



RON DAVIDSON
LAND USE PLANNING CONSULTANT INC.

July 23, 2026

Municipality of West Grey
402813 Grey Road 4
RR 2
Durham, ON
N0G 1R0

Attention: Matt Rapke
Senior Planner

Dear Mr. Rapke

**Re: Application for Zoning By-law Amendment
Part Lot 12, Concession 14 NDR
Geographic Township of Glenelg
Municipality of West Grey
503920 Grey Road 12
Owner: ADM Machining Inc. c/o Allen Martin**

This Planning Justification Report has been prepared to evaluate the planning merit of a Zoning By-law Amendment application proposing to establish an on-farm diversified use on the above-noted property.

The Proposal:

ADM Machinery Inc. c/o Allen Martin owns a 30.35 hectare property located at the southwest corner of the Grey Road 12 / Traverston Road intersection, in the former Township of Glenelg.

The owner proposes to erect an 800 square metre building in order to operate a machine shop under the on-farm diversified use policies of the Grey County Official Plan. The intended operation exceeds the size limits of a “home industry”, which is normally permitted as of right under the site’s current zoning, and therefore an amendment to the Municipality of West Grey Comprehensive Zoning By-law is necessary. Details of the amendment are provided later in this Planning Justification Report.

Mr. Martin will also be replacing the existing detached dwelling with a new house. Three existing sheds and a barn will remain on the site. Four smaller sheds will be removed to make room for the on-farm diversified use. These particular changes to the property are permitted under the current zoning of the property.

The Operation:

This business will involve the custom manufacturing of a variety of steel products, including parts for agricultural equipment, forklifts, cranes, and automobiles.

The business will employ Mr. Martin and up to five others.

In terms of anticipated vehicular traffic, one or two tractor trailers per week will deliver the raw materials to the subject property. The finished products will be shipped from the site on smaller, double-axle trucks three to four times per week.

The hours of operation will be Monday to Friday from 7 am to 6 pm.

In addition to the 800 square metre workshop, the operation will include a 500 square metre outdoor storage area and a graveled yard for parking and shipping/receiving. All operations will occur within an area comprising 5940 square metres. The new house will be located outside of this area and will share a driveway with the business. The proposed development is shown on the attached Site Plan.

The existing house is accessed by entrances/driveways from both Grey Road 12 and Traverston Road. Due to Traverston Road having half-load restrictions during the spring months, access to/from Grey Road 12 is necessary. The Grey County Transportation Department has advised that the access must be upgraded to a commercial entrance. Mr. Martin will be decommissioning the other existing entrance along Traverston Road.

Rows of trees having a minimum planting height of 2.0 metres will be planted along the entire lengths of the easterly and southerly boundaries of the area to be rezoned for screening and privacy purposes.

Subject Property:

The subject property is located at the southwest corner of the Grey Road 12 / Traverston Road intersection, approximately 9.5 kilometres southwest of Markdale.

Situated in the northeast corner of this 30.35 hectare lot is a cluster of buildings which include a house, barn, and several sheds. Approximately 22 hectares are cash-

cropped. The balance of the property is forested and scrubland. These site features are illustrated on Figure 1 of this Planning Justification Report.

Adjacent Land Use:

Land uses within the immediate vicinity of the subject property are represented by a mix of agricultural land, forested lands, and residential lots. As well, an on-farm diversified use is located to the northwest. Black's Creek follows a portion of the westerly lot line.

County of Grey Official Plan:

i. Land Use Designation

The subject lands are designated primarily 'Rural' on Schedule A of the Grey County Official Plan, as per Figure 2 of this Report. The floodplain of the watercourse located along the site's westerly boundary is designated 'Hazard Lands'.

ii. On-Farm Diversified Uses

The Grey County Official Plan gives consideration to on-farm diversified uses in the 'Rural' land use designation. Table 7 of the Official Plan provides examples of on-farm diversified uses, which include "*home industries (e.g. sawmill, welding or woodworking shop, manufacturing / fabrication, storage of boats or trailers, biomass pelletizer)*". The proposed machine shop would fall under this classification.

The relevant policies for on-farm diversified uses are found in Section 5.2.2 *Agricultural Development Policies*, as follows:

- 15) *New on-farm diversified uses shall be limited in size and scale, as per Table 8 below and to those uses that can be sustained by local service and infrastructure levels. New agricultural-related uses shall also be limited to uses that can be sustained by local service levels. Municipal official plans may choose to set local road standards required for such uses, which are in-line with the level and type of traffic being generated by the uses. Traffic Impact Studies may be required to determine the impact of the proposed operation on the local road network, as per section 8.3 of this Plan. Servicing or Noise Studies may also be required for new or expanded on-farm diversified or agricultural-related uses. Municipal official plans or zoning by-laws may also choose to limit individual uses that could otherwise be directed to settlement areas. Agricultural-related uses are not required to be limited in size, whereas on-farm diversified uses are required to be limited to the sizes shown in Table 8. Subject to the size limitation requirements of Table 8 of this Plan*

and section 5.2.2(17), on-farm diversified uses may be considered on lots less than 10 hectares in size in the Rural land use type.

