



Planning and Development

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August 19, 2025

Shavindra Fernando, Planning Assistant
Township of Southgate
sfernando@southgate.ca

**RE: Official Plan Amendment OPA3-25 and Zoning By-law Amendment C14-25 -
Briarwood
Con 2 SWTSR, PT Lot 234, Geographic Township of Proton, Township of
Southgate
Roll: 420709000505800
Agent: Innovative Planning Solutions (Dafne Gokcen)**

Dear Shavindra Fernando,

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 Summary

OPA3-25 - The Purpose of the proposed Official Plan Amendment is to re-designate the lands from Future Development and Hazard Land to Neighbourhood Area and to establish policies to guide future development. A low-rise residential development is proposed on the southwest part of the site near Ida Street. Only parts of the Hazard Land may be re-designated Neighbourhood Area. The Effect of the Official Plan Amendment would be to allow a low rise residential development on part of the site, and to put in place policies to guide the form of development on the rest of the lands.

C14-25 - The Purpose of the proposed Zoning By-law Amendment is to rezone the lands from Agricultural 2 (A2) and parts of the site in an Environmental Protection (EP) Zone to a site specific residential zone. The rezoning would allow low rise residential development on the southwest part of the site. Other zoning rules will be applied to other parts of the lands. The Effect of application is to rezone the southwest part of the

site to allow low rise residential development and to establish zoning categories and regulations for the rest of the site.

The proposed development consists of four (4) multi-family residential buildings of three (3) storeys in height with 376 total units. Parking is proposed above and below grade. Of the four buildings, three (3) are proposed to be for-sale condominium units while one (1) is proposed as purpose-built rental apartment units.

Documents submitted with the application and reviewed by staff:

- Planning Justification Report, Prepared by IPS, dated May 2025
- Floodplain Analysis prepared by Valdor Engineering Inc.
- Site Plan, Elevations, Floors Plans, and Site Statistics, prepared by S&C Architects, dated January 2025
- Topographic survey, prepared by J.D Barnes Surveying, June 8, 2018.
- Functional Servicing/Stormwater Management Report, prepared by Valdor Engineering Ltd., January 2025.
- Hydrogeological Study, prepared by Soil Engineers Ltd., January 29, 2025
- Geotechnical Report, prepared by Soil Engineers Ltd., December 2024.
- Phase 1&2 Archaeological Study, prepared by Earthwork Archaeological Services, January 29, 2019
- Traffic Impact Study, prepared by Paradigm Transportation Solutions Ltd., January 2025
- Environmental Impact Study, prepared by Birks Environmental, May 2025
- D2 and D6 studies, prepared by Sonair Environmental, November 22, 2024
- D6 study, prepared by Palmer, November 18, 2024
- Landscape Plan, prepared by Adesso design Inc, dated December 6, 2024
- Cover letter, comment response matrix, and application

The subject lands (~27 ha) are identified as the following in the County Official Plan:

- Schedule A – *Land Use Types* – Primary Settlement Area and Hazard Lands
- Appendix A – *Constraint Mapping* – Wellhead Protection Area B, C and D
- Appendix B – *Constraint Mapping* – Significant Woodlands, and Other Wetlands
- Appendix D - *Functional Road Classification and Planned Corridors* – Ida Street (local municipal road, ~160m frontage)

Comments

1. Staff understand that the proponent will submit a draft plan of condominium application at a future date. The County is the approval authority for plans of subdivisions, part lot control, plans of condominium and condominium exemption.

Generally, the condominium or subdivision application is submitted and reviewed concurrently with any associated *Planning Act* applications. It is unclear how the proposed plan of condominium will operate on the subject lands, particularly as one of the proposed apartment buildings is intended for rental and that there is a significant portion of the property that will not be developed (i.e. will a future condominium association manage the vacant lands and the rental building? Will the undeveloped portion of the property ultimately become a separately conveyable parcel? Etc.) Staff request further information be provided as it relates to the future condominium application, such as a concept draft plan of condominium, to assist in the review of the applications.

2. Per the submitted PJR, staff understand that that the proposed development will be located on the front portion of the subject lands providing a separation between the proposed residential use and the *existing* industrial use. However, it remains unclear how the development avoids or minimizes and mitigates potential impacts on the long-term economic viability of employment uses within the existing industrial park. There appear to be 3 vacant parcels in the industrial park directly abutting the subject lands and another 5 vacant parcels on the south side of Eco Park Way. The potential impacts of a directly adjacent sensitive land use (the proposed development) on the viability of these lands has not been considered. Employment areas shall be protected and preserved for current and future uses (2.8.2.1). Please provide additional clarity with regard to PPS policy 2.8.1.3.
3. Staff understand that the intent of the Future Development designation in the Southgate Official Plan is to restrict development in order not to jeopardize the orderly development of this area. The Future Development designation is also intended to apply until such a time that it is demonstrated that there is need for the additional land. Staff understand that there are a number of active and planned residential proposals in Dundalk. Staff encourage additional market analysis to further support the proposed Official Plan Amendment and residential development. Additional comments should be received from municipal staff in this regard.
4. Staff note that the D6 assessment has classified the nearby Lystek operation as a Class II facility. This property abuts the subject lands, and the recommended minimum separation distance of 70 meters cannot be met. As a result, the measurements from the property line (Lystek) to the closest sensitive activity (the proposed residential complex) has been used (approx. 620m separation). Staff understand that when separation distance is provided partially or entirely on-site, a site-specific zone exception could be put in place to ensure that any future changes comply with the D6 guidelines. It is also unclear if the vacant lands within the eco-

park have been considered. Staff note that the study also indicates that no odor was observed at the Lystek during a site visit in February 2024. Further comments related to the D6 study should be received from municipal staff.

