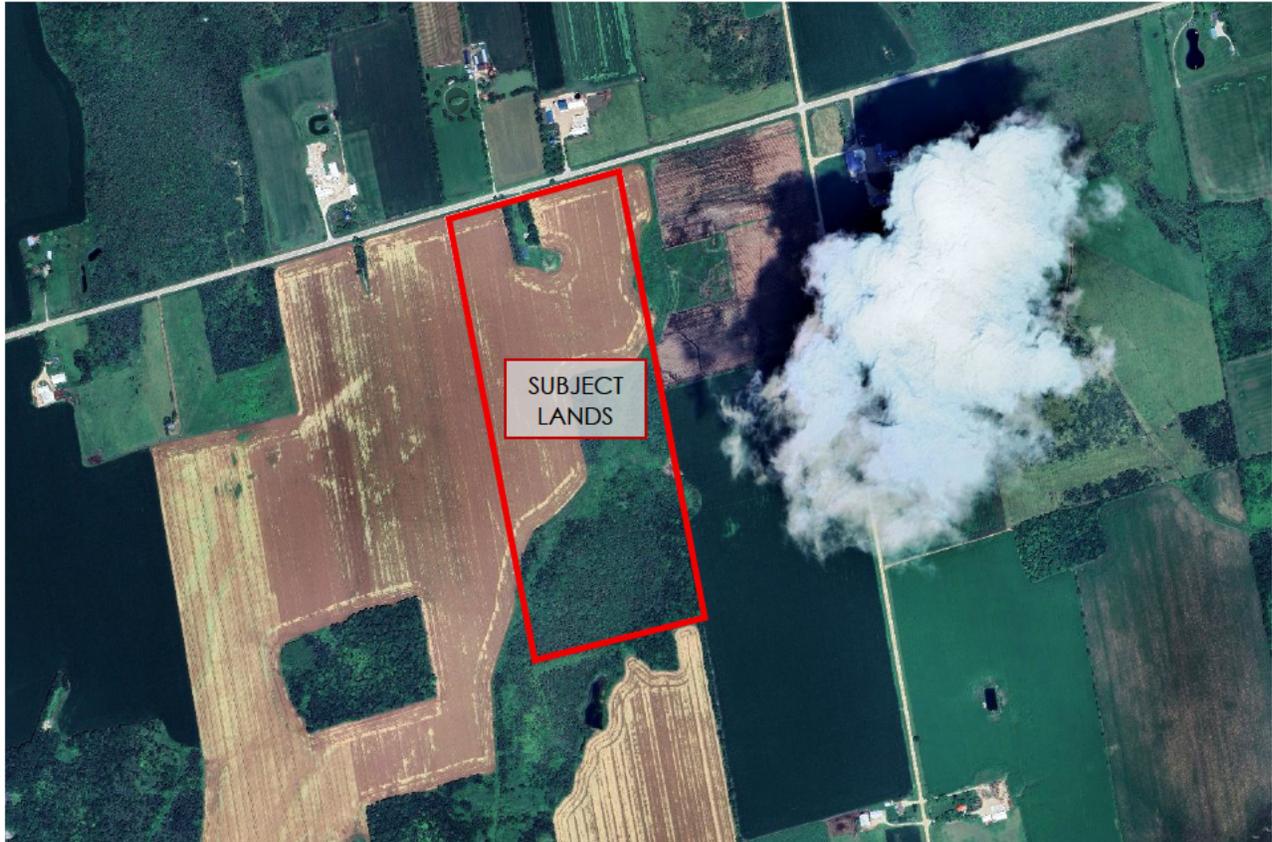


# PLANNING JUSTIFICATION REPORT

## APPLICATIONS FOR CONSENT TO SEVER & ZONING BY-LAW AMENDMENT

### SUBJECT LANDS:

186142 Grey Road 9, Township of Southgate, County of Grey



**JANUARY 2026**

#### **Subject lands:**

186142 GREY ROAD 9  
LOT 26, CONCESSION 12  
TOWNSHIP OF SOUTHGATE  
COUNTY OF GREY

#### **Prepared for:**

RHP Farms Ltd. & Cedar Acre Farms Ltd.  
File: 25018-3

#### **Prepared by:**



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Appendix B:	Completed Consent Application form
Appendix C:	Site Plan
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## 1.0 BACKGROUND AND CONTEXT

### 1.1 Purpose of Report

Cuesta Planning Consultants Inc. (CPC) has been retained by RHP Farms Ltd. & Cedar Acre Farms Ltd. to coordinate planning applications that would have the effect of creating a lot for a surplus farm dwelling. The subject lands legal description is: Con 12 Lot 26, Township of Southgate, in the County of Grey. The parcel presently contains an historic farm dwelling and an associated outbuilding but does not include the original barn which has been removed. Most of the land on the property is used for agriculture. The existing dwelling is surplus to the needs of the property owner. The retained agricultural parcel will continue to be farmed.

This report will examine the merits of the proposed use by evaluating the proposal against the following policies:

- ❖ The Provincial Planning Statement (PPS)
- ❖ The County of Grey Official Plan (Recolour Grey);
- ❖ The Township of Southgate Official Plan, October 27, 2022
- ❖ The Township of Southgate Zoning By-Law 19-2002.

This report and related materials are intended to satisfy the requirements of Sections 34 (10.1) & (10.2) & 53 (2) & (3) of the Planning Act, regarding the submission of a complete application.

### 1.2 Location and Description of Subject Lands *(Figure 1)*

The subject lands are approximately 8.7km south-west of the Dundalk settlement area, in the southern section of Grey County.

As noted previously, the subject lands are used for agricultural purposes and contain an historic farm residential dwelling and an outbuilding. This original township lot is approximately 40.96ha in area (101.21 ac). The farm cluster is centrally located in the northern part of the subject lands, and consists of the residential dwelling and a large, detached shed. All buildings are set back over 80m from Grey Road 9 and accessed by a single driveway.

