# Alternative Land Use Proposal for Inverhuron / Lakeshore Area A / Lakeshore Area B Prepared by PWEP, October 2024

This document outlines an alternative land use proposal for Inverhuron, Lakeshore Area A and Lakeshore Area B prepared by the Philosopher's Wool Environmental Preserve (PWEP). The document includes the following three requests:

- 1) Boundary Adjustment requests
- 2) Request for change of Settlement category from Secondary to Hamlet
- 3) Special Policy Area request

Please consult attached supporting documents for mapping reference.

## 1) Boundary Adjustment requests:

Schedule A (Lakeshore Section) of the Draft County OP designates as Secondary Settlement the entirety of Lakeshore Area A / Inverhuron (Kincardine OP Schedule A-3) AND Lakeshore Area B (Kincardine OP Schedule A-4), whereas the Kincardine OP applies the settlement designation only to the area south of Concession 2 and North of County Road 15 (see fig. 1)

We would therefore like to request that the settlement boundary be adjusted in the County Draft OP to align with the local OP, and in addition, that the settlement boundary be further adjusted to exclude the area north of Richards Drive (see point c below). This means excluding certain portions of Inverhuron and the Lakeshore from the Settlement Area, as follows:

- a) Area north of Concession 2 (see fig. 2) Schedule E and F / Lakeshore Section of the BC Draft OP show that this area contains a portion of the Little Sauble River, which is a designated Fish Sanctuary, as well as Key Feature Woodlands, Wetlands, Highly Vulnerable Aquifers and Significant Groundwater Recharge Areas.
- b) Lakeshore Area south of County Road 15, including Lakeshore Area A and B (see fig. 2) Lakeshore Area south of County Road 15, including Lakeshore Area A and B contain Key Feature Woodlands, Wetlands, Highly Vulnerable Aquifers, Significant Groundwater Recharge Areas and notably Karst Prone Bedrock (see fig. 7 for further detail on karst mapping).

The Draft County OP designates karst prone bedrock as hazard lands. Policy 2.1.6 states that "Hazard lands within the County pose an imminent risk to public health and safety due to inherent physical conditions, such as flood and erosion or unstable substates such as karst. This Plan discourages development on hazard lands for the long-term protection of life and property". Section 5.2 of the 2024 Provincial Planning Statement (PPS) also discourages development in karst topography areas.

These environmental features should not be included in a settlement area, and are the reason why we are requesting that a portion of this area be designated as a Special Policy Area (see point 3 below). Overall we suggest that this area be designated as a combination of Rural/Seasonal recreational, Natural Environment and Hazard lands; the strip along the lake with existing development can be placed in the 'shoreline and seasonal recreational' designation of the County plan, with the remaining area being placed in the NE/H designations.

c) Area north of Richards Drive within the current settlement area (see fig. 3) The rationale for this request is to protect the Little Sauble River, which is a designated Fish Sanctuary, and the surrounding lands, mostly key feature Woodlands that in many instances represent Significant Wildlife Habitat (SWH). Schedule E / Lakeshore Section of the BC Draft OP (Natural Environment System) shows that the area in question contains the following Key Features: Fish Habitat, Woodlands, and the following Supporting Features: Woodland Linkage. Schedule F / Lakeshore Section of the BC Draft OP (Water Resource System) shows that the area in question contains the following features: Watercourses, Wetlands, Highly Vulnerable Aquifers and Significant Groundwater Recharge Areas. These environmental features should not be included in a settlement area, and are the reason why we are requesting that this area be designated as a Special Policy Area (see point 3 below).

Furthermore the Inverhuron Provincial Park borders a large portion of the area in question. Protecting the area outlined in figure 3 by excluding it from the settlement area would be an excellent way to follow policy C2.2.3 set out in the Kincardine OP: "The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored, or, where possible, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features". We would further like to note that the portion of land on the southeast corner of Albert St and Concession 2 (see fig. 4) was recently donated to the Ontario Farmland Trust. Because this land is now in conservation, the argument for maintaining connectivity and recognizing linkages between natural heritage features and areas by excluding the area in question from the settlement area is further enhanced.

This would leave a remaining settlement area as illustrated in figure 5.

In summary: We are requesting these boundary adjustments in order to protect significant environmental and natural heritage features. The presence of the Natural Environment and Water Resource features listed above leads us to conclude that intensive development should be avoided throughout the area; in conclusion, a Secondary Urban designation is not fitting for the areas listed above in point a, b, and c.

