

NIAGARA ESCARPMENT — FOUNDATION —

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**Submission of the Niagara Escarpment Foundation on the
Draft Comprehensive Zoning By-Law,
Municipality of Grey Highlands
June 26, 2025
Robert Leverty, President**

The Niagara Escarpment Foundation (NEF) wishes to comment on two specific portions of the draft by-law, recognizing that only a portion of the land base of the Municipality of Grey Highlands is within the Niagara Escarpment Plan area.

Section 15.0 Recreational Resort Zone

The draft zoning by-law adds two Primary Uses that are not provided for as primary recreational uses in the Escarpment Recreation Area designation of the Niagara Escarpment Plan (NEP):

- iii Trail-Based Outdoor Recreation (including hiking, biking, cross-country skiing and snowmobile trails)
- iv Passive Recreational Use (including public and private parks, conservation areas, nature viewing areas, and other low-impact activities that are in compliance with NEP policies)

While the above two sets of land uses are to be encouraged as low-impact nature-based permitted uses, they cannot and must not be provided for in the by-law as primary recreational uses. The primary recreational uses that are provided for in the Escarpment Recreation Area designation of the NEP are downhill ski hills and golf courses (and, in areas of the NEP elsewhere in Grey and Bruce Counties, lakeshore residential areas). For example, providing for the Bruce Trail as a primary recreational use on a subject property could, under the draft by-law, justify the creation of the Secondary Uses listed in Section 15.0 – Resorts, Hotels, Motels and Lodges. With the

Bruce Trail running the entire length of the Niagara Escarpment, any lands zoned Recreational Resort in Grey Highlands now or in the future that have the Bruce Trail crossing or in the vicinity of them could have a resort or hotel as a secondary use. That runs totally contrary to the purpose of the NEP, which is to maintain the Niagara Escarpment and lands in its vicinity substantially as a continuous natural environment.

The Municipality of Grey Highlands must REMOVE Primary Uses Section 15.0 (iii) and (iv) from the draft comprehensive zoning by-law.

Section 17.0 Holding Zones – Wetlands and Other Natural Heritage Features

According to Ontario Nature, Southern Ontario has lost approximately 70% of its original wetlands – lost because of development (urban, agriculture, etc.) and other habitat destruction. The environmental and ecological value of wetlands is indisputable, with the following functions and processes: Flood attenuation; water filtration and water quality improvement; capture and transformation of surplus nutrients and contaminants; protection of the terrestrial parts of wetlands that also protect the active wetland and its biodiversity; protection of the groundwater discharge or recharge zones associated with the wetland; protection of built infrastructure that could be damaged by the annual and season expansion and contraction of wetlands; and many other functions related to biodiversity, rare plants, aquatic life, waterfowl, shorebird habitat and amphibian habitat.

For the Holding Zone Provision to be restricted only to lands within 30 metres of the Wetland Zone and to lands within 50 metres of select other Natural Heritage Features is completely inadequate. Grey Highlands should have a policy in its Official Plan stating that all development within 120 metres (often cited as the width of “adjacent lands” in planning documents) needs an Environmental Impact Study (EIS) or Natural Heritage Evaluation prior to any development. The final buffer, following on the findings of the EIS, should be reflected in any site-specific zoning by-law and could be even larger than 120m, depending on the ecological circumstances.

To provide for a ‘blanket’ 30m buffer is a one-size-fits-all approach that runs counter to respect for the immense diversity of natural heritage features in Grey Highlands.

Therefore, NEF opposes the draft zoning By-law provision to reduce the 120 metre buffer around wetlands to 30 metres.

The Niagara Escarpment Foundation (NEF) is a not-for-profit corporation, a non-partisan organization and a registered charity founded in 2001 to foster public awareness of the natural and cultural significance of the Niagara Escarpment and to conduct research related to protection of the Niagara Escarpment (nefoundation.ca).

The Board of Directors of NEF have a combined experience of over 175 years in Escarpment environmental planning and preservation.

Since 2001, the NEF has undertaken public awareness and research projects, primarily related to the effectiveness of the Niagara Escarpment Plan in protecting the Escarpment's watersheds, farmlands and continuous natural corridors to ensure the integrity and continuation of its UNESCO Biosphere designation.