



Via E-mail (wvankeulen@twpec.ca)

April 2, 2024(Revised)

Ms. Wendy Van Keulen  
Community Development Coordinator  
Township of Edwardsburgh Cardinal  
18 Centre St, Spencerville, ON K0E 1X0

**Subject: Site Plan Proposal Review**  
**2062 County Road 22 (Shanly Road)**  
**Lot 7, Concession 2 (Edwardsburgh)**  
**Roll Number: 070170101018600**

Dear Ms. Van Keulen,

South Nation Conservation (SNC) has reviewed the Site Plan Proposal for a commercial landscaping business at the above-noted property. The proposal includes 15 uncovered material storage areas, a 12.19m x 7.32m workshop, three storage buildings plus a storage container, customer parking and loading areas, and a berm. The full development area is .71 hectares. It is assumed that the proposed structures will not be serviced with water or sanitary services.

SNC's review considers the potential impacts of development on public health, safety, and the protection of property in accordance with Section 3.1 (Natural Hazards) of the Provincial Policy Statement (May 1, 2020) issued under Section 3 of the *Planning Act*.

It identifies possible regulatory requirements under Section 28 of the *Conservation Authorities Act* and Ontario Regulation 170/06, Development Interference with Wetlands and Alterations to Shorelines and Watercourses.

It considers the Sewage System Management Agreement between SNC and the Township of Edwardsburgh Cardinal.

Finally, it reviews the vulnerability mapping from the approved South Nation Source Protection Area Assessment Report and the policies of the Raisin-South Nation Source Protection Plan to determine whether activities related to future land use may impact Municipal sources of drinking water.

The following documents were included in the review.





- i. Stormwater Management Report. Prepared by Eastern Engineering Group Inc. Signed, stamped and dated October 5, 2023.
- ii. Drainage and Grading Plan. Dwg. C1. Prepared by Eastern Engineering Group Inc. Signed, stamped and dated March 8, 2024.
- iii. Updated Environmental Impact Study. Prepared by BCH Environmental Consulting Inc. Dated November 10, 2023.

## **Natural Hazards**

There are no mapped natural hazards on the property.

### *Unstable Soils*

The Updated Environmental Impact Study confirms wetlands to the south and west of the property, while historic mapping completed by the Ontario Ministry of Natural Resources considers almost the entire property to be wetland. A high water table and organic soils may be present on the property.

1. It is recommended that the applicant consult a qualified professional to confirm the suitability of the soils for the proposed uses, including any requirements to support the proposed structures.

### *Stormwater Management*

Development can increase surface runoff due to changes in impervious areas. These changes should not result in flooding and erosion, on and adjacent to the property.

For the subject property, approximately 2,800 m<sup>2</sup> of grass will be converted to 55 cm-thick gravel with four new structures totaling 312 m<sup>2</sup>.

The Stormwater Management Report acknowledges the standard practice of controlling stormwater runoff but does not propose stormwater quantity control. Runoff from the graveled and material storage areas will instead be directed towards existing ponds, and the southern wetland via a berm constructed on either side of the ponds. A calculation of increased runoff is not provided, and consequently, the runoff volume, storage, and ponding requirements if any are unknown.

The Updated Environmental Impact Study indicates that stormwater will collect and be stored in front of the berm, and the berm will be designed to allow infiltration through to



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sheet-flow into the wetland. There is no information on the berm in the Stormwater Management Report, however, and the Drainage and Grading Plan depicts a berm as well as structures on the edge of the gravel, approximately 5m from the proposed berm. It is not clear that the berm will function as recommended by the Updated Environmental Impact Study.

2. It is recommended that the Stormwater Management Report include a clear professional opinion that the change in land use will not result in local flooding on and adjacent to the property during a significant storm event.
3. If a Site Plan Agreement is required for the development, the Township may consider a clause in the Agreement indicating that any future changes to the site plan will require an update to the Stormwater Management Report, and quantity control may be required at that time.

### **Conservation Authority Regulations**

SNC implements Ontario Regulation 170/06, Development Interference with Wetlands and Alterations to Shorelines and Watercourses, developed under Section 28 of the *Conservation Authorities Act*.

Please note that any interference with a watercourse may require a permit and restrictions may apply. The site plan as proposed does not require a permit.

### **Source Water Protection**

The Property is not within a municipal drinking water Wellhead Protection Area or Intake Protection Zone.

I trust this review is to your satisfaction. If there are any questions, please feel free to contact our office.

Kind regards,

James Holland, MSc RPP  
Senior Planner  
South Nation Conservation