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October 7, 2024

Dafne Gokcen
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**RE: Pre-Consultation Meeting - Briarwood
CON 2 SWTSR PT LOT 235 RP;16R6964 PART 3; Township of Southgate
Roll: 420709000505800
Owner: Briarwood (Dundalk) Ltd.**

Dear Dafne Gokcen,

This correspondence is in response to our meeting on August 27, 2024. Thanks to you and your team for taking the time to meet with County and Township staff to outline the proposed development on the above-noted lands. We offer the following comments as a written record of our discussions.

Proposal Summary

To construct a 4-building apartment complex with a total of 376 units and 406 parking spaces (280 underground, 126 at grade). One building is proposed to have rental apartments (94 units), while the other three buildings will have condominium style ownership.

The subject lands are presently vacant. Surrounding land uses include the municipal wastewater treatment plant to the south-east, residential and institutional (school) uses to the north and north-west, and wooded areas to the north-east. The County's Rail Trail bisects the property. There is a waste transfer site (and historic landfill) located approximately 300 meters to the west.

Required Planning Applications

- Official Plan Amendment application (Township of Southgate)
- Zoning By-law Amendment application (Township of Southgate)
- Condominium Application (County of Grey)
- Site Plan Control Application (Township of Southgate)

Copies of the County's application forms, as well as technical guidelines and fees, can be found on the County's [website](#). The Township's application form can be found on the Township's [website](#). Application fees for the condominium application should be made by cheque to the County of Grey, and all other application fees should be paid by cheque to the Township of Southgate. Please reach out to Township staff to coordinate the timeline and payment for both the Official Plan and Zoning By-law Amendment applications.

Supporting Documents, Technical Studies and Reports

- Draft Plan of Condominium
- Detailed Site Plan
- Survey
- Planning Justification Report
- Stormwater Management Report and Plan
- Functional Servicing Report
- Hydrogeological Report
- Phase 1 & 2 (minimum) Archaeological Study
- Geotechnical Study
- Traffic Impact Study
- Environmental Impact Study
- D-4 Study to address any impacts of the nearby historic landfill and waste transfer station
- D-6 Study to address any impacts of the nearby industrial lands
- D-2 Study to address abutting wastewater treatment facility
- Floodplain Analysis, if required
- Comments from the Local Risk Management Official regarding Wellhead Protection Areas
- Comment Response Matrix, addressing the comments below and any agency comments (such as from the Grand River Conservation Authority)
- Information as required in Ontario Regulation 544/06

Please send any Terms of Reference for the above studies to County and Municipal staff prior to commencement.

Preliminary comments from the Grand River Conservation Authority (GRCA) should be obtained and may assist in determining the delineation of any hazard features on the subject lands. If changes to the Hazard Lands mapping are required, County staff would defer to GRCA for detailed review and comments in this respect. Please note, if an update to the County's Hazard mapping is required for general mapping accuracy purposes, this would not generally trigger a County Official Plan Amendment.

Staff would note that the property is situated within the traditional territory of the Six Nations of the Grand River and the Historic Métis community. Prior to moving forward with the above studies, staff would recommend consultation with local First Nations and Métis communities. It may be helpful for Indigenous partners to provide further insight into Terms of Reference for any of the above studies, to request additional studies and/or provide general planning comments at an early stage.

The subject lands are identified as the following:

County of Grey 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

Southgate Official Plan:

- Schedule A – Future Development and Environmental Protection
- Schedule C - Other Wetlands and various water courses
- Schedule E - within Wellhead Protection Areas B, C, & D
- Schedule F – Frontage on a Potential Planned County Collector Road (Ida Street)

Southgate Zoning By-law 19-2002:

- Restricted Agricultural (A2) and Environmental Protection (EP)

PPS 2020 and PPS 2024

1. The proposed site is located within 200 metres to the northwest and directly adjacent to the west of major industrial areas, including the Township's industrial Eco Park lands. Please clarify how the proposed design will comply with Sections 1.2.6 and 1.3 of the 2020 PPS and Sections 2.8 and 3.5 of the 2024 PPS to mitigate the impacts of the continued use and future expansion of these industrial lands and their associative sensitive uses. Appropriate studies to demonstrate will be required. Proximity to sensitive uses such as an historic landfill site, municipal wastewater treatment facility, and industrial land use sites require studies including a D-4, D-2, and D-6 to determine the effects of land use suitability.

