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**Stovel and Associates Inc.**  
*Planners, Agrologists and Environmental Consultants*

August 19, 2023

**Via Email**

Mr. David Stubbs  
Municipal Services Office – Western Ontario  
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**RE: Amendment to County of Haldimand Official Plan – 1320-HC-22-OPA-Phase 2  
ERO No. 019-6038**

Stovel and Associates Inc. (“SAI”) was retained by Greenhorizons Group of Companies (“Greenhorizons”) to review the proposed amendment to the County of Haldimand Official Plan. Greenhorizons owns 122.3 ha (302.2 ac) in the County of Haldimand of which 64.5 ha (160 ac) was recently included in the Urban Boundary of Caledonia (Map 1). These lands form part of the North Caledonia Employment Area. These lands are clearly intended and needed to provide employment opportunities in the County of Haldimand.

SAI reviewed 1320-HC-22-OPA-Phase 2.

Our concerns are as follows:

1. **Unevaluated Wetlands should not form part of the Natural Heritage System and should not be considered a Significant Natural Area.** The County has relied, in part, on mapping prepared by the Grand River Conservation Authority (“GRCA”) to identify unevaluated wetlands. It is our respectful opinion that the GRCA does not have the mandate to identify and evaluate wetlands for the purposes of Natural Heritage planning. Of note, the criteria used by the GRCA are not the same as the evaluation system employed by the Province of Ontario. Many of the GRCA unevaluated wetlands are too small to be evaluated under the Ontario Wetland Evaluation System (OWES). Several of these “unevaluated wetlands” are part of the agricultural landscape and/or recreational ponds that were dug by the former landowner. Recent changes to the “complexing” guidelines mean that these small features will not be included in larger significant wetlands. This issue will be compounded if the County of Haldimand includes unevaluated wetlands (and ponds) in the Natural Heritage System and gives the same weight of significance as a Provincially Significant Wetland or a Local Significant Wetland that was evaluated by the Ministry of Natural Resources and Forestry under the OWES.
  - **We ask that Section A. Natural Environment Policies be amended by removing the reference to unevaluated wetlands. The relevant mapping schedules should be modified to reflect this change.** We have included the

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relevant pages of 1320-HC-22-OPA that will be affected by this change (see attachment).

2. **Plantations planted under the Woodlot Improvement Act (WIA) or managed as part of the Managed Forest Tax Incentive Program should not be considered Significant Woodland.** The background report prepared by the private consultant notes that “*A plantation established and continuously managed for the sole purpose of complete removal at rotation, as demonstrated with documentation acceptable to the planning authority or NDMNRF, without a forest restoration objective*” would be an exception to the significant woodland criteria.”

However, my client owns a property with a WIA plantation that has been mapped as significant woodland.

- **We ask that this plantation be removed from the mapping of Significant Natural Environment Area Features (Schedule A-8) and page 92 of the document be revised to note this exception.**

We have provided attachments to illustrate the proposed policy change and an excerpt from the Haldimand County Natural Heritage System Study (highlighted portions that address exceptions related to plantations) to note the exception. We specifically request that the plantation located on 665 Highway 6 (Sen. Range 1, WPR E, half part lot 6) not be included as a significant woodland or part of the Natural Heritage System. We have also included a copy of the Woodlot Improvement Agreement, dated November 1, 1987 which is a prior program related to the current Managed Forest Tax Incentive Program. This plantation will be removed and used for lumber as was originally intended. Following the harvest, the plantation will be used for Employment Lands to create valuable jobs.

Greenhorizons wants to invest in the community of Caledonia by developing appropriate industrial and mixed industrial/commercial uses in the North Caledonia Employment Area. The result of this development will be more jobs for the community and more taxes for the local government. With the requested changes to 1320-HC-22-OPA- Phase 2, we feel that Greenhorizons will be better positioned to create a viable development plan. My client wants to start construction as soon as possible and has completed their first pre-consultation session (to develop terms of reference for technical studies).

Please feel free to contact me should you wish to further discuss the above matter.

