



November 20, 2025

Joanne Haley, General Manager – Planning, Building and Enforcement
6 Oak Street, Box 220
Lancaster, ON K0C 1N0

**Re: Planning Justification Report to Support a Zoning By-Law Amendment
21899 Old Highway 2
Part Lot 8, Concession 1
Geographic Township of Lancaster
Township of South Glengarry
SDG Counties
Owner: 15990955 Canada Inc. c/o Nick DeMarte**

Dear Ms. Haley,

Egis Canada has been retained by the property owner to assist with the completion of Zoning By-Law Amendment for the above noted property. The property contains an existing Light Industrial use, and the proposal is to re-zone the property from Highway Commercial (CH) to Light Industrial (ML) to allow for a wider range of permitted uses compared to the current property zoning. There are no new uses, buildings, or structures proposed for the property as part of the Zoning By-Law Amendment. A pre-consultation was conducted with Township staff on July 25, 2025, to review the rezoning proposal and obtain a list of requirements to support the Amendment. Consultation with MTO was recommended given the site abuts the Highway 401 Corridor. A pre-consultation request was submitted through the MTO Highway Corridor Management System and comments were received October 9, 2025. The comments supported the amendment in principal and will be submitted to the Township along with the application for Zoning By-Law Amendment.

SUBJECT PROPERTY

The subject lands are located at 21899 Old Highway 2 falling under PIN 67137-0364 and are legally described as Part of Lot 8, Concession 1, Lancaster, Part 1, 14R-2996; South Glengarry. The property measures approximately 3.0 hectares (7.4ac) in size with 101 metres of road frontage on Old Highway 2 (See Figure 1). The subject lands are designated Rural District on Land Use Schedule A6 to the SDG Counties Official Plan and zoned Highway Commercial (CH) on the South Glengarry Zoning By-Law – St. Lawrence Shoreline Part 14. The proposal is to re-zone the property from Highway Commercial (CH) to Light Industrial (ML) to increase the marketability of the property by adding additional permitted uses through the ML zoning. The adjacent property at 21895 Old Highway 2 was recently approved for a similar rezoning to Light Industrial (ML).

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The subject property contains two existing buildings. On the west side of the property is a light industrial building with two large bay doors on the south side of the structure. On the east side of the property is an industrial building containing an office which also looks to contain a residential unit. Historic streetview photos show a kids play set, a trampoline, and a pool indicating potential past residential uses (See Figure 2). The property is not currently being used for residential purposes. Each building is serviced by an individual on-site sewage disposal system. A well is located inside the eastern building on the property. To the rear of the property is a large pile of asphalt shingles which are also visible in Figure 2 on the next page.



Figure 1 - Aerial View of 21899 Old Highway 2



Figure 2 – September 2019 Google Streetview photo of East Building

Lands to the north of the subject property comprise the Highway 401 corridor with agricultural uses on the north side of the corridor. Lands to the east and south of the property consist of a mix of commercial, residential and vacant parcels of varying size. Lands to the east of the property contain a commercial food storage warehouse building with a vacant property located further west. The abutting lands at 21885 Old Highway 2 recently underwent a similar Zoning Amendment from Highway Commercial to Light Industrial to support the warehouse development.

PROVINCIAL PLANNING STATEMENT (PPS) 2024

The Provincial Planning Statement (PPS) 2024, issued under the authority of Section 3 of the Planning Act, provides policy direction on matters of provincial interest related to land use planning and development. The Provincial Planning Statement came into effect October 20, 2024, replacing the Provincial Policy Statement that came into effect on May 1, 2020.