## 2) Request for change of Settlement category from Secondary to Hamlet:

Schedule A-3 of the Municipal OP identifies an area south of Concession 2 and North of County Road 15 as a settlement area. Read in conjunction with the existing County OP, it emerges that the area in question is currently designated as a Primary settlement (see page 71 of the current OP, point 5.2.2.1, Inverhuron is listed as a primary urban community). The Draft OP proposes to designate this area as Secondary Urban Community (see Schedule A / Lakeshore Section).

PWEP would like to request that instead of Secondary Urban, the designation be reverted to Hamlet (the designation this area held prior to 2009 - date tbc), due to the following concerns:

a) Lack of infrastructure: this area does not have full municipal services, nor has a municipal class EA for Stormwater Management been conducted. We are concerned that major developments would be allowed to rely on private sewer systems, creating a potential disaster for the surrounding environment, especially considering the unique water resource systems in the area (see Schedule F / Lakeshore Section of the BC Draft OP). In terms of stormwater management, private stormwater systems raise significant concerns, because the municipality has no ability to control that the system installed by the developer is well maintained and working properly. Stormwater should be treated the same way as water or sewer: it should be publicly owned and managed, and a municipal class EA for stormwater management should be conducted on a watershed basis. Without this, a Secondary Urban designation seems premature.

We would like to note as well that 2.2.1. Growth Management Objectives (County Draft OP p. 7) states as a goal the following: "(3) Prioritize future growth and intensification in communities where there is existing or planned full municipal servicing". We object to the word "planned" without any specific timeline, because this can lead to situations in which (as we have seen in Inverhuron) even though the municipality may "plan" to bring water and wastewater services to the area, nothing like that happens and meanwhile large-scale developments that rely on privately owned and operated infrastructure get green-lighted, leading to a lack of oversight and potential overburdening and degrading of the natural heritage systems in the area.

To be clear, we are *not* advocating for municipal sewer services in Inverhuron, as this would entail a great cost to the environment and the community, and is contrary to addressing the other concerns we are raising in this proposal.

b) Natural Heritage: There are fragile natural environments within the Inverhuron Settlement Area, as shown in Schedule E and F / Lakeshore Section of the BC Draft OP (see fig. 6 and 7 for a detailed view). Development typical of a Primary or Secondary Settlement area would likely result in negative impacts on natural heritage features, including significant wildlife habitats that have been shown to exist in the area, causing irreversible damage to the ecological function and biodiversity of natural heritage systems in the area

- c) Land Use Compatibility: the area in question consists to a large extent of natural environment / agricultural / rural lands with low density housing. The type of intensive development permitted in Primary and Secondary Urban Communities would not be compatible with existing land uses.
- d) Public safety concerns: Traffic impacts. There is a traffic issue at the junction of Albert and CR2. At normal shift change in the morning there is a large number of vehicles attempting to travel east towards the B gate of BNPD as well as significant traffic traveling north on Albert and attempting to turn left onto CR2. This is an uncontrolled intersection. To our knowledge, no traffic study has ever been done. Traffic along Albert Street has increased enormously as is, and speed limits are often not respected. Another concern is the Lakeshore Area, especially along Victoria and Lake Street. These are quiet residential areas, and any increased traffic or construction would negatively impact the safety of residents.
- e) No Capacity Study to justify change from hamlet to Primary/Secondary Urban: The Bruce OP (4.7.6, p. 53) states that "A settlement capacity study shall be prepared in support of a local Official Plan or Amendment where significant development is proposed, or where a settlement area designation is proposed to be expanded or where significant health and safety considerations need to be addressed". So far we have seen no evidence of such a capacity study.

Furthermore, due to the special history of Inverhuron, we suggest that a <u>Cultural Heritage Area</u> designation be applied to the Inverhuron Settlement area.

On a County level, designating Inverhuron as a Secondary Urban Community would invite a level of growth that would alter this area in ways that do not align with at least four of the guiding principles of the new County OP, as follows:

- 1) Good Growth: Put growth in the right location, with the right services
- 6) Communities: Create wellbeing through access to complete and healthy communities
- 7) Heritage: Identify and manage cultural heritage
- 8) Natural Legacy: Manage natural resources wisely for future generations

## 3) Special Policy Areas

Finally, we would like to request that **special policy areas** be designated to protect fragile natural environments within the settlement area and along the lakeshore, as follows:

a) A special policy area to protect the Little Sauble River and surrounding lands, in order to safeguard Fish Habitat and ensure water quality through adequate vegetation cover and riparian buffer zones. The lands we propose for this special policy area are shown in figure 3, with the possible consideration of extending the area along the Little Sauble River toward Tiverton, roughly following the Woodland Linkage Feature shown in Schedule E / Lakeshore Section of the BC Draft OP (Natural Environment System)

