August 25, 2020  
GSCA File: P20221  

Township of Georgian Bluffs  
177964 Grey Road 18  
Owen Sound, ON  
N4K 5N5  

Attn: Jenn Burnett  
Planner  
jburnett@georgianbluffs.ca  

Dear Jenn Burnett  

Re: Site Plan Application SP-06-20  
106 Grey Road 17B  
Roll No. 42-03-540-005-179-00  
Township of Georgian Bluffs, formerly Derby Township  
Owner: Grey Bruce Water Company Inc. c/o Martin Harshman  

Staff has reviewed this application as per our delegated responsibility from the Province to represent provincial interests regarding natural hazards identified in Section 3.1 of the Provincial Policy Statement (PPS, 2020) and as a regulatory authority under Ontario Regulation 151/06. Grey Sauble Conservation Authority (GSCA) has also provided comments as per our Memorandum of Agreement (MOA) with the Township of Georgian Bluffs representing their interests regarding natural heritage and water identified in Sections 2.1 and 2.2, respectively, of the Provincial Policy Statement. The application has also been reviewed through our role as a public body under the Planning Act as per our CA Board approved policies. Finally, GSCA has provided advisory comments related to policy applicability and to assist with implementation of the Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Plan under the Clean Water Act.  

GSCA staff have reviewed the above-noted site plan application for the construction of five mini storage units.
Documents Reviewed

GSCA staff have reviewed the following documents circulated with the subject proposal:

- Email from GSS Engineering, dated July 18, 2020, received by GSCA August 7, 2020;
- Site Development Plans, drawings 20009-01 to 20009-06 inclusive, prepared by GSS Engineering, dated April 2020, revised August 21, 2020, received by GSCA August 21, 2020;
- Stormwater Management Report, prepared by GSS Engineering, dated August 2020, received by GSCA August 21, 2020;

Site Characteristics

Existing mapping indicates that the subject property is:

- Is partially regulated under Ontario Regulation 151/06. The regulated area is associated with the valleylands of the Pottawatomi River.
- Designated Sunset Strip and Niagara Escarpment Plan in the County of Grey Official Plan;
- Zoned M1 – Industrial and EP – Environmental Protection in the Township of Georgian Bluffs Comprehensive Zoning By-law;
- Located within an area that is subject to the policies contained in the Source Protection Plan;
- The property features a single-family dwelling, detached garage, detached workshop, gavel parking area, grassed manicured areas, and forested valley slope.

Delegated Responsibility and Statutory Comments

1. GSCA has reviewed the application through our delegated responsibility from the Province to represent provincial interests regarding natural hazards identified in Section 3.1 of the Provincial Policy Statement.

Natural hazards identified include the erosion potential of the Pottawatomi River valleylands.

3.1.1 Development shall generally be directed, in accordance with guidance developed by the Province (as amended from time to time), to areas outside of:

b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards.

GSCA Comment: The site plan was georeferenced with the existing EP – Environmental Protection zone mapping overlayed. A small portion of the most westerly structure (storage unit
#5) is within the existing EP zone. This is shown on the enclosed map. We understand no buildings or structures are permitted in the EP zone. The zoning by-law provisions also require buildings and structures maintain a 15 metre setback from the EP zone. Although not shown on the enclosed map, the 15 metre setback from the EP zone appears to impact storage unit #5 and to a small degree storage unit #4.

GSCA has refined the hazard boundary based on the slope hazard mapping criteria, site-specific review of the slope, topographic survey, and LiDAR contours. The results indicate that the hazard boundary can be reduced overall and that the most westerly restructure is not within the hazard area proper. The revised hazard boundary is shown on the enclosed Ont. Reg. 151/06 map. We recommend that any future zoning by-law utilize the revised mapping as the new EP boundary and the setback from the EP boundary be reduced to 0 metres. GSCA is of the opinion the proposal is consistent with the Section 3.1 policies.

2. **GSCA has reviewed the application as per our responsibilities as a regulatory authority under Ontario Regulation 151/06.** This regulation, made under Section 28 of the Conservation Authorities Act, enables conservation authorities to regulate development in or adjacent to river or stream valleys, Great Lakes and inland lake shorelines, watercourses, hazardous lands and wetlands. Development taking place on these lands may require permission from the conservation authority to confirm that the control of flooding, erosion, dynamic beaches, pollution or the conservation of land are not affected. GSCA also regulates the alteration to or interference in any way with a watercourse or wetland.

A portion of the subject property is regulated under Ontario Regulation 151/06: Regulation of Development, Interference with Wetlands and Alterations to Shorelines and Watercourses administered by the GSCA. The regulated area is associated with the Pottawatomi River valleylands. The enclosed Ont. Reg. 151/06 map shows the extent of the regulated areas subject to the GSCA permit.

During GSCA’s site visit, it was noted that works have commenced within the regulated area without GSCA authorization. The landowner was advised of this and a permit application was subsequently submitted. We note the application is being reviewed in conjunction with the subject site plan application.

