

STAR OAK DEVELOPMENTS LIMITED

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Region of Halton
Planning & Public Works Department
1151 Bronte Road
Oakville, Ontario
L6M 3L1

HALTON REGION
PLANNING AND
PUBLIC WORKS DEPT.

Attention: Patrick Murphy, Commissioner

Dear Mr. Murphy:

Re: Region of Halton Official Plan Review, Draft Technical Background Paper No. 6 "Rationale and Methodology for Determining Significant Woodlands in the Regional Municipality of Halton"

Star Oak Developments Limited is a landowner in North Oakville within the area designated for future urban uses by Regional Official Plan Amendment No. 8. We appreciate the opportunity provided by the Region of Halton to comment on the above captioned Draft Background Paper.

We believe we have a responsibility to our principals, our employees and our customers to advise Regional staff and Council of our concerns regarding Draft Technical Background Paper No. 6.

To provide a professional technical review of the Draft Background Paper's contents, Star Oak Developments retained ESG International Limited, a respected environmental consulting firm. They have advised us of a number of concerns with the methodology and contents of the Draft Background Paper. Their technical response addressed to the Commissioner of Planning & Development is attached to this letter.

We have also met on two occasions with Regional Staff, appeared as a delegation at the July 3, 2002 Planning & Public Works Committee meeting, presented preliminary comments to the Region's EEAC and attended various open houses and workshops hosted by Regional Staff as part of the Official Plan Review process.

Based on the findings of our environmental consultant and our own review of the Draft Background Paper, we believe the study is fundamentally flawed:

- The FRI mapping is known to be inaccurate, as acknowledged by the Region's Consultant;
- The science purportedly supportive of several of the criteria for significance is inconclusive, resulting in decisions regarding criteria which are not scientifically credible;
- The notion that meeting one of seven criteria of varying importance should be sufficient for a "significant" designation is highly questionable, particularly when it leads to 97% of the woodlands in Halton being deemed "significant";
- The methodology did not include any field investigations to evaluate desk top decisions (not even to determine why 3% of the woodlands under study somehow failed the "significant" test.

We are also concerned that woodlands deemed significant are proposed to be included in the Greenlands B category of the Greenlands system in the Regional Official Plan. The Draft Background Paper suggests a finality to this designation (page 52) which would preclude any expectation of development potential, but does not address compensation by the Region to affected landowners.

The Region's methodology does not prioritize woodlands for preservation. This would be understandable if the Region had unlimited resources to acquire all woodlands deemed significant. However this is not the case. The Region has finite resources available for Greenlands acquisition purposes. In the real world, the rigour of financial constraints acts very effectively to sharpen the focus on "needs" versus "wants". Such restraint is, unfortunately, completely absent in the methodology espoused in the Draft Background Paper.

In our opinion, the Region needs to re-think the initiative to designate significant woodlands as currently outlined in Draft Background Paper. A policy change of this magnitude needs to be supportable scientifically, legally and financially. The proposals contained in Technical Background Paper No. 6 do not meet this test.

Our Consultant has commented in the attached technical review, on the recent Regional staff suggestion that woodland significance in urbanizing areas of Halton be determined at the subwatershed study stage. We agree that this approach is superior to the recommendations of the Draft Technical Background Paper. At the subwatershed study stage, the determination of natural heritage features preservation can be based on comprehensive site analyses by qualified professionals.

With particular regard to our lands in north Oakville, there is no question that the subwatershed study process currently underway is the appropriate level at which woodland preservation should be addressed. We request that the north Oakville urban expansion lands be exempted from any future Region of Halton policies regarding significant woodlands.

Yours truly,

STAR OAK DEVELOPMENTS LIMITED



for:

Silvio Guglietti
General Manager
SG/ab