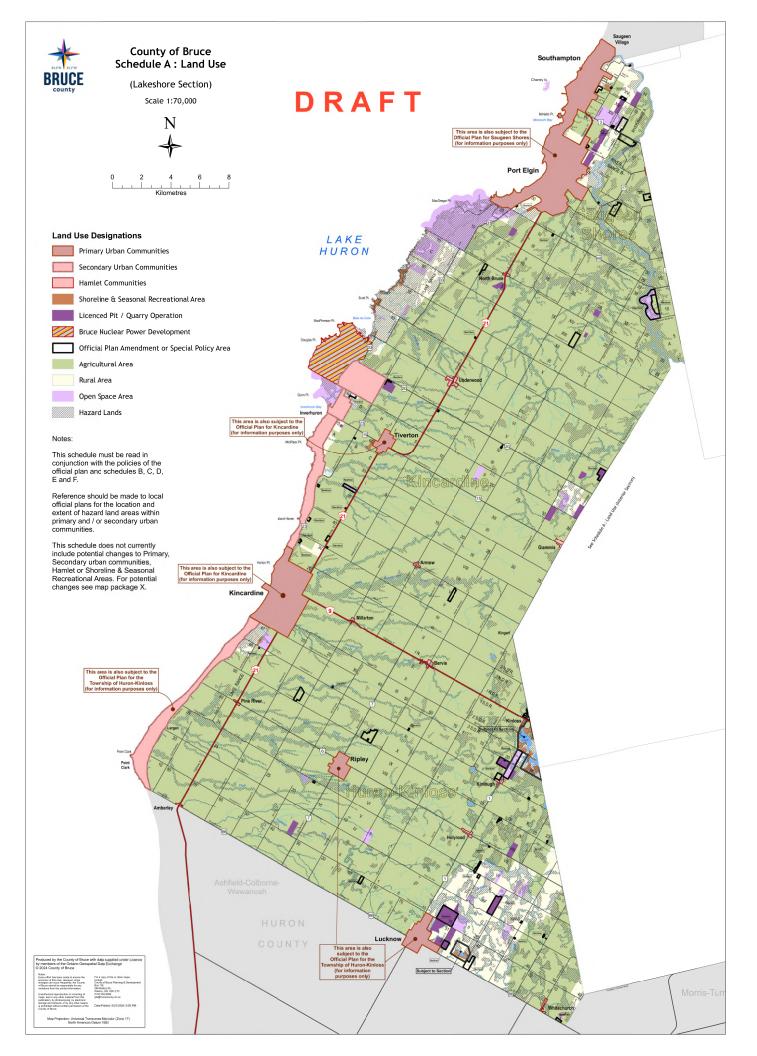
b) A special policy area to protect the remaining Huron Fringe Forest along the Lakeshore, as well as the many wetlands. The lands we propose for this special policy area are roughly shown in figure 8.

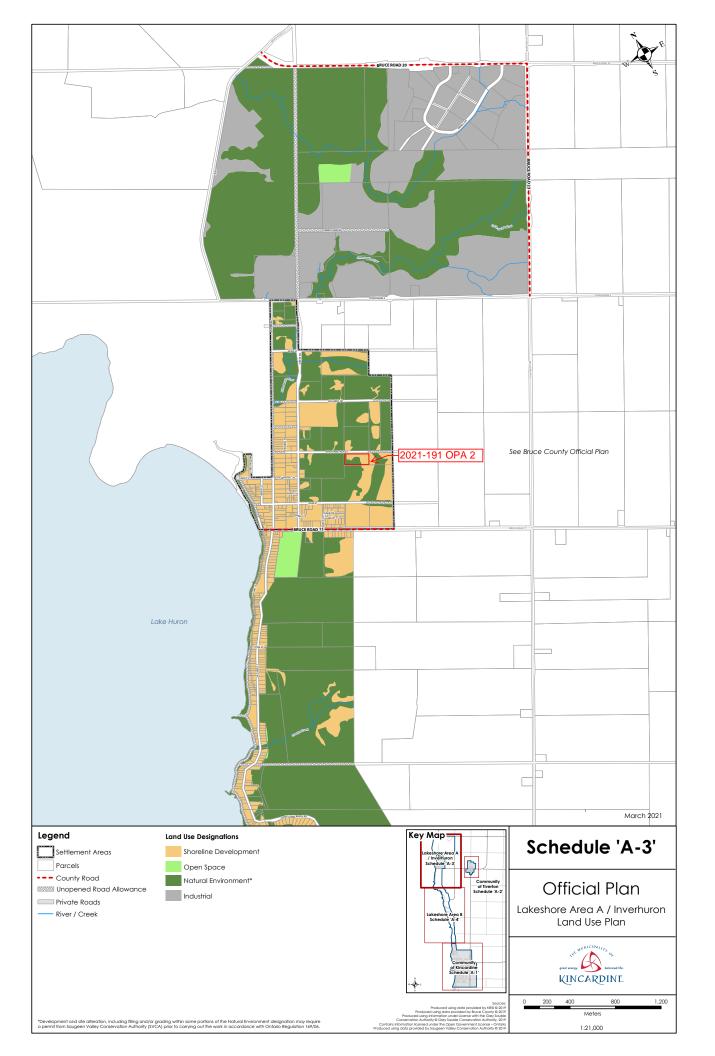
**In summary:** We respectfully request that the Settlement Boundaries be adjusted so as to have consistency between the County Draft OP and the local OP, as outlined in point 1; that the Inverhuron Settlement Area be designated as a Hamlet, rather than a Primary or Secondary Urban Community, as outlined in point 2; and that special policy areas be applied to protect fragile natural environments throughout the area, as outlined in point 3.

