, change in land use, or construction of buildings and structures, any of which requires approval under the Planning Act). Rather, good planning intends that any required studies, background work, or consultation be conducted as part of the development approvals process, and the regional policy framework should reflect this process.

Policy 3.3.50 also requires development proponents to provide a copy of the Stage 2 archaeological assessment where archaeological resources are found to the First Nation or Metis and “receive a response” prior to development proceeding. We believe that it is not appropriate to require a response in all instances and that receiving a response is not a policy requirement under any proponent’s duty to consult. It may not be possible to receive a response in a timely manner, or a lack of response may indicate there is no concern, all of which should not delay the development approvals process. We request that the words “and receive a response from” be deleted from Policies 3.3.50 a) and b).

Policies 3.3.2 and 3.3.4 identify the requirements for local and secondary plans. As stated above, we believe that these policies should be softened from “require” to “encourage” so that local municipalities have the flexibility to decide what policies to include in their local and secondary plans, based on the context and location of each. For example, the ongoing City of Pickering secondary plan study was commenced prior to the release of the Draft ROP and may not conform with the Region’s standards. Further, we believe that Policy 3.3.4.d) should be deleted in its entirety as parking standards are not within the Region’s purview and should be delegated to local official plans and zoning by-laws.

## **2.2 A Balanced Approach to Growth**

A number of policies in the Draft ROP appear to prioritize one type of growth, or one location of growth, over another. For example:

*Objective iii (Section 3.1):*

*Promote residential growth in the region by prioritizing intensification of existing residential areas.*

*4.1.2 Prioritize the provision of municipal water and sewage services within Urban Areas to development and redevelopment applications which produce an intensive and compact form of development to optimize the use of the services. This includes prioritizing the provision of municipal services and infrastructure to Strategic Growth Areas.*

It is inappropriate to prioritize the intensification of existing residential areas or Strategic Growth Areas as the sole focus of residential growth in the Region. Balanced region-wide growth can only be achieved through a combination of intensification, new designated greenfield area (“DGA”) growth, and rural settlements. Prioritizing only intensification may lead to an imbalance in growth patterns, resulting in strain on existing infrastructure and services in those areas. Encouraging a mix of different types of growth, including development within the DGAs, will assist in creating a balanced community. The current housing crisis

necessitates a variety of housing options for residents. Prioritizing only intensification may limit the availability of these options, whereas different types of growth can meet the diverse needs of the community, including market-based housing in the DGA.

### **2.3 Servicing Supply and Capacity**

There are a number of policies in the Draft ROP regarding the provision of servicing supply and capacity. While we understand that the intent of these policies is to ensure that the Region is able to provide adequate servicing to all urban development, we believe that these policies can be simplified to require compliance with the Provincial D5 guidelines, which are an established set of guidelines and regulations that would need to be applied and adhered to regardless of any Regional Official Plan policy. The additional requirements and language regarding servicing capacity in Policies 4.1.8 and 4.1.36, such as whether draft plan approval or “other Regional conditions” have been satisfied are vague and inconsistent with the Provincial D5 guidelines.

### **3.0 Repeated Comments Not Addressed in Draft ROP**

A number of the NEPLOG comments made previously were not addressed in the staff report, nor in the Staff Response table in Attachment 5 of the staff report. Please refer to our previous submission dated April 3, 2023 for a full list of comments. These include NEPLOG-proposed modifications to Sections 5.7.3, 5.7.7, 5.7.8, and 5.7.9 regarding secondary plan requirements for the Pickering 2051 SABE, Section 5.5.10 regarding employment area conversions, the proposed regional transit priority along Columbus Road, and Section 5.4.9 regarding the minimum size threshold of 20 hectares for a secondary plan exercise.

We continue to request that lands south of the Oak Ridges Moraine Conservation Plan and outside of settlement areas be designated as Rural Lands, given that a rural land use designation provides more appropriate land uses in and around new settlement areas. This also would provide a designated Rural Area, that continues to permit agricultural uses, but also provides for a recreational and rural interface between the Region’s urban area and the prime agricultural and environmental areas to the north. As a result of the proposed SABE in North-East Pickering and anticipated and imminent future development within the NEPLOG lands for urban uses, impacts on the existing agricultural areas within and adjacent to the North-East Pickering SABE are likely unavoidable. In particular, the lands to the immediate north and south of the NEPLOG lands are no longer continuous, interrupted by several County Rural Subdivisions, and sandwiched between existing and proposed urban development, which renders these lands unlikely candidates for continued agricultural uses. As such, we recommend that these areas surrounding the North-East Pickering SABE be re-evaluated under the Draft ROP and re-designated as Rural Lands, which will continue to permit agricultural uses in addition to other rural uses in accordance with proposed Policy 7.1.6.

The Region should create a rural land use designation, given that the PPS and Provincial Plans anticipate having either a Prime Agricultural Area or Rural Lands designation outside of settlement areas as the primary land use designations. The Region’s use of the Major Open Space Area designation as a surrogate for Rural and Environmental lands generally results in too little Rural lands being planned for in the Region, and the permissions of the Major Open



Space Area designation do not align with the Rural Lands policies of the PPS and Provincial Plans.

As such, we request that the Region create a Rural land use designation or expand both the geographic extent and permissions in the Major Open Space Area designation to plan for sufficient Rural lands with a full range of rural land use permissions in the Region.

#### **4.0 Conclusion**

We thank you again for the opportunity for continued participation and to provide input into the Region's MCR process. The NEPLOG continues to study and plan for the development of the NEPLOG lands in cooperation with the City of Pickering. We believe that the NEPLOG lands are a logical location to expand the urban area boundary to meet the Region's Community Area and Employment Area land needs and growth forecasts to 2051 and the Region's Draft ROP, with the modifications suggested herein, should be adopted expeditiously to advance planning for these lands.

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. Myron Pestaluky, Group Manager, NEPLOG  
Catherine Rose, City of Pickering  
Brian Bridgeman, Durham Region

Attachments: North-East Pickering Comments Letter dated April 3, 2023

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: North-East Pickering Landowners Group Response to Envision Durham –  
Comments on the Draft New Durham Region Official Plan (February 2023)**

Malone Given Parsons Ltd. (“MGP”) is the planning and land economic consultant for the North-East Pickering Landowners Group (“NEPLOG”), who own multiple properties in North-East Pickering. The purpose of this letter is to respond to Report #2023-P-6, Release of the Draft New Regional Official Plan (“Draft ROP”), released on February 10, 2023 and presented at a public meeting on March 7, 2023.

Further to our deputation at the public meeting, we are writing on behalf of the NEPLOG to provide comments on the Draft ROP and re-iterate our previous comments on the Region’s Growth Management Strategy and the identification of a proposed Settlement Area Boundary Expansion (“SABE”) on the NEPLOG lands.

We would like to take this opportunity to stress the importance of expeditiously completing the Region’s Official Plan review, to formally bring the identified SABEs into the urban boundary and continue the comprehensive planning for the North-East Pickering lands so that housing can be built as soon as possible. The NEPLOG has completed extensive background work and the City of Pickering is advancing the secondary planning of the North-East Pickering lands in this area; adoption of the new Durham Region Official Plan, including the NEPLOG lands within the settlement area, is essential to continue advancing the planning of this area under the appropriate policy guidance from the Region.

The balance of this letter contains our comments on the proposed Draft ROP for the Region’s consideration.

