



Planning and Development

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September 30, 2026

To: Victoria Mance, Junior Planner
Township of Southgate

* Sent by Email only

RE: C10-26, B5-26 & B6-26 - JJC Farms
Legally described as Con 15 Pt lot 26 W Pt Lot 27 Proton
Civic Address: 184678 GREY ROAD 9
Roll: 420706000414300
Township of Southgate

Dear Ms. Mance:

This correspondence is in response to the above-noted zoning by-law amendment and consent applications. Grey County staff have taken the time to review the circulated material under the policies of the Provincial Planning Statement and the Grey County Official Plan. Previously, County staff offered comments on different versions of the proposal, through pre-submission consultation in 2022, 2024 and 2025. We offer the following comments at this time.

Purpose and Effect of Zoning By-Law Amendment:

The purpose of Zoning By-Law Amendment application C10-26 is to allow for the following on the proposed severed parcel:

- Recognize a private campground (cabin and six trailer pads) on part of a ± 13 hectare irregularly shaped parcel to be conveyed by consent (File B5-26) to join to the abutting ± 4 hectare farm parcel to the northeast.
- Establish permitted uses and regulations for a ± 0.3 hectare surplus farm lot containing an existing farmhouse at 184678 Grey Road 9.
- Prohibit residential development on the retained ± 52 hectare agricultural parcel

The Effect of rezoning file C10-26 is to recognize a private campground containing a cabin and six trailer pads on a parcel to be joined to the abutting lot to the northeast (B5-26), to establish zoning provisions for a surplus farm lot containing an existing farm

house at 184678 Grey Road 9, and to prohibit residential development on the retained agricultural parcel (File B6-26).

Purpose and Effect of Consent Applications:

The Purpose of consent file B5-26 is convey a ± 13 hectare irregularly shaped lot to join to the abutting ± 4 -hectare non-farm parcel to the northeast. The proposed severed lot contains a private campground with a cabin and six trailer pads. Consent file B6-26 severs the subject lands to create an irregularly shaped ± 0.3 -hectare surplus farm lot containing an existing residence with ± 10 metres frontage on Grey Road 9 and ± 170 metres depth. The retained agricultural lot would have ± 52 hectares area and ± 220 metres frontage on Grey Road 9. Lands involved in the two consent files are subject to proposed rezoning file C10-26.

The effect of consent application B5-26 is to allow conveyance of a ± 13 -hectare parcel containing a private campground to the abutting owner to the northeast, and the effect of file B6-26 is to create a ± 0.3 -hectare surplus farm lot and retain an agricultural parcel

Grey County Planning Comments:

The Application materials submitted for review include:

- A revised Planning Justification Report dated June 2026
- An Addendum to the Planning Justification Report, Dated August 14, 2026
- A Scoped Environmental Impact Study by Roots Environmental dated March 3 2022
- Preliminary Hydrogeological Assessment for servicing of Trailer Pads by GM Blue Plan dated December 9, 2021.
- Concept plans, dated April 22, 2025; June 8th and June 11, 2026

The County Official Plan maps the subject lands as:

- Designated 'Agricultural,' 'Hazard Lands' and 'Provincially Significant Wetlands' on Schedule A;
- Designated 'Aggregate Resource Area' on Schedule B;
- Designated a Natural Heritage System 'Linkage' on Schedule C;
- Containing Significant Woodlands, a mapped water course, and "Other identified Wetlands" within Appendix B.

It should be noted that various iterations of the proposal have been circulated to Grey County staff since 2022. Staff have generally not been supportive of the submitted concept plans to date. At this time, County staff remain of the opinion that the proposal does not conform to the Grey County Official Plan, nor demonstrate consistency with

the Provincial Planning Statement. This opinion is further explained through comments below.

1. Lot Addition within the Agricultural Designation

The current proposal seeks to sever a portion of a 66-hectare farm parcel (roll 420706000414300) and add 15.27 hectares to an adjacent 4.13-hectare lot, to create a ~19.39 hectare vacant parcel and a 50.89 hectare retained parcel.

Both of the subject properties are designated predominantly 'Agricultural' within the Grey County Official Plan. Section 5.2.3(3) of the Grey County Official Plan notes that "Lot adjustments in the Agricultural land use type may only be permitted for *legal or technical reasons*." This policy stems directly from Section 4.3.3 (2) of the Provincial Planning Statement.