5. Per Section 7.2 of the County OP, development and site alteration is not permitted within the floodway portion of a floodplain, and buildings and structures are not generally permitted in the Hazard designation. Advice and approval from the regulating Conservation Authority, in addition to an EIS, is required when development and site alteration is proposed in the Hazard Lands designation. Staff understand that neither GRCA nor County ecology staff were consulted prior to the completion of the EIS dated May 2025. Further clarification should be obtained.
6. Further to the above, staff request that a site plan be provided that overlays the development concept, with the hazard and natural heritage features (i.e. the features identified in Schedule A and Appendix B of the County OP, as well as the GRCA-verified wetland boundaries and appropriate setbacks).
7. Per Appendix A of the County Official Plan, the subject lands are located within a Municipal Wellhead Protection Area (WHPA) or Municipal Intake Protection Zones (IPZs). Further review is suggested to assess the risks of the proposed uses to potentially contaminate groundwater or surface water. It is recommended that comments be provided from the local Risk Management Official to determine if any mitigation measures and/or restrictions on site would be warranted to protect local groundwater supplies.
8. County Ecology staff have completed a preliminary review of the proposal and EIS submitted to support the application and offer the following comments at this stage:
 - i. In comments dated October 2024, staff indicated that development should be restricted to the portion of the parcel that fronts on Ida Street, west of the wetland/hazard/stream area and an appropriate setback as identified within the EIS. However, the current site plan shows the development encroaching into the wetlands and wetland removal is proposed. Staff are also concerned that this is contrary to GRCA policy and additional comments should be obtained from GRCA.
 - ii. In comments dated October 2024, staff recommend that the consultant contact ecology staff to determine the Terms of Reference for the EIS. A TOR was not circulated to the appropriate authorities (Conservation Authority, County staff) to scope the EIS.
 - iii. It is unclear why the wetland adjacent to the proposed development is not part of the Melancthon Wetland Complex. Details such as the absence of hydrological

- connectivity and distance threshold, based on the Ontario Wetland Evaluation System, should be provided.
- iv. The EIS proposes removal of 1.1 ha of wetland and watercourse realignment. While the County may consider compensation where the mitigation hierarchy of avoid, minimize and mitigate has been followed, it is unclear if alternatives have been considered. The EIS should provide commentary on why compensation is the most appropriate option based on the mitigation hierarchy, which is premised on ecological considerations.
 - v. The EIS should provide further details on potential impacts as a result of SWM infrastructure.
 - vi. Water balance information should be integrated within the EIS to fully determine potential impacts and appropriate mitigation for wetlands as a result of proposed dewatering
9. County Transportation Services noted that no large traffic impact is expected on the County road and staff have no concerns.
10. Children's Services (social services) have reviewed the proposal and have no concerns.
11. Staff note that a Stage 3 Archeological Assessment is required. Has this assessment been completed? If so, kindly submit the report. It is also unclear if any local first Nations and/or Metis communities have been consulted for this development proposal. Please provide additional details as to how our Indigenous partners have been consulted.
12. From a general planning perspective, staff note that the PJR indicates that the project has been designed with pedestrian connections throughout the site, and the draft OPA indicates that the proposal will also promote and support active transportation in the area. However, it is unclear where these connections and active transportation infrastructure is located. Staff note that there is currently no pedestrian or cycling network on Ida Street. Further clarification is required.
13. Staff note that the proposed draft OPA document indicates that *"the purpose of the Amendment is to amend the land use designation of the lands shown on Schedule 1, attached hereto, from "Future Development" to 'Neighbourhood Area.'"* Staff understand that the subject lands are currently designated 'Future Development' and 'Hazard Land' on Map 2 of the Township's Official Plan, and that the proposal also includes the re-designation of a portion of the 'hazard land' designation to 'neighbourhood area'. Additional comments should be received from Township staff.

Summary

Staff acknowledges and appreciates that the proposal is seeking to expand the diversity and availability of housing options in the community and is expecting primarily seniors to be the future owners / tenants. Further, the net density of the proposed development is 106 units per hectare, creating a pocket of modest intensification within the settlement area and allowing for a more efficient use of land and infrastructure. However, staff are quite concerned that the proposal includes development within the floodway portion of the floodplain, a removal of 1.1 hectares of wetland, the realignment of a tributary, and the redesignation of natural hazards to a residential designation. In addition, the potential impacts of a directly adjacent sensitive land use (the proposed development) on the viability of the adjacent employment lands have not been adequately considered.

County staff recommend that the proposed Official Plan Amendment and Zoning By-law Amendment be deferred to allow further discussion with the proponent, County planning and ecology staff, GRCA and the Township staff, as well as providing time for amendments to the EIS (and other studies, as 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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