County of Grey Official Plan

Schedule A of the County OP designates the subject lands as Primary Settlement Area, which are intended for a full range of residential, commercial, industrial, recreational, and institutional land uses. These areas are suitable for high intensification targets, public transit services, and have full municipal services. The development of high-

quality urban form and open public spaces within these areas is also encouraged through site design, and urban design standards to create attractive and vibrant places that support walking and cycling for everyday activities and are transit supportive. New residential developments will be promoted at densities which efficiently use available servicing (subject to Section 8.9) and are appropriate to site conditions and existing patterns of development.

2. The proposed development represents a form of residential intensification supported by the County's policies and aligns with development appropriate to a Primary Settlement Area. The County OP supports intensification within settlement areas and encourages new rental accommodation. Please note that additional comments in this regard are provided below.
3. Section 3.5 (5) identifies a minimum residential development density of 25 units per net hectare. Please ensure that density calculations are provided for the proposed development.

Section 4.1 – Housing Policy – identifies that a variety of housing types are required to satisfy the present and future social, health, safety, and well-being requirements of residents. The County's [Age Friendly Community Strategy](#) builds upon this to consider an age-friendly approach to development. Housing choices, such as smaller rental apartments, allow people to live independently for as long as possible and remain part of their communities as they age.

4. There is a well-recognised and significant need for affordable and accessible housing throughout the County. Staff would be supportive of any opportunity to provide units for which the rent is at or below the average market rent in the area. Further, purpose built rental housing may qualify for a deferral and conditional exemption of County Development Charges. Should the applicant wish to discuss the inclusion of affordable units and/or a possible relief from County development charges, please contact staff.
5. The County in partnership with the Grey Bruce Health Unit has created a [Healthy Development Checklist](#), which highlights how to create healthy built environments. For example, including a variety of housing options, prioritizing those available for low-income households. The [Healthy Community & Residential Subdivision Guidelines](#) provides more in-depth considerations. Staff suggest that the applicant review and consider these resource documents as part of the application process.
6. From an Age-Friendly Community perspective, staff would encourage the applicant to consider the following:

- Increasing the tree canopy as well as the provision of shade on site, either natural or constructed, to provide protection from sun exposure
- The inclusion of waste and recycling storage inside of the building
- The inclusion accessible ground floor units with private outdoor space
- Minimizing pedestrian and vehicular crossings on site as much as possible and using enhanced pavement markings where those pedestrian crossings are proposed through the parking area
- Exploring opportunities within the proposed common courtyard area that supports healthy, age-friendly communities (i.e. children's play structure, seating, shaded areas, etc.)
- Exploring opportunities for the proposed development to increase pedestrian connectivity with the village of Dundalk and neighbouring amenities, such as the elementary school that abuts the subject lands, the nearby Eco Park, and County Rail Trail.

7. Per Appendix A of the County's Official Plan, the subject lands fall within Wellhead Protection Area B, C and D. It is recommended that further 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 reviewed the proposal and offer the following comments:

- i. Ideally, development would be restricted to the front of the parcel, west of the wetland/hazard/stream area with appropriate setback. Please ensure that a site plan is included with any future submission that delineates the hazard lands and shows the setback of the proposed development to this feature.
- ii. Natural Heritage - The property contains and/or is adjacent to provincially significant wetland, significant woodlands, significant wildlife habitat, potential habitat for threatened and/or endangered species, other wetlands, and fish habitat. It is Grey County staffs understanding that the proposed development will be located within and/or adjacent to the features. As such, it is Grey County Staffs opinion that the potential impact to natural heritage needs to be assessed through a scoped Environmental Impact Assessment (EIS). We recommend the consultant contact this office to determine a Terms of Reference for the study.
- iii. Stormwater Management - It is Grey County Staffs understanding stormwater management infrastructure is needed for the proposal. As such, a stormwater management report and plan must be prepared which demonstrates an acceptable level of outlet water quality. A sediment and

erosion control plan will be required, at minimum. We recommend the consultant contact this office to determine a Terms of Reference for the report.

- iv. Source Water Protection - It is Grey County Staffs understanding that the property contains wellhead protection areas that are subject to policies of the Source Water Protection Act. As such, the Risk Management Official of Drinking Water Source Protection should be tagged for comments on this application. The property also lies within an area designated as a Significant Groundwater Recharge Area, as such, low-impact development and infrastructure is strongly recommended.

