

July 16, 2026

Shaneque Johnson, Planning Admin Support
Township of Southgate
planning@southgate.ca

RE: Zoning By-law Amendment C8-26 Martin
112191 Grey Road 14
Township of Southgate
Roll: 420709000205300
Owner: Stephen Martin
Agent: Andrew Head, Dryden, Smith, & Head Planning Consultants

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 application is to rezone about ± 0.8 hectares of the ± 18.5 -hectare subject lands at the corner of County Road 14 and Southgate Road 14 to permit a "parochial" school for residents of the community. The proposed school would be built on the northeast corner of the parcel. The Effect of the rezoning is to permit a school to be built on the northeast corner of the site and severed from the subject lands through a future consent application.

Documents submitted with the application and reviewed by staff:

- Planning Justification Report, prepared by Dryden, Smith, & Head Planning Consultants, dated May 20, 2026
- Application, cover letter, Notice of Public Meeting
- MDS 1, prepared by Laverne Waber, dated July 14, 2025
- Site Plan, prepared by Dryden, Smith, & Head Planning Consultants, no date

The subject lands (+/- 18 ha) are identified as the following in the County Official Plan:

- Schedule A: *Land Use Types* - Rural, Agricultural, and Hazard Lands
- Appendix B: *Constraint Mapping* - Significant Woodlands and stream
- Appendix D: *Functional Road Classification* - frontage on Grey Rd 14 and Southgate Rd 14

Background

- County staff attended a pre-submission consultation meeting on January 15, 2026 with Township staff and the applicant.

Comments

The property is designated as 'Rural', 'Agricultural', and 'Hazard Lands' on Schedule A of the County Official Plan ('Recolour Grey,' 2019). The Rural land use type offers greater flexibility for lot creation, economic development, tourism, residential, and recreation. While there is greater flexibility in the Rural land use type, farming and resource uses are still to be given priority for protection.

1. Staff understand that proposed zoning by-law amendment to permit a schoolhouse for the local Old Order Mennonite community who rely on horse-drawn vehicles for transportation has been submitted in advance of the related consent application. As the intent is to sever the subject lands, a review of the related lot creation policies is also provided below. Permitted uses in the rural designation includes institutional uses including but not limited to cemeteries, places of worship or schools. Staff have no concerns in this regard.

Section 5.4.3 states that:

- 1) *All consents for new lot development shall be no smaller than 0.8 hectares in area, and the maximum lot density shall not be exceeded as outlined in Table 9 below.*

...

In order to avoid narrow linear parcels of land, the frontage-to-depth ratio for non-farm sized lots (see Diagram 1 below) shall be a maximum of 1:3 and the lot must conform to the appropriate zoning by-law in reference to minimum lot frontage and other applicable provisions. Justification to go beyond the 1:3 frontage-to-depth ratio shall be justified in a development application but will not require an amendment to this Plan.

2. The County Official Plan (OP) allows for some lot creation in the Rural designation based on the original Township lot fabric. In this case, the original township lot (LOT 13, CON 10 Proton) is 40 hectares and contains two existing

lots (being the subject lands and 112097 GREY ROAD 14 to the south). Table 9 in the County OP identifies that 3 severances would be permitted within a 40 ha original township lot size. The proposed new lot would be +/- 0.8 ha. As such, the creation of 1 new lot would meet County OP rural lot density policies.

3. Further to the above, staff note that while the proposed lot configuration does not meet the 1:3 frontage-to-depth ratio, it is not a narrow linear parcel of land. Section 5.4.2 2) also states that minimum lot size within the Rural land use type for non-agricultural uses shall be determined by the zoning by-law of the local municipality and shall address the requirements of Sections 8 and 9 of this Plan. As such, County staff will defer to Township staff regarding the proposed lot configuration and any frontage requirements.

Section 5.2.2 states that:

5) New land uses, including the creation of lots, and new or expanding livestock facilities shall comply with the Provincial MDS formulae. Municipal comprehensive zoning by-laws shall incorporate Provincial MDS formulae.

...

l) 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.*
4. The submitted planning justification report indicates that MDS relief is required from two barns on adjacent properties. However, it appears that there is an MDS deficiency from the barn and manure storage on the property to the north (145469 SOUTHGATE ROAD 14). The site plan indicates that a setback of 275.9 m is proposed from the neighbouring barn to the new schoolhouse, whereas a setback of 305 m is required. A setback of 297 m is proposed from the manure storage to the new schoolhouse, whereas a setback of 375 m is required

Staff note that the submitted MDS report does not reference the actual distances from the neighbouring manure storage or livestock barns for the 5 surrounding farms. Clarification should be provided.

5. The provincial MDS Guideline Document provides formulas and technical guidance for implementing setbacks between livestock barns and sensitive uses. As noted during pre-consultation meeting, Guideline #41 details measurements of MDS 1 setbacks for the creation of lots. It notes that for proposed vacant lots less than 1 ha, the setbacks are measured from the proposed lot line to the surrounding barns, manure storages or anaerobic digesters. However, it appears that the MDS setback is measured to the proposed schoolhouse not the new lot line. Clarification should be provided.
6. 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, both acknowledge that may be circumstances where some flexibility can be considered on a case-by-case basis.

During the pre-consultation meeting, the applicant mentioned that alternatives were considered and noted several site-specific considerations when determining the proposed lot location. From this conversation and staff's review, the following considerations are noted:

- The north-west corner of the property contains Hazards Lands and a drainage corridor and is regulated by Grey Sauble Conservation Authority.
- The remaining lands fronting Grey Road 14 are identified as Agricultural, which does not permit the proposed use and County Transportation has directed the entrance to be from the municipal road.
- Concerns regarding the schoolhouse entrance being located closer to the intersection of Grey Road 14 and Southgate Road 14, as it can be challenging to navigate when using a horse and buggy for transportation. The applicants noted that locating the schoolhouse further away from this intersection would be safer.
- The current lot location can meet MDS setbacks from the two barns on the west side of Grey Road 14; alternative locations could mean deficiencies in these MDS setbacks as well.

Staff note that the documents submitted support the proposed use and MDS reduction to not appear to detail these considerations.

7. County Ecology staff have reviewed the proposal and have no concerns.
8. County Transportation Services have reviewed the proposal and noted no concerns. Please be advised that no new storm water to be directed to the County Road. As the site plan shows, the entrance is to come off the municipal road, not County Road 14.

Summary

Provided that additional clarification is given regarding the MDS setback measurement and that Township staff are satisfied that sufficient reasoning has been provided to maintain the intent of the MDS Guidelines, staff have no concerns with the proposal.

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,

Cassondra Dillman
Intermediate Planner


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