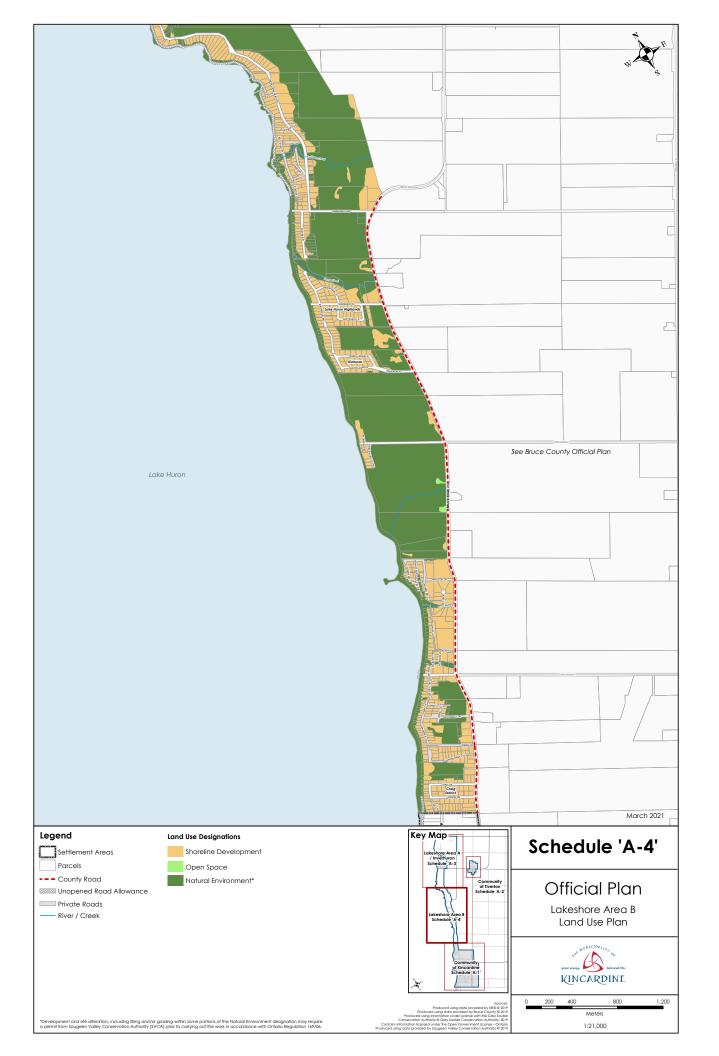
As additional food for thought, we would like to emphasize that human encroachment on natural environments is creating enormous pressure on ecosystems everywhere, and while we recognize the need for <u>affordable</u> housing to meet the needs of our growing community, the importance of safeguarding sensitive natural environments cannot be overstated.

We believe that it is possible to do both: meet the growing housing need through thoughtful, environmentally responsible development, while at the same time safeguarding natural environments on which we ultimately depend for all the essential services provided by functioning, healthy ecosystems. We therefore urge the Municipality and the County to work towards containing development within urban boundaries and preventing the kind of sprawl a Primary / Secondary Urban designation for Inverhuron and the Lakeshore would entail. It is our view that whenever possible, urban areas should accommodate the expected population increase, leaving more rural and natural areas intact. This approach allows for efficient use of existing infrastructure, rather than having to build new infrastructure at greater cost, as well as greater damage to the environment.

