

February 28, 2023

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: Submission on the draft new Regional Official Plan  
2765 Towline Road, City of Pickering  
Parts of Lots 20 & 21, Concession 3, Geographic Township of Pickering  
OUR FILE: 1226J

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On behalf of our client, White Owl Properties Limited, we are submitting comments on the recently released draft new Regional Official Plan (ROP) for your consideration. The subject lands are located at 2765 Towline Road, City of Pickering and legally described as Part of Lots 20 & 21, Concession 3, Geographic Township of Pickering, and are illustrated on the image to the right.

The submission is specific to the proposed land use designation on the subject lands, as shown on the Regional Structure (Map 1) and Greenlands System (Map 2). This request is a follow up to the request submitted as part of the Greenlands System mapping review.



The request is to:

- Modify the Greenlands System (Map 2) to remove the portion of lands that contain no natural features, as identified by current Regional and City Official Plan mapping and confirmed by an assessment of natural features, from the Greenlands System
- Re-designate the portion of lands identified below to be included within the Urban System as Community Area on Regional Structure (Map 1).

The request is supported with the following information:

- 1) Current Regional Official Plan Designations do not include any Key Natural Heritage Features on a Portion of the Subject Lands:

The subject lands are within the Major Open Space Area as designated on Schedule 'A'. Components of the Greenlands System primarily consist of Major Open Space Areas, Oak Ridges Moraine Areas and Waterfront Areas.



There are portions of the subject lands that do not include key natural heritage and hydrologic features, as mapped on "Schedule B - Map 'B1d' Greenbelt Natural Heritage System & Key Natural Heritage and Hydrologic Features".

The areas designated with natural heritage features are shown on the image to the right. There are no natural heritage features designation on lands to the west of the unopened road allowance. The majority of the lands designated are located to the east of the unopened road allowance.

- 2) City of Pickering Official Plan does not identify all of the land within the Natural Heritage System:

The City of Pickering Official Plan was referenced as additional information in support of the request. The City's Natural Heritage System mapping, as shown on Schedule IIIA to the Official Plan does not identify all of the lands with the "Natural Heritage System" (as shown on the right).



Schedule IIIB maps Significant Woodland, Areas of Natural and Scientific Interest (shown to the right), and other features that are not applicable to the lands. A portion of the lands to the east of the unopened road allowance is included with the Significant Woodlands, but lands to the west are not.



Schedule IIIC maps Shorelines, Significant Valley Lands and Stream Corridors (and May include Hazardous Lands). Only the portion of the lands associated with the creek is mapped on this Schedule, there are no other constrained lands.

Based on the City's Official Plan, there are portions of the subject lands that are not within the natural heritage system.

- 3) Site Specific Environmental Analysis Completed on the Subject Lands does not identify all of the lands as having Natural Features for Protection:

North-South Environmental Inc. (NSE) was retained by White Owl Properties to complete a natural heritage assessment for the property at Concession Road 3 at Valley Farm Road, Pickering. The following provides a summary of the assessment:

- Region Official Plan - The woodland limit as interpreted by the province (MNRF) using orthoimagery was incorporated by Durham Region into their Official Plan as a 'significant woodland' and therefore is also considered a 'key natural heritage feature'. The preliminary woodland limit identified during the site visit is quite similar to the limit of the significant woodland identified on Schedule B – Map B1d of the Durham Region Official Plan, which is consistent with the MNRF woodland mapping.
- A portion of the subject property lacks identified natural heritage constraints and has development potential. This includes early successional vegetation communities consisting of the whole of the west parcel, and a portion of the east parcel.

#### Conclusion and Request for Consideration

Based on the analysis of Region and City Official Plan mapping, there are portions of the subject lands that do not contain natural heritage features (lands west of the unopened road allowance and a portion of lands to the east). There are portions of the subject lands that do contain natural heritage features that warrant designation in the Greenlands System. Site specific environmental study was completed on the lands and confirmed that not all of the lands contain natural areas that would satisfy the requirements for consideration for protection as natural heritage features. The Regional Official Plan should not designate lands that do not contain natural features as part of the Greenlands System.

We would be happy to meet to discuss.

Yours truly,  
MHBC

A handwritten signature in black ink, appearing to read 'DAA', followed by a long horizontal line extending to the right.

Dave Aston, MSc, MCIP, RPP  
Vice President, Partner

- c. Christine Yee, White Owl Properties Limited