Notwithstanding the above, home rural occupations may be permitted in the Rural land use type on lots less than 10 hectares in size, which exceed the size limitations in Table 8, only where permitted in municipal zoning by-laws, or where adequate justification has been provided in support of a zoning amendment.

Table 8: On-farm Diversified Use Size Criteria

Land use type	Property Size	On-farm diversified Use Maximum Size
Agricultural	20 hectares or greater	The lesser of; • 2% of the total size of the property, or • a maximum combined area of the use of 8,000 square metres
	Less than 20 hectares	Bed and breakfasts and/or home rural occupations within the dwelling only.
Special Agricultural	10 hectares of agriculturally productive area or greater	The lesser of; • 2% of the total size of the property, or • a maximum combined area of the use of 8,000 square metres
	Less than 10 hectares of agriculturally productive area	Bed and breakfasts and/or home rural occupations within the dwelling only.
Rural	20 hectares or greater	The lesser of; • 2% of the total size of the property, or • a maximum combined area of the use of 8,000 square metres
	Less than 20 hectares	The lesser of; • 2% of the total size of the property, or • a maximum combined area of the use of 2,000 square metres

- 16) When determining the size of the on-farm diversified use it shall include buildings, laneways, parking, outdoor storage, servicing, exhibition areas, and/or amenity areas occupied by the on-farm diversified uses. Shared laneways / servicing, farm buildings, or landscaped areas also used by the farm shall not be included in the calculation of total use size. The passing of an implementing zoning by-law amendment will generally be required to permit new on-farm diversified uses, unless otherwise permitted 'as-of-right' in municipal zoning by-laws.

Comment: With the subject property being designated 'Rural' and comprising 30.35 hectares, consideration can be given to an on-farm diversified use occupying up to 6070 square metres of land. The proposal involves 5940 square metres and is therefore in conformity with this Official Plan policy.

17) *The gross floor area of the buildings (combined total for all buildings associated with the on-farm diversified use) shall not exceed 20% of the total area of the on-farm diversified use.*

Comment: The new 750 square metre workshop represents 13.47% of the area to be rezoned, which is well under the allowed 20%.

18) *Municipalities may choose to limit the size and accessory uses related to wineries, cideries, breweries, meaderies, or distilleries, based on local characteristics, and/or the availability of servicing.*

Comment: This policy is not relevant.

19) *Prior to considering a new on-farm diversified use, it shall be demonstrated that the following criteria can be met:*

- a) *The use or activity does not interfere with, or generate off-site adverse impacts, and is compatible with surrounding uses,*
- b) *The use or activity can be sustained by local service levels and infrastructure,*
- c) *The buildings to be used meet all Building Code requirements for the type of use being proposed,*
- d) *The scale of the operation is secondary to the active agricultural use on the farm property, and appropriate to the site and the surrounding area,*
- e) *The timing and duration of activities does not hinder agricultural operations on site or in the area,*
- f) *For special events, the use or activity represents an occasional activity and is not a regular occurring activity and does not have permanent structures,*
- g) *On-site parking can be accommodated without impacting the agricultural operation, and*

- h) The timing and duration of activities does not hinder agricultural operations on site or in the area.*

Comment: The proposed business should not have a negative impact on any adjacent land uses or residents, nor should it be disruptive to the nearby agricultural operations. More information on potential impact, specifically in regard to the Province's D-6 Guidelines, is provided below.

Rows of trees having a minimum planting height of 2.0 metres will be planted along the entire lengths of the easterly and southerly boundaries of the area to be rezoned for screening and privacy purposes.

The new use will not place additional demand for services on the Municipality.

The workshop will meet all requirements of the Ontario Building Code.

Agricultural activity will continue on the subject property. The amount of land occupied by the on-farm diversified use is very small in comparison to the area being cash-cropped.

Mr. Martin intends to operate the business Monday to Friday, from 7 am to 6 pm. The agricultural activities that are occurring on the site or within the general vicinity of the subject property should not be hindered by the new use, as explained above, regardless of the hours of operation.

There is ample area on the property to accommodate the limited number of vehicles that will visit the site.