**1.0 North-East Pickering SABE Area Calculations and Natural Heritage System**

As detailed in our letter dated January 18, 2023 on the Region’s proposed SABEs, we request that the Region amend the North-East Pickering SABE areas in the Draft ROP to be consistent with the calculations prepared by MGP on behalf of the NEPLOG to correct discrepancies in

area and mapping calculations for land area exclusions, avoid irregular and awkward shaped parcels, establish logical boundaries, respect the updated boundaries of the Natural Heritage System (“NHS”), and avoid non-developable lands used for infrastructure.

The detailed reasons for refining the NHS mapping are described in our letter dated January 18, 2023 and its attachments, all as attached hereto as Attachment 1. 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.

## **2.0 Balance of Community and Employment Areas in North-East Pickering**

As outlined in our submission in Attachment 1 and the associated SABE map, we request that the delineation of Community and Employment Areas in North-East Pickering in the Draft ROP be amended to reflect a more appropriate balance of land uses appropriate for the context in this part of the Region.

The NEPLOG SABE map identifies NEPLOG’s community land area of 1,056 hectares and an employment land area of 233 hectares, compared to the Region’s community land area of 1,010 hectares and employment land area of 253 hectares, consolidated and centred around the Highway 407 corridor, which we believe is the most appropriate location for employment.

The shift in employment areas from north to south of Highway 407 generates a larger and more appropriately sized area to establish a full range of employment uses with visibility and convenient access to the highway system. The proposed reconfiguration of employment lands better implements provincial, regional, and local planning policies to protect and integrate employment areas with planned or existing infrastructure corridors and major goods movement facilities. Further, the NEPLOG-proposed breakdown maximizes the potential for community building around future potential transit along Seventh Concession Road that can be realized in North-East Pickering to establish a new residential and mixed-use community in this part of the Region. In this regard, limiting the direct interface of employment areas and

mixed-use communities can prevent compatibility issues and concerns which allows both areas to best achieve their planned function.

Planning new employment areas in a corridor approach north of Highway 407 provides employment adjacent to the highway, but limits the extent of this area, which can facilitate the Secondary Plan process planning for these areas as business parks and with compatible uses to the Community Areas to the north. If the area was larger, it would support the planning and location of larger and potentially more noxious uses, which is not desirable next to a future transit corridor and related transit-oriented, mixed use development. A corridor approach to employment will also enable the provision of commercial and institutional uses in the Community Areas near to interchanges at Westney, Salem and Lakeridge Roads.

A larger and consolidated employment area south of Highway 407 provides for an area of concentrated and more intensive employment uses within limited exposure to surrounding residential communities. Proposed Community Area lands surrounding the villages of Greenwood and Kinsale will provide an appropriate interface between the employment uses and existing communities.

The other reasons for our requests regarding refined Community and Employment Areas in North-East Pickering are described in our previous letter found in Attachment 1. We request that the Draft ROP be amended to reflect the NEPLOG's Community and Employment Areas, which will provide a more complete community in North-East Pickering.

### **3.0 Requirements for Preparation of Secondary Plans**

Sections 5.7.3, 5.7.7, and 5.7.8 of the Draft ROP establish policy requirements with respect to the preparation of secondary plans for lands within the 2051 SABEs, including site-specific policies for the North-East Pickering SABE. It is our opinion that the Draft ROP should provide a list of potential requirements for any secondary plan process and study; however, the final determination of required studies will vary depending on the size, location and nature of the secondary plan. There may be opportunities to expedite a secondary plan process to create a high-level land use or structure plan with detailed studies to follow through the development approvals process. Therefore, the final requirements for a secondary plan are best determined by area municipalities when commencing a secondary plan process.

In this respect, Policy 5.7.3 should encourage, not mandate, certain studies, and should be amended as follows:

*“5.7.3 Support detailed planning by the area municipalities for lands within the 2051 Urban Expansion Areas, primarily through the preparation of secondary plans that ~~meets and goes beyond~~ **address** the requirements of Policies 5.4.9 to 5.4.16, and includes the following, **where appropriate**.”*

In addition, it is our experience that the minimum size for a secondary plan is closer to the area of a concession-lot block, and generally ranges from 200-400 hectares. This minimum area is appropriate given that such an area will likely include more complicated planning considerations that span multiple owners and planning considerations. As such, we request that the size threshold in Policy 5.4.9 be increased to at least 100 hectares, and ideally 200 hectares for development to proceed through a secondary planning exercise.

The Draft ROP contains two policies with respect to the secondary plan process for the SABE in Pickering (being the North-East Pickering lands): Policy 5.7.7 which applies generally to the SABEs in Pickering, Whitby, Oshawa, and Clarington, and Policy 5.7.8, which applies only to the SABE in Pickering. Policy 5.7.7.e) does not appear to be applicable to the other SABEs, and so it is duplicative in conjunction with Policy 5.7.8.a), which applies specifically to North-East Pickering. Moreover, the policy requires that a secondary plan process identify funding models and commitments, including the parties for funding, cost sharing and implementation, which we believe are not appropriate requirements for a secondary plan process. Lastly, it is not clear that this policy would only pertain to the secondary plan area itself; at the very least the policy should be clarified to apply to flood mitigation solutions with the applicable secondary plan area. Therefore, we suggest that Policy 5.7.7.e) be deleted in its entirety.

Policy 5.7.8.a) should be revised as follows to provide the appropriate level of regional policy guidance for future secondary plan studies relating to flooding concerns and the Carruthers Creek Watershed Plan. Policy 5.7.8 b) be deleted as the Minister's Zoning Order and Airport Site Order and Zoning Regulations will be applicable or not irrespective of the policies of the ROP:

*"5.7.8 Apply, in addition to Policy 5.7.7, the following ~~additional~~ requirements as part of a secondary plan process and subwatershed study for lands located within the Pickering 2051 Urban Expansion Area:*

*a) **Require the secondary plan to include a policy that ensures that,** prior to ~~the approval of a secondary plan~~ **development approvals,** ensure that all other applicable policies of the Carruthers Creek Watershed Plan have been addressed, including those directed to area municipalities related to ~~existing~~ **and future natural hazards/downstream water flows;** ~~and~~*

