



RON DAVIDSON
LAND USE PLANNING CONSULTANT INC.

January 13, 2026

Township of Southgate
185667 Grey Road 9
Dundalk, ON
N0C 1B0

Attention: Victoria Mance, Junior Planner

Dear Victoria:

**Re: Planning Justification Report
Application for Zoning By-law Amendment
Part Lot 6, Lot 7, Concession 19,
Geographic Township of Egremont, Township of Southgate
County of Grey
243716 Southgate Road 24
Owner: Elvin Martin**

Further to recent pre-consultation discussions with your office, enclosed please find a completed Zoning By-law Amendment application submitted on behalf of Elvin Martin, the owner of the subject property. The application fees have been paid to the Township directly by Mr. Martin.

To assist with your evaluation of the proposal, I am providing the following information:

Purpose of the Zoning By-law Amendment:

Elvin Martin owns a 69.74-hectare farm located in the former Township of Egremont. Since 2016, Mr. Martin has been operating a small home industry on a small portion of this property that involves the mixing of minerals for animal feed. This business, however, is slightly larger than permitted under the “home industry” provisions of the Township of Southgate Zoning By-law, and therefore he is requesting a Zoning By-law Amendment to recognize the existing operation under the “agricultural-related” policies of the Township’s Official Plan and the Grey County Official Plan.

Details of the Operation:

Minerals (e.g. calcium, phosphorus, magnesium, zinc, and copper), vitamins (e.g. Vitamins A, B, and E) and flavouring, all in powdered form, are brought to the subject property and blended into a mineral food supplement for farm animals. The blended product is then sold to farmers who mix it with the feed for their beef and dairy cattle, hogs, sheep, horses, chickens, and goats in order to maintain healthy animals.

The raw products are shipped to the site mostly in totes and bags stacked on crates, subsequently removed from the truck with a forklift, and then stored indoors. Occasionally, the minerals, vitamins, and/or flavouring arrive in bulk in a tanker truck, in which case it is transferred from the truck into one of the storage bins. The blended food supplement leaves the Martin farm in totes, bags, and barrels.

The business utilizes a 107 square metre building which includes a mixing area, office, and storage room. The mixing machine is located within the building and is operated by an electric motor. Three storage bins and three shipping containers are also used in this operation for storage purposes. No outdoor storage is required.

A total of approximately four to five transport trucks frequent the site each week, bringing the raw ingredients to the property and taking away the finished blended product. Farmers will also retrieve the mineral mix using pick-up trucks, from time to time.

This business employs Mr. Martin, immediate family members living on this farm, and one other person.

Business hours are typically Monday to Friday, 9:00 am to 7:00 pm, although the blending sometimes begins as early as 7:00 am. Occasionally, the business operates on Saturdays, but never on Sundays. Because Mr. Martin provides an on-demand service, there are slow times. The business typically operates between 30 and 35 hours per week.

Mr. Martin has no plans to expand the size of his operation.

Subject Property:

The Martin farm is located along the south side of Southgate Road 24, immediately east of the historical settlement of Tartan, within in the former Township of Egremont, as

illustrated on Figure 1 of this Planning Justification Report. This property also has frontage along Southgate Sideroad 47.

Situated on the site are two detached dwellings, the mineral mixing plant, a livestock barn, and four storage sheds used in conjunction with the farming operation occurring on the property. Three shipping containers and small storage bins also exist on the property.

Approximately 57 hectares of this 69.74-hectare farm are cash-cropped. Forested areas exist along the southern boundary and in the northeast corner.

The various features of the site are shown on Figure 1. The area of the property subject to rezoning is shown in more detail on Figure 2.

Adjacent Land Uses:

Lands within the immediate vicinity of the subject property appear to be used for agricultural and residential purposes. Several residential lots exist nearby.

Township of Southgate Zoning By-law:

The subject property is zoned 'A1' (Agricultural) on Schedule A of the Township's Zoning By-law, as illustrated on Figure 3 of this Planning Justification Report.

Permitted uses in the 'A1' zone are agricultural uses, a detached dwelling, two additional residential units, a bed and breakfast establishment, home industry, home occupation, vacation farm, temporary farm help accommodation, wayside pit or quarry, forestry, conservation, and accessory uses and/or buildings/structures.

The definition of "home industry" is:

"Home Industry" means an occupation accessory to a permitted farm use or rural residential use which may include, amongst others, a carpentry shop, a metal working shop, a plumbing shop, an electrical shop, a welding shop, a farm equipment or machinery repair shop, a storage building for boats, automobiles, or other similar use, provided that:

- (a) there is not more than one (1) employee employed in the home industry other than the owner or family members;*

- (b) one non-luminous business identification sign advertising the business, no larger than one (1) square metre (11 square feet), to indicate to persons outside, that any part of the lot is being used for home industry purposes is permitted;*
- (c) the home industry shall be secondary to the main use of the lot;*
- (d) the home industry shall not create a public nuisance or an unsafe condition in terms of noise, traffic and parking and will not change the general character of the property;*
- (e) not more than 25% of the floor area of the dwelling or not more than 100 square metres (1,076 square feet) of an accessory building is used for the home industry;*
- (f) one off-street parking space, other than that required for the dwelling, is provided for every 18.5 square metres (199 square feet) of floor space occupied by the home industry; and,*
- (g) outdoor storage or display of materials or goods in support of such home industry shall be permitted in the rear or side yard of the home industry building, subject to a maximum size of 200 square metres.*

Mr. Martin was of the understanding that his existing operation was permitted by the Township's Zoning By-law as a "home industry". He recently learned, however, that his 107 square metre building exceeds the 100 square metre maximum floor area limit stipulated in paragraph (e) above, and therefore a Zoning By-law Amendment is necessary in order to have his business legally recognized by the Zoning By-law.