- 20) Ministry of the Environment, Conservation and Parks (MECP) D-6 Guidelines, or any successor thereto, shall be considered for any new agricultural-related uses or on-farm diversified uses or an industrial nature in the Agricultural, Special Agricultural, or Rural land use types, to guide the separation of industrial uses from nearby dwellings, institutional uses, or other sensitive non-agricultural uses. Uses which are covered as normal farm practices by the Farming and Food Practices Protection Act (FFPPA) shall not be required to meet the D-6 Guidelines, provided they meet all required Provincial noise, air, water, and wastewater standards.*

Comment: The proposed machine shop is not expected to create a negative impact on any adjacent sensitive receptors, which in this case would be the

nearby residences. This operation would generally not create any air, water, or wastewater pollutants. A minor amount of noise is possible; however, given the small-scale size of the business, the hours of operation, and the small amount of truck traffic to be generated from this on-farm diversified use, it is highly doubtful that noise will become an issue.

The D-6 Guidelines would classify the intended operation as a “*Class I Industrial Facility*”, which is defined as:

Class I Industrial Facility

A place of business for a small scale, self contained plant or building which produces/stores a product which is contained in a package and has low probability of fugitive emissions. Outputs are infrequent, and could be point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration. There are daytime operations only, with infrequent movement of products and/or heavy trucks and no outside storage.

Comment: The Guidelines state that lands situated within 70 metres of a Class 1 Industrial Facility, such as the intended on-farm diversified use, are considered to be located in an area of potential influence. On this note, the area to be rezoned is situated approximately 198 metres from the closest neighbouring dwelling, which is located to the south, and therefore the neighbour’s house is well outside of the potential area of influence. Other nearby dwellings exist approximately 296 metres to the northwest, 322 metres to the west, 308 metres to the northeast, and 283 metres to the east.

Notwithstanding the setbacks from the neighbouring residences and the on-farm diversified use’s compliance with the D-6 Guidelines, the emissions of the new use should still be considered. In this regard, this workshop will not create an odour or dust or cause vibrations, and any noise generated will be very limited and should not be heard beyond the property limits.

With regard to the Minimum Distance Separation (MDS) formulae, Section 5.2.2, subparagraph 5) of the Official Plan states the following:

- (a) *MDS I will generally not be required for on-farm diversified uses, except where a municipality has required MDS to apply in their municipal official plan*

or zoning by-law. For the purposes of MDS, on-farm diversified uses should be considered a Type A land use.

Comment: No local Official Plan exists in the Municipality of West Grey, and therefore MDS I does not apply.

iii. Aggregate Deposits

Schedule B of the County Official Plan recognizes almost the entire subject property, including the area to be rezoned, as 'Aggregate Resource Area', as shown on Figure 3 of this Planning Justification Report. This mapping implies that a primary source of sand and gravel may exist on the site. Section 5.6.2 *Aggregate Resource Area Policies* includes the following:

- 7) *In Aggregate Resource Areas shown on Schedule B, new non-agricultural uses may be considered on existing lots of record, where they are a permitted use in the Agricultural, Special Agricultural, or Rural land use types. Where such non agricultural uses are not permitted by those land use types, and an official plan amendment is required, new non-agricultural uses may only be permitted if:*
 - a) *The extraction of the aggregate resource is not feasible due to the quality or quantity of material or the existence of incompatible development patterns. The quality and quantity of the material will be determined by having a qualified individual dig test pits within the area proposed for the nonagricultural development; or*
 - b) *The proposed land use or development serves a greater long-term interest of the general public than the aggregate extraction; and*
 - c) *Issues of public health, public safety, and environmental impact are addressed.*

Comment: An on-farm diversified use is permitted in the 'Rural' designation, and therefore this new non-agricultural activity may be considered.

iv. Natural Heritage

Schedule C of the Grey County Official Plan applies the 'Natural Heritage System: Linkage' constraint to the area of the property situated adjacent to Black's Creek, as shown on Figure 4 of this Planning Justification Report.

Section 7.1 *Core Areas and Linkages* includes the following:

- 1) *Core areas are the County's largest pockets of significant natural features, and represent the best areas for interior species habitat and natural function in the County. Grey County is home to some of the largest Core Areas remaining in Southwestern Ontario. Cores Areas are crucial to the environmental health of the County, and represent an opportunity for conservation. Within Core Areas, the County places a priority on environmental protection.*

Core Areas largely overlap portions of other significant natural features including Provincially Significant Wetlands, Areas of Natural and Scientific Interest, Other Wetlands, Significant Woodlands, Significant Valleylands, Habitat of Endangered and Threatened species, Hazard lands, and Fish Habitat.