Section 2.5 of the PPS speaks to Rural Areas in Municipalities with policies aimed at achieving healthy, integrated and viable rural areas. The proposed Zoning By-Law Amendment will help build upon rural character by placing the property into a more appropriate zone to allow for future use of the on-site buildings for light industrial lands uses and will leverage rural amenities and assets by ensuring existing building stock is maintained for future use (PPS 2.5.1[a]). The rural road infrastructure can continue to be used efficiently (PPS 2.5.1[d]). The

Zoning Amendment will promote the diversification of the economic base by maintaining current buildings on-site for future potential employment uses (PPS 2.5.1[e]). The proposed Zoning By-Law Amendment will help achieve healthy, integrated and viable rural areas. Growth and development may be directed to rural lands in accordance with policy 2.6 of the PPS 2024.

Section 2.6 of the PPS speaks to Rural Lands in Municipalities. Pursuant to Section 2.6.1 industrial uses are not specifically mentioned but Other Rural Land Uses are permitted pursuant to PPS 2.6.1[g]. Industrial uses are generally to be directed to rural lands outside of settlement areas like the subject property. Industrial land uses would fall under the umbrella of Other Land Uses pursuant to the PPS. This is evidenced through the recent rezoning to Light Industrial for the abutting property to the west. No new uses, buildings or structures are proposed. The lands can be sustained by rural service levels (PPS 2.6.2). Development is appropriate for the infrastructure available and would not require uneconomical expansion to support the Zoning Amendment (PPS 2.6.3). Overall, the proposed rezoning to Light Industrial would be consistent with the Rural Lands in Municipalities policies of the PPS 2024.

Section 2.8 of the PPS speaks to Employment. The property is currently in a Highway Commercial zone which would support limited employment opportunities. A Zoning Amendment to Light Industrial will maintain the employment opportunity potential for the property ensuring an appropriate mix and range of employment opportunities to meet long term needs are provided (PPS 2.8.1.1[a]). Existing buildings on the property will be maintained through the Zoning Amendment providing a suitable site for employment uses which can support a wide range of activities (PPS 2.8.1.1[b]). The site represents a strategic location for investment as close proximity to the Highway 401 corridor present numerous opportunities for future employment uses (PPS 2.8.1.1[c]). Pursuant to PPS 2.8.1.2 *“industrial, manufacturing and small-scale warehousing uses that could be located adjacent to sensitive land uses without adverse effects are encouraged in strategic growth areas and other mixed-use areas where frequent transit service is available, outside of employment areas.”* The buildings on-site are small scale buildings with no significant point source emissions. Class I industrial uses require a minimum 20 metres separation distance to sensitive uses pursuant to the D-Series Guidelines. The Old Highway 2 road allowance provides sufficient separation from sensitive land uses to the south side of Old Highway 2. The lands fall outside of the Employment District on Schedule A6 to the SDG Counties Official Plan and would not be considered an Employment Area pursuant to Section 2.8.2 of the PPS.

Chapter 3 of the PPS speaks to Infrastructure and Facilities with policies for Transportation Systems located under **Section 3.2**. The PPS requires transportation systems be provided which are safe, energy efficient, facilitate the movement of people and goods, are appropriate to address projected needs, and support the use of zero- and low- emission vehicles. A Zoning By-Law Amendment to place the property in a Light Industrial zone

would not impact the current transportation systems provided by Highway 401 or Old Highway 2 (PPS 3.2.1). As such, efficient use of existing and planned infrastructure would be achieved (PPS 3.2.2).

Section 3.5 of the PPS speaks to Land Use Compatibility for minor and major industrial facilities and sensitive land uses. A Zoning Amendment to a Light Industrial zone will result in the property being considered industrial which requires separation distances to nearby sensitive uses. Land Use Compatibility will be address in detail later in this report to ensure mitigation of any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety

Section 3.6 of the PPS speaks to Sewage, Water and Stormwater. The subject property is currently serviced by a private well and two individual on-site sewage disposal systems which will remain through the redevelopment. Pursuant to Section 3.6.4 *“where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual on-site sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.”*

Chapter 4 of the PPS speaks to the Wise Use and Management of Resources with Natural Heritage policies found under **Section 4.1**. There are no natural heritage features identified within the property boundary. As no new development or site alteration is proposed as part of the Zoning Amendment any identified natural heritage features on nearby properties will be protected for the long term.