In this regard, the requested Zoning By-law Amendment would add a special provision to the current 'A1' zoning to allow for this specific agricultural-related use. The proposed site-specific zoning would apply only to the general area of the subject property where the business is operating, as illustrated on Figures 2 and 4 of this Planning Justification Report. Approximately 2,078 square metres of land would be rezoned.

The recommended text of the proposed Zoning By-law Amendment is:

A1-x Permitted Uses in the A1-x Zone:

- (a) an Agricultural-related Use being a mineral mixing plant for the making of farm animal nutrients secondly to an Agricultural Use listed in Section 6.1 of the Zoning By-law; and,*

(b) *uses permitted in Section 6.1 of the Zoning By-law.*

Regulations for Uses Permitted in the A1-x Zone:

(a) *Shall be the regulations stated in Section 6.2 of the Zoning By-law except for the following:*

(i) *Maximum zoned area for the Agricultural-related use: 2078 square metres.*

Official Plans:

County of Grey Official Plan:

Schedule A of the County of Grey Official Plan designates the Martin farm as 'Agricultural', as shown on Figure 5 of this Planning Justification Report.

The policies contained in Section 5.2 *Agricultural Land Use Type* of the Official Plan identify the land uses permitted within this designation, which include agriculture, agricultural-related uses, on-farm diversified uses, forestry, conservation, etc. The mixing of minerals for a livestock feed supplement would qualify as an "agricultural-related use", as confirmed by County and Township Planning Departments during the pre-consultation discussions. It should be noted that Table 7 *Permitted Use Examples in Agricultural; and Rural Land Use Types* of the County Official Plan specifically identifies "farm input supplier, e.g. seeds, feed, fertilizer, etc." as an example of an "agricultural-related use".

According to Section 5.2.2 (5) (d), the Minimum Distance Separation (MDS) formulae does not apply to agricultural-related uses. As such, the proximity of the business to adjacent livestock facilities is not relevant to this proposal.

Section 5.2.2 (15) states the following with regard to on-farm diversified uses and agricultural-related uses:

15) *New on-farm diversified uses shall be limited in size and scale, as per Table 8 below and to those uses that can be sustained by local service and infrastructure levels. New agricultural-related uses shall also be limited to uses that can be sustained by local service levels. Municipal official plans may choose to set local road standards required for such uses, which are in-line with the level and type of traffic being generated by the uses. Traffic Impact Studies may be required to determine the impact of the proposed operation on the local road network, as per*

section 8.3 of this Plan. Servicing or Noise Studies may also be required for new or expanded on-farm diversified or agricultural-related uses. Municipal official plans or zoning by-laws may also choose to limit individual uses that could otherwise be directed to settlement areas. Agricultural-related uses are not required to be limited in size, whereas on-farm diversified uses are required to be limited to the sizes shown in Table 8. Subject to the size limitation requirements of Table 8 of this Plan and section 5.2.2(17), on-farm diversified uses may be considered on lots less than 10 hectares in size in the Rural land use type.

Regarding the above, please take into consideration the following:

- An agricultural-related use is not limited in size by this policy, in terms of lot area and building size. That notwithstanding, the proposed Zoning By-law Amendment will limit the amount of land on which the business can operate to a 2,078 square metre area, as shown on Figures 2 and 4 of this Planning Justification Report, in order to provide assurance to the neighbours that the operation will remain compatible over the long term. This area is considerably smaller than the 8,000 square metres that the Official Plan would allow to be rezoned under the more restrictive on-farm diversified use policies that are stipulated on Table 8. With regard to building size, an on-farm diversified use would be allowed within a building having a floor area up to 750 square metres, as explained in Table 8, whereas the building used in Mr. Martin's business comprises only 107 square metres. He also utilizes three shipping containers and three bins for storage purposes. The Official Plan also does not limit the floor area of the operation, and it does not appear necessary to include such a restriction in the proposed Zoning By-law Amendment.
- In terms of the new business being supported by existing local service levels, the only relevant issue in this instance is the road system. As noted above, the business averages four to five truck trips per week, with most of the trucks accessing the site from Provincial Highway 6 via Southgate Road 24. This stretch of the Township road is in good condition and should continue to be able to accommodate about one truck per day, on average. It is worth noting that the business has been operating and utilizing this road network for about ten years.
- With regard to noise, the actual mixing of the ingredients generates very little noise outside of the building. The mixer is located indoors and is operated by an electric motor, which is relatively quiet. One forklift is used in the day-to-day operations and utilizes a backing up alarm that emits a beeping noise. In the interest of being a good neighbour, Mr. Martin is willing to replace the current alarm with a quieter system that has been approved by the Ministry of Labour, if

recommended by Township Council. The existing business also utilizes a blower, which is attached to the tanker truck, when the ingredients are shipped to the site in a tank. The blower transfers the powder from the tanker truck to the storage bin, and in doing so, generates some noise. Mr. Martin advises that this happens about once per week, for about one hour, and occurs during normal business hours. Since the blowers operate on the south side of the building, the mineral mixing shop and the large shed to the north should assist in buffering the neighbours' homes to the north from the noise.

Based on the foregoing, the proposed use of the property is consistent with the Official Plan policies pertaining to agricultural-related uses.