Finally, we would like to point out that this situation represents an opportunity for all of us: Inverhuron and the Lakeshore area could become a conservation showcase piece for the municipality and the county. There is the Inverhuron Provincial Park, which already attracts a great number of tourists and visitors, and now the presence of the Ontario Farmland Trust will offer further opportunities for environmental engagement and education. By adopting a planning strategy that has as a concept the creation of a natural and cultural heritage area dedicated to conservation and environmental tourism and learning in Inverhuron, a site with great visibility due to the presence of the Bruce Power nuclear generating site, Kincardine and Bruce County can chart a way forward for good growth and environmental stewardship.









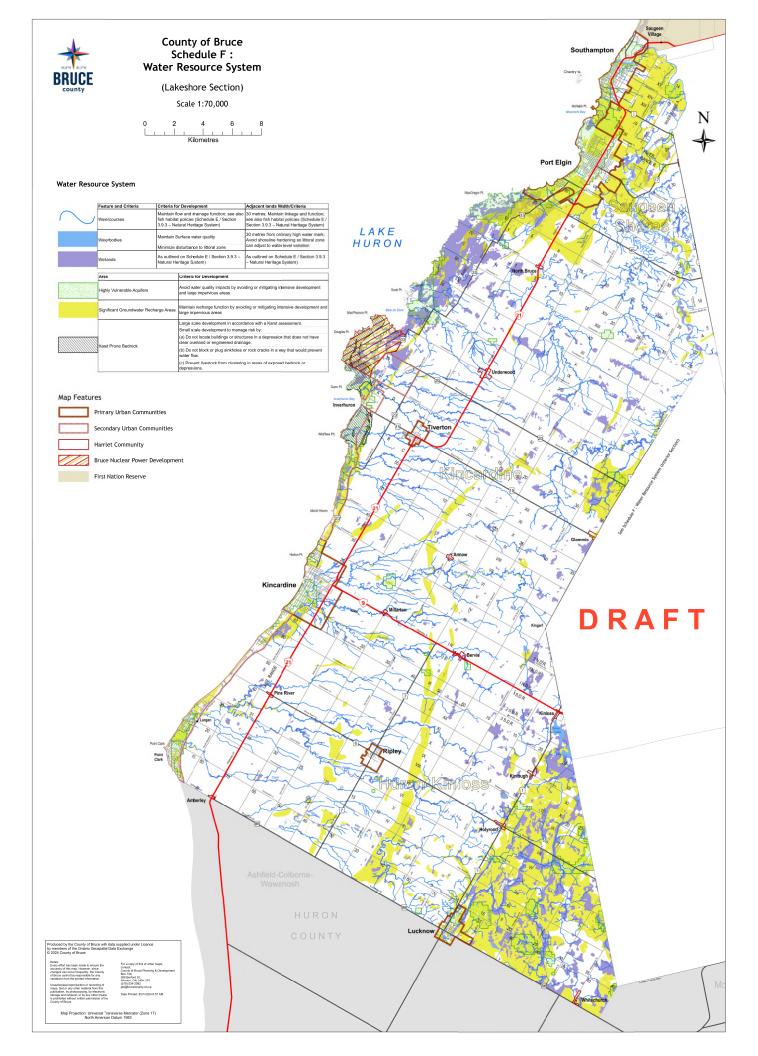
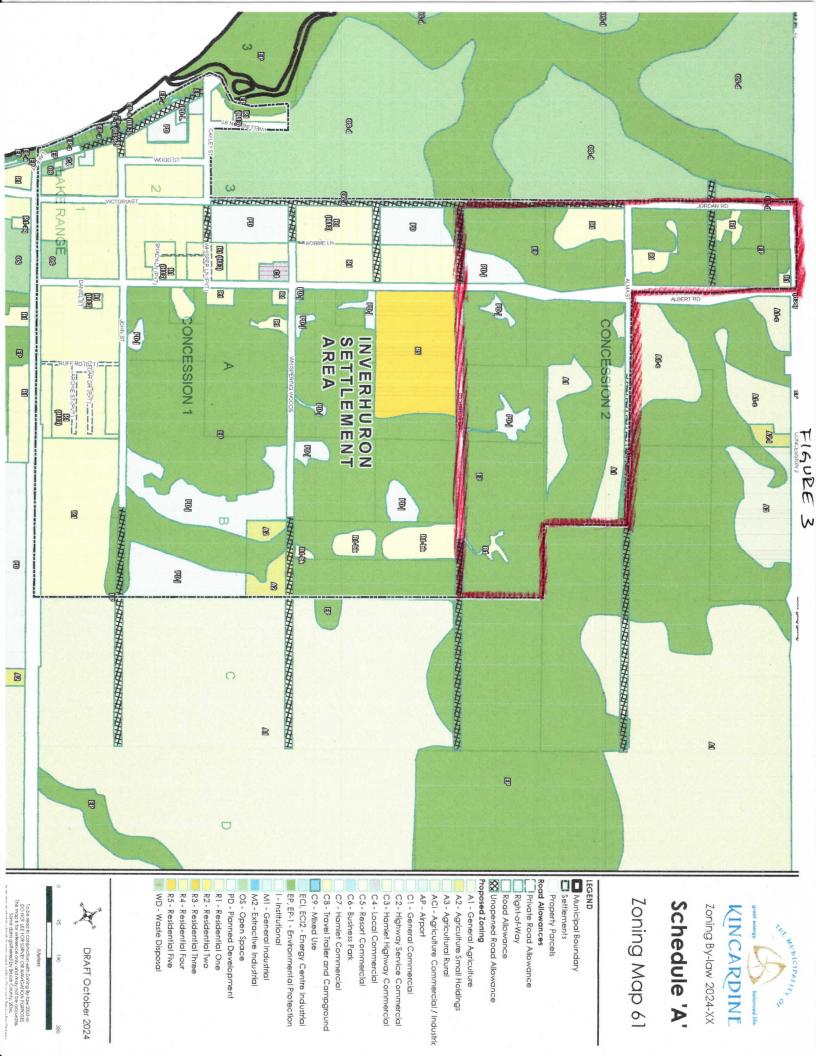
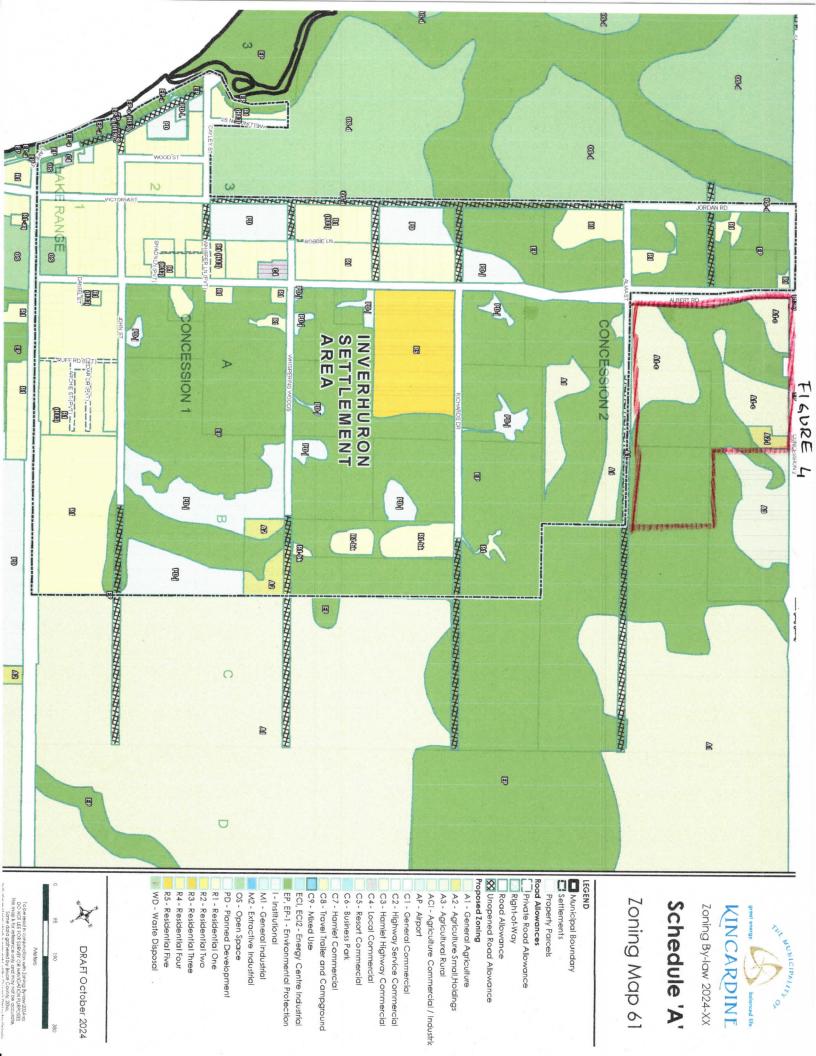