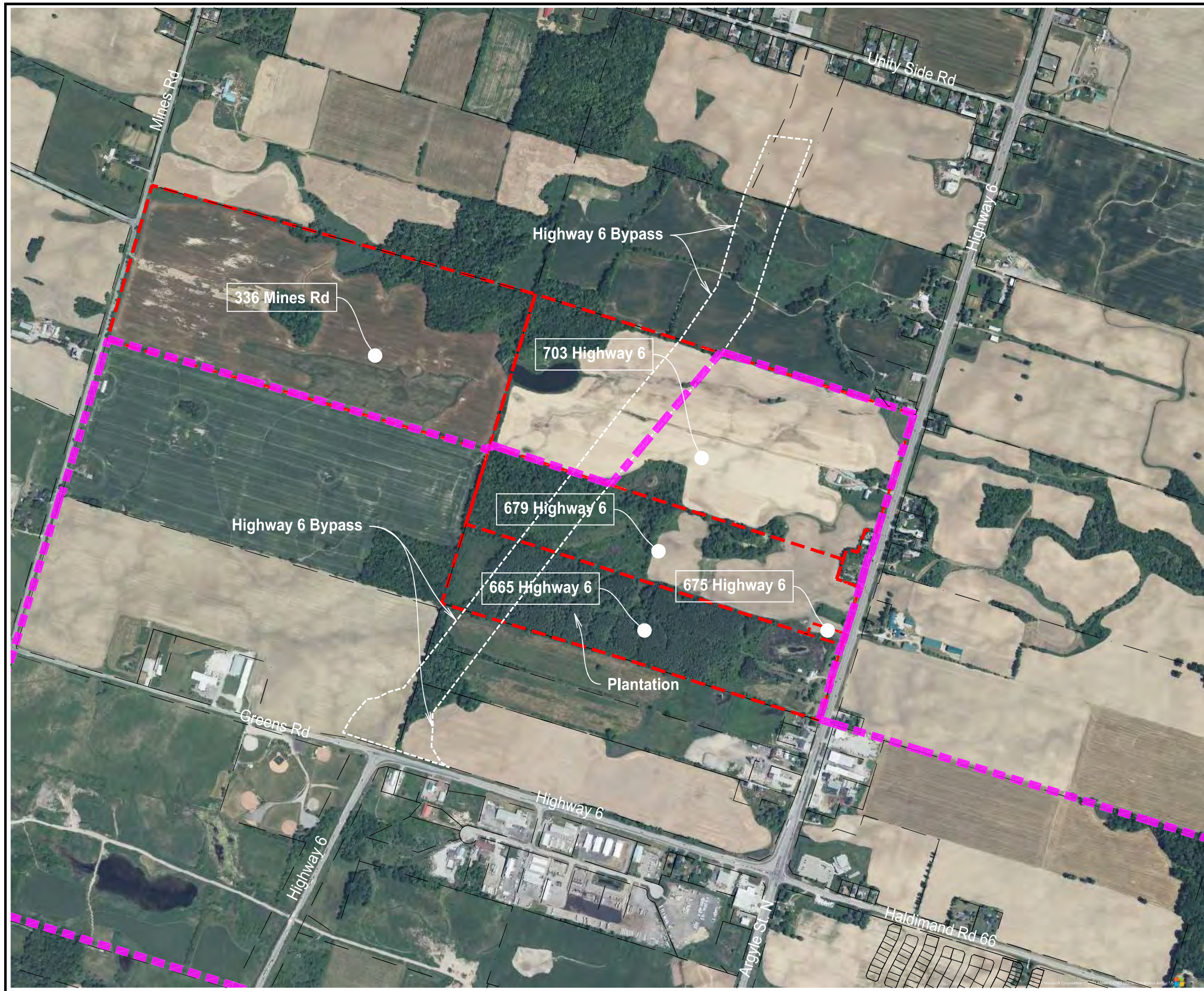
Yours truly,

*Rob Stovel*

Robert P. Stovel, M.Sc., M.C.I.P., R.P.P.

cc. Steve Schiedel, Greenhorizons







## Map 1 Location Map

703 Highway 6 - SEN RANGE 1 WPR E HALF PT LOT 5 RP  
18R3008 PARTS 3 & 4  
679 Highway 6 - SEN RANGE 1 WPR E HALF PT LOT 6 RP  
18R3008 PT PART 1 PART 2  
665 Highway 6 - SEN RANGE 1 WPR E HALF PT LOT 6  
675 Highway 6 - SEN RANGE 1 WPR PT LOT 6  
RP 18R3418 PART 1 & 2  
336 Mines Road - SEN RANGE 1 WPR W HALF PT LOT 5 RP  
18R3008 PART 5

### Notes

1. All Coordinates Were Determined Using NAD83 CSRS - Zone 17.
2. This is Not a Plan Of Survey.
3. All Shapefiles Have Been Extracted From The Corporation of Haldimand County's Online ArcGIS Software, The Government of Ontario: Land Information Ontario Open Data, and The Grand River Conservation Authority's Geospatial Data.
4. Aerial Imagery Provided By Microsoft Corporation @ 2022 Maxar CNES (2022) Distribution Airbus DS.
5. On-site Wetlands To Be Assessed For Conformity With The G.R.C.A.'s Wetland Removal Policies (Policy 8.4.4 and 8.4.5).
6. On-site Watercourse / Drainage Features To Be Evaluated Based on a Headwater Drainage Feature Assessment - Fluvial Geomorphology Components.

