

November 18, 2024

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

**RE: Zoning By-law Amendment C25-24 -Ahmad
CON 5 PT LOT 12 RP 17R186; PART 9 (no civic address)
Township of Southgate
Roll: 420709000108180
Owner: Sagheer Ahmad**

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 rezoning is to allow a Recreation Community Care Centre for individuals with disabilities along with a proposed residence as a Group Home on the subject lands.

The Effect of rezoning would be to permit a Group Home as defined in the Zoning Bylaw on the subject lands within a residential dwelling in which persons with disabilities will be living with supervision consistent with their particular needs.

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

- Schedule A – Land Use Types – Rural, Hazard and Provincially Significant Wetland
- Appendix B – Constraint Mapping – Significant Woodlands

Land Use

Schedule A of the County OP designates the subject lands as Rural. Outside of settlement areas, the Rural land use type offers flexibility economic development, tourism, residential, and recreation. While there is greater flexibility, farming and resource uses are still to be given priority for protection.

1. Residential dwellings, as well as institutional and resource based recreational uses are permitted in the rural designation. Staff note that the applicant has requested a zoning change to Recreational Commercial zone (C5) to permit a residential use with a community recreational care center, while the notice of public meeting references a group home. Staff request additional clarification be provided. Should the intent of the proposed development include a resource based recreational use, staff recommend that the applicant or their agent submit a planning justification letter detailing how the proposed development meets the criteria described in Section 5.4.2(8).
2. The application materials, staff understand that there is no livestock operation within 450m of the proposed development however, and note that no MDS calculations were provided. Where new residential dwellings are permitted on existing lots of record, the MDS formulae is applied to the new house. Additional comments in this regard should be received from municipal staff.

Further to the above, Section 9.18 states that:

RESOURCE BASED RECREATIONAL USES must mean those recreational uses where the prime reason for location by their very nature, require certain natural attributes for their location including the availability of large lots or land areas. Uses permitted may include passive and active recreational facilities and associated commercial and residential uses. Such uses can include water-based recreation, campgrounds, lodges/resorts and skiing/snowboarding facilities.

The Grey County Official Plan encourages a variety of housing types to satisfy the present and future social, health, safety, and well-being requirements of residents, including housing opportunities that address the needs of persons with physical, sensory, and mental health disabilities. Section 4.2.3 states that:

“Social and Special Needs Housing” is considered “non-market” housing, and refers to housing that is provided or owned only by public or private non-profit organizations; targeted towards a specific at risk population, including: people who have specific needs beyond economic needs, unemployed, physically and intellectually disabled, those experiencing mental health and addictions, those with mental health illnesses, the terminally ill, victims of domestic violence.

Grey County is primarily responsible for supplying, maintaining, and administering social and special needs housing, although there are additional suppliers including not-for-profits and private sector companies. There is a recognized need for the County to take leadership in ensuring Social housing needs are met. The County will actively look to:

- *Direct new social housing units towards designated Primary Settlement Areas to ensure residents live close to essential services and supports, promoting the flexibility and ease in carrying out a healthy lifestyle;*

...

3. Social housing, such as a group home, is typically directed towards designated Primary Settlements Areas to ensure residents live close to essential services and supports, promoting the flexibility and ease in carrying out a healthy lifestyle. However, staff also recognize that a wide variety of housing types, including social and special needs housing, is very needed in the community. Staff request additional information, such as a letter or planning justification brief, be provided to support a group home in a rural setting.
4. Staff note that no servicing details were provided with the application materials. Should the proposed residence generate more than 10,000 L of sewage per day, the individual private sewage treatment and sewage disposal system servicing must be designed in accordance the MECP *Design Guidelines for Sewage Works* and apply for and receive approval under the Ontario Water Resources Act. Should the proposed residence generate more than 4,500 L of effluent, a servicing options report and hydrogeological report is required, per O. Reg. 545/06. Staff request that additional clarity is provided regarding proposed servicing. Additional comments regarding servicing should also be received from municipal staff.

Ecology Comments

County ecology staff have reviewed the application and provide the following comments:

5. The subject property contains potential 'Habitat of Threatened or Endangered Species', 'Significant Wetlands', potential 'Fish Habitat', 'Significant Woodlands', 'Significant Wildlife Habitat', and a watercourse. Additionally, the property is considered an area that may influence Highly Vulnerable Aquifers. In reviewing the proposal, which includes the development of a group home, it is County staff's understanding that the proposed building is in the adjacent lands of the natural heritage features and will be restricted to the existing cleared area. It is

County staff's opinion that the Environmental Impact Study can be waived, provided that the development (building, septic, etc.) maintain a 30-metre setback from the PSW boundaries. County staff recommend ecological restoration through native plantings 25 metres from the water's edge to enhance the PSW feature. As the property is considered an area that may influence Highly Vulnerable Aquifers, low-impact development is recommended (e.g., permeable pavement for driveways and parking areas) as a best management practice as per 8.9.2. of the County's OP.

6. County staff understand a gazebo and bridge is proposed within the PSW as part of this development. New development is not permitted in the PSW, and further study is required if development in the PSW is formalized as part of the proposal. Trails are considered acceptable in the PSW, provided they meet the following criteria:
 - The proposed works are to be located entirely on the subject property;
 - The path is at grade;
 - No significant amount of excavation, clearing, etc. is required (e.g., no more than 10 trees to be cleared/removed, or over 24 cubic metrics of excavation required)
 - The path will not exceed a width of 1.2 meters;
 - No other structures are proposed related to the landscaping;
 - There will only be one route per property; and
 - The proposed trail does not impact neighbouring properties (if so, landowner permission is required).

7. Please note it is the responsibility of the applicant to ensure the Endangered and Threatened Species policy in the PPS has been appropriately addressed. Please contact the Ministry of Environment, Conservation and Parks (MECP) at SAROntario@ontario.ca for information on endangered and threatened species. If you have any questions or concerns regarding the above, please reach out to ecology@grey.ca.

Transportation Comments

County transportation staff have reviewed the application and provide the following comments:

8. No TS issue for zoning.

9. Issues to be addressed in future site plan application:
 - Proposed building to maintain 75ft setback from County ROW centre line
 - Commercial entrance permit is required

- A 0.3m reserve along the frontage of the County road may be requested

10. Further to the above comments, planning staff understand that the proposed development would contain fewer than 10 residential units. As such, Site Plan Control may not be applicable. Further comments should be received from municipal staff.

Summary

Staff acknowledge that the proposed development would provide a much-needed housing type in the community. Nonetheless, staff recommend that the application be deferred to provide additional information and clarity regarding proposed use and development. Staff request that the following information be provided:

- Additional clarity regarding the type of land use requested (i.e. a residential use with an accessory resource-based recreation use, an institutional use, a residential use, etc.) and additional information to support a group home in a rural setting, preferably by way of a planning justification letter/brief.
- A planning justification letter/brief detailing how the proposed development meets the criteria described in Section 5.4.2(8), if required.
- A detailed site plan showing the location of the proposed development and associated servicing, entrance, site circulation, any proposed trails and/or outdoor amenity space, the PSW and Hazard boundary and setback distances, the 23m required setback from the centreline of Grey Road 14, and any other details as required to illustrate the proposed development.
- MDS calculations, if required.
- Details related to site servicing, including a Servicing Options Report, to ensure that the development can be adequately serviced on private servicing, including confirmation regarding septic capacity and well-water availability (i.e. that D-5-4 and D-5-5 policies can be adequately addressed), if required.

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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