The property contains several different soil types; Parkhill Loam is in the northeastern corner, Harrison Silt Loam in the northwestern corner and the remainder of the property consists of Listowel Silt Loam. Much of the northern half of the subject lands has an agricultural tile drainage system; Approximately 20ha of the 40.96ha of the subject property is systematically tilled. There is an existing constructed Municipal Drain, identified as Hanna Drainage Works (1968) also located on

the property. It is an open drainage system that bisects the southern portion of the property and continues north. The southern portion of the subject lands contains a low-lying woodland area regulated by Saugeen Valley Conservation Authority (SVCA).



Figure 1: Location Map

### 1.3 Site and Surrounding Land Use (Figure 2)

With respect to surrounding land uses, the subject lands are in an area of the Township dominated by agricultural use. There are large parcels used for agriculture, on all sides of the subject lands and in the surrounding area. There are a few on-farm diversified uses in the area but overall the predominate land use is agricultural. The uses on adjacent lands are summarized below:

- ❖ **North:** Agricultural land
- ❖ **South:** Agricultural land and woodlands
- ❖ **East:** Agricultural land
- ❖ **West:** Agricultural land

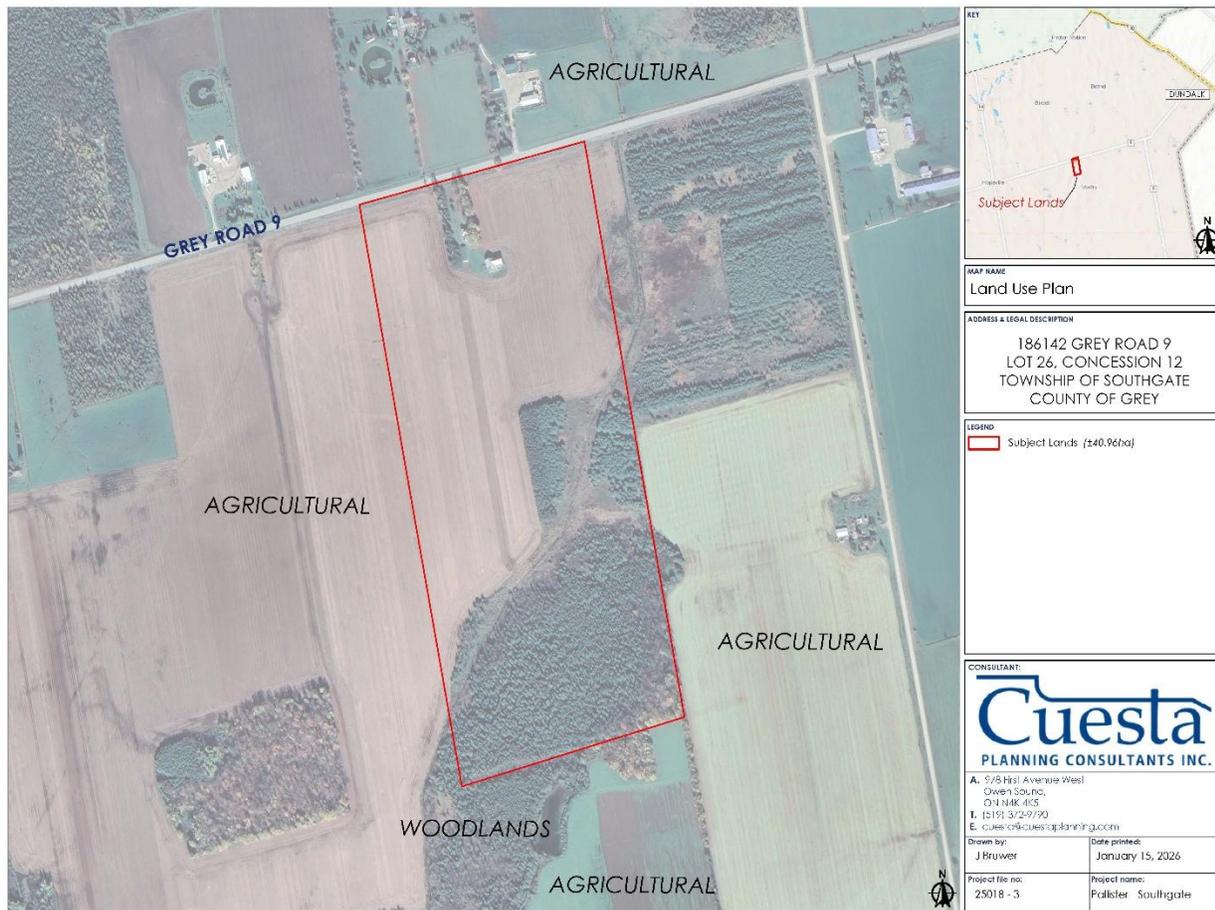


Figure 2: Surrounding Land Use

### 1.4 Background and Description of Proposal (Figure 3)

The proposal will involve the creation of a residential lot for a surplus farm residence. The retained lands, ±40ha (±98.84ac) in area, will continue to be used for farming purposes. The severed lands, approximately 0.94ha (2.32ac), will continue to be used for residential purposes, along with the associated accessory building. The farm dwelling is not required by the owner who resides elsewhere.

Surplus farm dwelling severances are permitted by Provincial, County and Municipal policy. Due to trends in the agricultural industry involving farmland consolidations, many historic family farmhouses are no longer required for farmer habitation. Surplus farm dwelling severances are intended to protect these dwellings from demolition and to maintain options for rural housing opportunities, as well as preserving agrarian land.