### Legend

Existing Lot Line	
Subject Lands	
North Caledonia Employment Area	

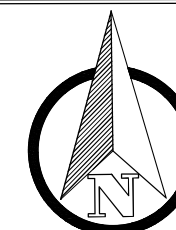
### Parcel Area Table

Parcel	Area (± ha)
703 Highway 6	40.1ha
679 Highway 6	20.1ha
665 Highway 6	20.5ha
675 Highway 6	0.3ha
336 Mines Road	41.3ha

**Client: Greenhorizons**

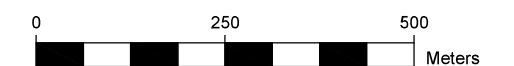


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**DRAFT**

Date : 08/18/2023



Scale 1:10000



5. The Water Resources section outlines policies related to Source Water Protection and Watershed Planning.
  6. Section C relates to Hazard Land policies. The Hazard Land policies are subdivided into:
    - a) Riverine Hazard Lands containing policies related to the watershed of the Grand River and other major drainage basins;
    - b) Lakeshore Hazard Lands containing policies related to Lake Erie; and
    - c) Other Hazard Lands containing policies related to steep slopes, unstable soils and undermined areas.
  7. Environmental policies relating to solid waste management and air quality are located in Section 5 – Community Building of this Plan.
21. That Section 2. Environment be amended by deleting Section A. Natural Environment Policies in its entirety and by substituting in its stead the following text:

**A. NATURAL ENVIRONMENT POLICIES**

1. Natural Environment Areas are generally identified as those areas and features that provide important ecological, or biological and/or hydrological functions, contribute to human health, exhibit varied topography, contribute to water resources, potentially contain threatened or endangered plant or animal species or provide habitat suitable for threatened and endangered species. The County is committed to preserving Natural Environment Areas to sustain essential **ecological functions** and protect natural biological diversity. The designation of lands as a Natural Environment Area does not necessarily imply that the lands will be purchased by a public agency or that the lands are available for public use. Citizen-based and voluntary stewardship efforts such as conservation easements, donations, and education and stewardship promotion will be supported by the County and conservation authorities.
2. Natural Environment Areas are divided into two categories – **Significant** Natural Environment Areas (**Significant** NEAs) and Supporting Natural Environment Areas (Supporting NEAs).

Significant NEA Features	Supporting NEA Features
<ul style="list-style-type: none"> <li>- <b>Provincially Significant Wetlands</b></li> <li>- Locally <b>significant</b> <del>or unevaluated wetlands</del> within a <b>Natural Heritage System</b></li> <li>- <b>Significant Woodlands</b></li> <li>- <b>Significant Valleylands</b></li> </ul>	<ul style="list-style-type: none"> <li>- Locally <b>significant</b> <del>and unevaluated wetlands</del> <del>outside of a Natural Heritage System</del></li> <li>- Other <b>woodlands</b> greater than 1 ha</li> <li>- Other treed areas</li> </ul>

agencies.

**Provincially Significant Woodlands**

8. No new **development** or **site alteration** shall be permitted within a **significant woodland**, except in the case of a mineral aggregate operation, where it has been demonstrated that there will be no **negative impacts** on the significant woodland or its **ecological functions**. A new mineral aggregate operation, inside the Growth Plan Natural Heritage System or Haldimand Natural Heritage System is not permitted within a **significant woodland** unless the woodland is occupied by young plantation or early successional habitat. A **woodland** is deemed **significant** in Haldimand County if it is at least 1 hectare in size and meets at least two of the following criteria, or if it is within 5 kilometres of Lake Erie and is at least 2 hectares in size.