Also, Schedule B of the Grey County Official Plan applies the 'Aggregate Resource Area' constraint to the entire Martin farm. (This mapping is not included in this Planning Justification Report.) The applicable policies are intended to generally prohibit development that might otherwise inhibit or impede the potential extraction of sand or gravel in the future. The Official Plan recognizes the importance of aggregate production, now and in the future, in Grey County. The policies, however, state this constraint mapping is not intended to prohibit any land use that is already permitted in the 'Agricultural' designation, such as agricultural-related uses. As such, the proposal conforms with the 'Aggregate Resource Area' policies of the Official Plan.

Furthermore, Appendix B of the Official Plan identifies a small area along the westerly limit of the property as 'Earth Science Area of Natural and Scientific Interest' and the forested lands at the south end as 'Significant Woodland'. (This mapping is not included in this Planning Justification Report.) The intent of the Official Plan is to prohibit development in these natural heritage feature areas or within 120 metres unless it can be demonstrated that no negative impact would occur. In this regard, the lands designated 'Earth Science Area of Natural and Scientific Interest' and 'Significant Woodland' are situated approximately 130 metres and 710 metres, respectively, from the closest point of the area to be rezoned, and therefore, there should be no negative impact on these natural heritage features.

Based on the above, the proposed Zoning By-law Amendment conforms to the Grey County Official Plan.

Township of Southgate Official Plan:

Schedule A of the Township's Official Plan designates the Martin property as 'Agricultural', as shown on Figure 6 of this Planning Justification Report.

The 'Agricultural' policies contained in Section 5.4 of the Township's Official Plan are identical to the County's Official Plan policies with regard to permitted uses. Table 1 of the Official Plan recognizes "*farm input supplier, e.g. seeds, feed, fertilized, etc.*" as an example of a permitted agricultural-related use, and the County and Township Planners have confirmed that Mr. Martin's operation is an agricultural-related use.

Section 5.4.1.2 *Development Policies* states the following:

- 3) *Agricultural-related uses are not limited in size by this Official Plan; however, the Township's Zoning By-law may contain provisions that restrict the amount of land dedicated to the agricultural-related use and the size of the building(s). Agricultural-related uses shall conform to the Ministry of the Environment, Conservation and Parks D-6 Guidelines.*

The proposed Zoning By-law Amendment volunteers a restriction on the amount of land to be rezoned for this agricultural-related use, despite the above-noted policy which does not require a limitation of this nature. The area to be rezoned comprises only 2,078 square metres of land and is identified in Figures 2 and 4 of this Planning Justification Report.

With regard to the Province's D-6 Guidelines, please consider the following:

- The nutrient mixing operation qualifies as a 'Class I Industrial Facility', given that the business is small scale, has a low probability of fugitive emissions, limits the hours of operation to daytime, and involves only about four or five truck trips per week;
- The D-6 Guidelines recognize lands within 70 metres of a 'Class I Industrial Facility' to be within an area of potential influence and recommends a minimum separation distance of 20 metres. There are no houses or other sensitive land uses within 70 metres of the site, other than the two dwellings located on the Martin farm. The closest neighbour's house is located approximately 187 metres to the north of the proposed area to be rezoned;
- Notwithstanding the proposal's compliance with the recommended setback of the D6 Guidelines, consideration should still be given to all aspects of the operation;
- With regard to noise, the actual mixing of the ingredients generates very little noise outside of the building, as explained earlier in this Report. The mixer is located indoors and is operated by an electric motor, which is relatively quiet. If the forklift's backing up alarm causes issues for anyone, Mr. Martin – in the

interest of being a good neighbour – is willing to replace the current alarm with a quieter system that has been approved by the Ministry of Labour. The blowers that are attached to the tanker trucks bringing the ingredients to the site can generate noise, as noted above. Mr. Martin advises that most of the ingredients are not shipped by a tanker truck, although this does occur about once per week, on average, and the blower runs for about one hour each time during daylight hours. Since the blowers operate on the south side of the building, the mineral mixing shop and the new, large shed to the north of the mixing shop should assist in buffering the neighbour's homes to the north from the noise; and,

- Mr. Martin and his family live on the subject property, and therefore it is in his own best interest to mitigate all potential noise issues to the greatest extent possible.

In a manner identical to the above-noted Grey Council Official Plan, the subject lands are recognized in Appendix B of the Southgate Official Plan as 'Aggregate Resource Area'. (This mapping is not provided in this Planning Justification Report.) The associated policies are intended to prohibit new land uses that would inhibit or impede the potential future extraction of aggregate from these lands. These policies, however, permit land uses that are currently permitted in the 'Agricultural' designation, including agricultural-related uses. The proposed rezoning therefore conforms to this policy.

Also, the 'Scientific Earth Area of Natural and Scientific Interest' and the 'Significant Woodland' apply to portions of the lands. (This mapping is not provided in this Planning Justification Report.) As explained earlier, the required setbacks from these natural heritage features are greatly exceeded, and therefore the proposal conforms to the Official Plan.

Of importance in the consideration of this application is the fact that the Township's Official Plan, which was prepared in 2022, directs the next Comprehensive Zoning By-law to allow for agricultural-related uses listed in Table 1 without requiring a landowner to go through the Zoning By-law Amendment process. That policy, contained in Section 5.4.1.2, states:

- 1) *The Township's Zoning By-law will generally permit, as-of-right, those agricultural uses and agricultural-related uses listed in Table 1 within the zone(s) that are applied to the countryside, except a marijuana/cannabis production facility.*

Unfortunately, the Township has not had an opportunity to prepare a new Comprehensive Zoning By-law, and therefore this policy from the new Official Plan has

not been implemented. As such, a Zoning By-law Amendment is still necessary in order for Mr. Martin's current operation to be legally recognized.

In view of the above, it is evident that the proposed Zoning By-law Amendment conforms to the Township's Official Plan.