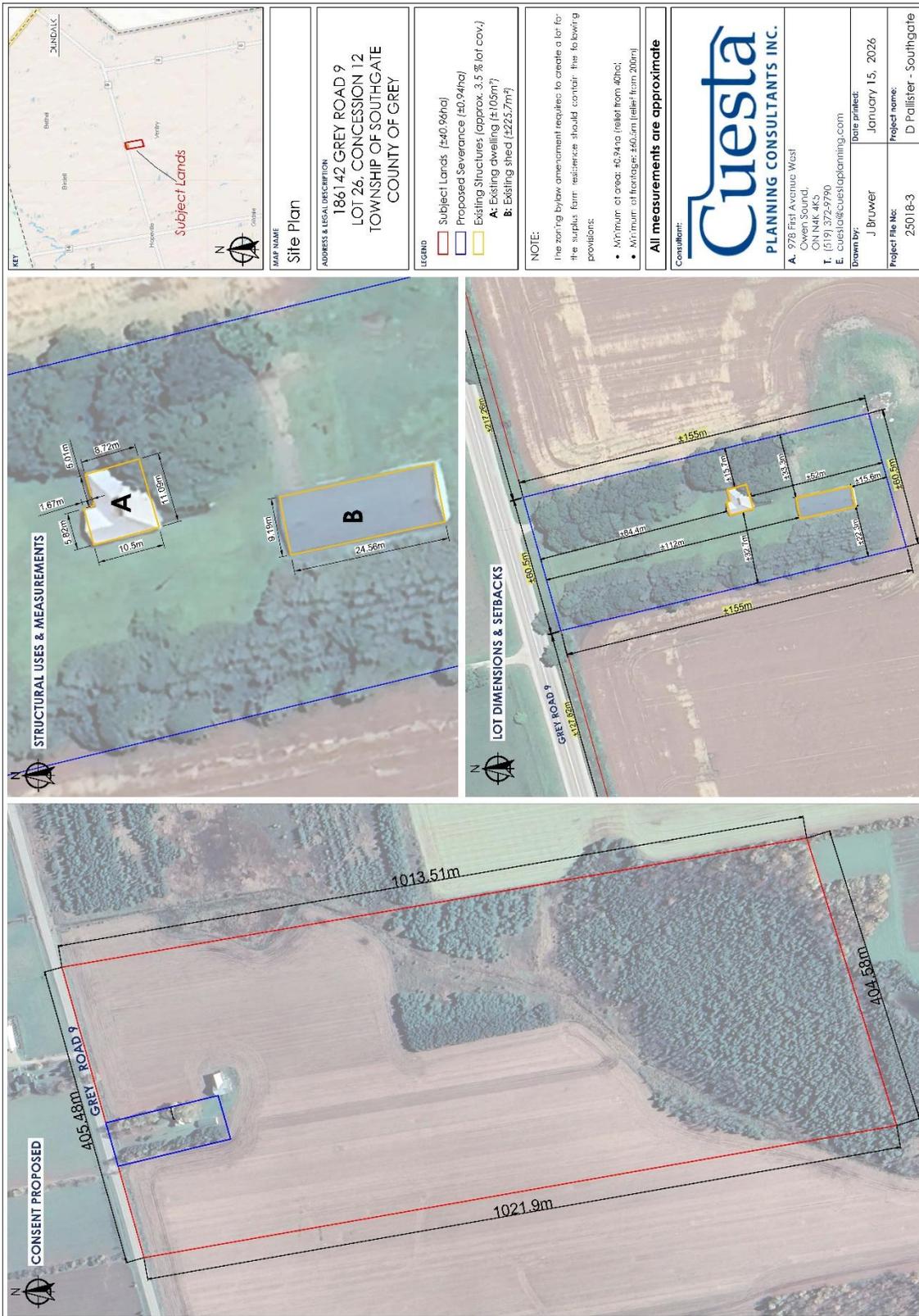


Figure 3: Site Plan (see Appendix C for full size plan)

## 1.5 Pre-Submission Consultation and Approvals Required

Cuesta Planning Consultants Inc. conducted pre-submission consultation with the Township of Southgate staff. It was determined that a consent and zoning by-law amendment application would be required to permit a small lot for the farmhouse and to prohibit residential uses on the retained parcel. No other specific areas of County or Municipal interest were identified.

This report, site plan and accompanying applications are intended to satisfy the municipal requirements for a "complete application". The following items have been included:

1. Planning Justification Report
2. Zoning By-law Amendment application form and accompanying sketches (*see Appendix A*).
3. Consent application form and accompanying sketches (*see Appendix B*).
4. Site plan (*see Appendix C*)
5. Payment of application fees (*provided upon submission*)

Based on the results of the consultation and a review of the applicable land use policy, the following approvals are required.

*Table 1: Approvals Required*

Application	Approval Authority
<p><b>1. Zoning By-law Amendment is required to:</b></p> <ul style="list-style-type: none"> <li>• Prohibit residential uses on the retained farm parcel.</li> <li>• To seek relief in relation to the minimum required agricultural lot area from 40ha to permit an approximately 0.94ha lot for the surplus dwelling.</li> <li>• To seek relief in relation to the minimum lot frontage requirements from 200m to approximately 60.5m for the surplus residential dwelling.</li> </ul>	Township of Southgate
<p><b>2. Consent to sever</b> is required to separate the existing residential dwelling and building cluster from the rest of the farm lot, in accordance with provisions provided in the amending bylaw.</p>	Township of Southgate

## 2.0 LAND USE POLICY CONSIDERATIONS

As stated under Section 3 of the Planning Act, all decisions by any authority that affects a land use planning matter, shall be consistent with the Provincial Planning Statement (PPS). In October,

2024, the Province of Ontario implemented an updated Provincial Policy Statement, which is now referred to the Provincial Planning Statement (PPS). Any decisions made, on or after this date, are to be consistent with the 2024 PPS.