Significant Woodland Criteria *	Standard	
<p><b>1. Size</b></p> <ul style="list-style-type: none"> <li>Size refers to the area extent of the <b>woodland</b></li> <li><b>Woodland</b> must be at least 40 m wide</li> <li><b>Woodland</b> areas are considered to be continuous if gaps between <b>woodland</b> units are &lt;20 m wide, even if bisected by a road).</li> </ul>	<p><b>Forest Cover by Planning Unit</b></p>	<p><b>Minimum catch size for significance</b></p>
	<p>All Urban Areas</p>	<p>2 ha</p>
	<p>Less than 10% (Walpole and Townsend)</p>	<p>2 ha</p>
	<p>Between 10% to 15% (Sherbrooke, Rainham, Oneida and Dunn)</p>	<p>4 ha</p>
	<p>More than 15% to 20% (Seneca, North and South Cayuga, Moulton and Woodhouse)</p>	<p>10 ha</p>
	<p>Greater than 20% (Canborough)</p>	<p>15 ha</p>
<p><b>2. Connectivity</b></p>	<ul style="list-style-type: none"> <li><b>Woodlands</b> located within 50 m of a Natural Environment Area, as listed in A.3 and A.4.</li> </ul>	
<p><b>3. Proximity to Water</b></p>	<ul style="list-style-type: none"> <li><b>Woodlands</b> located within 30 m of any hydrological feature, including all creeks, streams, rivers, <b>wetlands</b> and lakes.</li> </ul>	
<p><b>4. Significant Species and Significant Wildlife Habitat</b></p>	<ul style="list-style-type: none"> <li>The <b>woodland</b> contains threatened, endangered, special concern, provincially or locally uncommon plant or wildlife species, or <b>Significant Wildlife Habitat</b>.</li> </ul>	
<p><b>5. Woodland Diversity</b></p>	<ul style="list-style-type: none"> <li><b>Woodland</b> complexes contain several vegetation community types with variable species composition and structure. Based</li> </ul>	

\* Plantations planted under the Woodlot Improvement Act (WIA) or managed as part of the Managed Forest Tax Incentive Program should not be considered a Significant Woodland.

(but not including unevaluated wetlands or ponds)

### **Consideration of Managed Forests as Significant Woodland Criterion**

Managed woodlands are currently included as a significance criterion in the existing Official Plan, but this criterion has been removed. While managed forests serve as valuable natural heritage features on the landscape, the inclusion of managed forests as a Significant Woodland criterion is problematic. This is due to the potential for change in woodland property ownership, often resulting in a change in management as woodlands are withdrawn from their management agreement by a new landowner. If a woodland was to be deemed Significant based on that area being a managed forest (e.g. in the Managed Forest Tax Incentive Program), as well as meeting a second criterion, that woodland would be protected under the same policies that are applied to Significant Natural Environment Areas. However, unlike the Significant Woodland criteria, the managed forests criterion has the potential to be impacted by changes in land ownership or management activities, rather than by changes to the physical structure of the natural feature.

Woodlands that are subject to management agreements or forest management plans, such as those registered in the Managed Forest Tax Incentive Program, will receive suitable protection based on the legislative framework outlined in their specific agreement or management plan. Despite the ecological benefit provided by managed forests, their inclusion as Significant Woodlands has the potential to be problematic in cases of landowner and management changes, and the overall benefit provided by their identification as Significant Woodland is redundant, based on the protections already afforded to these woodlands and the fact that many of these woodlands would already be considered under the Significant Woodland criteria outlined in Table 6.

Plantations are considered for woodland significance based on the same criteria as applied to woodlands of natural origin. Exceptions to this are the following, consistent with the guidance provided by the OMNR (2012):

- A plantation managed for the productions of fruits, nuts, Christmas trees, or nursery stock;
- A plantation managed for tree products with an average rotation of less than 20 years;

- A plantation established and continuously managed for the sole purpose of complete removal at rotation, as demonstrated with documentation acceptable to the planning authority or NDMNRF, without a forest restoration objective;
- A woodland dominated by Buckthorn (*Ramnus* species) or Norway Maple (*Acer platanoides*) that threatens good forestry practices and environmental management, where native tree species cover less than 10% of the ground and are represented by less than 100 stems of any size per hectare.

Woodlands that fall into any of these exceptions are not considered Significant.