Section 4.2 of the PPS speaks to Water. There are no significant surface or groundwater features on or abutting the property and no new development is proposed.

Section 4.3 of the PPS speaks to Agriculture. Lands to the north of the Highway 401 corridor are identified as Agricultural Resource Lands pursuant to the SDG Counties Official Plan. As no new development is proposed for the property no impacts on agricultural areas or the ability to continue farming these areas is anticipated.

Section 4.4 of the PPS speaks to Minerals and Petroleum, neither of which have been identified on the property.

Section 4.5 speaks to Mineral Aggregate Resources which have not been identified on the property.

Section 4.6 of the PPS speaks to Cultural Heritage and Archaeology. The site does not contain any significant cultural or archaeological resources.

Chapter 5.0 of the PPS speaks to Protecting Public Health and Safety with policies for Natural and Human-Made Hazards. There are no hazardous shorelines, hazard lands along rivers, or hazardous sites identified for the property (PPS 5.2.2). No development or site alteration would occur within the floodplain areas or areas inaccessible during times of flood (PPS 5.2.3[c]). No natural hazards occur on the property.

No mine hazards; oil, gas, and/or salt hazards; or former mineral mining operations, mineral aggregate operations or petroleum resource operations have been historically located on the property (PPS 5.3.1). The site contains a potential human-made hazard in the form of a large pile of asphalt shingles left over from the previous owner which could have the potential for contamination (PPS 5.3.2). A Phase 1 Environmental Site Assessment was completed for the property and determined a Phase 2 assessment was not required. The asphalt shingles do not present an environmental concern for the Zoning Amendment.

Overall, a site-specific Zoning By-Law Amendment for 21899 Old Highway 2 to rezone the property to Light Industrial (ML) would be consistent with the policies of the Provincial Planning Statement (PPS) 2024.

ENVIRONMENTAL LAND USE PLANNING GUIDES (D-SERIES GUIDELINES)

The proposed Zoning By-Law Amendment is seeking to place the property at 21889 Old Highway 2 into a Light Industrial (ML) zone. The Province of Ontario Environmental Land Use Planning Guides, typically referred to as the D-Series Guidelines, speak to environmental considerations and requirements for industrial land use, sensitive lands, sewage and water services, and private wells. The D-1-3 guide provides definitions for Land Use Compatibility and defines a sensitive land use as follows:

A building, 'amenity area' or outdoor space where routine or normal activities occurring at reasonably expected times would experience 1 or more 'adverse effect(s)' from contaminant discharges generated by a nearby 'facility'. The 'sensitive land use' may be a part of the natural or built environment. Depending upon the particular 'facility' involved, a sensitive land use and associated activities may include one or a combination of:

- i. Residences or facilities where people sleep (e.g. single and multi-unit dwellings, nursing homes, hospitals, trailer parks, camping grounds, etc.). These uses are considered to be sensitive 24 hours/day.*
- ii. A permanent structure for non-facility related use, particularly of an institutional nature (e.g. schools, churches, community centres, day care centres).*
- iii. Certain outdoor recreational uses deemed by a municipality or other level of government to be sensitive (e.g. trailer park, picnic area, etc.).*
- iv. Certain agricultural operations (e.g. cattle raising, mink farming, cash crops and orchards).*
- v. Bird / wildlife habitats or sanctuaries.*

Four residential properties with civic addresses of 21890, 21894, 21902 and 21912 Old Highway 2, along with a fifth vacant property with residential potential, are located opposite the subject property along Old Highway 2. Additional residential properties are located further south and southwest of the property closer to the St. Lawrence River. All these residential uses would be considered sensitive land uses pursuant to the D-1-3 guide requiring appropriate separation from the lands to be rezoned Light Industrial. There are no institutional uses or outdoor recreational uses near the lands to be re-zoned. The abutting lands to the east are used for agricultural purposes however the lands do not comprise Prime Agricultural Resource Lands pursuant to the SDG Counties Official Plan. Rezoning the property at 21899 Old Highway 2 to a Light Industrial (ML) zone would not preclude the lands from continued farming operations as no new buildings or emission sources are proposed through the rezoning request.