"Legal or Technical reasons" is defined both within the County OP and PPS as:

"severances for purposes such as easements, corrections of deeds, quit claims, and minor boundary adjustments, which do not result in the creation of a new lot."

The submitted planning justification report notes that the lot addition would be considered a "minor boundary adjustment" and would therefore meet the definition of the PPS and OP. The rationale is that the majority of the land to be conveyed to the smaller lot would be designated as 'Provincially Significant Wetlands' or 'Hazard Lands,' and therefore would not substantively impact the cultivated area of either property. While County staff would concur with this assessment, the outcome of this approach would be to expand a non-conforming, under-sized lot. Should either lot be sold to a different owner in future, the result could be increased potential for land-use conflicts. Through previous discussions with OMAFA, lot adjustments that do not meet the definition for legal or technical reasons have not been supportable in the past and can lead to inconsistency when dealing with the agricultural land base.

Staff would suggest that a preferable planning outcome may be to simply add all of the smaller lot (being roll 420706000414301) to the larger lot (roll 420706000414300), to ensure that cultivated lands are consolidated on to a singular landholding, rather than expanding a small, non-conforming Agriculturally designated lot, which is not consistent with the PPS.

2. Existing Private Campground

County staff understand that the existing private campground was established without permits (from the Conservation Authority or building officials) or land use permissions. The owners are therefore seeking retroactive permission for this use. The private

Sept. 30, 2026

campground (including six concrete trailer pads, a septic system, water connections, a cabin, accessory structure, and access roads) is partially located within the 'Agricultural' designation and partially located within the 'Hazard Lands' designation, per Schedule A of the Grey County Official Plan. The existing cabin appears to be located within the 'Provincially Significant Wetlands.'

Section 4.3.2(1) of the Provincial Planning Statement states that *"In prime agricultural areas, permitted uses and activities are: agricultural uses, agriculture-related uses and on-farm diversified uses based on provincial guidance."* Further, 4.3.2(4) notes that a *"principal dwelling associated with an agricultural operation"* shall be permitted in prime agricultural areas as an agricultural use. Section 4.3.2(5) notes that up to two additional residential units shall be permitted in prime agricultural areas, subject to certain criteria.

The submitted Planning Justification Report suggests that the private campground should be considered as accessory to the primary agricultural use of the property. It is unclear to County staff how the campground would be considered as accessory to or for the primary agricultural function of the property.

The County's Official Plan recognizes that campgrounds shall be considered as resource based recreational uses, and typically only permitted within the Rural designation. Section 5.4.2(8) of the Grey County Official Plan stipulates that:

Campgrounds shall only be considered under the Rural land use type as a resource based recreational use, and shall not be considered as an on-farm diversified use.

This is also reflected within Table 7 of the Grey County Official Plan. It should be noted that the definition of "campground" within the Official Plan does not differentiate between campgrounds that are open to the general public, or only available for private use. It is the opinion of County staff that both have the potential for similar land-use impacts. Furthermore, a "private campground" would be unlikely to meet the intent of the on-farm diversified use policies defined within the PPS. Section 2.3 of the Provincial Guidelines notes that *"On-farm diversified uses are intended to enable farm operators to diversify and supplement their farm income, as well as to accommodate value-added and agri-tourism uses in prime agricultural areas."* It is not anticipated that a private campground would meaningfully contribute towards income diversification to support the sustainability of the farming operation. Finally, it is noted that the property proposed to contain the campground would be less than 20 hectares in size. Per Table 8 of the County Official Plan, on-farm diversified uses are only permitted on Agricultural properties at least 20 hectares in size.

Finally, County staff have concerns about the precedence of formally permitting a use of this nature.

With regard to the 'Hazard Lands' on site, it is noted that while an environmental impact study has been undertaken, there has been no flood mapping undertaken to demonstrate how or whether these sites may be at risk in the event of a flood scenario. Generally, the County's Official Plan does not permit new development within the Hazard Lands. It is recommended that further comments be received by Saugeen Valley Conservation Authority (SVCA) in this regard.