- 2) *Development proposed within Core Areas, their 120 metre adjacent lands, or Linkages will be required to undertake an environmental impact study (EIS), unless otherwise exempted by 7.11.3 of this Plan*. This EIS will assess the natural features, their adjacent lands and their connections to other natural features. Table 10 below provides for the permitted uses in Core Areas and Linkages. (Note: Please see the text highlighted below by the author of this Planning Justification Report.)*

Permitted Use	Permitted in Core Areas	Permitted in Core Areas Adjacent lands	Permitted in Linkages	EIS Required*
<i>Agricultural uses including new buildings and structures</i>	Yes	Yes	Yes	No
<i>Agricultural-related uses requiring new buildings or structures</i>	No	Yes	Yes	Maybe
<i>Home rural occupations within existing buildings</i>	Yes	Yes	Yes	No
<i>On-farm diversified uses requiring new buildings or structures</i>	No	Yes	Yes	Maybe
<i>Conservation and flood control projects</i>	Yes	Yes	Yes	No
<i>Forest, fish, and wildlife management</i>	Yes	Yes	Yes	No

<i>Transportation, utility, and service corridors as per Section 8</i>	Yes	Yes	Yes	<i>Maybe</i>
<i>Compatible recreation</i>	Yes	Yes	Yes	<i>Maybe</i>
<i>Good forestry management as defined in the County's Forest Management</i>	Yes	Yes	Yes	<i>No</i>
<i>Existing uses, buildings and structures, or minor expansions thereto</i>	Yes	Yes	Yes	<i>No</i>
<i>Reuse of existing building and structures, provided the reuse will not have any additional environmental impacts</i>	Yes	Yes	Yes	<i>No</i>
<i>Existing mineral aggregate extraction operations</i>	Yes	Yes	Yes	<i>No</i>
<i>Expanded mineral aggregate extraction operations</i>	Yes	Yes	Yes	<i>Yes</i>
<i>New mineral aggregate extraction operations</i>	<i>No</i>	Yes	Yes	<i>Yes</i>
<i>New residential dwellings or accessory uses on existing lots of record</i>	Yes	Yes	Yes	<i>No</i>

Comment: The area proposed to be rezoned for the new on-farm diversified use is situated, at its closet point, approximately 45 metres from the 'Natural Heritage System: Linkage' constraint. The lands within this 45 metre separation include a large shed, gravel parking lot, a manicured lawn, and cropped lands. Also, the majority of the area to be rezoned is already covered by buildings or gravel, and the area that is subject to further disturbance (i.e. for the workshop and additional gravel yard) is located approximately 100 metres from this constraint. As a result, no negative impact on this natural heritage feature should occur.

Portions of the subject property are also classified as 'Significant Woodland' on Schedule B of the Official Plan, as shown on Figure 5 of this Planning Justification Report. Section 7.4 *Significant Woodlands* includes the following:

- 1) *No development or site alteration may occur within Significant Woodlands or their adjacent lands unless it has been demonstrated through an environmental*

impact study, as per Section 7.11 of this Plan, that there will be no negative impacts on the natural features or their ecological functions. Adjacent lands are defined in Section 7 and 9.18 of this Plan.

Note: The Official Plan defines “adjacent lands” for a ‘Significant Woodland’ to be those lands located within 120 metres of this feature.

Comment: The closest ‘Significant Woodland’ boundary is further from the area to be rezoned than the ‘Natural Heritage System: Linkage’ feature. As such, for the same reasons listed above, the proposed Zoning By-law Amendment should place no negative impact on the woodland feature.

v. Policy Review Conclusion

In view of foregoing, the proposed on-farm diversified use conforms to the Grey County Official Plan.

Provincial Planning Statement:

The Provincial Planning Statement (PPS) permits on-farm diversified uses in prime agricultural areas and on rural lands. The PPS provides the following definition:

On-farm diversified uses: means uses that are secondary to the principal agricultural use of the property, and are limited in area. On-farm diversified uses include, but are not limited to, home occupations, home industries, agritourism uses, and uses that produce value added agricultural products. Ground-mounted solar facilities are permitted in prime agricultural areas, including specialty crop areas, only as on-farm diversified uses.

Section 2.3.3.1 of the PPS includes the following policy for on-farm diversified uses in rural and prime-agricultural areas:

Proposed agriculture-related uses and on-farm diversified uses shall be compatible with, and shall not hinder, surrounding agricultural operations. Criteria for these uses may be based on guidelines developed by the Province or municipal approaches, as set out in municipal planning documents, which achieve the same objectives.

This Planning Justification Report has demonstrated that no impact on the surrounding agricultural operations should occur.

Also, the PPS protects natural heritage features and areas of known aggregate deposit. The policies have been carried forward into the Grey County Official Plan and have been addressed in this Planning Justification Report.