The D-1-3 guide provides definitions for three separate classes of industrial facility based on their size, daily operations, emissions, and site activity. The definitions for Class I, II and III industrial facilities are as follows:

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.

Class II Industrial Facility - A place of business for medium scale processing and manufacturing with outdoor storage of wastes or materials (i.e. it has an open process) and/or there are periodic outputs of minor annoyance. There are occasional outputs of either point source or fugitive emissions for any of the following: noise, odour, dust and/or vibration, and low probability of fugitive emissions. Shift operations are permitted and there is frequent movement of products and/or heavy trucks during daytime hours.

Class III Industrial Facility - A place of business for large scale manufacturing or processing, characterized by large physical size, outside storage of raw and finished products, large production volumes and continuous movement of products and employees during daily shift operations. It has frequent outputs of point source and fugitive emissions of significant impact and there is high probability of fugitive emissions.

The D-6-1 Guide provides industrial classification criteria like scale, processes, outputs, and intensity of operations to establish the class of industrial facilities. Table 1 on the next page provides the Industrial Categorization Criteria for the three classes of industrial land uses.

Table 1 – D-6-1 Industrial Categorization Criteria

Category	Outputs	Scale	Process	Operation / Intensity	Possible Examples
Class 1	<ul style="list-style-type: none"> - Noise: Sound not audible off property - Dust and/or Odour: Infrequent and not intense - Vibration: No ground borne vibration on plant property 	<ul style="list-style-type: none"> - No outside storage - Small scale plant or scale is irrelevant in relation to all other criteria for this Class 	<ul style="list-style-type: none"> - Self contained plant or building which produces / stores a packaged product. Low probability of fugitive emissions 	<ul style="list-style-type: none"> - Daytime operations only - Infrequent movement of products and/or heavy trucks 	<ul style="list-style-type: none"> - Electronics manufacturing and repair - Furniture repair and refinishing - Beverages bottling - Auto parts supply - Packaging and crafting services - Distribution of dairy products - Laundry and linen supply
Class 2	<ul style="list-style-type: none"> - Noise: Sound occasionally audible off property - Dust and/or Odour: Frequent and occasionally intense - Vibration: Possible groundborne vibration, but cannot be perceived off property 	<ul style="list-style-type: none"> - Outside storage permitted - Medium level of production allowed 	<ul style="list-style-type: none"> - Open process Periodic outputs of minor annoyance - Low probability of fugitive emissions 	<ul style="list-style-type: none"> - Shift operations permitted - Frequent movement of products and/or heavy trucks with most movements during daytime hours 	<ul style="list-style-type: none"> - Magazine printing - Paint spray booths - Metal command - Electrical production manufacturing - Manufacturing of dairy products - Dry cleaning services - Feed packing plant
Class 3	<ul style="list-style-type: none"> - Noise: sound frequently audible off property - Dust and/or Odour: Persistent and/or intense - Vibration: Ground-borne vibration can frequently be perceived off property 	<ul style="list-style-type: none"> - Outside storage of raw and finished products - Large production levels 	<ul style="list-style-type: none"> - Open process Frequent outputs of major annoyances - High probability of fugitive emissions 	<ul style="list-style-type: none"> - Continuous movement of products and employees - Daily shift operations permitted 	<ul style="list-style-type: none"> - Manufacturing of paint and varnish - Organic chemicals manufacturing - Breweries - Solvent recovery plants - Soaps and detergent manufacturing - Manufacturing of resins and costing - Metal manufacturing

The existing buildings on-site are not currently designed for production activities where products can be manufactured. Outside storage of asphalt shingles is presently occurring but these are not used for manufacturing processes. Noise, dust and vibration would be limited to movement of vehicles on the property. The buildings are self-contained and operations would be daytime only. **The use would fall under a Class 1 Industrial Facility.** Further, any future development application will need to show compliance with D-6 guidelines allowing for future control and assessment of uses if the property is redevelopment in the future.

