



Planning and Development

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November 21, 2025

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

**RE: Southgate Official Plan Amendment 6-25 (OPA 11)
'Alternative Notice Options'
Township of Southgate**

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

The proposed Official Plan amendments would update the Township of Southgate Official Plan in order to provide policies related to the use of Alternative Measures for notification of various Planning Act applications, including a Community Improvement Plan. The amendment would apply to all lands within the Township of Southgate.

Documents submitted with the application and reviewed by staff:

- Staff Report PL2025-052 – Official Plan Amendment – Alternative Notice options dated June 18, 2025
- Draft By-Law for Official Plan Amendment #11 (dated October 2025)
- Notice of Public Meeting, no date

Comments

Overall, County staff are supportive of the Township's intent to continue to streamline planning processes and update local policies in keeping with changes to Provincial direction. That said, as most notification requirements are regulated under the Planning Act, we would encourage the Township to conduct their own internal due diligence prior to making any changes that would differ from prescribed regulations. Specific comments

and recommendations are noted in Table 1, below. That said, County staff are not able to provide legal advice on interpretation of the Act, so these comments are provided for general consideration by the Township.

Table 1

Proposed OPA By-Law	Comments
<p>“7.XX – Alternative Measures (1) It is desirable for the Township to ensure that Alternative Measures for obtaining public input on a variety of Planning Act related matters is established given the generally diminishing availability of print media, increasing availability of digital tools and disruptions and reductions in local mail delivery.</p> <p>Alternative Measures will apply to Township Official Plan (new or amendments thereto) (Part III), Community Improvement Plans (new or amendments thereto) (Part IV), Zoning By-laws (new or amendments thereto) (Part V), Minor Variances (Part V - Section 45) and Consents (Part VI – Section 53) made pursuant to the Planning Act.</p>	<p>As noted above, the Township may wish to conduct their own internal due diligence prior to implementing changes that depart from the regulations prescribed under the Planning Act. Further clarification is provided in comments below.</p>
<p>2) Alternative Measures do not apply to any application where the County of Grey is the Approval Authority.</p>	<p>Noted. No comments.</p>
<p>(3) a. Pursuant to Section 34 (14.4) and 53 (4.5) of the Planning Act – The Township does not find it desirable to utilize Alternative Measures for notice to prescribed Persons or Public Bodies at this time. The Township will continue to circulate applications via digital email.</p> <p>b. The Township may pursue the use of a digital workflow or approvals system (permit system) in the future. If this occurs, no amendment to this plan is required to pursue this option for circulation of Planning Act applications. It will be the responsibility of the Township</p>	<p>No comments.</p> <p>No comments.</p>

to ensure that all prescribed Persons and Public Bodies can be circulated applications via this software. The Township will also ensure that email, as an alternative, remains available.	
(4) Pursuant to the applicable sections of the Planning Act, all information for any application will be available for inspection by the public during regular business hours at the Township Administration Office.	No comments.
<p>(5) a. Council may eliminate notice to the public and a public meeting for a minor Official Plan, Zoning By-law Amendment or Community Improvement Plan Amendment that:</p> <ul style="list-style-type: none"> i. Changes the numbers of sections or the order of sections in the Plan or By-law but does not add or delete sections. ii. Consolidates previously approved Official Plan, Zoning By-law or Community Improvement Plan Amendments in a new document without altering the approved policies, provisions or maps. iii. Corrects grammatical or typographical errors in the Plan or By-law that do not affect the intent of the policies, provisions or maps. iv. Rewords policies or provisions or re-illustrates mapping to clarify the intent and purpose of the Plan or By-law, without affecting the intent or purpose of the policies, provisions or maps. <p>(5) b. Where changes are made pursuant to 7.XX (5) (a.), a record of those changes will be maintained in the Official Plan, Zoning Bylaw and the Community Improvement Plan.</p>	<p>On this item, County staff would inquire if it is the Township's intent to continue to 1) circulate minor amendments to required agencies listed in the Act; and 2) to prepare a staff report for review and decision by Township Council, etc.</p> <p>It is noted that Grey County is the approval authority for amendments to the Southgate Official Plan, and the County should be notified, at minimum, of any changes to the Township of Southgate OP in this regard.</p>
<p>(6) a. Notice for all Planning Act applications will be given as follows:</p> <ul style="list-style-type: none"> i. by means of a notice sign on the lands subject to an application, an advertisement in the applicable 	<p>County staff would inquire if sub-section (i) may be reworded to additionally acknowledge that Notice for all Planning Act applications shall include individual notice to all property owners within the radius prescribed under the Planning Act; <i>notwithstanding</i>, where individual notice</p>