With regard to the on-site Provincially Significant Wetlands (noting that the County's mapping currently shows that the hunt camp is located within the PSW), County Planning Ecology staff have undertaken a site visit and reviewed the prepared EIS and can confirm that the current boundaries of the wetland appear to be slightly inaccurate. Staff have further confirmed that the existing cabin is adjacent to (within 4 meters), rather than within, the wetlands. Further comments are provided by Ecology staff in section 4, below.

3. Proposed Surplus Farmhouse Severance

The applicants are proposing to sever the existing farmhouse (located on Roll 420706000414300) and retain a 50.89 hectare lot, which would be re-zoned to prohibit future residential development. Currently, the cabin and trailer pads are located on the retained lands, but these would be 'added to' the smaller parcel to the east, being roll 420706000414301.

Section 5.2.3(1)(b) of the County's Official Plan outlines criteria prior to consideration of a surplus farmhouse severance. Generally, County staff would suggest that these criteria are achieved; except however that the County would not support the retention of the private campground use on the retained lot or abutting lot. The County may be able to support the retention of the hunting cabin (as a standalone, primary dwelling), subject to further supportive comments from SVCA.

4. Grey County Planning Ecology Comments

County Ecology reviewed the Scoped Environmental Impact Study (EIS - Roots Environmental, 2022). Ecology staff would note the following comments:

1. The EIS provided an amended PSW boundary and indicates the existing hunting cabin is approximately 4 meters from the edge of the Yoevil Swamp PSW. The EIS indicates this setback does not demonstrate any erosion or degradation and provided no further site alteration or development occurs within this setback, no direct impacts (i.e., removal) to the PSW are anticipated.
2. The EIS indicates that, 'minor loss of vegetation occurred as a result of the construction of the hunting cabin along the edge of the wetland. It is

recommended that restoration occur on site shown in Figure 5 - Mitigation Measures to offset that loss. The restoration area shall be graded to match the surrounding area, have topsoil applied, seeded with a native seed mix, and planted with native trees/shrubs endemic to that area. Provided restoration of buffer areas associated with the watercourse and wetland occur as shown and recommended in this report, we anticipate no negative impacts to Fish Habitat.' County Ecology also understands that SVCA reviewed this planting program on May 27, 2024 (Appendix 1 of the PJR). Given the EIS indicates that there is no anticipated negative impacts to Fish Habitat, and provided restoration of buffer areas is completed, County Ecology supports including restoration works as per Figure 5 as a condition of approval, where appropriate.

It is anticipated that this work may be completed as a condition of consent, or through any future site plan approval application. If you have any questions regarding the above, please reach out to ecology@grey.ca.

5. Grey County Transportation Comments:

The subject properties have frontage on Grey Road 9. Based on the available aerial imagery, existing access laneways exist for the proposed surplus farmhouse severance, as well as the neighbouring property that is proposed to be enlarged. However, it is unclear how the larger retained farm parcel would be accessed. Should a field entrance be required from Grey Road 9, it is recommended that the applicants connect further with Grey County Transportation Services to determine that a new entrance can be accommodated. Previous comments from Transportation Services advised that a new entrance would not qualify for separation distance, but would qualify for density. Sight distances appear to be achieved. An exemption to County separation policies may be required in this regard.

In addition to the above comments, as a condition of consent, road widening of 1.0m shall be conveyed to the County of Grey along the frontage of the County Road for both the severed and retained parcels.

Summary

In summary, Grey County planning staff would suggest that the proposal:

- Does not adequately conform to the Grey County Official Plan;
- Is not consistent with the Provincial Planning Statement; and
- Does not have sufficient regard for the Planning Act.

Should Township council wish to proceed with an approval for this application, it is recommended that a requirement for road widening along the frontage of the County

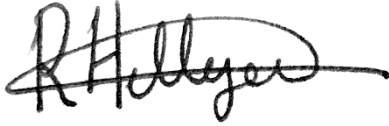
Page 7

Sept. 30, 2026

Road be added as a condition of consent, as well as a requirement for replanting and restoration as described within the EIS.

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

Yours truly,

A handwritten signature in black ink, appearing to read 'R. Hillyer', with a stylized flourish at the end.

Becky Hillyer
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Cc Scott Taylor (Grey County, by email only)
Michael Oberle (SVCA, by email only)