



4th Line + Concession 10, South Glengarry

Planning Rationale
Official Plan Amendment and Zoning By-law Amendment
February 4, 2026

Prepared for Arcane Defense

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1.0 Introduction

This Planning Rationale has been prepared by Fotenn Planning + Design on behalf of Arcane Defense (the “applicant”) in support of applications for an Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) for the property legally described as Part Lot 8, Concession 9, located near the intersection of 4th Line Road and Concession 10 in the Township of South Glengarry, within the United Counties of Stormont, Dundas and Glengarry (herein referred to as the “subject site”).

The applications seek to permit the establishment and operation of a Recreational Commercial Establishment, specifically an indoor firing range with an associated training facility, retail store, and canteen.

The Official Plan Amendment proposes to redesignate the subject site from “Salvage Yard District” to “Rural District” in the United Counties of Stormont, Dundas and Glengarry Official Plan (OP). This redesignation will allow for a broader range of rural and recreational commercial uses and bring the site into conformity with the policies of the “Rural District.”

The accompanying Zoning By-law Amendment seeks to rezone the property from Rural (RU) to a site-specific Rural Exception (RU-X) Zone to permit a Recreational Commercial Establishment in the form of an indoor firing range and its accessory uses.

The subject site is currently designated “Salvage Yard District” and “Rural District” under Schedule A6: Land Use – Township of South Glengarry of the Official Plan. The “Salvage Yard District,” which applies to most of the property, permits the storage, dismantling, recycling, and transfer of vehicles, building materials, and non-hazardous waste. The “Rural District,” which applies to the remaining portion, supports a variety of rural land uses, including recreational commercial and highway commercial uses that serve tourism and leisure industries.

A designated “Waterway”, identified as the McDougal Municipal Drain, traverses the property from Concession Road 10 southward to 4th Line Road, providing direct and indirect fish habitat.

Schedule B1 – Natural Hazards and Features of the OP identifies organic soils on portions of the site, primarily in the southwestern and eastern areas. Schedules B2 and B3 identify significant woodlands on the adjacent property to the east, with a small portion extending onto the subject site along the eastern boundary.

The site is currently zoned Rural (RU) under Zoning By-law No. 38-09, which permits a range of rural and residential uses but does not include a *Recreational Commercial Establishment* as a permitted use. As such, a site-specific Rural Exception (RU-X) Zone is required to explicitly permit the proposed indoor firing range and associated accessory uses. The proposed OPA and ZBA will enable the development of a recreational commercial use that aligns with the intent of the Rural District designation, is compatible with surrounding land uses, and incorporates appropriate measures to minimize environmental and operational impacts.

The following materials are submitted in support of the OPA and ZBA applications:

- / Concept Plan;
- / Ecological Impact Study;
- / Phase 2 Environmental Site Assessment;
- / Geotechnical Subsurface Investigation;
- / Engineering Review Letter – Sound Transmission and Acoustic Mitigation Measures;
- / This Planning Rationale;
- / Owner Authorization; and,
- / Required Application Fees.

Site Description + Surrounding Context

The subject site is located in proximity to the southeastern corner of the intersection of 4th Line Road (County Road 23) and Concession Road 10 in the Township of South Glengarry. Concession Road 10 is a Township Road that forms the boundary between the Township of South Glengarry and the Township of North Glengarry.

A residential property, municipally known as 21914 Concession Road 10, is located on the southeast corner of 4th Line Road and Concession Road 10 and abuts the subject site.

The subject site has an approximate area of 11.7 hectares, with 354 metres of frontage along 4th Line Road and 171 metres of frontage along Concession Road 10. Vehicular access to the subject site is provided via an existing entrance on the east side of 4th Line Road, adjacent to the residential property at 21914 Concession Road 10.

The subject site is currently developed with two existing shed structures located near the 4th Line Road entrance. A municipal drain traverses the eastern portion of the subject site, originating north of Concession Road 10. The drain runs south through the property to the southern lot line, then turns west to parallel the southern boundary before terminating at 4th Line Road.

An unevaluated wetland is located in the southwestern portion of the subject site, near the intersection of 4th Line Road and the southern property boundary. Areas of tree cover are present throughout the subject site, with a more continuous wooded area located along the eastern property boundary, contiguous with a larger treed area on the adjacent lands to the east.

The surrounding area is characterized by a mix of rural and rural residential land uses, with agricultural uses also present to the south. Adjacent land uses are as follows:

- / North: Rural and Rural Residential
- / East: Rural and Rural Residential
- / South: Rural, Rural Residential, and Agricultural
- / West: Rural Residential