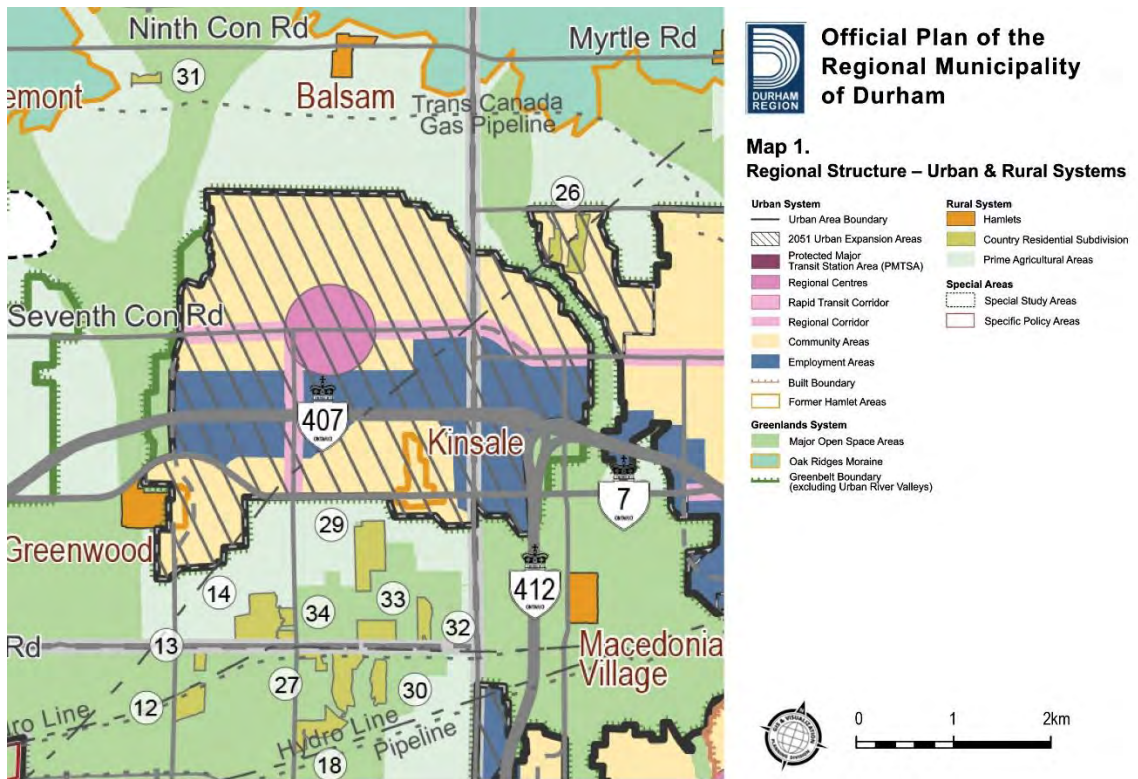
*b) ~~assess the impacts of existing Minister's Zoning Orders and Airport Site Order and Zoning Regulations which currently restricts the development of these lands as a result of the potential for a future airport to the west. Development shall not proceed until such time it has been demonstrated that the relevant requirements, including those related to noise and building height restrictions have been met. Satisfying the requirements of this policy may be dependent on future actions first being undertaken by provincial and federal levels of government, as described in Policy 5.5.34.~~*

We also request that Policy 5.7.9 be deleted in its entirety. This policy is not required as appropriate consultation with the public, stakeholders, and other commenting agencies will be determined through the planning processes for each secondary plan and development application, and the mandatory consultation on some of the items in Policy 5.7.7 is not required with all the parties listed in this policy, and certainly not required in parts of the Whitby, Clarington and Oshawa 2051 expansion areas.

## 4.0 Proposed Prime Agricultural Area Designation on Surrounding Lands

Lands abutting the proposed North-East Pickering SABE are proposed to be designated Prime Agricultural Area or Greenlands, Major Open Space Areas on Map 1, Urban Structure, of the Draft ROP, as shown in Figure 1 below.

Figure 1: Draft ROP Map 1 Extract



Source: Durham Region (2023)

The PPS defines Prime Agricultural Areas in the following manner:

**“Prime agricultural area:** means areas where prime agricultural lands predominate. This includes areas of prime agricultural lands and associated Canada Land Inventory Class 4 through 7 lands, and additional areas where there is a local concentration of farms which exhibit characteristics of ongoing agriculture. Prime agricultural areas may be identified by the Ontario Ministry of Agriculture and Food using guidelines developed by the Province as amended from time to time. A prime agricultural area may also be identified through an alternative agricultural land evaluation system approved by the Province.”

Further, the PPS states that planning authorities shall designate prime agricultural areas in accordance with guidelines developed by the Province (Policy 2.3.2).

A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 (“Growth Plan”)

provides a similar policy which states that prime agricultural lands will be designated in accordance with mapping provided by the Province (Section 4.2.6.2). Section 4.2.6.9 of the Growth Plan provides that municipalities may conduct further refinement of provincial mapping of the agricultural land base based on implementation guidance issued by the Province.

The most current Provincial guideline regarding the implementation procedures of refining agricultural land mapping is the ‘Implementation Procedures for the Agricultural System in Ontario’s Greater Golden Horseshoe’ (“Provincial Implementation Procedures”) issued by OMAFRA dated March 2020. Section 3.3.2.1 of the Provincial Implementation Procedures provides that the municipality may refine Prime Agricultural Areas under specific circumstances, including, but not limited to, the following:

- To make minor technical adjustments;
- To account for settlement area boundaries and additional refinements to settlement area boundaries in effect as of July 1, 2017.

We recognize that in accordance with the policies of the PPS, Growth Plan and the Provincial Implementation Procedures, the Region conducted agricultural studies as background studies for the preparation of the Draft ROP; however, these were conducted prior to the finalization of the SABEs. Further agricultural analysis should be completed to account for the Prime Agricultural Areas that are now fragmented and have direct interface with lands proposed to be included in the settlement area boundaries and designated for urban land uses.

As such, we request that lands south of the Oak Ridges Moraine Conservation Plan and outside of settlement areas be designated as Rural Lands, given that a rural land use designation provides more appropriate land uses in and around new settlement areas. This also would provide a designated Rural Area, that continues to permit agricultural uses, but also provides for a recreational and rural interface between the Region’s urban area and the prime agricultural and environmental areas to the north. As a result of the proposed SABE in North-East Pickering and anticipated and imminent future development within the NEPLOG lands for urban uses, impacts on the existing agricultural areas within and adjacent to the North-East Pickering SABE are likely unavoidable. In particular, the lands to the immediate north and south of the NEPLOG lands are no longer continuous, interrupted by several County Rural Subdivisions, and sandwiched between existing and proposed urban development, which renders these lands unlikely candidates for continued agricultural uses. As such, we recommend that these areas surrounding the North-East Pickering SABE be re-evaluated under the Draft ROP and re-designated as Rural Lands, which will continue to permit agricultural uses in addition to other rural uses in accordance with proposed Policy 7.1.6.

The Region should create a rural land use designation, given that the PPS and Provincial Plans anticipate having either a Prime Agricultural Area or Rural Lands designation outside of settlement areas as the primary land use designations. The Region’s use of the Major Open Space Area designation as a surrogate for Rural and Environmental lands generally results in too little Rural lands being planned for in the Region, and the permissions of the Major Open Space Area designation do not align with the Rural Lands policies of the PPS and Provincial Plans.

As such, we request that the Region create a Rural land use designation or expand both the geographic extent and permissions in the Major Open Space Area designation to plan for sufficient Rural lands with a full range of rural land use permissions in the Region.

## **5.0 Other Comments**

Based on our review of the Draft ROP, we have other miscellaneous comments for the Region's consideration:

- Please clarify that the population and employment projections in Figure 1 are minimums;
- Policy 5.5.10 should be amended to permit the conversion of lands within Employment Areas to non-employment uses outside of or before the next municipal comprehensive review, in conformity with Growth Plan Policy 2.2.5.10 and PPS Policy 1.3.2.5, which establish the criteria under which those conversions may be permitted; and
- Policy 4.1.8 should be replaced with a policy that denotes that the supply of water or sewage to a development will only occur in accordance with Provincial policies and guidelines, including the D5 series of guidelines.
- The Draft ROP should recognize the role and function of Columbus Road/Concession Road 7 as a major east-west arterial that has the potential for regional transit service. In particular, Columbus Road/Concession Road 7 has the potential to connect with 16th Avenue or Major Mackenzie Drive in the City of Markham and as far east to Harmony Road in the City of Oshawa and provide interregional transit connections between these municipalities. The Regional Corridor identified on the NEPLOG lands should be extended to the east and west and identified as a future rapid transit corridor.