The following analysis will evaluate the proposal against applicable PPS policy. In addition to the Provincial Planning Statement (PPS), the County of Grey Official Plan (Recolor Grey), the Township of Southgate Official Plan, and the Township of Southgate Zoning By-law 19-2002, provide land use policy applicable to the proposal.

## 2.1 Provincial Planning Statement, 2024

Any land use decision must be assessed against the applicable provisions of the PPS. Although the PPS is to be read in its entirety, the following Chapters are the most applicable to the consideration of the proposal.

Chapter 4 **“Wise Use and Management of Resources”**

Chapter 5 **“Protecting Public Health and Safety”**

*Table 2: Provincial Planning Statement Evaluation*

<b>4 Wise Use and Management of Resources</b>	
<b>4.1 Natural Heritage</b>	
<b>1. Natural features and areas shall be protected for the long term.</b>	
Policy Evaluation:	A portion of the central and southern part of the subject lands contains a natural heritage feature including significant woodlands and hazard lands associated with a drainage feature. This area is regulated by the Saugeen Valley Conservation Authority and will remain intact as part of the retained agricultural property and remain unaltered as part of this proposal.
<b>4.3 Agriculture</b>	
<b>1.Planning authorities are required to use an agricultural system approach, based on provincial guidance, to maintain and enhance a geographically continuous agricultural land base and support and foster the long-term economic prosperity and productive capacity of the agri-food network.</b>	
Policy Evaluation:	This application supports the continued agricultural use on the existing property.

**4.3.3. Lot Creation and Lot Adjustments**

**1. Lot creation in prime agricultural areas is discouraged and may only be permitted in accordance with provincial guidance for:**

- c) (in part) one new residential lot per farm consolidation for a residence surplus to an agricultural operation, provided that: 1. the new lot will be limited to a minimum size needed to accommodate the use and appropriate sewage and water services; and 2. the planning authority ensures that new dwellings and additional residential units are prohibited on any remnant parcel of farmland created by the severance.**

Policy Evaluation:

The proposed consent request related to a farm consolidation. The dwelling is surplus to the needs for a bona fide farmer which meets this policy.  
The proposed zoning for the severed surplus dwelling lot will prohibit new dwellings or any residential units on the property.

**5. Protecting Public Health and Safety**

**5.2 Natural Hazards**

**1. Planning authorities shall, in collaboration with conservation authorities where they exist, identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidelines**

Policy Evaluation:

There are Saugeen Valley Conservation Authority regulated areas located on the farm parcel and are associated with drainage and woodland features on the property. These features will remain intact on the retained parcel. See Figure 6 for the relevant figure in this regard.

**POLICY COMPLIANCE:**

- The proposal represents an efficient use of land. There are few options for retaining rural housing, one means is by way of surplus farm dwelling consents. The 0.94 hectare lot for the existing residence is consistent with section 4.3.3. The consent will allow the owner to sell the farmhouse to a third party buyer which will result in the long term preservation of this existing residence.
- The proposal does not change land use on either the surplus parcel or the retained agricultural parcel. Therefore no impacts are anticipated to natural features located on the property.
- The proposed severed lot is locally appropriate. An approximate 0.09 hectare lot is standard in size for a non-farm rural residential lot. It will contain the house, outbuilding and treelined driveway; but will not remove any arable land.
- No additional infrastructure will be required to serve the existing residential dwelling, which will continue to use the existing entrance. Access to the retained agricultural parcel will require a field entrance, which will follow County requirements and have no impact on County interests.

- Provincial policy does not require that Minimum Distance Separation Formulae be applied to this surplus farm dwelling severance.
- The residential dwelling will continue to be served by the existing private well and private septic system. The lot boundaries will be created to ensure that there will be no conflict with required distance from the septic system to the adjacent lot lines as prescribed under Part 7 of the Ontario Building Code.
- Surplus farm dwelling severance are specifically permitted by the PPS subject to several criteria. The severed lot has been designed to remove as little land from production as possible. The retained lands will be zoned to prohibit future residential development as required under the policy. The retained lands will continue to be farmed.

#### SUMMARY:

The analysis above demonstrates that the proposal complies with the applicable policies of the Provincial Planning Statement. Surplus Farm Dwelling Severances are explicitly permitted in agricultural areas, and to comply with the policy, the lot has been configured to remove as little land as possible while maintaining reasonable access and frontage to both the severed and retained lands. All services required for the existing uses will continue to be used, and no expansion of the existing municipal infrastructure is required with the minor exception of a new field entrance for the retained agricultural land.

## **2.2 County of Grey Official Plan (Recolour Grey) (Figures 4, 5 and 6)**

The subject lands are designated as Agricultural and Hazard Lands in the Grey County Official Plan (Recolour Grey). A surplus farm dwelling severance is one of the few types of consents permitted in the Agricultural areas.

There are some mapped features on the subject lands of County interest. A portion of the central and southern property is identified as Hazard Land in the County's Official Plan. This designation reflects the existing municipal drain and associated woodland features on site. This is regulated by the SVCA. The remaining portion of the property is designated Agriculture.

No aspect of this proposal will impact or alter the existing conditions on the subject lands, including the natural features retained as part of the agricultural parcel.

An evaluation of the applicable policies with regard to the proposal is included in the following table.

Table 3: County of Grey Official Plan Evaluation (Recolour Grey)

**5 CULTIVATE GREY****5.2 Agricultural Land Use Type****5.2.5 Agricultural Development Policies**

2) In the Agricultural land use type, newly created farm lots should generally be 40 hectares (100 acres) in size, in order to reduce the breakup of farmland. New lot creation shall be in accordance with section 5.2.3 of the Plan.

3) The minimum lot size within the Agricultural land use type for non-agricultural permitted uses is restricted to the minimum size required, with as little acreage as possible taken out of productive agricultural land.

**5.2.3 Consent Policies**

Lot creation in the Agricultural land use types is generally discouraged and may only be permitted for *agricultural uses, agricultural-related uses, surplus farmhouse severances, infrastructure* and conservation lots in accordance with section 5.2.3 of this Plan.