### 5.3.3 Significant Valleylands

Valleys are low areas of land that typically follow the course of a stream. Valleylands are the natural area that occurs in a valley or other landform depression that has water flowing through or standing for some period of time (OMMAH 2020a). In order to accurately map valleylands, precise topographic and hydrological data is required, along with land cover mapping to identify natural features. Detailed mapping of all natural areas (such as meadows, thickets, etc.) within the County is not available. Throughout the course of this study, it was determined that the accurate mapping of Significant Valleylands could not be undertaken without site-specific studies that would identify natural areas surrounding valleys. As such, Significant Valley Corridors were identified along specific watercourses within Haldimand County, in consultation with TAC, as a surrogate for Significant Valleylands (Map 4d). To determine which valleylands within the County are considered significant, TAC members were asked to recommend major river systems that would warrant this level of protection. The main factors for determining Significant Valley Corridors included the size, locational context, habitat provisions, and importance of maintaining water quality. The following watercourses have been identified as Significant Valley Corridors within Haldimand County:

- Boston Creek
- Grand River
- McKenzie Creek
- Mill Creek
- Nanticoke Creek
- Oswego Creek



thereof has entered into an agreement with the Minister assuming the obligations of the Owner under this agreement in respect thereto.

in the event that,

(a) the Owner does not comply with the provisions of this agreement, or

(b) the person, firm or corporation that has acquired the interest of the Owner in the forest or part thereof does not enter into the agreement referred to in paragraph 6(2) (b),

the Owner agrees that the Minister may on written notice to the Owner terminate this agreement and thereupon the Owner agrees to pay to the Minister the estimated management costs that are specified in the management program for the work that was performed under that program.

8. (1) Any notice required to be given by the Minister or Owner under this agreement may be personally delivered or mailed by pre-paid registered post to the last known address of the party to whom such notice is required to be given.

(2) Any notice mailed in accordance with subparagraph 1 shall be deemed to have been received on the fifth day next following and excluding the day it is deposited with any post office.

9. The Minister for the purposes of this agreement may act through the District Manager of the Niagara Administrative District, Ministry of Natural Resources, who can be contacted at the following address and telephone number:

Ontario Ministry of Natural Resources  
P.O. Box 1070, Hwy. #20 W.  
Bonthill, Ontario  
L0S 1E0

Telephone: 892-2656 or Zenith 73000

10. It is hereby agreed that in construing this agreement the word "Owner" shall be read and construed as "Owner or Owners" as the number of the person or persons referred to in each case requires, and the number of the verb agreeing therewith shall be construed as agreeing with the said word so substituted.

IN WITNESS WHEREOF the parties hereto have executed this agreement.

SIGNED, SEALED and DELIVERED in the presence of

Robert J. Potter

Robert J. Potter

Robert J. Potter

E.A. Krubier  
District Manager as authorized for the Minister of Natural Resources

Reed Tremblay

Owner Reed Tremblay

Owner Elfrida Tremblay





Improvement Act

AGREEMENT made in duplicate this 12th day of November

1987 under The Woodlands

BETWEEN

THE MINISTER OF NATURAL RESOURCES  
for the Province of Ontario, herein referred to as  
"Minister",

- and -

Real Tremblay

- and -

Elfriede Tremblay

Address: 665 Hwy. #6  
R.R. #1  
Caledonia, Ontario  
N0A 1A0  
herein referred to as "Owner".

Phone No. Home: 765-2274  
Bus. 1-692-3322  
(wife)

THIS AGREEMENT WITNESSES that in consideration of the mutual provisions contained herein the parties hereto agree as follows:

1. This agreement shall be in affect for the period of 15 years, commencing with the 1st. day of November 1987

2. The Owner hereby gives leave and licence unto the Minister, his servants, agents and contractors to enter onto the land, herein forest, described in Schedule "A", for the purpose of planting nursery stock or improving woodlands in accordance with the management program, herein management program, described in Schedule "B".

3. Provided that moneys are appropriated therefor by the Legislature, the Minister agrees to plant nursery stock or improve woodlands on the forest in accordance with the management program.

4. The Owner agrees to provide the nursery stock to be planted in accordance with the management program and it is understood that such nursery stock may be purchased from the Minister at the prices prescribed from time to time by the regulations under the Forestry Act.

5. (1) During the term of this agreement, the Owner agrees to protect the forest against livestock, fire, insects, disease and other perils in accordance with the management program.

(2) The Owner agrees not to cut or remove any tree growing on the forest except as specified in the management program or for use by the Owner.

(3) This agreement shall not prevent the Owner from carrying out on the forest any operations that are consistent with this agreement.

6. (1) The Owner agrees to give written notice to the Minister of any proposed disposition of the forest or any part thereof.

(2) In the event of a disposition referred to in subparagraph 1, the Owner agrees that the Owner will not be relieved of the obligations of the Owner under this agreement until,

(a) the disposition has been completed, and

(b) the person, firm or corporation that has acquired the interest of the Owner in the forest