Furthermore, the PPS requires municipalities to provide opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses. This policy would support the proposed land use.

The proposal is consistent with the relevant policies of the PPS.

West Grey Zoning By-law:

The subject lands are currently zoned 'A2' (Rural) and 'NE' (Natural Environment) on Schedule A of the Municipality's Zoning By-law, as shown on Figure 6.

Permitted uses in the 'A2' zone include a detached dwelling, agriculture, home occupations, and home industries. Home industries would include a machine shop, although such operation is limited in size to 233 square metres of floor area. Any business greater than 233 square metres requires a Zoning By-law Amendment and must conform to the on-farm diversified use policies of the Grey County Official Plan. The 800 square metre workshop proposed for the site therefore requires a Zoning By-law Amendment.

The proposed Zoning By-law Amendment will change the zoning of 5940 square metres of land to 'A2-x' (Rural with special provisions), as shown on Figure 7. The balance of the property will remain zoned 'A2' and 'NE'. The suggested wording of this new, site-specific zone is as follows:

Notwithstanding any applicable provisions of By-law 2025-12 to the contrary, the following provision shall apply to those lands zoned A1-x:

- (i) Additional permitted uses shall be limited to a machine shop, provided the floor area of the building occupied by this industrial use does not exceed 750 square metres.*

Concluding Comments:

The proposed Zoning By-law Amendment has strong planning merit and should be given favourable consideration.

I trust your office will deem the application complete. Should you require additional information, please do not hesitate to contact the undersigned. Before scheduling the

public meeting, please advise of the potential meeting date to ensure my availability.
Your assistance in this matter is sincerely appreciated.

Respectfully submitted,

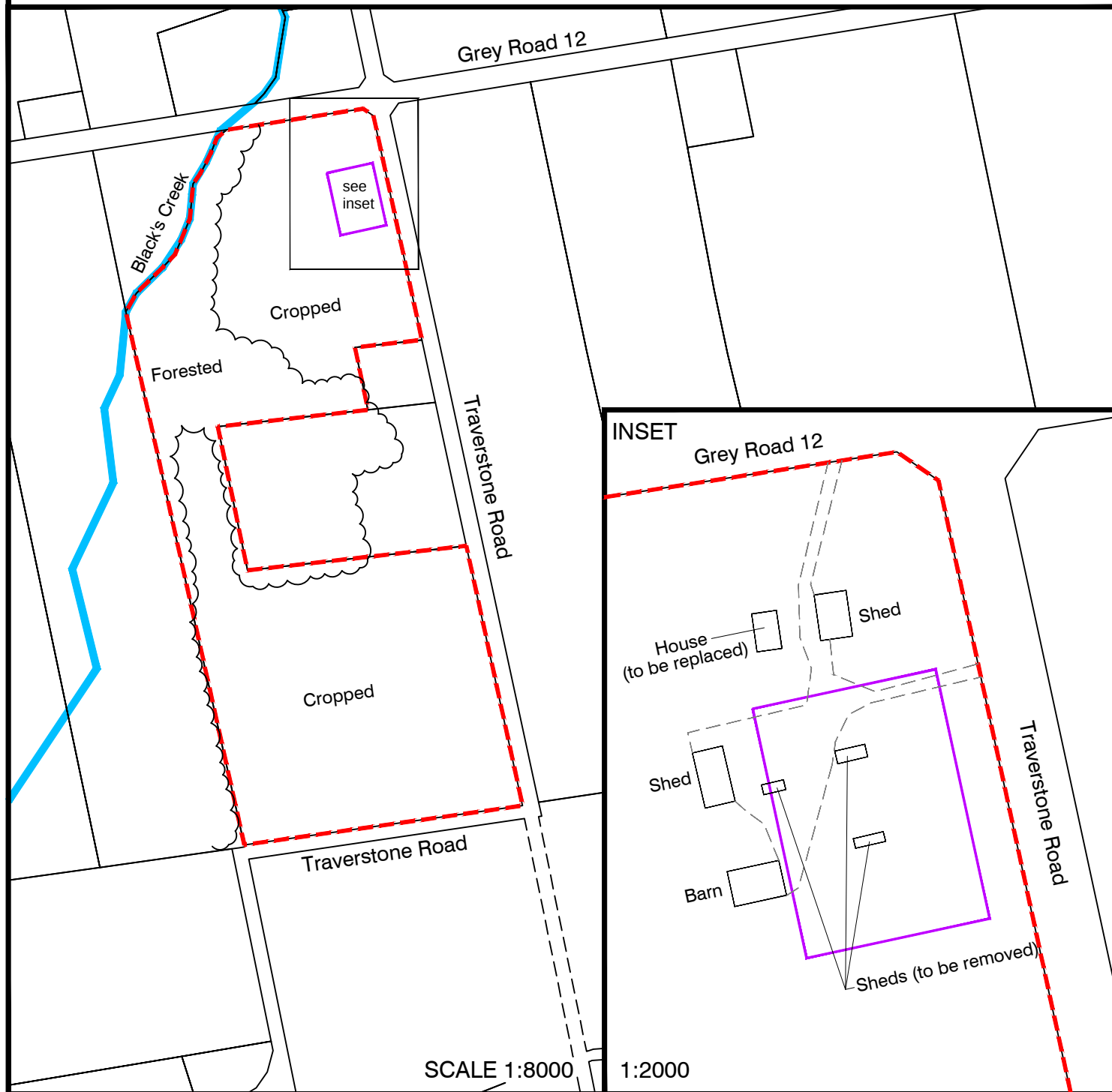
A handwritten signature in blue ink, appearing to be 'Ron Davidson', with a stylized, flowing script.