<p>newspaper(s) and posting on the Township website.</p> <p>ii. Notwithstanding Section 7.XX (6) (a) (i.), if the application or amendment affects a significant area of land, or affects lands in the entire Township, notice will be given in a digital and/or print newspaper(s) and the Township website, to the satisfaction of the Township Clerk.</p> <p>iii. If individual notice is provided to the owners of land in addition to the requirements of subsection (i.) above, pursuant to Ontario Regulation 200/96, Section 3 (6), individual notice for a Minor Variance will be provided to owners within 30 metres provided the Zoning By-law restricts the use of land to Single Detached, Semi-detached or duplex housing and is serviced by municipal water and sewer services.</p> <p>iv. If an open house is required by the Planning Act, notice will be given by advertisement in a digital and/or print newspaper(s) and the Township website, to the satisfaction of the Township Clerk.</p>	<p>is not possible (due to postal strike, etc.), the Township shall provide notice by way of the alternate measures listed within the amendment.</p> <p>For smaller mailouts, other municipalities have considered opportunities to utilize courier services; and/or to hand-deliver notices during postal strike scenarios. County staff realize that both methods may be cost- and time-intensive; particularly for larger mailouts.</p> <p>County staff are concerned that it may be difficult to provide timely notice to residents should individual (mailed) notice no longer be used within the Township. For example, not all members of the community may be readily able to access the Township's website, or other electronic sources. Staff acknowledge that participation in local decision making is an important democratic process and, while time-consuming, has the potential to inform better planning decisions and increase public trust and transparency.</p>
<p>6. b. The Township may also employ any other means to obtain public views on planning applications or issues, which may include but are not limited to:</p> <p>i. Use of public opinion software (such as "speak up").</p> <p>ii. Survey websites (such as Survey Monkey).</p> <p>iii. Public meetings/open houses.</p> <p>iv. Any public polling website.</p> <p>v. Township social media sites.</p> <p>vi. A central notice posting at a publicly accessible location designated by the Township</p>	<p>Staff generally have no concerns and support a variety of public engagement tools that go above and beyond the regulations outlined in the Planning Act in order to solicit public opinion on matters that impact land use planning. For further clarity, the Township may wish to specify what types of applications may trigger the need for additional levels of engagement (ex: for redevelopment of municipal or publicly owned lands; 5 and 10-year official plan updates; settlement area boundary expansions, etc.)</p>
<p>(6) c. Where the Township is seeking public feedback for planning applications or issues, the Township will ensure that</p>	<p>No concerns.</p>

the ability to submit hard copy feedback (letters, written opinions) is accommodated.	
(6) d. Where an On-farm Diversified Use (OFDU) is approved through as-of-right rules in the Township Zoning By-law, the applicant shall erect a notice sign outlining the specifics of development, when construction will commence and the applicant's contact information (mail, email and phone number). This sign must be erected prior to commencement of construction and must also include a copy of the approved Building Permit, issued by the Building Department of the Township.	County staff would kindly inquire about the rationale of this additional signage requirement for a use that may be permitted as-of-right under the zoning by-law amendment.
(7) For any amendments to the Community Improvement Plan, the Township will provide a minimum of seven (7) days notice via the Township website, rather than a public meeting. The notice will include any applicable appeal rights, pursuant to the Planning Act.	Section 17 (15) of the Planning Act outlines the consultation and public meeting process for approving CIP's. Generally, an open house and a public meeting are required for the approval of a new CIP. Section 19.3 of the Planning Act does permit a municipality to outline alternative procedures within their OP for informing and obtaining the views of the public in respect of any amendments to a CIP. The Township may wish to consider adding additional verbiage to the proposed sub-section (7) to consider when notice will be provided on the website; as opposed to the hosting of a public meeting (ie: for major changes a meeting may be considered; whereas for minor/clerical changes, a meeting may not be required).
(8) Notwithstanding Section 7.XX (6) above, a public meeting is not required for a Zoning amendment that is or will be required as a condition of a provisional consent for lot creation for a residence surplus to a farming operation under Section 5.4.1.3 of this Plan provided that the information required under Section 34(14.5) of the Planning Act is provided in the notice of the proposed consent application.	County staff acknowledge that Sections 34(14.3) and (14.6) of the Planning Act outline the option to establish "alternative measures" for informing and obtaining the views of the public in respect of a proposed zoning by-law, provided such measures are set out in an official plan. County staff would suggest that eliminating the need for a public meeting for a zoning by-law amendment established as a condition of consent for a surplus farmhouse severance

	application would certainly have merit from a general efficiency perspective, and would encourage the Township to undertake their own due diligence regarding this interpretation of the Act.
(9) Where the Township Clerk determines that there has been a loss in coverage of newspaper(s) for the Township, notice provided in Section 7.XX (6) (a) (i.) can cease using any newspaper advertisement without an amendment to this section of the Township Official Plan	No concerns.
(10) As part of any notice for applications under Section 7.XX (6), Township staff will determine a deadline for submission of any comments on any application, if necessary	No concerns, provided that any deadline for comment submission occurs after a public meeting.

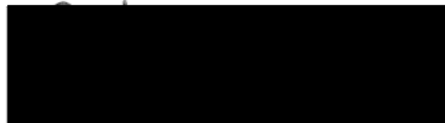
Summary

In summary, the County values the work that the Township continues to undertake towards more efficient planning outcomes. The above comments should be viewed as items for consideration at this stage, but we would encourage the Township to undertake further due diligence as it relates to interpreting the Planning Act and/or departing from any prescribed regulations of the Act.

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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www.grey.ca