## **6.0 Conclusion**

We thank you again for the opportunity for continued participation and to provide input into the Region's MCR process. The NEPLOG continues to study and plan for the development of the NEPLOG lands in cooperation with the City of Pickering. We believe that the NEPLOG lands are a logical location to expand the urban area boundary to meet the Region's Community Area and Employment Area land needs and growth forecasts to 2051 and the Region's Draft ROP, with the modifications suggested herein, should be adopted expeditiously to advance planning for these lands.



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. Myron Pestaluky, Group Manager, NEPLOG  
Catherine Rose, City of Pickering  
Brian Bridgeman, Durham Region

Attachments: North-East Pickering Comments Letter dated January 18, 2023

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: North-East Pickering Landowners Group 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 the North-East Pickering Landowners Group (“NEPLOG”), who own multiple properties in North-East Pickering. The purpose of this letter is to respond to Report #2022-INFO-91, the Envision Durham Growth Management Study, Phase 2: Draft Settlement Area Boundary Expansions (“SABE”) and Area Municipal Growth Allocations, File D 12-01 released on November 10, 2022.

The NEPLOG supports the findings of the Region’s report #2022-INFO-91, which identifies an additional land need for the Region of approximately 3,671 hectares of community and employment lands, in line with the Council-endorsed scenarios (including community land need Scenario #2A) for land needs from May 2022 and directs Pickering’s allocation of that growth to a SABE in North-East Pickering.

We would like to take this opportunity to stress the importance of expeditiously completing the Region’s official plan review, to formally bring these identified SABEs into the urban boundary and continue the comprehensive planning for the North-East Pickering lands so that housing can be built as soon as possible. The NEPLOG is ready to advance the planning of the North-East Pickering lands and has completed extensive work to date to support this required land need in Pickering and assist the City through its secondary plan study process which has already commenced and background studies have been issued.

The balance of this letter contains our comments on the proposed SABE in North-East Pickering for staff consideration.

## **1.0 Non-Developable and Natural Heritage System Land Areas**

The Region identifies 1,195 hectares of additional land need in Pickering, with 947 hectares of community area and 248 hectares of employment area, described in Appendix #2 and illustrated in a map in Attachment #2 to report #2022-INFO-91.

Based on our detailed mapping and calculations, there are discrepancies between what has been numerically proposed as new community and employment area, and what has been mapped, as illustrated in the table below.

North East Pickering SABE	Report #2022 INFO 91	Attachment #2 Map (MGP Calculation)	NEPLOG Proposed Areas (MGP Calculation)
Community Land Area	947 ha	1,010 ha	1,056 ha
Employment Land Area	248 ha	253 ha	233 ha
<b>Total Land Area</b>	<b>1,195 ha</b>	<b>1,263 ha</b>	<b>1,289 ha</b>

By our calculation, the Region is proposing a SABE in North-East Pickering of 1,261 hectares of additional land (66 hectares more than the Region’s 1,195 hectares described in report #2022-INFO-91) and have been unable to create the 1,195 hectares identified by the Region.

It is unclear which areas the Region included as developable community and employment area however we believe that refinements are necessary to reflect the developability of these lands. By our calculations, the North-East Pickering lands contain a total of 1,289 hectares of developable lands, a 26-hectare difference to the 1,263 hectares shown on the Region’s proposed SABE map.

As shown on the map attached to this letter, our calculations and map exclude all Natural Heritage System (“NHS”) lands and areas encumbered by highway and utility infrastructure. The NEPLOG consultants have undertaken detailed environmental work to delineate the boundaries of the NHS that informs our land area exclusions.

In this regard, the NEPLOG’s environmental consultant, GeoProcess Research Associates (“GeoProcess”), provided an earlier submission to the Region through the Envision Durham process dated May 2, 2022 that outlines the NEPLOG’s concerns with the Region’s mapping of the NHS. We reiterate the concerns outlined in that earlier submission (attached here for reference) and provide the GIS shapefiles prepared by GeoProcess that identifies the NEPLOG’s proposed NHS mapping following fieldwork and ground-truthing, as well as a detailed review of proposed Natural Heritage System mapping from the Region, City, and conservation authorities. We request that GeoProcess’ mapping be utilized in the delineation of the NHS within North-East Pickering in the proposed Regional Official Plan.

Similar to what the Region has done for the Council-endorsed employment areas, we request that the Region amend the North-East Pickering SABE areas to be consistent with the calculations prepared by the MGP on behalf of the NEPLOG, avoid irregular and awkward shaped parcels, establish logical boundaries, respect the updated boundaries of the NHS, and avoid non-developable lands used for infrastructure.

## **2.0 Balance of Community and Employment Areas in North-East Pickering**

We request that the delineation of community and employment areas in North-East Pickering should be amended to reflect a better balance of land uses appropriate for the context in this part of the Region.

We have prepared a map showing the requested NEPLOG breakdown and location of community and employment areas, attached to this letter. The map identifies NEPLOG's community land area of 1,056 hectares and an employment land area of 233 hectares, compared to the Region's community land area of 1,010 hectares and employment land area of 253 hectares.

The NEPLOG breakdown includes less total area of employment lands, however the proposed employment lands are proposed to be consolidated and centred around the Highway 407 corridor, which we believe is the most appropriate location for employment. The shift in employment areas from north to south of Highway 407 generates a larger and appropriately sized area to establish a full range of employment uses with visibility and convenience access to the highway system. The proposed reconfiguration of employment lands makes best use of provincial, regional, and local planning policies to protect and integrate employment areas with planned or existing infrastructure corridors and major goods movement facilities.

Small pockets of employment areas that are disconnected from the larger employment area by existing communities, the NHS, or community land areas have been removed (in particular, in the southeast corner of North-East Pickering) or are now proposed as community land areas. In our opinion, employment areas are better planned in large, connected employment areas than in isolated pockets and reduces potential land use compatibility concerns with adjacent community land uses.

Further, the NEPLOG-proposed breakdown maximizes the community uses that can be built in North-East Pickering to establish a new residential and mixed-use community in this part of the Region. The community area lands will provide for increased residential and population-related employment in this area.

In our opinion, the NEPLOG-proposed breakdown and location of community and employment land areas is appropriate and provides a complete community in North-East Pickering. We note that these changes will result in the need for adjustments to the land area breakdowns in other identified SABEs however there is a sufficient diversity of areas within the Region to accommodate both employment and community uses.

## **3.0 Conclusion**

We thank you again for the opportunity for continued participation and to provide input into the Region's MCR process. The NEPLOG continues to study and plan for the development of these lands in cooperation with the City of Pickering. We believe that the NEPLOG lands are a logical location to expand the urban boundary area to meet the Region's Community Area land needs and growth forecasts to 2051 and the Region's proposed SABEs, with the modifications suggested herein, should be approved expeditiously to advance planning for these lands.

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

Yours very truly,  
Malone Given Parsons Ltd.