2) "The lot proposed for the surplus farmhouse (and accessory buildings if applicable) will be limited in area and shall only be of sufficient size to accommodate the surplus farmhouse to the farming operation, accessory buildings (including any unused livestock facility, if this does not make the lot excessively large), a well, and a sewage treatment and disposal system, while ensuring that as little land as possible is removed from the agricultural lands."

5.2.3(1)(b) New residential lots are not permitted in the Agricultural land use type. Where a house is deemed surplus to a farm operation as a result of farm consolidation, a lot may be severed provided that:

1) The owner of the lands to be severed is a 'bona fide farmer', or as a condition of the consent application the lands will be sold to a 'bona fide farmer'. For the purpose of this policy, the bona fide farmer must have a farm business registration number. A 'bona fide farmer' is defined to include a limited company, sole proprietorship, incorporated company, numbered company, partnership and other similar ownership forms.

2) The lot proposed for the surplus farmhouse (and accessory buildings if applicable) will be limited in area and shall only be of sufficient size to accommodate the surplus farmhouse to the farming operation, accessory buildings (where including accessory buildings does not make the lot excessively large), a well, and a sewage treatment and disposal system, while ensuring that as little land as possible is removed from the agricultural lands.

3) Unless added onto an abutting farm parcel that already contains a dwelling, the remnant farm parcel shall be rezoned to prohibit the future construction of a new residential dwelling of any type.

4) The severance of a surplus farmhouse shall comply with Provincial MDS Formulae. For the purposes of this section, only livestock facilities situated on the farm parcel from which the surplus farmhouse is being severed, shall be used in determining Provincial MDS Formulae compliance;

5) Given that no new house can be built as a result of the surplus farmhouse being severed from the land holding, the requirements for an environmental impact study, do not apply; however no new surplus

**farmhouse severances will be permitted in the Aggregate Resource Areas identified on Schedule B to this Plan; and,**

**6) The existing farmhouse is habitable at the time of application.**

**Lot creation in the Agricultural land use type is generally discouraged and may only be permitted for agricultural uses, agricultural-related uses, surplus farmhouse.**

## **Natural Grey**

### **7.2 Hazard Lands**

**Hazard Lands include floodplains, steep or erosion prone slopes, organic or unstable soils, poorly drained areas, and lands along the Georgian Bay shoreline. These lands can be impacted by flooding, erosion, and/or dynamic beach hazards or have poor drainage, or any other physical condition that is severe enough to pose a risk for the occupant, property damage, or social disruption if developed. While these lands are intended to be regulated so as to avoid natural hazards, they also contribute to the natural environment within the County**

## **MOVE GREY**

### **8.9.1 Services**

**Managing our sewage and human waste is important to our health and the health of our environment. The Provincial Policy Statement includes a number of policy considerations for servicing growth and development. This includes policies that support the use of municipal water and sewer systems and to identify situations when development can be considered using private wells and septic systems. The following are policies regarding servicing:**

**9) In any part of the County to be serviced by individual on-site private systems, new development by way of subdivision or condominium will be subject to a Servicing Options Study in accordance with the MECP's D-5-3 Guideline or any future updates to this Guideline. Local municipalities will need to be satisfied that any new development by way of consent can be adequately serviced by individual on-site private systems if that is the proposed form of servicing.**

**INDIVIDUAL ON-SITE SEWAGE SERVICES means individual, autonomous sewage disposal systems within the meaning of s.8.1.2, O.Reg. 350/06, under the Building Code Act, 2006 that are owned, operated, and managed by the owner of the property upon which the system is located.**

**INDIVIDUAL ON-SITE WATER SERVICES means individual, autonomous water supply systems that are owned, operated, and managed by the owner of the property upon which the system is located.**

### **POLICY COMPLIANCE:**

- *Surplus farm dwelling severances are recognized and permitted agricultural consents under Grey County policy.*
- *The retained farm parcel will be ±40ha in area, which is of sufficient size to be feasible for agriculture, and consistent with adjacent agricultural land uses. See Figure 4 for the corresponding OP Schedule 'A'.*

- *The severed non-farm parcel has been kept to as small a size as possible, while still providing a logical lot layout of sufficient size for servicing of the existing farmstead to continue (Figure 3).*
- *The hazard lands designation on the property reflects the wooded and municipal drain/water course areas in the central to southern portion of the retained agricultural parcel. No development or alteration is proposed to subject lands. The hazard land area will remain undisturbed through this proposal and will remain on the retained parcel.*
- *Safe access to the surplus parcel has already been established but there will be a need for one additional access location for the retained agricultural parcel, by means of a field entrance off the County right-of-way.*
- *The retained farm parcel will be rezoned to prohibit any residential uses.*
- *No change in the individual on-site private water and private sanitary septic services will occur because of this proposal. The proposed lot lines will ensure that the existing septic system will comply with the applicable minimum required distances under Part 7 of the Ontario Building Code.*

#### SUMMARY:

The analysis above demonstrates that the proposed surplus farm dwelling severance meets the intent of the applicable Grey County Official Plan policies. Lot lines have been designed to remove as little product agricultural land from production as possible, while providing for a logical lot fabric and shape. Lot lines have also been designed to comply with the minimum required setback for the existing residential dwelling septic system under Part 7 of the Ontario Building Code.

This proposal consists of a surplus farm dwelling severance with no additional development or intensification of use. Outside of those identified in the above sections, there are no additional policies needed to be assessed.