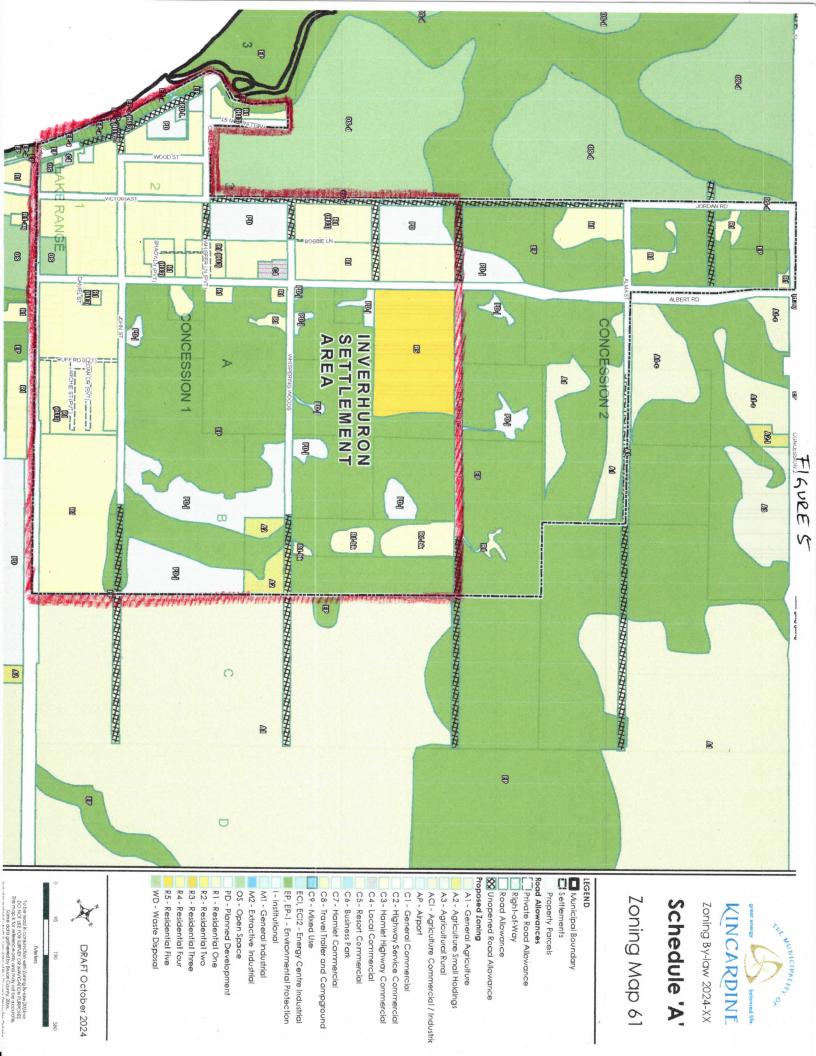
Figure 2

Detail from BC Draft OP, Schedule A / Lakeshore Section

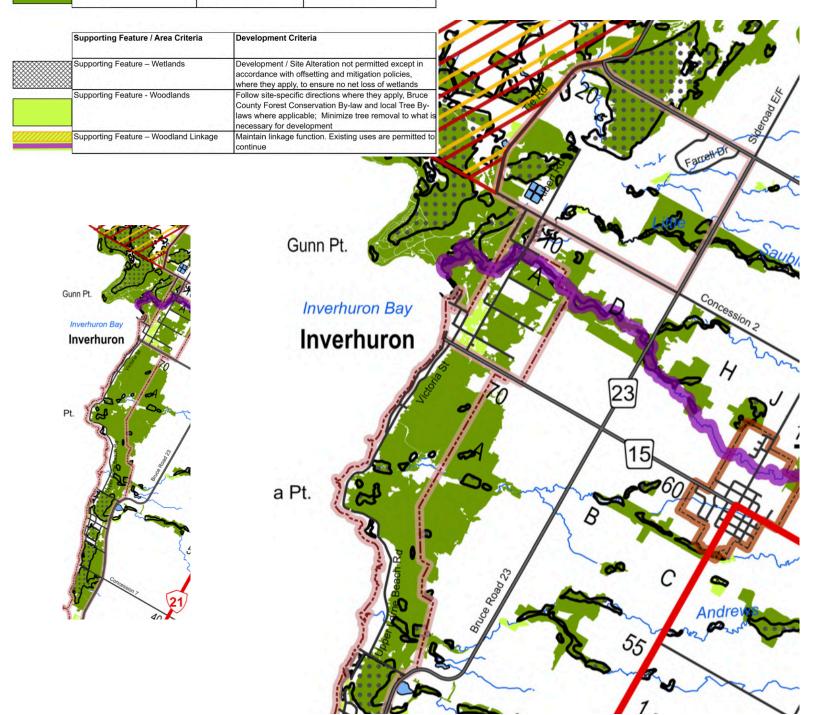








	Key Feature / Area Criteria	Criteria for Development Within Feature	Adjacent Lands Width / Criteria for Development
0	Fish Habitat	Not permitted except in accordance with provincial and federal requirements	120 metres; No negative impact to feature or its ecological function per provincial direction
************ ************* ***********	Provincial Areas of Natural and Scientific Interest (ANSI)	No negative impact to feature or its ecological function per provincial direction	120 metres; No negative impact to feature or its ecological function per provincial direction
	Provincial Earth Science Areas of Natural and Scientific Interest (ESANSI)	No negative impact to feature or its ecological function per provincial direction	50 metres; maintain educational, scientific and interpretive values per provincial direction.
	Key Feature - Wetlands	New Development / Site Alteration Not Permitted per Provincial Direction	120 metres; No negative impact to feature or its ecological function per provincial direction
	Key Feature - Woodlands	No negative impact to feature or its ecological function per provincial direction	120 metres; No negative impact to feature or its ecological function per provincial direction



#### Water Resource System

Gunn Pt.

McRea Pt.

Island Haven

Inverhuron

Feature and Criteria	Criteria fo	or Development	Adjacent lands Width/Criteria
Watercourses	fish habita	low and drainage function; see also it policies (Schedule E / Section itural Heritage System)	30 metres; Maintain linkage and function; see also fish habitat policies (Schedule E / Section 3.9.3 – Natural Heritage System)
Waterbodies Maintain		Surface water quality	30 metres from ordinary high water mark; Avoid shoreline hardening so littoral zone can adjust to water level variation
	Minimize o	disturbance to littoral zone	can adjust to water lever variation
Vetlands		d on Schedule E / Section 3.9.3 – eritage System)	As outlined on Schedule E / Section 3.9.3  – Natural Heritage System)
Area		Criteria for Development	
Highly Vulnerable Aquifers		Avoid water quality impacts by avo and large impervious areas	iding or mitigating intensive development
Significant Groundwate	er Recharge Areas	Maintain recharge function by avoiding or mitigating intensive development and large impervious areas	