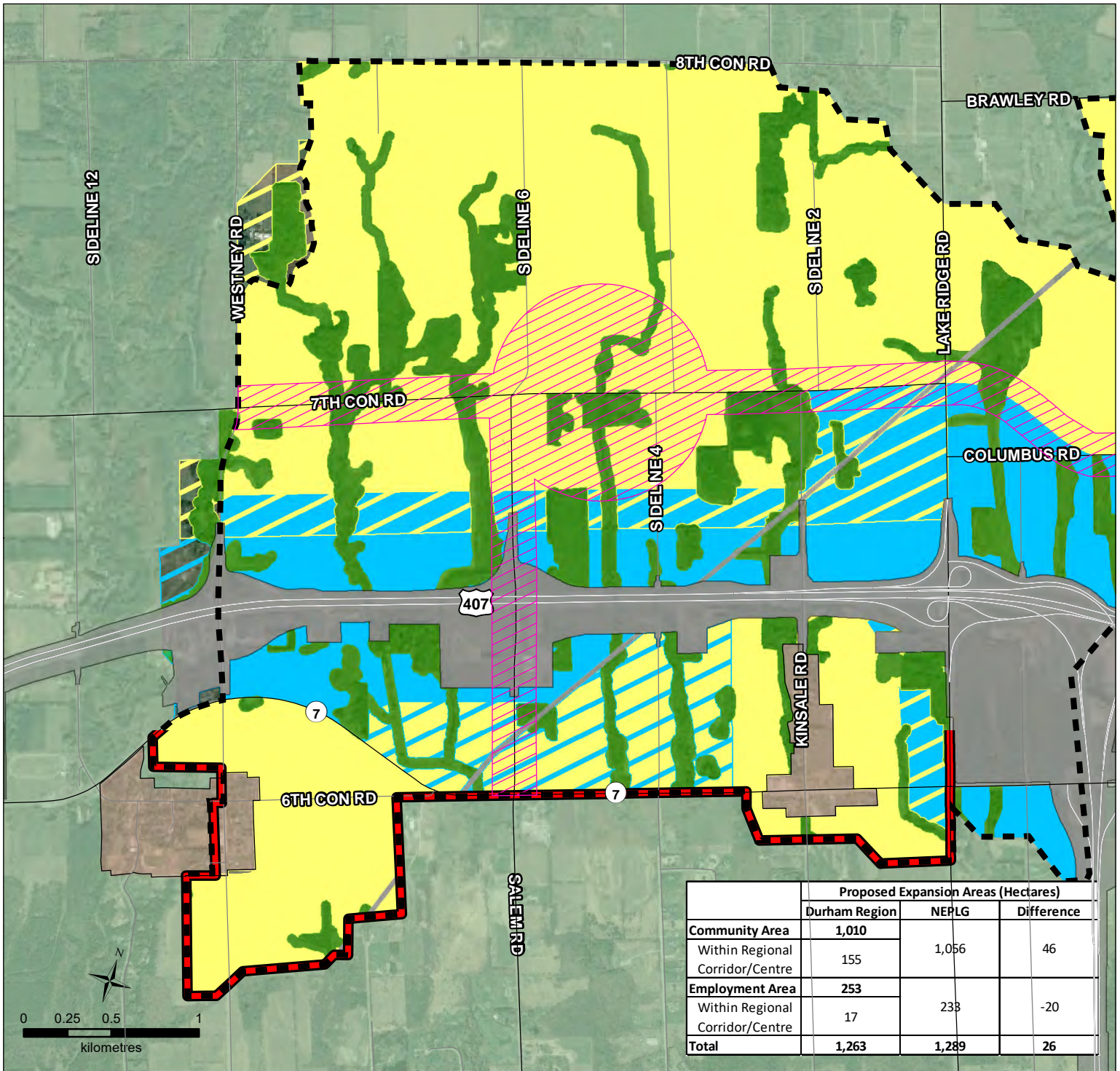
**Matthew Cory, MCIP, RPP, PLE, PMP**

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

cc. Myron Pestaluky, Group Manager, NEPLOG  
Catherine Rose, City of Pickering  
Brian Bridgeman, Durham Region

Attachments: North-East Pickering Proposed SABE Comparison Map  
GeoProcess GIS Data Shapefiles for the North-East Pickering NHS  
GeoProcess Submission to Envision Durham dated May 2, 2022

# NORTH-EAST PICKERING PROPOSED SETTLEMENT AREA BOUNDARY EXPANSION



	Proposed Expansion Areas (Hectares)		
	Durham Region	NEPLG	Difference
<b>Community Area</b>	<b>1,010</b>		
Within Regional Corridor/Centre	155	1,056	46
<b>Employment Area</b>	<b>253</b>		
Within Regional Corridor/Centre	17	233	-20
<b>Total</b>	<b>1,263</b>	<b>1,289</b>	<b>26</b>

- North-East Pickering
- Hamlet
- Natural Heritage System
- Major Infrastructure
- Provincial Plans**
- Greenbelt Plan
- Durham Region Proposed Settlement Area Boundary Expansion Area
- Durham Region Proposed Expansion Area Designations**
- Living Area / Community Area
- Employment Area
- Regional Corridor / Centre

- NEPLG Proposed Expansion Area Designation Differences**
- Living Area / Community Area
- Employment Area

Contains information licensed under the Open Government Licence – Ontario

MGP File: 20-2918  
Date: January 16, 2023

May 2, 2022

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

**Re: Proposed Natural Heritage System**

---

Envision Durham,

This letter has been prepared on behalf of the Northeast Pickering Landowners Group. We have reviewed the proposed Natural Heritage System prepared for the area identified as Northeast Pickering (boundary shown on attached Map). We note that the Provincial Policy Statement (2020) requires that "*Natural heritage systems shall be identified in Ecoregions 6E & 7E1, recognizing that natural heritage systems will vary in size and form in settlement areas, rural areas, and prime agricultural areas.*" Additionally, the PPS defines Natural Heritage Systems as "*a system made up of natural heritage features and areas, maintain biological and geological diversity, natural functions, viable populations of indigenous species, and ecosystems. These systems can include natural heritage features and areas, federal and provincial parks and conservation reserves, other natural heritage features, lands that have been restored or have the potential to be restored to a natural state, areas that support hydrologic functions, and working landscapes that enable ecological functions to continue. The Province has a recommended approach for identifying natural heritage systems, but municipal approaches that achieve or exceed the same objective may also be used.*"

We believe that the proposed Natural Heritage System has four areas of concern as it relates to the area shown:

- 1) The inclusion of tile drains and drainage features that were confirmed to be absent in the field;
- 2) The inclusion of hedgerows throughout the plan;
- 3) The inclusion of areas of plantation and thicket that are not significant woodlands; and,
- 4) The inclusion of riparian corridor widths in excess of the regulated area and wildlife corridor requirements.

The attached Map 1 shows the areas of concern in yellow and additional information is provided below for each area. The limits of the NHS are generic and based on the best available information at the time of writing. Delineated boundaries may be refined further via ground truthing in the field.

