

April 14, 2025

Elisha Milne, Legislative and Planning Coordinator
Township of Southgate
emilne@southgate.ca

**RE: Local Official Plan Amendment application OPA1.2025 and Zoning By-law
Amendment application C3-25
265068 Southgate Road 26; Township of Southgate
Roll: 420709000310500
Owner: Westside Manufacturing Inc.
Agent: MHBC Planning Ltd. c/o Gillian Smith**

Dear Elisha Milne,

This correspondence is in response to the above noted application. We have had an opportunity to review the application in relation to the Provincial Planning Statement (PPS) and the County of Grey Official Plan (OP). We offer the following comments.

Proposal

The Purpose of the proposed Official Plan Amendment is to allow for site specific policy changes that limit total floor area for an on farm diversified use to 20% of the area zoned for such a use to a maximum of 750 square metres. The change to the Official Plan along with a proposed zoning amendment would allow expansion of an existing on farm diversified use. The Effect of proposed amendment is to add site specific policy in the Township Official Plan to allow up to 955 square metres floor area so this on farm diversified use can be expanded through rezoning. Additional storage is also proposed.

The Purpose of the proposed Zoning By-law Amendment is to allow a +-205 square metre addition to the existing on farm diversified use (dry industrial) to maximum 955 square metres of floor area. Storage would increase by 320 square metres to allow a total of 820 square metres indoor, covered and/or outdoor storage. Combined the proposed use including all workshop space and storage would increase from 1250 square metres to 1775 square metres maximum. The Effect of proposed amendment is

to change the current zoning to allow an on farm diversified use with 955 square metres floor area, 820 square metres of storage (inside, outside, covered) and a total of 1775 squares of workshop and storage, all within the existing zoned area for the use.

The subject lands are identified as the following in the County Official Plan:

- Schedule A – Land Use Types – Agricultural and Hazard Lands
- Appendix B – Constraint Mapping – Significant Woodlands and Other Wetlands

Documents submitted and reviewed:

- Cover letter, prepared by MHBC Planning Ltd., dated January 31, 2025
- Site Plan, prepared by EMS Construction Inc., dated November 28, 2024
- Planning Justification Report, prepared by MHBC Planning Ltd, dated January 27, 2025
- Application Forms

Comments

Schedule A of the County OP designates the subject lands as Agriculture which permits On-farm Diversified uses (OFDU).

Per Table 8 in Section 5.2.2, the OFDU on Agricultural lands greater than 20 hectares shall be, *“the lessor of: 2% of the total size of the property, or a maximum combined area of the use of 8,000 square metres.”*

Further, Section 5.2.2(17) of the County OP states: *“The gross floor area of the buildings (combined total for all buildings associated with the on-farm diversified uses) shall not exceed 20% of the total area of the on-farm diversified use.”*

1. The subject property is approximately 72 hectares in size, which would permit a maximum area of 8000 square meters for the OFDU, inclusive of all parking, loading, buildings, servicing, and outdoor storage, and up to 1600 square meters gross floor area of all buildings. Staff understand that Zoning By-law Amendment was approved in 2022 which permits an OFDU consisting of a small-scale industrial workshop to occupy 8000 square meters. The proposal does not contemplate a change to the area occupied by the OFDU, but rather is proposing to increase the total outdoor storage area to 820 square meters and the total building footprint to 952 square meters. As such the proposal complies with the size requirements for OFDUs established by the County OP. County planning staff have no concerns.

2. Further to the above, staff note that the Planning Justification Report indicates a total building footprint area, however, the County OP considers the total gross floor area (GFA) of the buildings associated with an OFDU. While it is acknowledged that this difference is unlikely to result in proposal exceeding a GFA of 1600 m², staff recommend that the Gross Floor Area of all existing and proposed buildings associated with the OFDU be confirmed.
3. Staff acknowledge that the Planning Justification Report outlines how the proposal conforms to Section 5.2.2.(19) of the County OP, regarding criteria for establishing a new OFDU, including that the proposed use is existing and no changes to the intensity of the existing activities are proposed, no additional servicing is required, and that the primary use of the property is agricultural.

Section 5.2.2(5) of the County OP states:

e) MDS I will generally not be required for on-farm diversified uses, except where a municipality has required MDS to apply in their municipal official plan or zoning by-law.

4. Any additional comments in this regard should be received from municipal staff.

Section 5.2.2 (20) of the County OP states:

Ministry of the Environment, Conservation and Parks (MECP) D-6 Guidelines, or any successor thereto, shall be considered for any new agricultural-related uses or on-farm diversified uses or an industrial nature in the Agricultural, Special Agricultural, or Rural land use types, to guide the separation of industrial uses from nearby dwellings, institutional uses, or other sensitive non-agricultural uses. Uses which are covered as normal farm practices by the Farming and Food Practices Protection Act (FFPPA) shall not be required to meet the D-6 Guidelines, provided they meet all required Provincial noise, air, water, and wastewater standards.

5. Municipal staff shall review the applicability of the D-6 Guidelines to the proposed development.
6. Schedule A of the County OP also indicates that portions of the subject lands contain Hazard Lands. While it appears that the proposed development is located outside these lands, nonetheless, staff recommend that comments are received from Saugeen Valley Conservation Authority.

Appendix B of the County OP indicates that the subject lands contain Significant Woodlands and a small portion of 'other wetlands' along the southern property boundary.

7. Should the applicant seek to injure or destruct trees on lands that extend more than 15 metres from the outer edge of which a Building Permit has been issued, staff recommend consulting the [County's Forestry Management By-law](#). An exemption to the by-law is required, for example, to injure or destroy trees in order to install and provide utilities to the construction or use of a building, structure or thing for which a Building Permit has *not* been issued or for the cutting of a tree in a forested area 1 hectare in size or larger.

County Ecology staff have reviewed the application and offer the following comments:

8. The subject property contains and/or is adjacent to potential 'Habitat of Threatened or Endangered Species', 'Other Wetlands', 'Significant Woodlands', 'Significant Wildlife Habitat', potential 'Fish Habitat', and a 'Stream'. Additionally, the property is considered a Significant Groundwater Recharge Area. County staff have reviewed the proposal and based on the site plan, the proposed development will be within adjacent lands to the identified natural heritage features and within a previously disturbed area. As such, it is County staff's opinion that the potential impact to this feature would be negligible, and the requirement for an EIS can be waived.
9. Please note it is the applicant's responsibility to ensure the endangered and threatened species policy referred to in the PPS has been appropriately addressed – "Development and site alteration shall not be permitted in habitat of endangered species and threatened species, except in accordance with provincial and federal requirements". While the County is not supportive of development within Habitat of Threatened and/or Endangered Species, County staff are not the regulating authority under the Endangered Species Act. The applicant is advised to contact the Ministry of Environment, Conservation and Parks (MECP) at SAROntario@ontario.ca for further information on how to address this policy.
10. County ecology staff have no concerns with the application. If you have any questions or concerns regarding the above, please reach out to ecology@grey.ca

County Planning staff have no concerns with the subject application.

The County requests notice of any decision rendered with respect to this file.

If you wish to discuss this matter further, please contact me.

Yours Truly,

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