Guideline D-6, Compatibility Between Industrial Facilities and Sensitive Land Uses, provides for classification criteria and examples to categorize specific industries. Separation between sensitive land uses and industrial facilities is assessed in two ways; 1) through influence areas, and 2) through minimum separation distances. Influence areas are areas where one or more adverse effects may be experienced but are not considered a strict setback for the development of sensitive uses. New sensitive uses can be established within the influence areas of industrial uses, and new industrial uses can be established in proximity to sensitive uses provided proper mitigation of any potential impacts within the areas of influence are managed. The Ministry has established the following influence areas for industrial uses:

Class I — 70 metres

Class II — 300 metres

Class III — 1000 metres

The D-6 Guide also provides direction for minimum separation distances required between sensitive uses and industrial facilities. These distances must be met between sensitive uses and industrial facilities. The minimum separation distances are:

Class I—20 metres minimum

Class II—70 metres minimum

Class III—300 metres minimum

Separation distance measurements can be completed in one of two ways. General land use plans measure from the area designated for the industrial use to the area designated for the sensitive use. This method is generally applied when the industrial and sensitive uses share a common property line. Site specific plans measure from the closest existing, committed or proposed property/lot line of the industrial land use to the property/lot line of the closest existing, committed or proposed sensitive land use. This approach is used when other lands intervene between the industrial property and sensitive use property. Intervening uses could include, but are not limited to, infrastructure like roads, natural areas, or other sensitive or non-sensitive uses located between the proposed sensitive use and the industrial facility.

The subject property at 21899 Old Highway 2 does not share an existing, committed or proposed property/lot line with any part of the sensitive residential uses across the road. The site-specific plan method for measuring separation distance would be applied. The Old Highway 2 road allowance measures approximately 26 metres in width. A Class I industrial facility has a minimum separation distance of twenty (20) metres. Therefore, the minimum separation distance to the nearest sensitive receptors pursuant to the D-6 Guide for industrial separation can be met for the proposed Zoning Amendment to Light Industrial.

UNITED COUNTIES OF STORMONT, DUNDAS, AND GLENGARRY OFFICIAL PLAN

The subject lands are designated Rural District on Land Use Schedule A6 to the SDG Counties Official Plan. An employment district extends to the western side lot line of the property. There are no Natural Hazards or Features identified on Schedule B1 to the Official Plan, no Significant Woodlands are identified on Schedule B2, no Natural Heritage Systems are identified on Schedule B3, the site is outside any Source Water Protection Areas pursuant to Schedule B4, and no aggregate is identified on Schedule B5. The Official Plan was adopted July 17, 2017, and approved February 4, 2018.

Section 3 of the SDG Counties Official Plan speaks to Community Growth and Settlement with policies for Rural Lands found under **Section 3.3**. Development shall typically be serviced by individual on-site water supply and sewage disposal which is the current form of servicing on the property. The property is not within an Employment District but is immediately adjacent to one. The subject property is developed with structures that could support potential employment uses that would benefit from exposure to the travelling public.

Section 3.4 of the SDG Counties Official Plan speaks to the Scope of Land Use with Rural District policies found under Section 3.4.6 stating “*the Rural District contains a variety of land uses, such as farms, forests, small industries, golf courses, and in many places, small clusters of residential and commercial development. The intent of this designation is to accommodate a variety of land uses that are appropriate for a rural location and a limited amount of residential development where such development will not preclude continued agricultural and non-residential uses.*” The designation recognizes small industries as a land use within the Rural District. A Zoning Amendment to allow the existing buildings to be used for Light Industrial purposes would meet the intent of the Official Plan by permitting a small industry near other industrial land uses. Pursuant to Section 3.4.6 a zoning by-law amendment is required for new industrial and commercial uses.