Provincial Planning Statement:

The Provincial Planning Statement (PPS) generally permits agriculture, agricultural-related uses, and on-farm diversified uses in prime agricultural areas. Section 2.3.3.1 states:

Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on guidelines developed by the Province or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.

The proposed mineral mixing operation qualifies as an agricultural-related use, as explained in the PPS implementation document entitled Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas, which is discussed later in this Planning Justification Report. The proposed use will be compatible with and not hinder other nearby farming operations.

The PPS also protects areas of aggregate deposits and natural heritage features. The policies of the PPS pertaining to these matters have been implemented through the Official Plans for the County and Township, which have been addressed above.

Based on the above, the requested Zoning By-law Amendment is consistent with the PPS.

Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas:

The Guidelines on Permitted Uses in Ontario's Prime Agricultural Areas are intended to give direction to decision-makers when interpreting the PPS policies pertaining to prime agricultural areas. The subject lands are recognized as being situated within a prime agricultural area, as evidenced by the fact that the lands are designated 'Agricultural' on Schedule A of the Grey County Official Plan.

Section 2.2.2 of the Guidelines recognizes “*farm input supplier, e.g. seeds, feed, fertilized, etc.*” as an example of an agricultural-related use. The following apply:

2.2.1 PPS Criteria for Agriculture-Related Uses

All of the following criteria must be met to qualify as agriculture-related uses in prime agricultural areas.

- 1. Farm-related commercial and farm-related industrial use.*
- 2. Shall be compatible with, and shall not hinder, surrounding agricultural operations.*
- 3. Directly related to farm operations in the area.*
- 4. Supports agriculture.*
- 5. Provides direct products and/or services to farm operations as a primary activity*
- 6. Benefits from being in close proximity to farm operations.*

With regard to these policies, please consider the following:

- The proposed use, which produces a mineral food supplement for animal feed and then sold to farmers, is clearly a farm-related industrial use;
- This type of business is compatible with farming and will not hinder any nearby agricultural operation; and,
- The mixed product is shipped directly to farmers in the area and other customers in the region. The intended use clearly supports agriculture, provides a direct product to farm operations as a primary activity, and benefits from being in close proximity to farming operations.

Given the foregoing, the proposed Zoning By-law Amendment is in keeping with the Guidelines on Permitted Uses in Ontario’s Prime Agricultural Areas.

Summary / Conclusion / Recommendation:

Elvin Martin has been operating a home industry on his farm since 2016. The size of the building used for this business, however, exceeds the maximum floor area

requirement permitted under the “home industry” provisions of the Township’s Zoning By-law, albeit very slightly. Whereas the Zoning By-law limits the floor area of such a business to 100 square metres, the building within which Mr. Martin mixes minerals occupies 107 square metres. Mr. Martin was not aware of this non-conforming situation until recently.

The requested Zoning By-law Amendment will permit the existing business under the “agricultural-related uses” policies of the Grey County Official Plan and the Township of Southgate Official Plan.

This Planning Justification Report has demonstrated that the rezoning conforms to both Official Plans and is consistent with the Provincial Planning Statement. Therefore, favourable consideration can be given to the rezoning request.

As noted earlier in this Report, this Zoning By-law Amendment would not be required if the Comprehensive Zoning By-law had been updated to reflect the new Southgate Official Plan.

Following approval of the Zoning By-law Amendment, Mr. Martin will be required to enter into a Site Plan Agreement with the Township.

As explained earlier in this Report, Mr. Martin is willing to replace the forklift’s existing backing up beeping alarm with a quieter type of alarm, should the forklift’s noise be an issue.

Closing Comments:

I trust you will find this application package complete. Should you require any additional information, please contact the undersigned.


On a final note, please contact me to discuss a possible public meeting date before actually scheduling the meeting in order to ensure our availability.

