

**Township of Southgate,
185667 Grey County Rd. 9
Dundalk, ON N0C 1B0.
Attn: Victoria Mance**

August 14, 2026

SUBJECT: Applications-Consents to Sever and Zoning By-law Amendment (JJC Farms c/o Cuesta).
Addendum to the Planning Justification Report (PJR) prepared by Cuesta Planning Consultants Inc. (CPC)
LANDS: 184678 Grey Road 9, Concession 15 S Part Lot 26 W Part Lot 27, Township of Southgate.

Dear Victoria,

The Township of Southgate has forwarded its Pre Submission Consultation form, dated August 6, 2026, that contains the staff review of the three (3) land use applications submitted for a proposal on the above noted lands. The submitted application; a rezoning application and two (2) consent applications, along with a PJR, and two (2) technical reports were completed, however, the staff review identified several matters that needed clarification before staff could support the application.

As noted in the PJR, the proposal has parts. The first part involves the rationale for and subsequent consent to create a lot for a surplus farm residence. From the consultation comments received, it would appear that staff is satisfied that this aspect of the proposal is consistent with the PPS and conforms to the County of Grey and Township Official Plans.

Below please find a response to remaining issues outlined the Township of Southgate (Township) August 6, 2026 comments.

Township August 6, 2026 Comment	Response
Issue 1: Lot Areas Correction	The address and lot areas in the submitted rezoning application have been corrected. The revised application is appended to this Addendum Report.
Issue 2: Location of Hunt Camp Structure	In the initial discussion with the former Township planner, Mr. Clint Stredwick, a concern with the proximity of the hunt camp structure to the PSW was discussed. In recognition of the fact that PSWs and other natural features are identified initially through air photos, it is necessary to have the boundaries of these natural heritage features ground truthed. Based on the foregoing, Roots Environmental (Roots) was retained to delineate the limits of the natural heritage features on the property and prepare a Scoped Environmental Impact Study

	(SEIS) to ensure no negative impacts on nature heritage features and functions resulted from the development and ensure compliance with applicable municipal/provincial policies and legislation. The Roots SEIS was submitted with the application. The SEIS determined that the hunt cabin is approximately 4 metres from the edge of the Yoevil Swamp PSW. This setback is considered stable and does not demonstrate any erosion or degradation. Based on the findings of the Roots SEIS, the County mapping should be clarified at this location. The SEIS findings also confirm the issuance of a permit for the cabin and sewage system by the SVCA in 2016 (permit no. 16-016) was appropriate.
Issue 3: Campground Qualification	Commercial campgrounds do not qualify as an "On Farm Diversified Use (OFDU) in the County of Grey Official Plan. Campgrounds are defined in the County of Grey Official Plan as, <i>"the use of land for the provision of overnight or short-term temporary accommodation for trailers, motor homes, yurts, geodesic domes, and tents, but not long-term, permanent accommodation such as mobile homes, and includes services and facilities normally incidental and subordinate to such a use including washroom and bathing facilities, indoor and/or outdoor recreational areas, and an entrance kiosk"</i> (emphasis added). The PJR makes it clear that the McLaughlin hunt cabin and trailer pads are a private recreation facility. Creating six (6) or seven (7) trailer pads does not constitute a commercial campground. There is no need to amend the County of Grey Official Plan for a commercial campground that does not exist. It is sufficient control to define the hunt camp building and the cement pads as a "private recreation facility" that can be limited in size and restricted to 'seasonal use' if need be and permit the use in the revised Environmental Protection Zone.
Issue 4: Zoning Compliance (Section 2.10, 5.16 e), 5.25)	<u>Section 2.10 Environmental Protection Zone</u> This provision recognizes that the boundaries of natural heritage features are general and may be refined based on consultation with the appropriate Conservation Authority and/or a technical evaluation. The Roots SEIS more accurately defined the boundary of the PSW and demonstrated that the hunt camp/cabin had no impact on the ecological function of the PSW.

	The Saugeen Valley Conservation Authority (SVCA) confirmed the provisions of this section by the issuance of a permit for the building and septic system. <u>Section 5.16 e) Setback from Watercourses</u> Section 5.16 e) (i) references an 8-metre setback from top of bank of a watercourse or open drain or from an Environmental Protection Zone. It would appear that the hunt cabin may not meet the 8-metre setback, however, the location was approved by the SVCA and the SEIS determined that the location did not impact the functioning of the PSW or the unevaluated wetland to the east of this private recreation area. If required, it would seem reasonable to provide relief from these provisions and limit any further encroachment to the top of bank. Section 5.16 e) (ii) references setbacks to cold or warm water streams. The SVCA defines pond area, which is controlled by a dam structure, as "man-made ponds". No streams are present. Section 5.25 Wetlands Protection (W) Zone Setback. The 120 metre setback from this zone can be reduced by the preparation of an Environmental Impact Study. The Township planner required the applicant to prepare an Environmental Impact Study which was prepared by Roots Environmental. The study confirmed that the location of the hunt camp/cabin did not impact the PSW.
Issue 5: Categorizing the Existing Use	It is the position of the applicant that the existing use, the hunt cabin and trailer pads, have never been considered as anything other than a private recreation area for the McLaughlin family. The private family recreation facility will continue when it is located on the 17.7 ha. Open Space/Conservation lot. It is important for the Township to confirm this situation in the implementing zoning bylaw amendment. The amending bylaw could include the following: <i>"For the purposes of this bylaw the following definition of a private recreation facility shall apply;</i> <i>A private recreation facility may be permitted on Con. 15 S Part Lot 26 W and Part Lot 27, Egremont, and includes one hunt cabin as accessory structure, up to seven (7) cement trailer pads and is subject to private use only".</i>

Summary:

The foregoing, as well as the initial Planning Justification Report, confirms that no County Official Plan Amendment should be required for a private recreational facility such as the one located on the McLaughlin farm. The applications will require modification to the Township zoning bylaw to permit the creation of a lot for a surplus farm residence and to recognize the location and use of a private recreation area. The foregoing Addendum includes a suggested definition for a private recreation facility that limits its size, location, and use. This definition and the amending bylaw would not offend the provisions of the PPS, the County of Grey Official Plan or the Township Official Plan.

I would appreciate your review of this Addendum and your comment on the completeness of the application. We look forward to working with the Township on the subject application.

Yours truly,



Don Scott (*Cuesta Planning Consultants Inc.*)

cc: Jim McLaughlin (via email)