Ron Davidson, BES, RPP, MCIP

c.c. Allen Martin
Eli Sherk

Figure 1: Location Map

-  Subject Lands
-  Area of Proposed On-Farm Diversified Use



503920 Grey Road 12
Municipality of West Grey

Figure 2: Grey County Official Plan Schedule A

-  Subject Lands
-  Area of Proposed On-Farm Diversified Use
-  Hazard Lands
-  Agricultural
-  Rural



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Figure 3: Grey County Official Plan Appendix B

-  Subject Lands
-  Area of Proposed On-Farm Diversified Use
-  Significant Woodlands
-  Other Wetlands
-  ANSI, Life Science



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Figure 4: Grey County Official Plan Schedule C

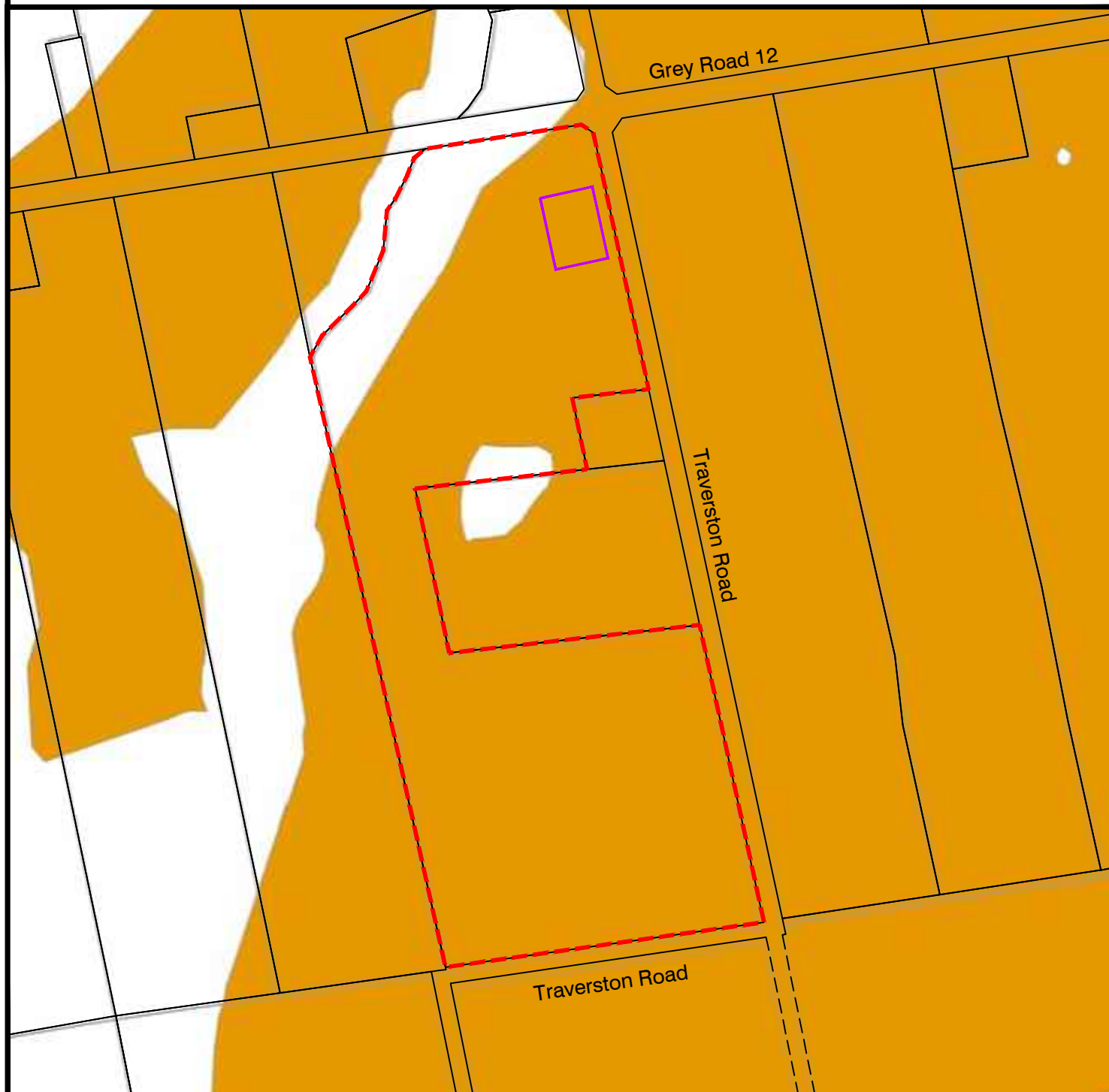
-  Subject Lands
-  Area of Proposed On-Farm Diversified Use
-  Natural Heritage System: Linkage



