

May 19, 2026

Shaneque Johnson
Township of Southgate
planning@southgate.ca

**RE: Minor Variance Application – A3-26 Martin
185526 GREY ROAD 9, Township of Southgate
Municipality
Roll: 420709000211500
Owner: Stephen & Veronica Martin
Agent: Dryden, Smith & Head Planning Consultants Ltd.**

Dear Shaneque Johnson

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

The Purpose of the minor variance is to reduce the Minimum Distance Separation II requirement to allow an existing livestock operation to expand with a new drive-in shed, chicken barn, dairy barn, and liquid manure pit south and east of the existing farmhouse and buildings on-site. The submitted MDS calculation proposes a setback from the Hopeville settlement boundary of 290 metres for new buildings (460 metres required) and 379 metres for liquid manure storage (500 metres required).

The Effect of the application is to permit the existing livestock operation to expand with a new drive-in shed, chicken barn, dairy barn and liquid manure storage. The Minimum Distance Setbacks from the east edge of the Hopeville Settlement Boundary would be reduced.

Documents submitted with the application and reviewed by staff:

- MDS calculations, prepared by Stephen Martin, dated November 6, 2025
- Site Plans, Application documents, Notice of Public meeting

Background

- County staff attended a pre-submission consultation meeting with the agent, planner and township staff on January 15, 2026.

The subject lands (+/- 40 ha) are identified as the following in the County Official Plan (OP):

- Schedule A: *Land Use Types* – Rural and Hazard Lands
- Appendix B: *Constraint Mapping* – Significant Woodlands and Stream
- Appendix D: *Functional Road Classification* – frontage on Grey Road 9

Comments

Schedule A of the County OP designates the subject lands as Rural. Section 5.2.2 (5) I) states:

Municipalities should not reduce MDS through a minor variance, zoning amendment, or official plan amendment, except where sufficient reasoning has been provided, and the intent of the MDS Guidelines has been maintained. MDS shall generally not be modified for the purposes of permitting new non-farm sized lot creation. In reviewing the rationale for a variance, there should be demonstration that the variance would:

- *not be able to be met through a modification to the development being proposed (e.g. set a building back further than proposed),*
 - *make an existing situation better to reduce the potential for conflict*
 - *impose undue hardship, such as major farm operation, inefficiencies, or servicing constraints, by not granting the variance, or*
 - *be small enough such that there is very limited potential for land use conflict*
1. Based on the submitted MDS II Report, staff understand that the proposed farm building setback is 290 m, whereas 460 m setback from the Settlement Area is required, representing a 37% reduction. The proposed manure storage setback is 379 m, whereas 500 m is required, representing a 24% reduction. Staff also note that the proposal appears to involve a substantial increase in nutrient units associated with the proposed construction.
 2. In addition to the above noted OP policy, the MDS Guideline document provides direction regarding the consideration of reduced MDS setbacks in certain circumstances, including where doing so may help address environmental or public health and safety considerations or avoid natural or human-made hazards. ([Section 8.2 Reducing MDS Setbacks](#))

While the County OP and the MDS Guidelines do not generally support or encourage reductions to MDS setbacks, there may be circumstances where some flexibility can be considered on a case-by-case basis. In general, staff recognize that the expansion of a livestock facility can be a normal part of an evolving farm operation.

At this time, it is not clear to staff how the proposal addresses the criteria in the policy noted above or demonstrates that the intent of the MDS Guidelines is maintained.

3. Further to this, staff note that during the pre-submission consultation meeting, additional justification was requested in support of the application. Given the extent of the requested variance to a settlement area and the potential for future residential development, some questions staff raised included: how will odor impacts be minimized? Is there another suitable alternative location considered? Is the proposed livestock facility similar to others on surrounding lands? Would permitting a larger manure storage reduce manure spreading events, especially during winter months, or improve nutrient management practices? Staff would expect for the file to include, at minimum, a planning justification brief/letter addressing Policy 5.2.2 (5) I) and the MDS Guidelines.

County Ecology staff have reviewed the proposal and provided the following comments:

4. As identified in Appendix B of the County Official Plan, the subject property contains or is adjacent to mapped Significant Woodlands, Other Identified Wetlands, and watercourse and drainage features. The property may also support or include potential habitat for Threatened or Endangered Species, Significant Wildlife Habitat, and Fish Habitat. In addition, the lands are located within a Significant Groundwater Recharge Area, as identified by the Ontario Source Protection Information Atlas. These designations are relevant to Section 8.11 of the County Official Plan, which addresses water quality and quantity protection.
5. County Ecology staff have reviewed the submitted application materials and note that the proposed expansion of the existing livestock operation, including additional barns and a liquid manure storage facility, is located within the existing farmyard and previously disturbed agricultural areas associated with the current operation. Based on the information provided, and provided that no development or site alteration is proposed within identified natural heritage features or any applicable vegetation protection zones/setbacks, the proposal is not anticipated to result in adverse impacts to natural heritage features or their ecological functions. Per 7.11.3 of the County Official Plan, County Ecology staff are satisfied that an Environmental Impact

Study (EIS) is not required. As such, the requirement for an Environmental Impact Study (EIS) can be waived.

If you have any questions or require further information, please contact County Ecology staff at ecology@grey.ca.

6. County Transportation Services staff have reviewed the proposal and no concerns.

Summary

The County and the MDS Guidelines do not generally support or encourage reduction to the MDS setbacks. Based on the submitted materials, the proposal involves significant reductions to MDS II setbacks (being the settlement area of Hopeville), and it is not clear how it meets the County Official Plan (specifically 5.2.2 (5) I)) or maintains the intent of the MDS Guidelines. Staff have requested further planning justification to explain why the variance is needed, whether alternatives were considered, and how potential impacts such as odour and future land use conflict will be addressed.

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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