		Large scale development in accord	ance with a Karst assessment.
		Small scale development to manag	e risk by:
arst Prone Bedrock		(a) Do not locate buildings or structures in a depression that does not have clear overland or engineered drainage.	
Raist Florie Bediock		(b) Do not block or plug sinkholes or rock cracks in a way that would prevent water flow.	
		(c) Prevent livestock from clustering in areas of exposed bedrock or depressions.	

Gunn Pt.

a Pt.

Inverhuron Bay

Inverhuron

Farrell D

Concession :

Little

# Natural Environment System

County-scale Linkage

Local Landscape-scale Linkage

# Figure 8 BCOP Draft Schedule E / detail

Key Feature / Area Criteria	Criteria for Development Within Feature	Adjacent Lands Width / Criteria for Development
Fish Habitat	Not permitted except in accordance with provincial and federal requirements	120 metres; No negative impact to feature or its ecological function per provincial direction
Provincial Areas of Natural and Scientific Interest (ANSI)	No negative impact to feature or its ecological function per provincial direction	120 metres, No negative impact to feature or its ecological function per provincial direction
Provincial Earth Science Areas of Natural and Scientific Interest (ESANSI)	No negative impact to feature or its ecological function per provincial direction	50 metres; maintain educational, scientific and interpretive values per provincial direction.
Key Feature - Wetlands	New Development / Site Alteration Not Permitted per Provincial Direction	120 metres; No negative impact to feature or its ecological function per provincial direction
Key Feature - Woodlands	No negative impact to feature or its ecological function per provincial direction	120 metres; No negative impact to feature or its ecological function per provincial direction

Supporting Feature / Area Criteria	Development Criteria
Supporting Feature – Wetlands	Development / Site Alteration not permitted except in accordance with offsetting and mitigation policies, where they apply, to ensure no net loss of wetlands
Supporting Feature - Woodlands	Follow site-specific directions where they apply. Bruce County Forest Conservation By-law and local Tree By- laws where applicable; Minimize tree removal to what is necessary for development
Supporting Feature – Woodland Linkage	Maintain linkage function. Existing uses are permitted to continue