9. County Transportation Services have reviewed the proposal and have no concerns.

10. Tree removal in advance of any approvals of development shall only be done in accordance with the [County's Forest Management By-law](#), and any applicable by-laws or regulations at the Township and/or Conservation Authority.

Township of Southgate Official Plan

11. Schedule 'A' of the Township Official Plan designates the subject lands as Future Development and Hazard Lands. Future use of these lands has not been determined and the designation continues to apply to these lands until such time as the need for additional land within the proposed new designation has been demonstrated and where municipal services can be made available to service the development. A Township Official Plan Amendment is required to change the land use designation. It is the goal of the Township to ensure that residential growth can be accommodated for a minimum of fifteen years through residential intensification, including development vacant or underutilized lots, as included in Subsections 3.4.1 and 3.4.2 of the Official Plan.

12. Compliance with provincial legislation such as the Planning Act and 2024 PPS should be demonstrated regarding housing affordability. To further encourage affordability, see Development Charges Act Section 4.1 regarding the definition of affordable and attainable housing. As defined by Subsection 3.4.3 of the Township Official Plan, "affordable housing" is defined as:

- a) *In the case of home ownership, is the least expensive of the following:*
 - i) *Housing where the purchase price is at least 10 percent below the average purchase price of a resale unit in Grey County or,*

- ii) *Annual housing expenses do not exceed 30% of gross household income for low and moderate incomes (i.e., before tax household income).*
 - b) *In the case of rental housing, is the least expensive of the following:*
 - i) *At or below the average market rent in Grey County or,*
 - ii) *Rent prices do not exceed 30% of gross household income for low and moderate incomes.*
- 13.** To encourage affordable housing, the Township may consider a request for a grant in lieu of development charges, planning fees and building permit fees in return for a commitment by the developer to meet specified affordability targets. Consideration can be given to reduced lot areas, frontages, and reduced yard requirements and increased lot coverage, in order to facilitate affordable and attainable housing. In some instances, it may be appropriate to reduce the onsite parking requirements for the Zoning By-law to facilitate more affordable housing.
- 14.** Subsection 3.7.2 of the Township Official Plan identifies the requirement of a Stormwater Management Report prepared by a qualified expert to determine the effect of increase runoff due to development of the site and identify stormwater management measures as necessary to control any increases in flow. This must be fulfilled to the satisfaction of the Township and Conservation Authority. Please reach out to Staff to determine the applicable fees and timelines of this application, including the optional pre-consultation process.
- 15.** A Traffic Impact Study is required to examine the impact of traffic generated along Ida Street, which is slated as a Potential Planned County Collector Road. Per Section 3.8, the road pattern designed in the proposed subdivision should be designed using a grid road pattern while avoiding curvilinear streets and cul-de-sacs. The potential for a new Township road allowance exiting the rear of the subject lands and connecting to Gold Street and Hagan Street West to the north. This is proposed by Township Staff as a 20-metre right-of-way corridor to benefit vehicular and pedestrian traffic flow within the proposed subdivision and adjacent areas. This road allowance is typically created through the Plan of Subdivision process and constructed at the expense of the developer.
- 16.** The proposed development is located within 700 metres of Dundalk's Wastewater Treatment Facility, shown on Schedule 'E' of the Official Plan. To ensure compatibility with the proposed development and the Wastewater Treatment Facility, the proposed shall be in compliance with the recommended buffer separation guidelines of the Ministry of Environment, Conservation and Parks D-2 Guideline. Township Staff are in agreeance with the County's

recommended for further compliance to D-4 and D-6 Guidelines due to the site's proximity to the Eco Park employment lands and the Township's historical landfill site.

Township of Southgate Zoning By-law

17. The subject lands are zoned Restricted Agricultural (A2) and Environmental Protection. The proposed use of the property is not permitted per By-law 19-2002 and requires a Zoning By-law Amendment. This can be submitted and processed in-tandem with the required Township Official Plan Amendment, as outlined above. The Planning Justification Report should be submitted and include reasoning and evidence as to why the rezoning of the subject lands would not cause loss of productive agricultural lands.
18. Environmental Protection area is identified following 2 watercourses that run across the subject lands. The proposed development has been directed away from these sensitive areas, but evidence is still required to support that minimal impacts are expected to this area pending proper site design. Township Staff are in agreeance with the County's recommendation to submit an Environmental Impact Study to determine environmental impacts on-site.