**Advisory Comments**

3. **GSCA has reviewed the application through our responsibilities as a service provider to the Township of Georgian Bluffs in that we provide comment on natural heritage features under Section 2.1 of the Provincial Policy Statement and on water under Section 2.2 of the Provincial Policy Statement through a MOA.**
2.1 Natural Heritage

2.1.1 Natural features and areas shall be protected for the long term.

GSCA Comment: The natural heritage features identified on the subject lands include significant woodland and significant valleylands as mapped in the County of Grey Official Plan, potential for significant wildlife habitat, and adjacent lands to fish habitat associated with the Pottawatomi River.

2.1.5 Development and site alteration shall not be permitted in:

- **b)** significant woodlands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
- **c)** significant valleylands in Ecoregions 6E and 7E (excluding islands in Lake Huron and the St. Marys River);
- **d)** significant wildlife habitat;

unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.

GSCA Comment: The Grey County OP mapping identifies the forested valley as significant woodland and extends to a cluster of trees to the south west of the property. These trees have been removed but based on the air photo and site visit were not part of the valley woodland.

The OP identifies the Pottawatomi River valley as significant valleylands. The mapping extends from the valley and onto the plateau area adjacent to the valley. A portion of the proposed development is within this mapped feature.

A review of NHIC records indicate potential significant wildlife, however, none of the candidate species were observed during GSCA’s site visit. We anticipate that any significant wildlife habitat is associated with the forested valleylands.

2.1.8 Development and site alteration shall not be permitted on adjacent lands to the natural heritage features unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

GSCA Comment: The proposed development is adjacent to significant woodland, significant valleylands, potential significant wildlife habitat, and fish habitat. The County of Grey Official Plan and Natural Heritage Reference Manual recommends a 120 metre adjacent lands width for consideration of negative impacts. No information has been provided by the applicant in this regard. As the site was already disturbed for the proposed development a review of air photos
was conducted to identify existing conditions. Based on a review of air photos prior to site
development commencing, the area of the proposed development appears to be primarily gravel
parking and grass, with some conifer trees in the south west. Based on the contours in the GSS
site plans, drainage appears to be directed to an incised feature that extends into the property. As
the valleylands are remaining undisturbed and with the implementation of a satisfactory
stormwater management plan we do not anticipate negative impacts with regards to the natural
heritage features. As such, we are of the opinion the proposal is consistent with the Section 2.1
policies.

2.2 Water

2.2.1 Planning authorities shall protect, improve or restore the quality and quantity of water by:

i) Ensuring stormwater management practices minimize stormwater volumes and
contaminant loads, and maintain or increase the extent of vegetative and pervious
surfaces.

GSCA Comment: The proposed development will increase the amount of impervious area
resulting in impacts to stormwater if left unmitigated. The proposed approach to stormwater
management is for a series of catchbasins to collect stormwater and utilize a clear stone gallery
below the drive lanes for storage and ultimately infiltration into the subsoils. GSCA has reviewed
the Stormwater Management Plan prepared by GSS Engineering and are satisfied with the
proposed approach. We recommend that the Township require certification in writing from the
project engineer that the proposal, including the underground stone infiltration gallery is
constructed in accordance with the proposed design. GSCA is of the opinion the proposal is
consistent with the Section 2.2 policies.

4. GSCA has reviewed the application in terms of the Saugeen, Grey Sauble, Northern
The Source Protection Plan came into effect on July 1st, 2016 and contains policies to
protect sources of municipal drinking water from existing and future land use
activities.

The subject property is located within an area that is not subject to the local Source Protection
Plan.

Summary
Given the above comments, it is the opinion of the GSCA that:

1. Consistency with Section 3.1 of the PPS has been demonstrated;
2. Ontario Regulation 151/06 does apply to the subject site; A permit is required from our office
   for the proposed development within the GSCA regulated area;
3. Consistency with Section 2.1 and Section 2.2 of the PPS has been demonstrated;
4. The subject site is located within an area that is subject to the policies contained in the Saugeen, Grey Sauble, Northern Bruce Peninsula Source Protection Plan.

**Recommendation**

GSCA has no objections to the approval of the subject application. We note, a future zoning by-law may be required at the discretion of the Township to address storage units #4 & 5 and implement the revised EP zone shown on the enclosed map. We recommend the Township require certification in writing from the project engineer that the proposal was constructed as per the engineer’s design, including the stone infiltration gallery.

Please inform this office of any decision made by the Township of Georgian Bluffs with regard to the applications. We respectfully request to receive a copy of the decision and notice of any appeals filed.

Should you have any questions, please contact the undersigned.

Sincerely,

Mac Plewes
Watershed Planner, Environmental Planning & Regulations

Encl. Existing EP – Environmental Protection Zone Map
Revised Ont. Reg. 151/06 and Hazard Map

c.c. Dwight Burley & Sue Carleton, GSCA Directors, Township of Georgian Bluffs
Martin Harshman, Landowner/applicant
Jeff Graham, GSS Engineering Ltd.
Planning & Building Departments, Township of Georgian Bluffs
Planning Department, County of Grey
Niagara Escarpment Commission
GSCA: Regulation of Development, Interference with Wetlands and Alterations to Shorelines and Watercourses (Ontario Regulation 151/06)

Scale = 1:1300

106 Grey Road 17B
Roll No. 42-03-540-005-179-00
Township of Georgian Bluffs (Derby)

Friday, August 21, 2020