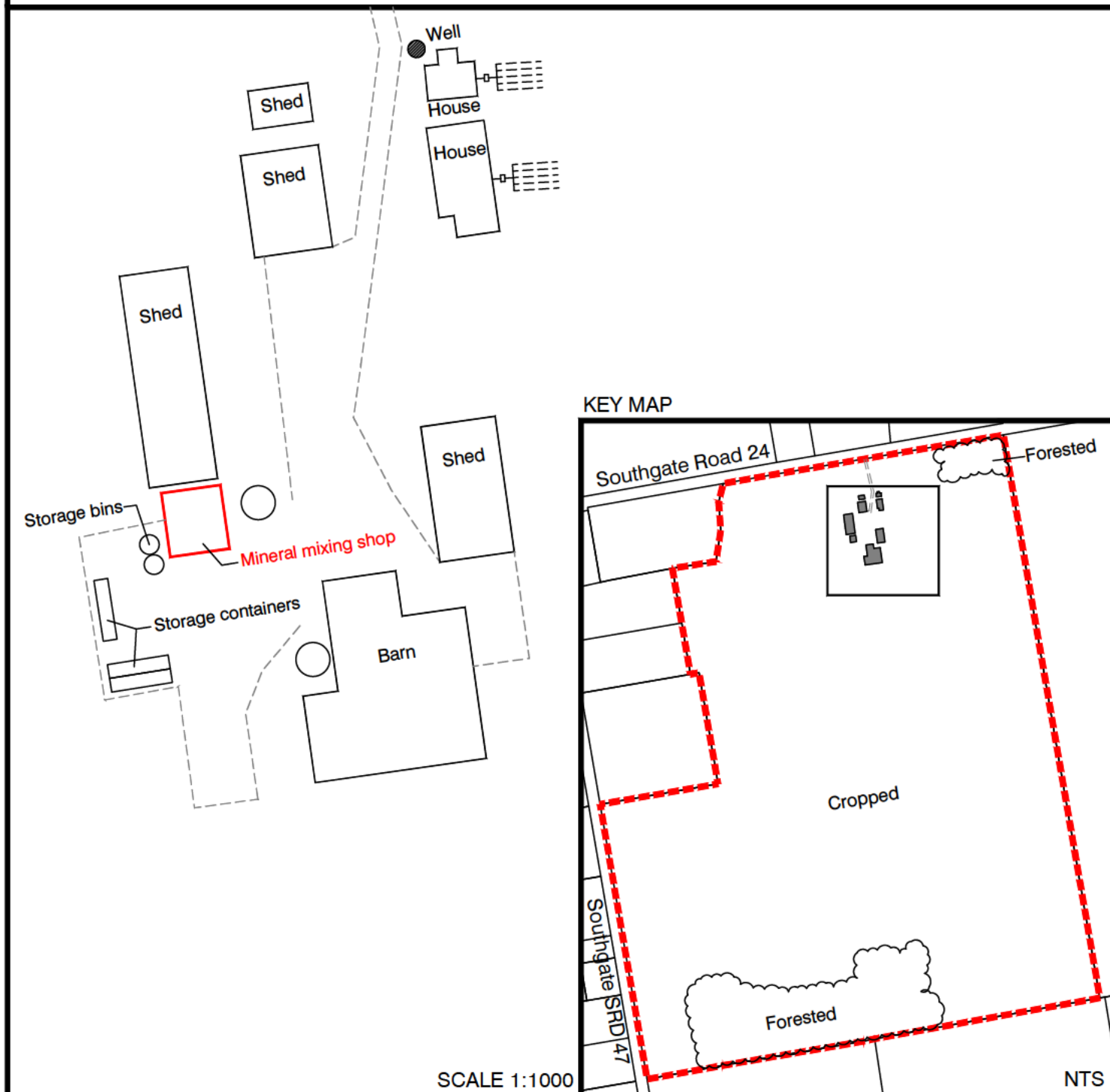
Sincerely,



Ron Davidson, BES, RPP, MCIP
c.c. Elvin Martin


Figure 1: Subject Lands

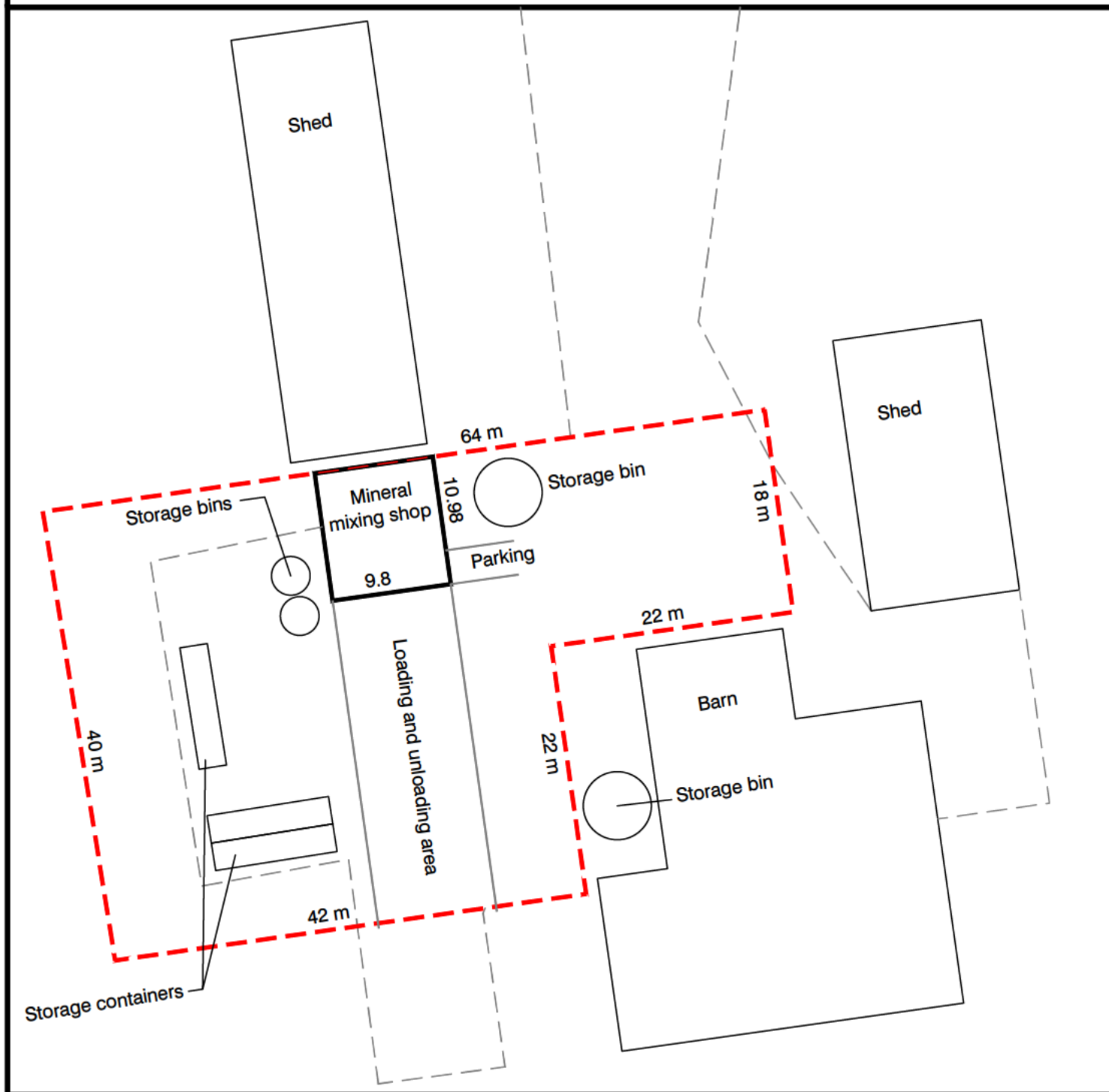
 Subject Property



243716 Southgate Road 24
Township of Southgate