Pursuant to the SDG Counties Official Plan, when considering an application to amend the zoning By-law to permit a new industrial use, the following must be considered:

a) The use would not be better located in a Settlement Area or the urban area;

- Due to the potential for adverse impacts relating to noise, dust, odour or vibration industrial uses are better suited for rural areas outside settlement areas or urban boundaries in order to mitigate impacts on more densely populated residential / urban areas.

b) The volume and pattern of traffic flow anticipated from the development will not interfere with the proper functioning of the local road network;

- The volume and pattern of traffic flow is not expected to change and no new development or redevelopment is proposed.

c) The privacy of adjacent landowners or the mitigation of potential adverse impacts from lighting, noise, odour, dust or traffic can be achieved by separating the land uses, buffering or other measures as part of the development;

- Proper mitigation of potential impacts can be achieved through the current distance separations between on-site buildings and nearby sensitive uses.

d) The potential for reducing possible impacts on neighbouring agricultural uses or nearby rural residential or settlement areas, where relevant;

- The agricultural use adjacent to the subject property, which falls in the rural district, has continued unabated since the initial development of 21899 Old Highway 2 many years ago. The Zoning Amendment will not preclude the neighbouring property from continuing farming operations.

e) The development is in keeping with the surrounding rural character and landscape;

- The existing buildings and structures on the property are not proposed to change. The rural character and landscape of the property will be maintained.

f) All relevant servicing, design and compatibility and environmental protection policies of this plan;

- All relevant sections will be addressed.

g) Noxious uses will only be considered where suitable screening and buffering can be provided and generally these uses will not be considered in vulnerable drinking water protection areas, immediately adjacent to residential areas, or in waterfront areas; and,

- Noxious uses are not proposed.

h) The impact that the development will have on the protection of tree cover as result of proposed site clearing and grading, fencing, security lighting, and other similar site plan matters.

- The site is already mainly clear of vegetation. As no new development or redevelopment is proposed as part of the Zoning Amendment no changes in existing tree cover along the road or at the rear of the property will be impacted.

Section 3.5 of the SDG Counties Official Plan speaks to permitted land uses. Table 3.5 does not specifically list industrial uses within the Rural District column of the table, however Section 3.4 does permit small industries in accordance with the Rural District policies. The property at 21899 Old Highway 2 has adequate size to support the uses and meet zoning requirements (SDG OP 3.5.1.1). Both buildings are serviced demonstrating adequate servicing capacity (SDG OP 3.5.1.2). The site has sufficient frontage on Old Highway 2 with two (2) existing access points to the traveled road (SDG OP 3.5.1.3). On-site vegetation could be enhanced if additional screening is needed for future industrial land uses (SDG OP 3.5.1.4). Land Use Compatibility concerns have been addressed previously in this report. The use can achieve the required separation distances set forth in the D-Series Guidelines (SDG OP 3.5.1.5). Appropriate zoning for the property will be established through the Zoning By-Law Amendment (SDG OP 3.5.1.7). As no new development is proposed site plan control may not be required (SDG OP 3.5.1.8). The completed ESA determined no additional site assessment or environmental compliance approvals would be needed (SDG OP 3.5.1.9).

Section 3.5.2 of the SDG Counties Official Plan speaks to Planning Guidelines with wording for Industrial Areas found under Section 3.5.2.4. The existing industry on the property has been located to take advantage of the existing road infrastructure and nearby connection to the Highway 401 corridor. The highway interchange also connects to County Road 23 providing connections to various rural roads within South Glengarry. The proposed industry will not pollute surface or groundwater resources as the development is well separated from nearby water resources. The abutting lands to the west are also zoned Light Industrial and Employment Area. While the subject property falls beyond the employment area the Zoning Amendment would result in the clustering of industrial uses close to the Highway interchange. Area exists along the front of the property for enhanced screening if required for future uses. Existing on-site services can continue to service the property. Finally, *“where the intensification, expansion or conversion of/to an industrial uses(s) occurs, the planning review shall ensure that the lot size is adequate for all requirements of the intended use including parking, water supply and sewage disposal systems, that access will be safe, and that the change will be compatible with adjacent uses.”* Pursuant to the site sketch the property measures 31,721 square metres in size, well above the zoning by-law minimum of 4,000 square metres, with suitable land area to accommodate parking, servicing and access.