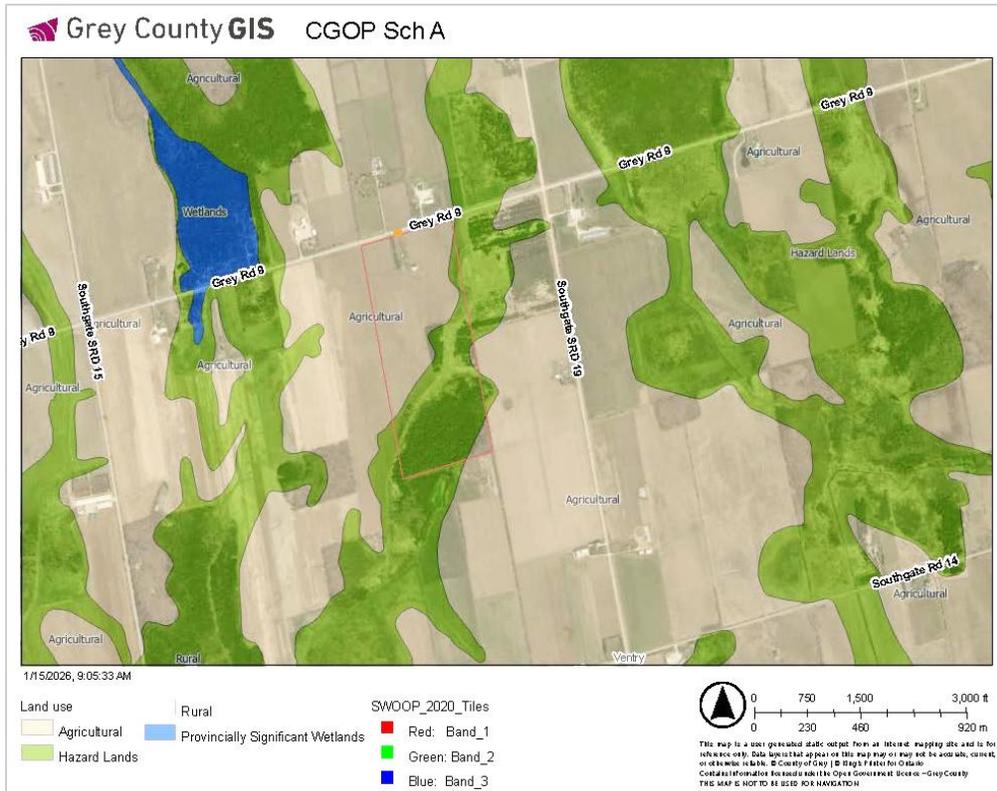


Figure 4: County of Grey Official Plan – Schedule ‘A’

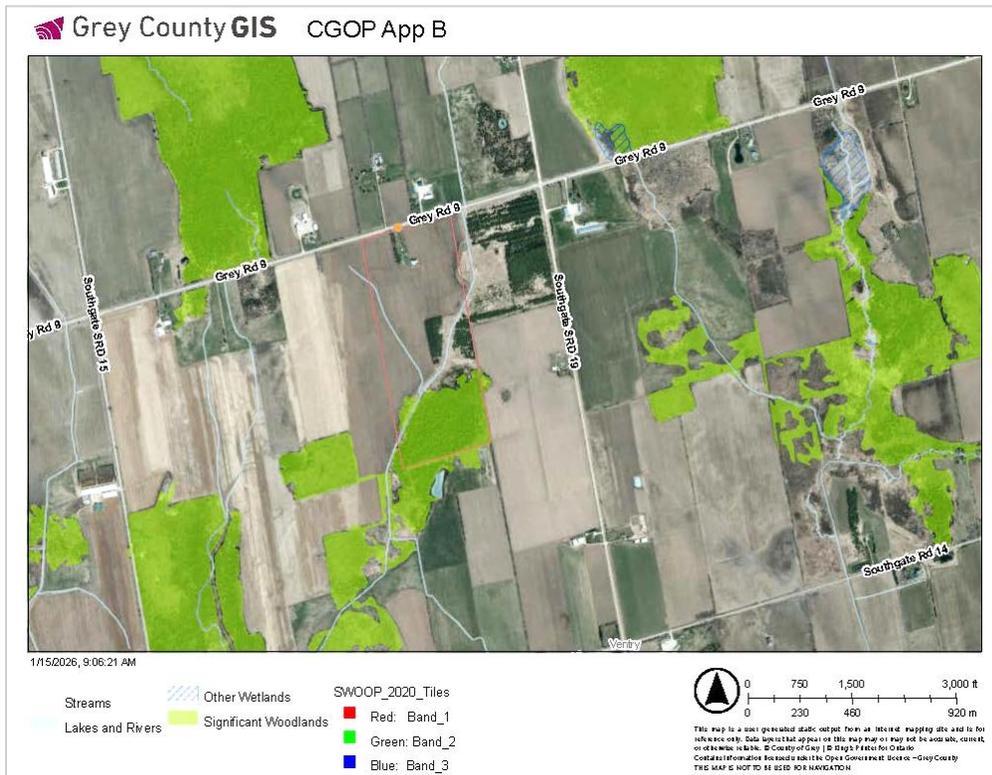


Figure 5: County of Grey Official Plan – Appendix ‘B’