Figure 2: Site Plan

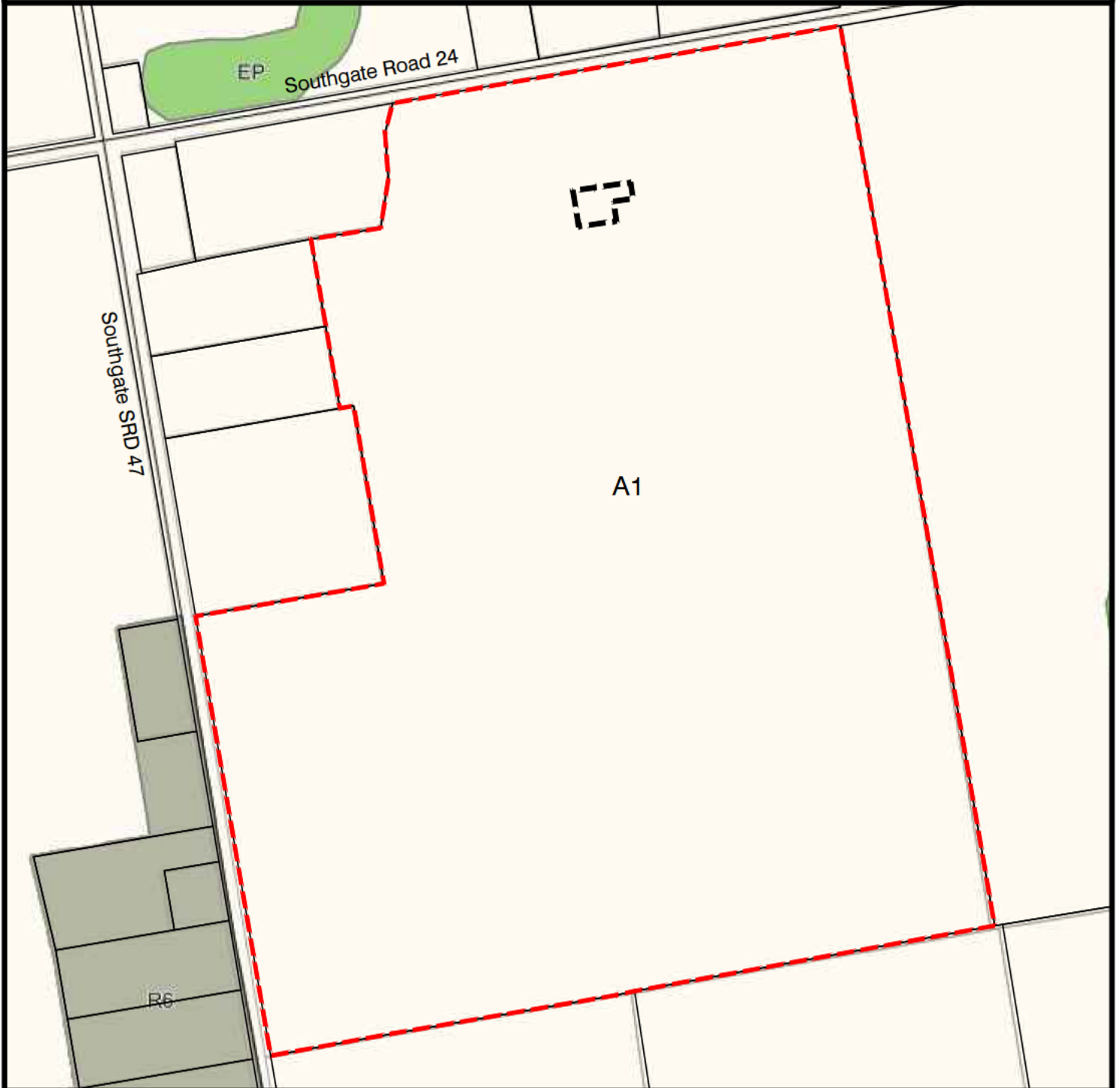
 Area Subject to Rezoning



243716 Southgate Road 24
Township of Southgate



Figure 3: Township of Southgate Zoning By-law Schedule A