Section 4.3.6 of the SDG Counties Official Plan Speaks to Transportation with policies for a variety of road classifications. The Highway 401 corridor to the north of the property comprises a Provincial Highway pursuant to Section 4.3.6.1. As no new development is proposed and no existing or proposed accesses will be needed from the provincial highway the overall function of the corridor will not be impacted. A pre-consultation was

completed with MTO who determined the Zoning Amendment could be supported in principle. Old Highway 2 is a County Road pursuant to Section 4.3.6.2. The site currently has two access points from Old Highway 2. As no new accesses and no new development or redevelopment are proposed no impacts on the functioning of the County Road is anticipated. No new lot creation is proposed pursuant to Section 4.3.6.2.1.

Section 5 of the SDG Counties Official Plan speaks to Resource Management. There are no agricultural resource lands, aggregate extraction uses, aggregate reserves, environmental hazard lands, provincially or locally significant wetlands, species habitat, fish habitat, ANSIs, significant woodlands or significant valleylands on or directly abutting the subject property. As such, the policies of Section 5 will not be addressed further in this report.

Section 6 of the SDG Counties Official Plan speaks to Public Health and Safety. There are no natural hazards on the property. The large pile of asphalt shingles has not been deemed a source of contamination for the property. A Phase 1 ESA was completed by Paterson Group and did not recommend a Phase 2 assessment. There would be no natural or man-made hazards on the property pursuant to Section 6 of the SDG Counties Official Plan.

Overall, the Rural District does allow for small industries outside of Employment Areas. A zoning by-law amendment to place 21899 Old Highway 2 into a Light Industrial (ML) zone would be consistent with the policies of the SDG Counties Official Plan, can meet required separations to sensitive uses, and would be complementary to the light industrial use falling to the west of the property.

TOWNSHIP OF SOUTH GLENGARRY ZONING BY-LAW 06-2023

The subject lands are zoned Highway Commercial (CH) on the South Glengarry Zoning By-Law – St. Lawrence Shoreline Part 14. The proposal is to re-zone the property from Highway Commercial (CH) to Light Industrial (ML) to increase the marketability of the property by adding additional permitted uses through the ML zoning. Lands to the west of the subject property recently underwent a similar rezoning to Light Industrial (ML).

Section 3 of the Zoning By-Law sets forth General Provisions for the development of properties within the Township of South Glengarry with policies for Accessory Uses, Buildings and Structures located in **Section 3.1**. The two buildings on-site would both be considered primary for the purposes of the zoning review. There are no other accessory structures to these two primary uses located on the property.

Section 3.30 of the Zoning By-law speaks to Open Storage and Outdoor Display Open Storage applicable to the property due to the current storage of asphalt shingles. This situation was left over from the previous owner who imported the shingles onto the property. Their storage is accessory to the principal use of the property (ZBL 3.30[a]). The shingles are setback from the side property line outside the required yard (ZBL 3.30[b]). The open

storage does not cover more than 40% of the lot area (ZBL 3.30[c]). The property owner has had the shingles assessed to ensure no environmental concerns will result from their storage. However, due to the cost of removal the owner is seeking to maintain the shingles on the property until a solution can be found.

Section 3.39 of the Zoning By-Law speaks to Special Setbacks with policies for Provincial, County and Municipal Roads in Section 3.39(1). Both existing buildings are setback greater than 30 metres from Old Highway 2 a County Road (ZBL 3.39.1[b]). There are no proposed buildings.