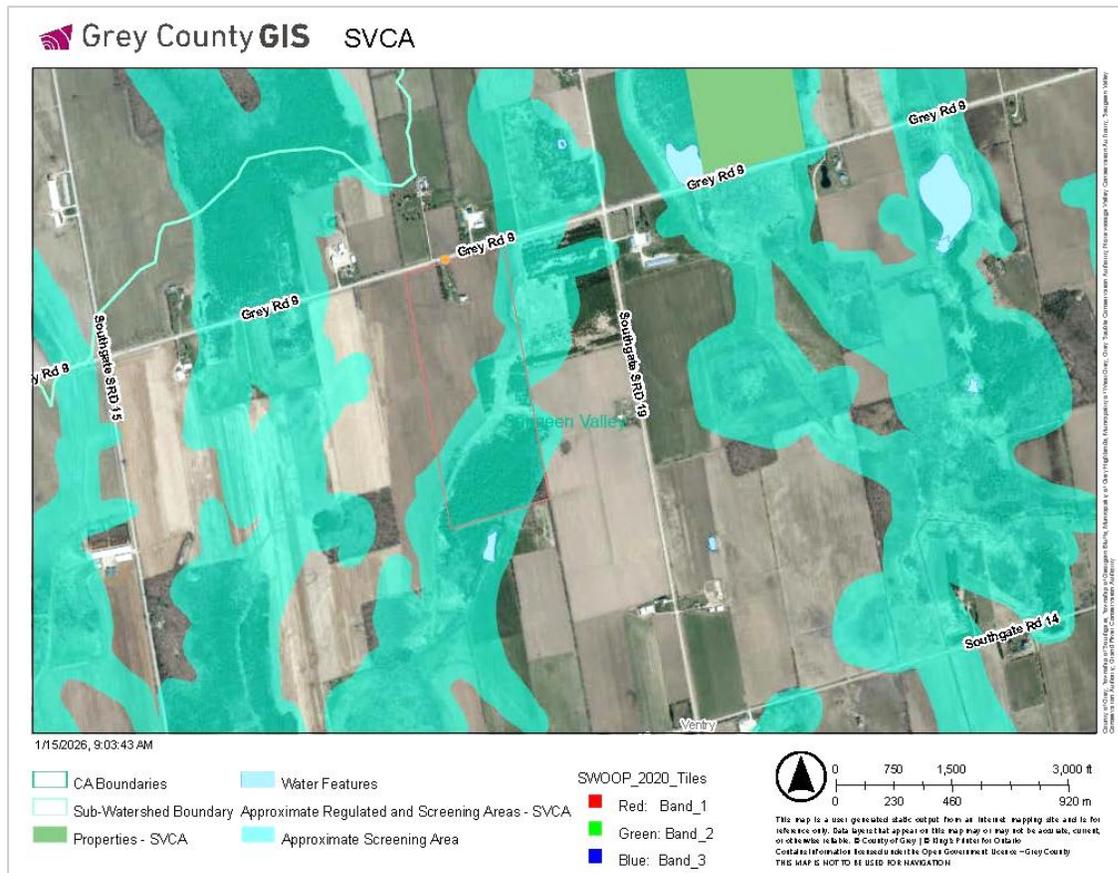


Figure 6: SVCA

## 2.3 The Township of Southgate Official Plan (TSOP)

The countryside policies of the TSOP are similar to those of the County Official Plan. In the Township Plan the subject lands has similar designations, these being Agricultural in the northern and western section and Hazard in the south-eastern area. The provisions for severing lots to include surplus farmhouses and outbuildings is found in Section 5.4.1.3 of the TSOP.

Table 4: Township of Southgate Official Plan Evaluation

<p><b>SECTION 5: LAND USE DESIGNATIONS</b></p> <p><b>5.4 THE COUNTRYSIDE</b></p> <p><b>5.4.1 Agricultural Designation</b></p> <p><b>5.4.1.3 Consent Policies</b></p> <p><b>3) New residential lots are not permitted in the Agricultural designation except however that consideration may be given to the creation of a small lot containing a residence that is deemed surplus to a farm operation as a result of farm consolidation, provided that:</b></p> <p><b>a) The owner of the lands to be severed is a bona fide farmer, or as a condition of the consent application the lands will be sold to a bona fide farmer. For the purposes of this policy, the bona fide farmer must have</b></p>
--

<b>a farm business registration number and may include a limited company, sole proprietorship, incorporated company, numbered company, partnership, and other similar ownership forms.</b>	
Policy Compliance:	Pallister Farm Livestock Ltd meets the definition of a Bonafide farmer.
<b>b) The lot proposed for the surplus farmhouse (and accessory buildings if applicable) will be limited in area and shall only be of sufficient size to accommodate the surplus farmhouse to the farming operation, accessory buildings (where including accessory buildings does not make the lot excessively large), a well, and a sewage treatment system, while ensuring that as little land as possible is removed from the agricultural lands.</b>	
Policy Compliance:	The proposed lot is ±0.94ha in area and will not remove any arable land from the retained farmland. This lot is of sufficient size to accommodate the residence, one outbuilding, and the well and septic services. The existing distance of the farmhouse from the County Road helps dictate the lot size.
<b>c) Unless added onto an abutting farm parcel that already contains a dwelling, the remnant farm parcel shall be rezoned to prohibit the future construction of a new residential dwelling of any type.</b>	
<b>d) The severance of a surplus farmhouse shall comply with the MDS formulae only in situations where the livestock facility and the surplus farmhouse are currently situated on the same property but would end up situated on separate properties as a result of the severance.</b>	
<b>e) Not withstanding 3.1.4.1 (3) and 5.4.1.2 (24) to the contrary, a surplus farmhouse severance may be permitted on lands shown as Aggregate Resource Area on Schedule B.</b>	
<b>f) The existing farmhouse is habitable at the time of application.</b>	
Policy Compliance:	With regard to subsection c) the retained lands will be zoned to prohibit future residential development, as the owner does not own abutting farmland.  Items d) & e) are not applicable to the subject application. With respect to subsection f), the farmhouse is presently occupied and can therefore be deemed habitable.

**SUMMARY:**

The TSOP permits lots for surplus farm residences, subject to the same provisions as the PPS and the County Official Plan, which have been reviewed in previous sections of this planning report. The drainage system and associated woodlands will not be affected by the proposal.

**2.4 The Township of Southgate Zoning By-law Number 19-2002 (Figure 7)**

The subject lands are primarily in the Agricultural Zone (A1) with an Environmental Protection (EP) zone in the central/southern portion of the proposed retained agricultural parcel that contains a municipal drain and contains land identified as Significant Woodlands.