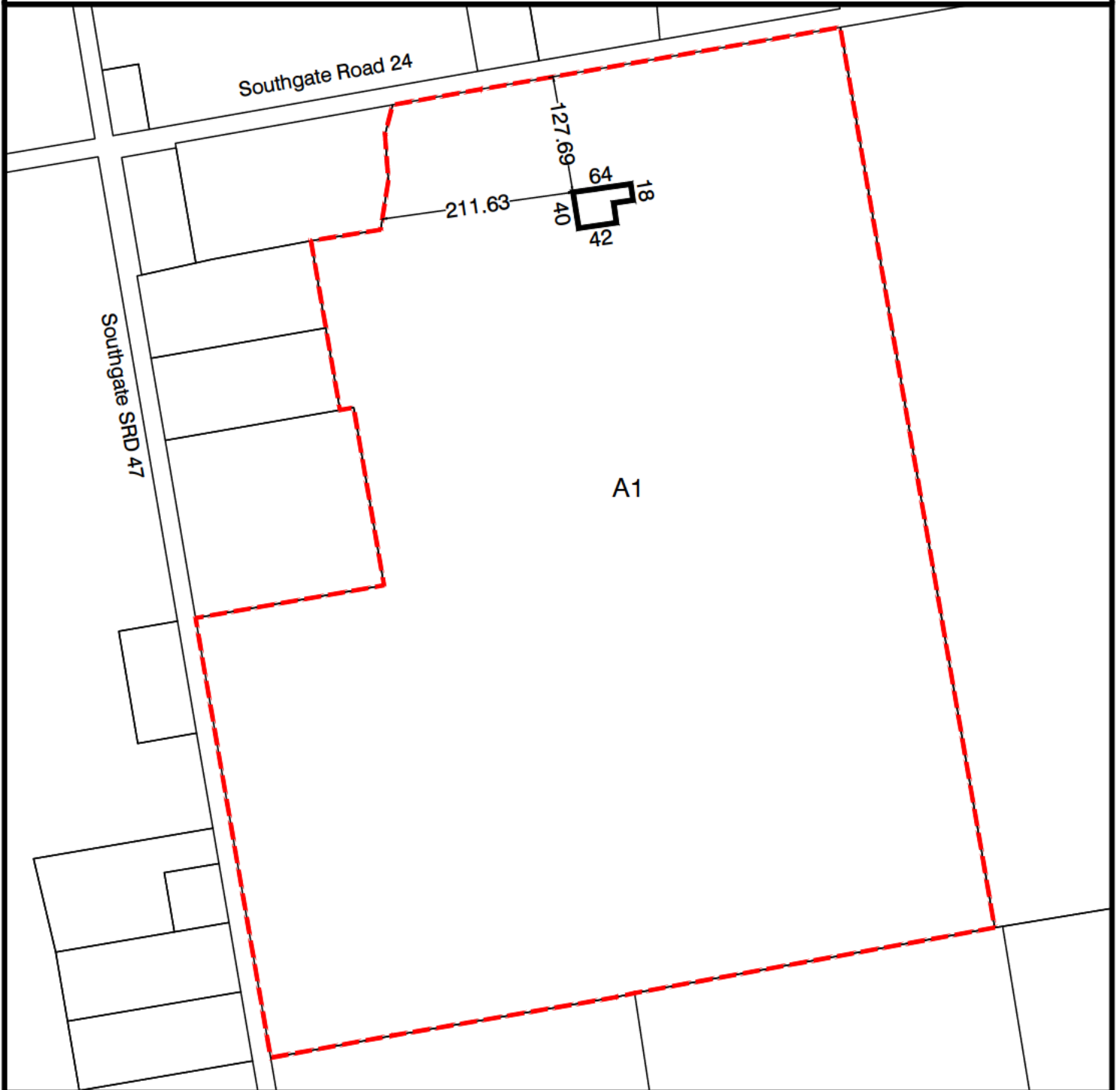
-  Subject Lands
-  Area to be Rezoned



243716 Southgate Road 24
Township of Southgate

Figure 4: Proposed Rezoning

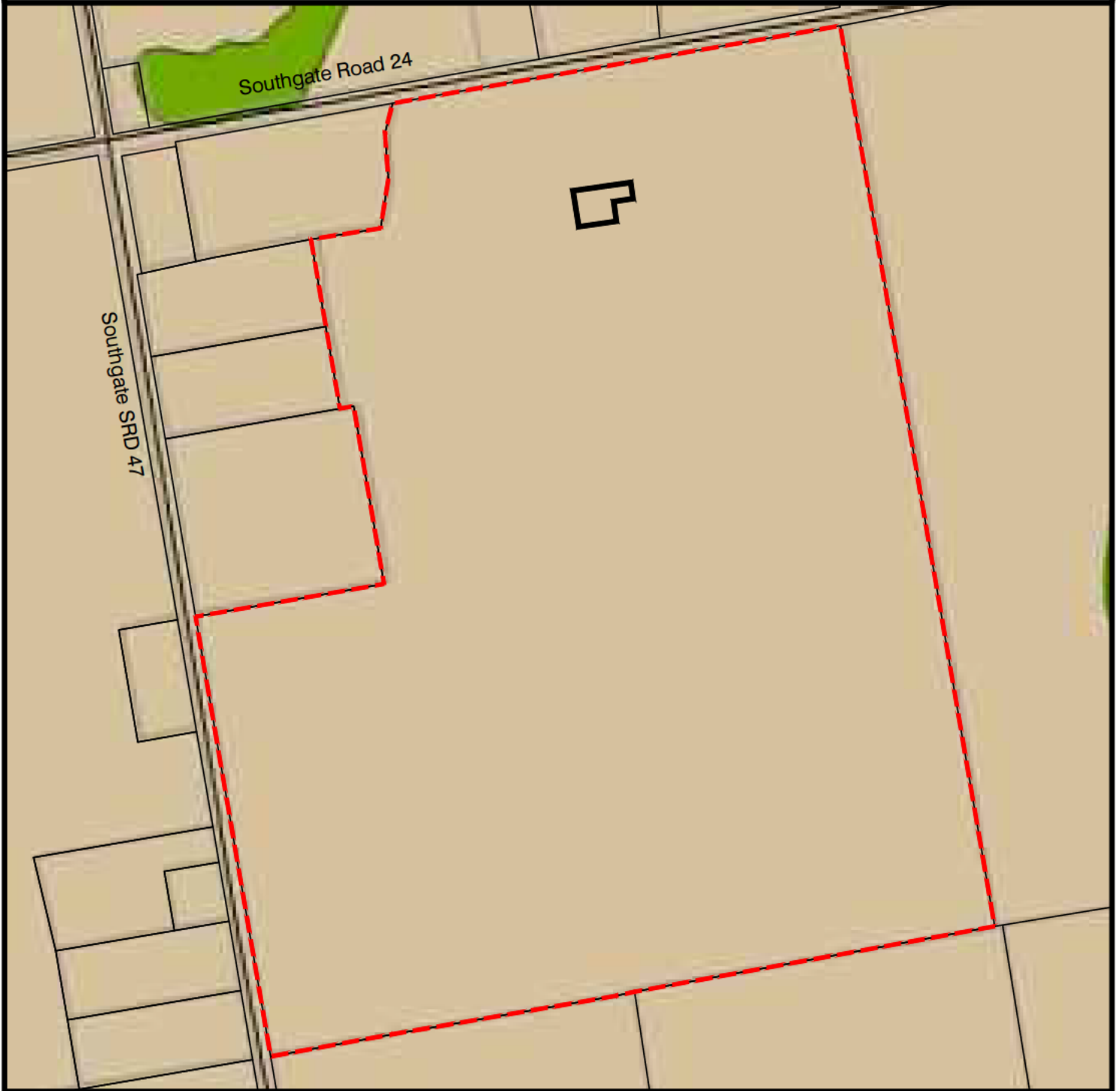
-  Subject Lands
-  Lands to be zoned A1-x