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Figure 5: Grey County Official Plan Schedule B

-  Subject Lands
-  Area of Proposed On-Farm Diversified Use
-  Aggregate Resource Area



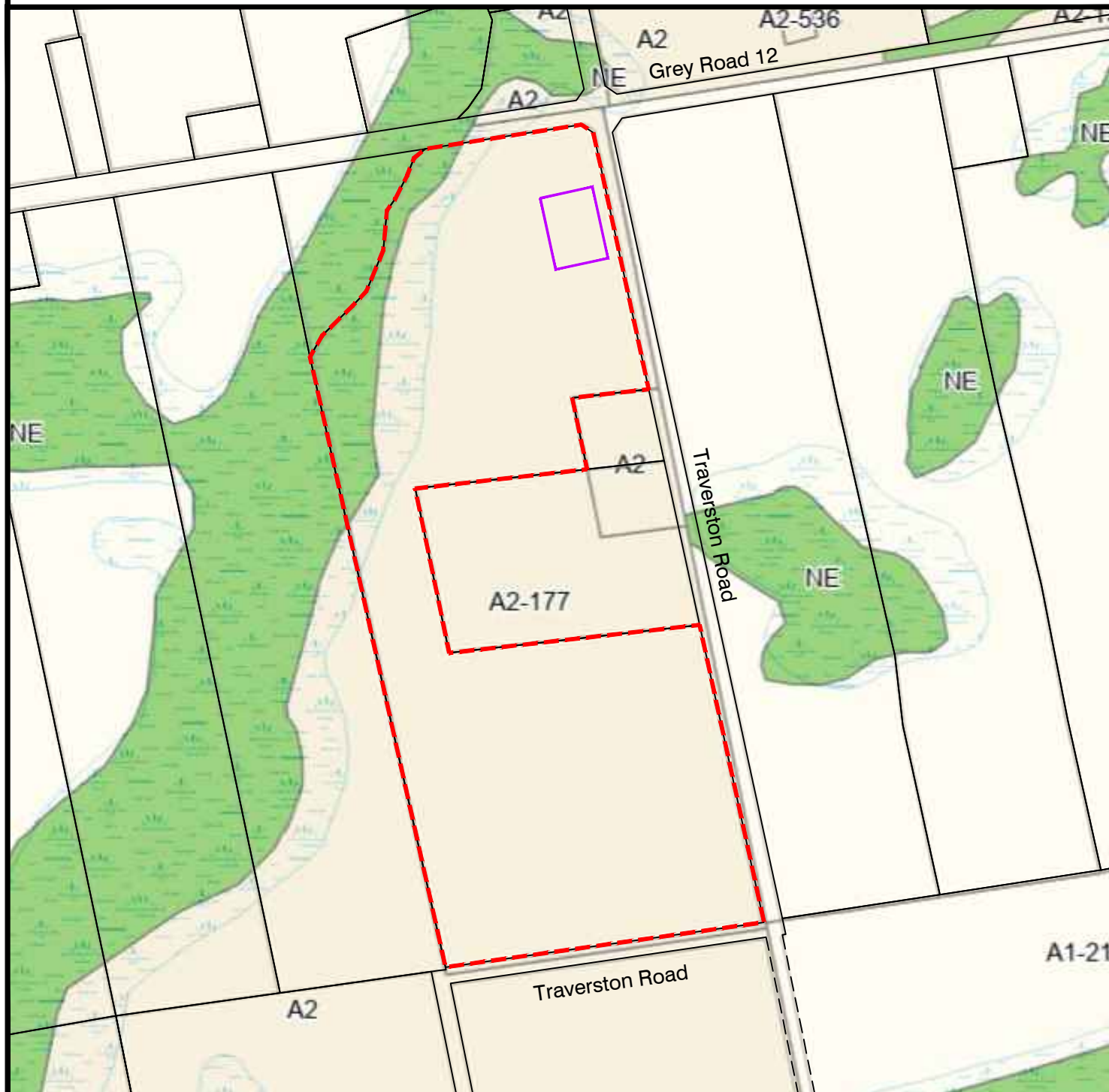
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Figure 6: Municipality of West Grey Zoning By-law