The EP designation reflects these features, and this proposal will not negatively impact or alter any of these areas. The zoning by-law amendment will establish a lot area for the surplus farmhouse and, if required, recognize the size of the retained agricultural lot. The retained lands will be rezoned to prohibit residential uses.

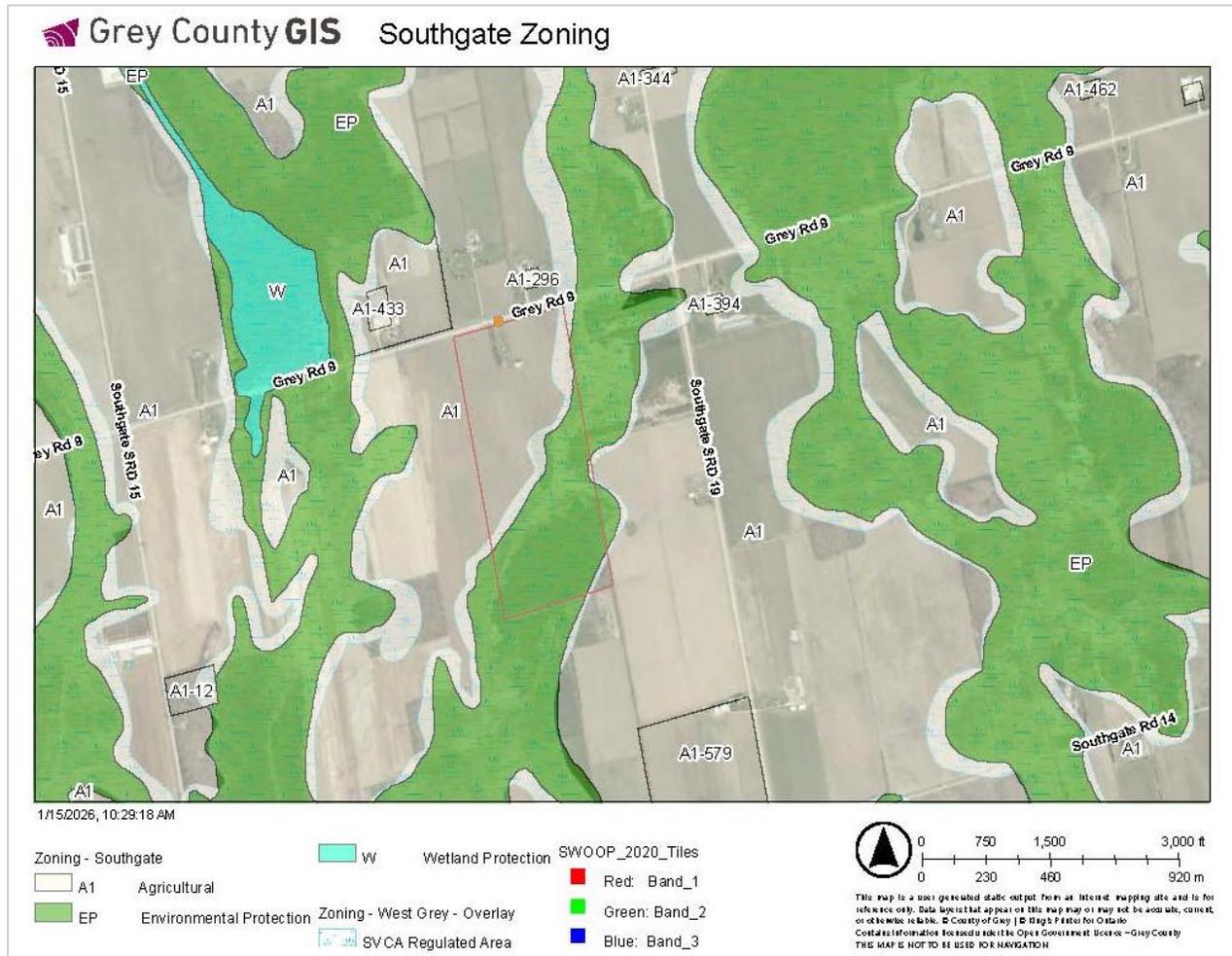


Figure 7: Township of Southgate Zoning (Excerpt)

The zoning bylaw amendment required to create a lot for the surplus farm residence should contain the following provisions for the surplus farm lot:

- Minimum lot area: ±0.94ha
- Minimum lot frontage: ±60.5m

All other provisions of the A1 zone apply.

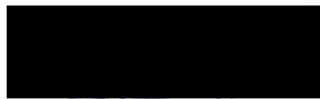
### 3.SUMMARY AND CONCLUSIONS

The proposed zoning by-law amendment and consent to sever applications will create a lot for a surplus farm dwelling. As a result of this proposal, the overall use of the subject lands will not change. There are no other natural resources or matters of provincial or local interest that would constrain this proposal.

In consideration of the foregoing analysis, the following is concluded:

1. The proposal is consistent with the Provincial Planning Statement, as surplus farm dwelling severances are permitted provided, they are limited in area to accommodate the farmstead and services and to minimize the loss of productive farmland. The PPS requires the local authority to prohibit residential uses on the retained farm parcel. As no new residential lot is created the provision in relation to cash-in-lieu of parkland should not apply.
2. The proposal meets the intent of the Grey County Official Plan and the Township of Southgate Official Plan, as surplus farm dwelling lot severances are a permitted type of limited development that will not change the use of the subject lands.
3. An amendment to the Township of Southgate Zoning By-law Number 19-2002 is required to rezone the retained farm lot to prohibit residential uses. A Consent is required to create a lot size and configuration for the surplus farm dwelling, in accordance with the zoning bylaw amendment.
4. The proposal reflects appropriate rural planning principles.

Respectfully submitted,



**Don Scott** (MCIP, RPP)

*Cuesta Planning Consultants Inc.*