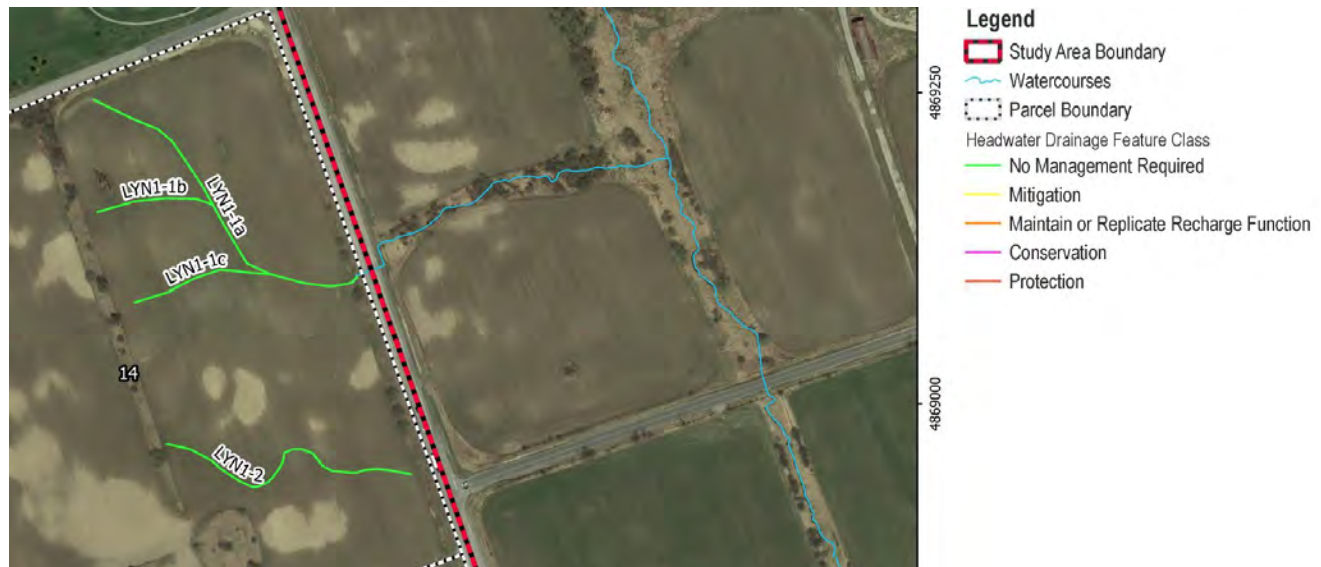
## 1.1. Tile Drain and Drainage Features

We have completed detailed headwater drainage feature assessments for the Northeast Pickering Lands. During this review, we have prepared mapping of the headwater drainage features and their categorization according to the TRCA Headwater Drainage Assessment Protocol (appended to this letter). We have attached a map with these results and note that the proposed Durham Region Natural Heritage System includes several areas of tile drain or drainage assessed to be 'No Management Required'. To meet the designation of 'No Management Required', a headwater drainage feature must have the following: Limited Hydrology Input, no Recharge Hydrology, not be a Wetland, nor have contributing Terrestrial Ecology value. An example of this is shown on Map 1 in the area identified as Area A. The photo below shows the infield site condition from the Headwater Drainage Feature Assessment for this area of proposed Natural Heritage System. See Map 2 for the delineated and classified headwater drainage features that have been surveyed to date in Northeast Pickering.



Photo A: Photo showing the No Management Required HDF on the property located at 7001 Lake Ridge Road.





Excerpt from the Headwater Drainage Feature Assessment

## 1.2. Inclusion of Hedgerows

Our assessment of the proposed Durham Region Natural Heritage System notes that hedgerows have been included in the Northeast Pickering Lands. The process for the identification of Significant Woodlands in the Natural Heritage Reference Manual notes the following: *Minimum patch width: This width is intended to exclude relatively narrow linear treed areas such as hedgerows. The minimum average width for significance can be related to the woodland size threshold being applied. For example, a minimum 40 metre average width where the size threshold is 4 hectares or less can be increased to a 60 metre width where the size threshold is 10 hectares or more.*

It is clear in the Natural Heritage Reference Manual that hedgerows are not intended to be designated as woodlands, or Significant Woodlands. This is consistent with the proposed Regional Natural Heritage System throughout most of Durham Region but was not applied to the Northeast Pickering Lands as shown below. An example is highlighted below for Area B on Map 1.



Excerpt from the Envision Durham interactive viewer for a portion of Northeast Pickering with multiple hedgerows included in the proposed NHS.



Area approximately 3 km east of Northeast Pickering with numerous hedgerows not included in the proposed NHS consistent with the Natural Heritage Reference Manual.

### 1.3. Inclusion of Areas of Plantation and Thicket

We have completed Ecological Land Classification for the Northeast Pickering Lands and have identified the areas of wetland, woodland, meadow, thicket and plantation. We note that several areas of the proposed Durham Region Natural Heritage System are found on non-significant features such as thicket, plantation and meadow. Areas of Thicket, Meadow and Plantation are more appropriately dealt with on a Secondary Plan level where the specific attributes of these, often marginal, features can be evaluated. The City of Pickering is actively undergoing a Secondary Plan Process for the Northeast Pickering Lands and as such, the identification of these features as NHS should follow that process rather than the high-level Region Wide process.

Area C on Map 1 shows an example of a sparsely planted plantation which are not included in the City of Pickering NHS that have been proposed for the Durham Region NHS. This is an example of areas where detailed study will better determine if the plantation has sufficient density, ecological function, wildlife habitat and species diversity to warrant inclusion in an NHS. Notable plantation areas that would be better assessed via a secondary plan have also been highlighted in Map 1 due to their size and relation to nearby thickets and plantations.



Airphoto of the sparse plantation and thicket area proposed for inclusion in the Durham Region NHS (Area C, Map 1).

#### 1.4. Inclusion of Extended Riparian Corridors

As with the thickets, meadows and plantations, the identification of appropriate riparian corridors is best done at the Secondary Plan level. The riparian corridors identified in the Envision Durham NHS vary widely. For the identification of vegetated corridors adjacent to streams, the Natural Heritage Reference Manual recommends a buffer of 30m. The Natural Heritage Reference Manual also notes the following: *Planning authorities may consider the need for greater distances for natural cover for the reasons such as the following: a water feature is highly stressed; an endangered or threatened aquatic species is present; enhancement of functions including detrital input, bank stabilization, pollutant removal and wildlife habitat/corridors are identified as further objectives; another feature or area that has ecosystem-based planning importance (e.g., natural heritage system, floodplain or significant valleyland) is present.* These concerns would be best identified on a case-by-case basis at the Secondary Plan Level. The riparian corridors proposed in the Durham Region NHS that extend beyond the width of the TRCA regulated area represent restoration plans for future corridors. Many of the proposed NHS systems today are in active agriculture with limited to absent tree cover. Area D below is an example of currently farmed lands that is proposed to be NHS. The widths of the future linkage corridors should be based on considerations such as flooding, the type and nature of the core areas being linked, the presence of Regional connections and the expected wildlife usage of the linkages.



Photo showing the watercourse and existing conditions (Area D, Map 1).

---

## 2. Alternative Natural Heritage Systems and Core Areas

---

Delineation of the NHS in the context of the Ontario Natural Heritage Reference Manual (2010), the Ontario Provincial Policy Statement (2005), and the Regional Natural Heritage System for the Growth of the Greater Golden Horseshoe Criteria Methods (2018) should include the following natural features and their associated buffers:

### **Hydrological Features**

Hydrological functions are protected under multiple levels of policy. Wetlands, Valleylands, watercourses, seeps, riparian zones, and headwater drainage features (HDFs) are the primary parameters for hydrological NHS features. Additionally, areas of high infiltration, if identified may require additional study to maintain natural infiltration rates.