Section 3.39(6) of the Zoning By-Law speaks to Industrial Uses. As established earlier in this report, the site would be considered a Class I industrial use based on outputs, scale, and operational intensity. Pursuant to Section 3.39(6a) the minimum separation distance from a sensitive land use to a Class I industry shall be 20 metres. Lands to the north, east, and west of the property do not contain sensitive land uses. Lands to the south contain residential dwellings that would be considered sensitive. The Old Highway 2 road allowance is approximately 26 metres wide providing the required separation pursuant to the zoning by-law. Further, the on-site buildings are setback more than forty-five metres from the front lot line providing additional separation to nearby dwellings.

Part 4 of the Zoning By-Law speaks to Parking and Loading Provisions. Industrial uses require one parking space for every 95 square metres of gross floor area, plus one space for each three employees per shift. Both buildings measure roughly 390 square metres in size. The parking requirement based on floor area would equal 8.2 spaces rounded up to nine. The site sketch submitted with the Zoning Amendment shows 14 parking spaces on the site providing the minimum parking requirement plus five additional spaces supporting up to 15 employees. If an employment use of that size were established the site has ample space for additional parking if required. One of the spaces could be established as a barrier-free space if required. Sufficient area exists around both buildings to provide loading spaces in accordance with Section 4.18 of the zoning by-law.

Part 8 of the Zoning By-Law speaks to Industrial Zones including the proposed Light Industrial (ML) zone. Permitted uses for industrial zones are set forth in Section 8.1. No changes to permitted uses are proposed. The site currently contains an accessory residential unit which is not permitted in the ML zone. No exceptions are included to maintain the residential unit.

Section 8.2 outlines Zone Standards for the various industrial zones. Zone provisions for the ML zone and the existing provisions for the property are provided in the table on the next page.

Zoning Table for 21899 Old Highway 2 – Light Industrial (ML) zone		
Zone Standard (Private Services)	Requirement	Existing Condition
Lot Area (min)	4,000m ²	31,720m ²
Lot Frontage (min)	40m	106.7m
Lot Coverage (max)	35%	2.46%
Height (max)	15m	< 15m
Front Yard (min)	9m	45.9m / 47.3m
Rear Yard (min)	8m	228.0m / 240.5m
Interior Side (min)	6m	8.9m / 6.2m
Exterior Side (min)	9m	N/A
Landscaped Space (min)	10%	~ 28%

The property complies with the minimum lot area and frontage for the Light Industrial (ML) zone and both existing buildings on the property can meet zone provisions relating to yard setbacks, height, and lot coverage without the need for exceptions. Overall, the proposed Zoning By-Law Amendment from Highway Commercial (CH) to Light Industrial (ML).

CLOSURE

The subject property at 21899 Old Highway 2 is currently zoned Highway Commercial (CH) with two existing buildings on the property each serviced by private well and septic. A large stack of asphalt shingles left over from the previous landowner is located toward the rear of the property. The current owner is seeking a Zoning By-Law Amendment to place the property into a Light Industrial (ML) zone to help increase marketability and attract new business to the site. The use is small in scale with no expected adverse impacts. The size and operational intensity of the use would fall under a Class I facility if rezoned to Light Industrial (ML). Required separation distances from nearby sensitive uses can be achieved. The proposed Zoning By-Law Amendment is consistent with the Provincial Planning Statement (PPS) 2024, the Environmental Land Use Planning D-Series Guidelines, the United Counties of Stormont, Dundas and Glengarry Official Plan, and the site can meet all zone provisions and yard setbacks of the Zoning By-Law. The proposed Zoning By-Law Amendment would be appropriate for 21899 Old Highway 2.



Should you have any questions or require additional information in support of the proposed Zoning By-Law Amendment please do not hesitate to contact the undersigned.

Sincerely,

A handwritten signature in blue ink that reads "Chris Clarke".

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