243716 Southgate Road 24
Township of Southgate





Figure 5: Grey County Official Plan Schedule A

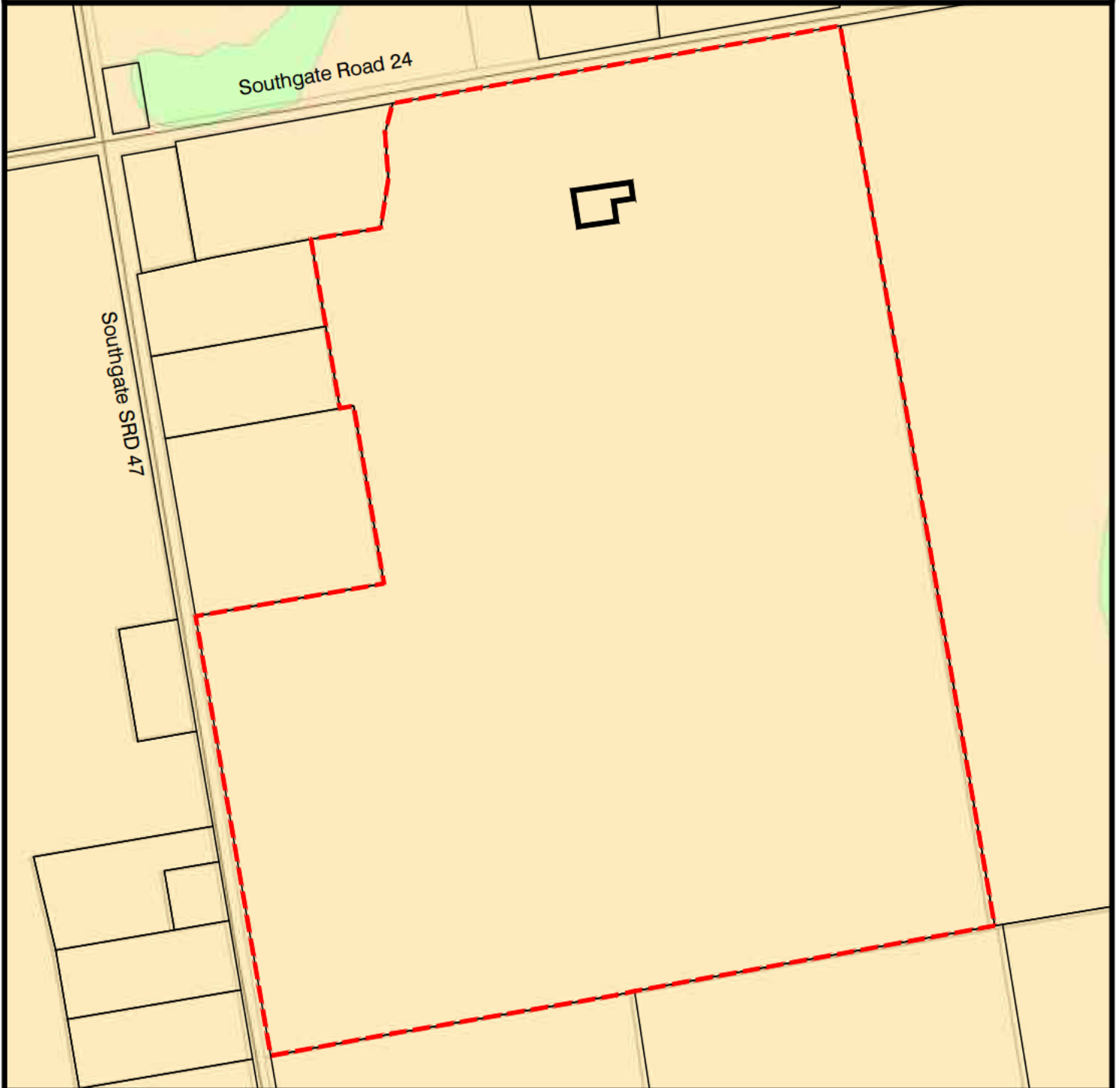
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|--|--|
|  Subject Lands |  Agricultural |
|  Area to be Rezoned |  Hazard Lands |



243716 Southgate Road 24
Township of Southgate

Figure 6: Township of Southgate Official Plan Schedule A

- | | |
|--|--|
|  Subject Lands |  Agricultural |
|  Area to be Rezoned |  Hazard |



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