Wetlands were identified using data from the Toronto Region Conservation Authority (TRCA) and Central Lake Ontario Conservation Authority (CLOCA). As part of the Secondary Plan process, additional ground truthing will occur for wetlands and a 30-metre setbacks should applied to wetlands and watercourses.

### **Woodlands:**

Woodlands were identified as any forested area that was one (1) hectare in size or greater. As per the Natural Heritage Reference Manual (2010), all woodlands should be provided with a 10 metre setback from the dripline edge.

## **Species at Risk Habitat**

Field work completed in 2021 identified areas with confirmed Species at Risk (SAR) habitat, including Eastern Meadowlark, Bobolink, Barn Swallows, and Eastern Wood-pewee. These habitats should be taken into consideration when developing the design for the NHS limits and linkage locations.

## **Significant Wildlife Habitat**

Significant Wildlife Habitat (SWH) screening was completed as part of the preliminary assessment to designing the NHS criteria limits. Areas that provided potential SWH should be considered in the design of the NHS limits and linkage locations.

## **Linkages/Corridors:**

Linkages are important aspects of any NHS and are necessary in maintaining NHS integrity and function. As per the Natural Heritage Reference Manual (2010), a linkage is defined as *a linear area intended to provide connectivity to the Regional or site level, supporting a range of community and ecosystem processes, enabling plants and animals to move between core areas and other larger areas of habitat over a period of generations.* These are areas that would improve or restore a link between existing Natural Heritage features both within and outside of the Veraine lands. The Ontario Natural Heritage Reference Manual recommends linkages to be formed between patches of habitat and/or within patches of land with restoration potential to maintain ecological functions at a landscape level. It is also recommended that blocks of habitat be arranged close together to limit further habitat fragmentation.

Linkage areas should consider the following factors:

- Length and width of the linkage
- Composition
- Orientation
- Configuration
- Habitat
- Shape

Other primary considerations include maintaining regional ecological integrity and selecting corridors with the potential to provide multiple linkages. Regional connections are valuable in maintaining and restoring the overall biodiversity and ecological functions over the long-term and should be large enough to encompass a wide range of species, habitats, and ecological functions. The proposed system should connect to the Regional NHS at multiple locations and contain the following corridors:

- multiple north-south corridors;
- multiple east-west corridors and;
- supporting corridors that connect the north-south and east-west corridors.

Main corridors that are equal to or greater than 100 m wide will support regional connectivity for flora and fauna. These corridors function as ecological connections between the Duffins Creek, Carruthers Creek, and Lynde Creek watersheds. In addition, smaller local riparian corridors will provide connection to the Area of Natural and Scientific Interest (ANSI) located immediately west of the Veraine Lands in the Duffins Creek Valley.

---

### 3. Working Landscape Areas

---

Working landscape areas are areas that could be developed to contribute to the ecological and/or hydrological function of the surrounding areas. This can include passive parks and green-surface infrastructure such as swales, rain gardens, and green roofs. Working landscape areas can also operate as linkages in the NHS and can be used to form a portion of the larger corridors.

---

### 4. Restoration and Enhancement Areas

---

Areas that could be restored to a natural state to enhance the local ecological, hydrological, and linkage functions should be identified and selected in the proposed NHS criteria.

In fragmented landscapes, core areas that contain groups of habitat patches can provide opportunities for rehabilitation, habitat enhancement, and restoration. In turn, this proposes a much more robust and resilient NHS. Gap enhancement areas should be integrated within the existing NHS in locations such as riparian zones, wetlands, and woodlands, and in areas where the NHS will form narrow pinch points or otherwise inaccessible gaps. Most opportunities for habitat enhancement may be found within the buffer setbacks from these features.

---

### 5. Existing Infrastructure

---

Some areas that may be selected for linkages or habitat restoration as a part of an NHS include areas that are not developable due to the presence of existing infrastructure, but also provide habitat. This primarily includes meadows beneath regional powerlines that form natural corridors. These hydro-corridors may be included as linkages where it was deemed appropriate.

---

### 6. Closing

---

Having reviewed the proposed Durham Region NHS in northeast Pickering, it includes a number of the important parts of an NHS as defined in the PPS 2020. With corrections of the areas of improperly mapped features (No Management Required HDF's and Hedgerows) and refinement through the Secondary Plan process of the marginal vegetation communities and riparian corridors, the NHS will serve as the backbone of any proposed land use changes in this area. Under the current agricultural use, approximately 10% of the site is in natural vegetation. The future NHS and restoration activities present the opportunity to more than double the amount of natural vegetation while improving hydrologic conditions in the watercourses in northeast Pickering.

Extensive ground-truthing work has been done to verify the existence and extents of natural heritage features on the lands owned by the Northeast Pickering Landowners group. This work has provided strong evidence that the extents of the natural heritage system should be modified according to the principles outlined in this letter and as seen in Map 1 (blue), and the NHS in the Envision Durham official plan should not exceed these limits.