General Planning Comments

The proposed housing development provides alternative housing options for new homeowners and helps to achieve density within the Township. Township Staff have met internally to further discuss the proposal and offer the following comments to continue fostering meaningful planning within the Township.

Four main areas of concern have been identified that Township Staff require further clarification and improvement on:

Community Connectivity & Road Access

19. The development is located over 500 metres away from Downtown Dundalk and lacks connection to public amenities and the pedestrian network. The applicant will be required to connect the site into the pedestrian network to demonstrate that the site design improves quality of life and community integration.
20. The site lacks road access connectivity to the rest of the surrounding lands. The Township is open to further discussion regarding a municipal road access over a 20 metre road right of way corridor to incorporate a sanitary sewer and provide future road connectivity through the site to the Dundalk urban area to the northeast. Safety concerns regarding speeding hazards should be addressed in appropriate traffic studies.

Environmental Impacts & Zoning Concerns

- 21.** A large portion of the subject lands to the north of the proposed development are designated Hazard Lands and zoned Environmental Protection. The presence of watercourses, wetlands, and a high-water table on-site require further studies to ensure environmental protection and address significant environmental impacts. This may impact on the cost and viability of the underground parking concept in the proposal. A high percentage of hardscaping is proposed. Alternative designs should address environmental and land use sensitivities to lessen impacts of impermeable surfaces.
- 22.** The proposed site is located within 200 metres to the northwest and directly adjacent to the west of major industrial areas, including the Township's industrial Eco Park lands. Please clarify how the proposed design will comply with Sections 1.2.6 and 1.3 of the 2020 PPS and Sections 2.8 and 3.5 of the 2024 PPS to mitigate the impacts of the continued use and future expansion of these industrial lands and their associative sensitive uses. Appropriate studies to demonstrate will be required. Proximity to a sensitive use such as an historic landfill site, municipal wastewater treatment facility, and industrial land use sites require studies including a D-4, D-2, and D-6 to determine the affects of land use suitability.

Infrastructure Availability

- 23.** Determine the availability and capacity of water and sewer services and show the location of sewer and water connections and allocations for the proposed 376 units. Please review the [Southgate Servicing Strategy 2024](#) which includes maps of existing sanitary and water services.
- 24.** Any proposed watermain layout should include a looped configuration through the development to existing infrastructure to ensure system redundancy and maintain sufficient fire flow capacity.
- 25.** The need for effective Stormwater Management and further studies are required for the proposed units and parking spaces. The high percentage of impermeable surfaces proposed including 406 parking spaces at-grade require effective Stormwater Management strategies. The proposed 280 parking spaces underground are not feasible due to the Township's high-water table. Applicant to assess the local water table and soil conditions to determine viability.
- 26.** The development is located in Wellhead Protection Areas B, C, and D, requiring careful consideration of water resource protection and comments are required

from the Township's Risk Management Official regarding Wellhead Protection Areas.

Housing Affordability & Market Fit

27. The dedication of affordable housing units is encouraged by the Township. The decreased availability of apartment units to 94 units raises questions about whether the proposal adequately addresses affordability. Further expansion of how the proposal addresses affordability, identifies housing needs, and market position for the units should be addressed in the Planning Justification Report and other applicable studies.

28. The potential for industrial workers from the nearby Eco Park businesses to live and work within 15 minutes could be an opportunity. The lack of connectivity to the surrounding community and other amenities diminishes this potential and should be addressed in the site design to include connection in all forms of movement such as vehicle, pedestrian, and cycling access.

Staff appreciate the submission of the proposed development, as it can help the Township achieve density, access to affordable units, and ensure a variety of housing types. Considerable concerns have been raised regarding the proposed development's impact on surrounding land use including: industrial, environmental, and Municipally owned sites. The Township is open to alternative design to the site including rear road access to provide connectivity. Township Staff advise further discussion regarding proper access to the subject lands to connect to Gold Street and Hagan Street West. We look forward to further discussing the proposed development and reviewing the above requested information to provide a detailed technical review.

The County and Township reserve the right to request further information based on public or agency comments or detailed technical review after the applications have been submitted.

If you wish to discuss this matter further, please contact us.

Yours Truly,

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