-  Subject Lands
-  Area of Proposed On-Farm Diversified Use



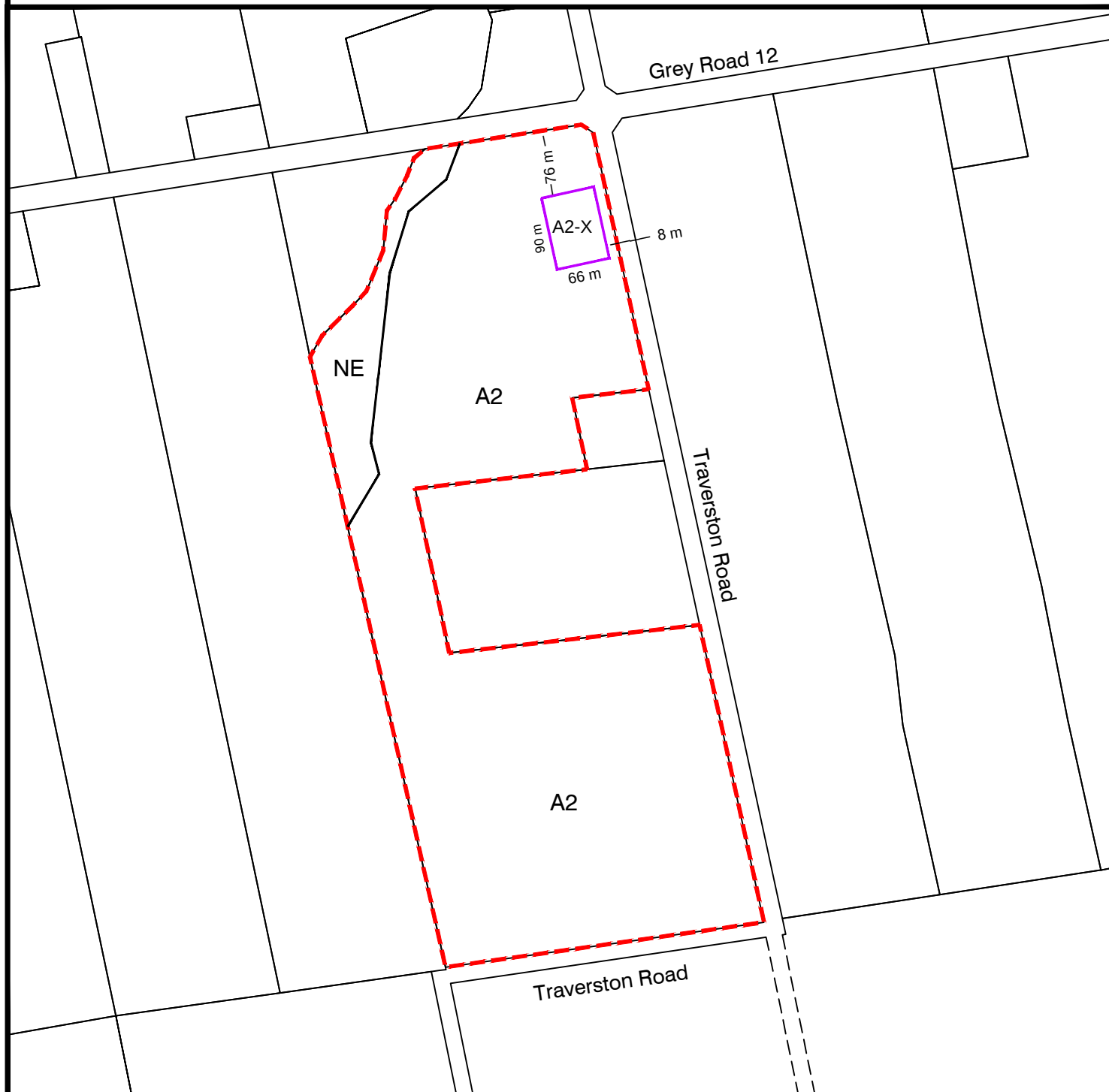
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Figure 7: Proposed Zoning

-  Subject Lands
-  Area of Proposed On-Farm Diversified Use



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