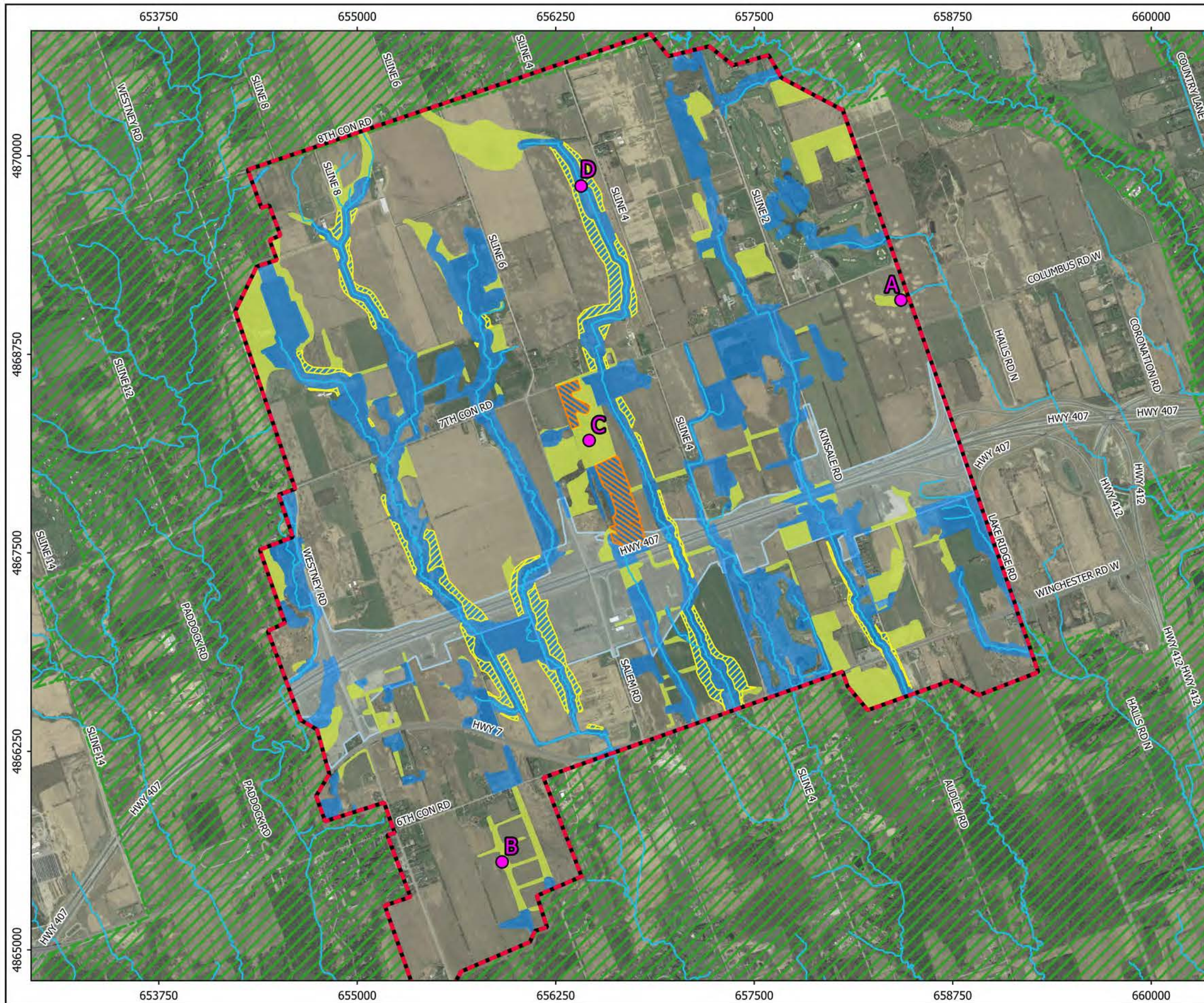
Regards,

**GEOPROCESS RESEARCH ASSOCIATES INC.**

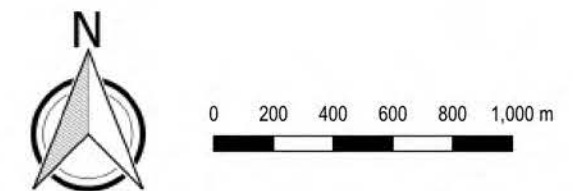


Ian Roul, MSc.  
Senior Ecologist





- Legend**
- Subject Property
  - Watercourses
  - Greenbelt Area
  - MTO Easement
  - Envision Durham Proposed Modified NHS: Informed by GRA analysis and ground truthing
  - Envision Durham NHS Areas of Concern
  - Watercourse Buffer Over-extension Areas
  - Notable Plantation Areas
  - Photo Areas

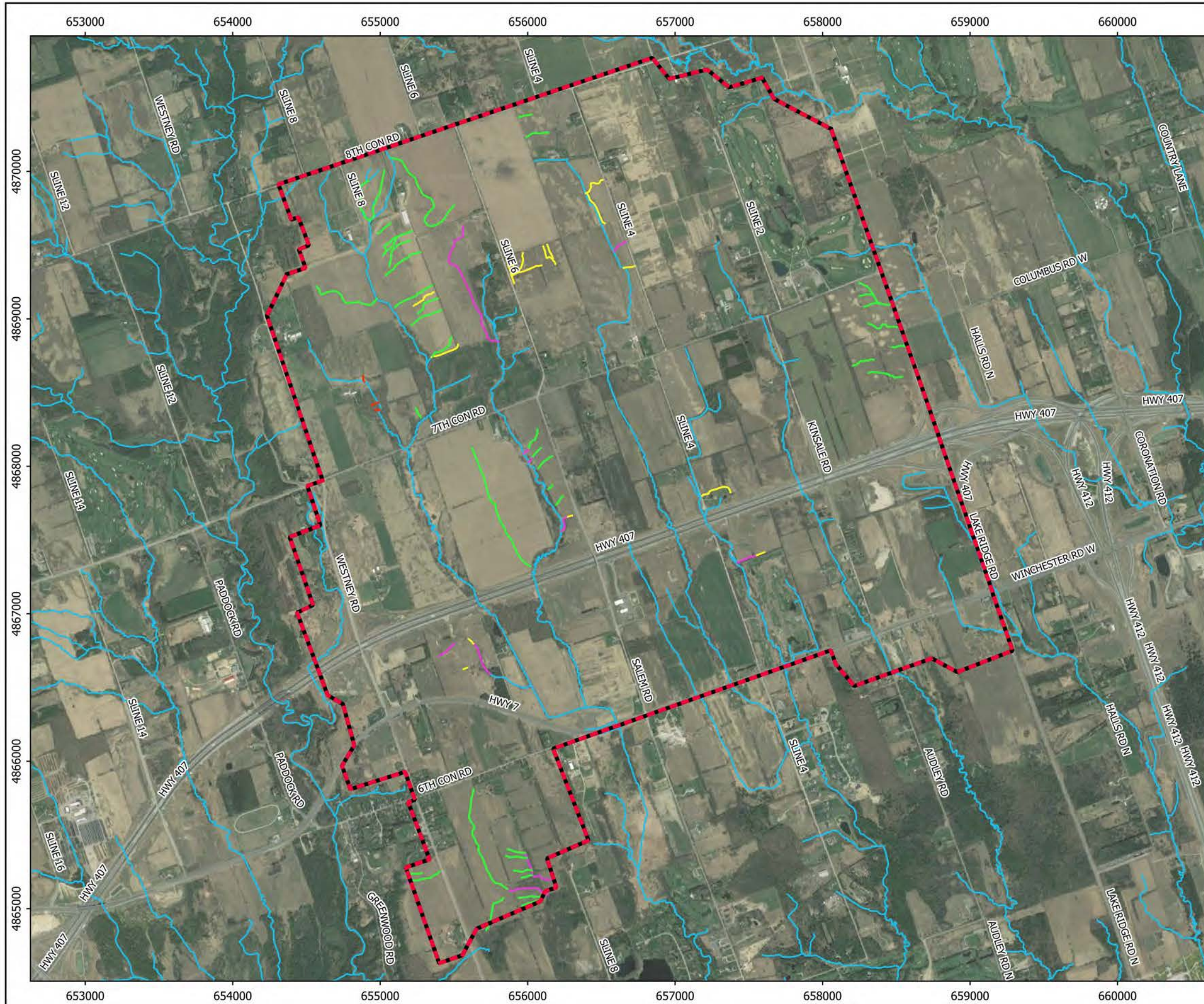


**GeoProcess**  
RESEARCH ASSOCIATES

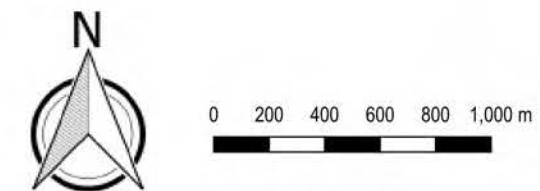
CREATED BY:	DH	PROJECT NO.:	P2021-510
CHECKED BY:	IR	DATE:	May 02, 2022

**Map 1.**  
Envision Durham:  
Proposed Natural Heritage System

**Northeast Pickering**  
NE Pickering Landowners Group



- Legend**
- Subject Property
  - Watercourses
  - Headwater Drainage Feature Class
    - No Management Required
    - Mitigation
    - Maintain or Replicate Recharge Function
    - Conservation
    - Protection



CREATED BY:	DH	PROJECT NO.:	P2021-510
CHECKED BY:	IR	DATE:	May 02, 2022

**Map 2.**  
 Headwater Drainage Features  
 Northeast Pickering

**Northeast Pickering**  
 NE Pickering Landowners Group