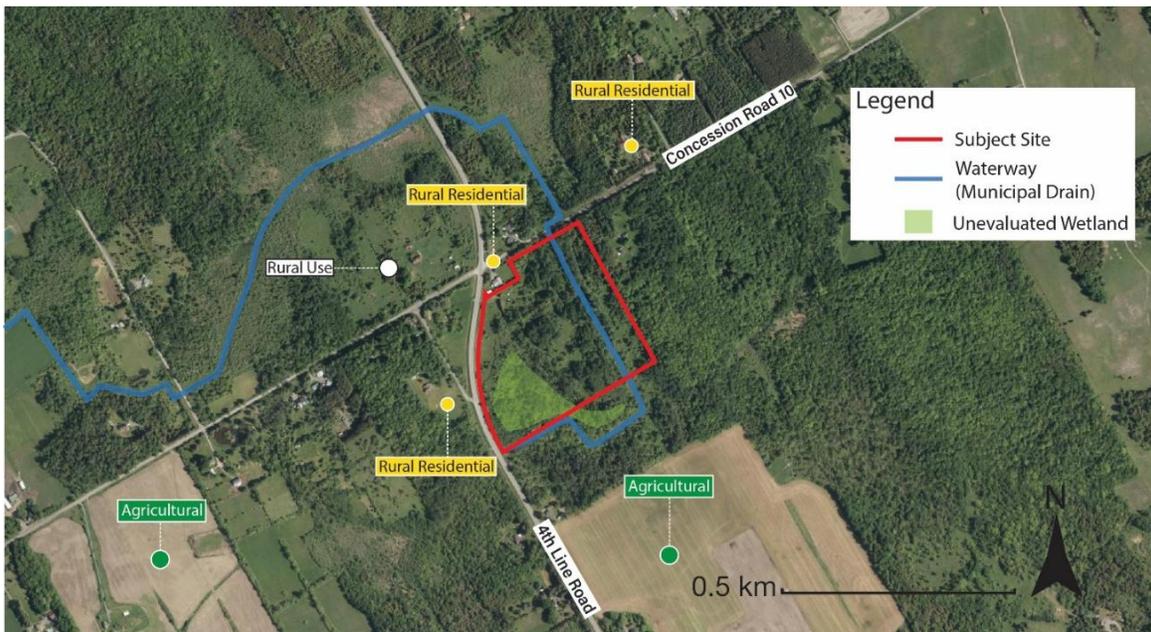


Figure 1. Site Context Map (Source: SDG Explorer, 2024 DRAPE Imagery, annotated by Fotenn Planning + Design)

3.0 Development Proposal

The subject site is designated “Rural District” and “Salvage Yard District” on Schedule A6 of the United Counties of Stormont, Dundas and Glengarry Official Plan (OP). Through consultation with County and Township staff, it is understood that the “Salvage Yard District” designation limits permitted uses to the storage, dismantling, and recycling of materials, as well as associated retail, shipping, and receiving activities. This designation does not contemplate broader rural uses, including recreational commercial establishments such as an indoor firing range.

In contrast, the “Rural District” designation permits a broader range of rural, recreational, and tourism-related uses that are compatible with the proposed development. Accordingly, this application seeks to redesignate the subject site entirely to “Rural District” to facilitate the proposed use.

The subject site is currently zoned Rural (RU) under Township of South Glengarry Zoning By-law No. 38-09. While the RU Zone permits a range of rural-based uses, it does not permit a Recreational Commercial Establishment such as an indoor firing range. Therefore, a Zoning By-law Amendment is proposed to apply a site-specific Rural Exception (RU-X) Zone to permit a Recreational Commercial Establishment consisting of an indoor firing range and its accessory components, including a retail store, training facility, and canteen.

The proposed development consists of a single-storey building with a total gross floor area (GFA) of approximately 3,251 square metres. The building will include:

- / An administrative area of approximately 975 square metres (30% of total GFA) containing a lobby, washrooms, training/classroom space, canteen, retail store, and offices;
- / A 25-metre indoor firing range of approximately 812 square metres (25% of total GFA); and
- / A 50-metre indoor firing range of approximately 1,436 square metres (45% of total GFA).

The administrative area will be located along the northern portion of the building, adjacent to the proposed parking area and primary access from Concession Road 10. The two firing ranges will be attached to the rear (southern) side of the administrative area. Both ranges will be prefabricated, purpose-built structures designed to meet industry safety standards and mitigate potential impacts, including noise. Locating the ranges centrally on the subject site will further minimize potential effects on surrounding properties.

The proposed building will be situated within the central portion of the subject site, well set back from all property boundaries, and will maintain a 30-metre setback from the municipal drain (McDougal Drain) located on the east side of the proposed building.

A surface parking area is proposed to the north of the building, in front of the administrative area, providing 50 parking spaces. A vehicular circulation area will loop around the building and parking area to support efficient access and maneuvering. The existing entrance on Concession Road 10, located east of the municipal drain, will remain but is not proposed for use in connection with the new development.

The proposed Official Plan Amendment (OPA) and Zoning By-law Amendment (ZBA) will facilitate the development of a well-designed recreational commercial establishment that complements the surrounding rural context and character. The proposal makes efficient use of an underutilized rural property, maintains appropriate setbacks from natural features, and incorporates design and operational measures to mitigate potential impacts. Overall, the proposed development aligns with the intent of the “Rural District” designation by supporting a low-impact, rural-appropriate commercial use that contributes to local economic development and diversification within the Township of South Glengarry.

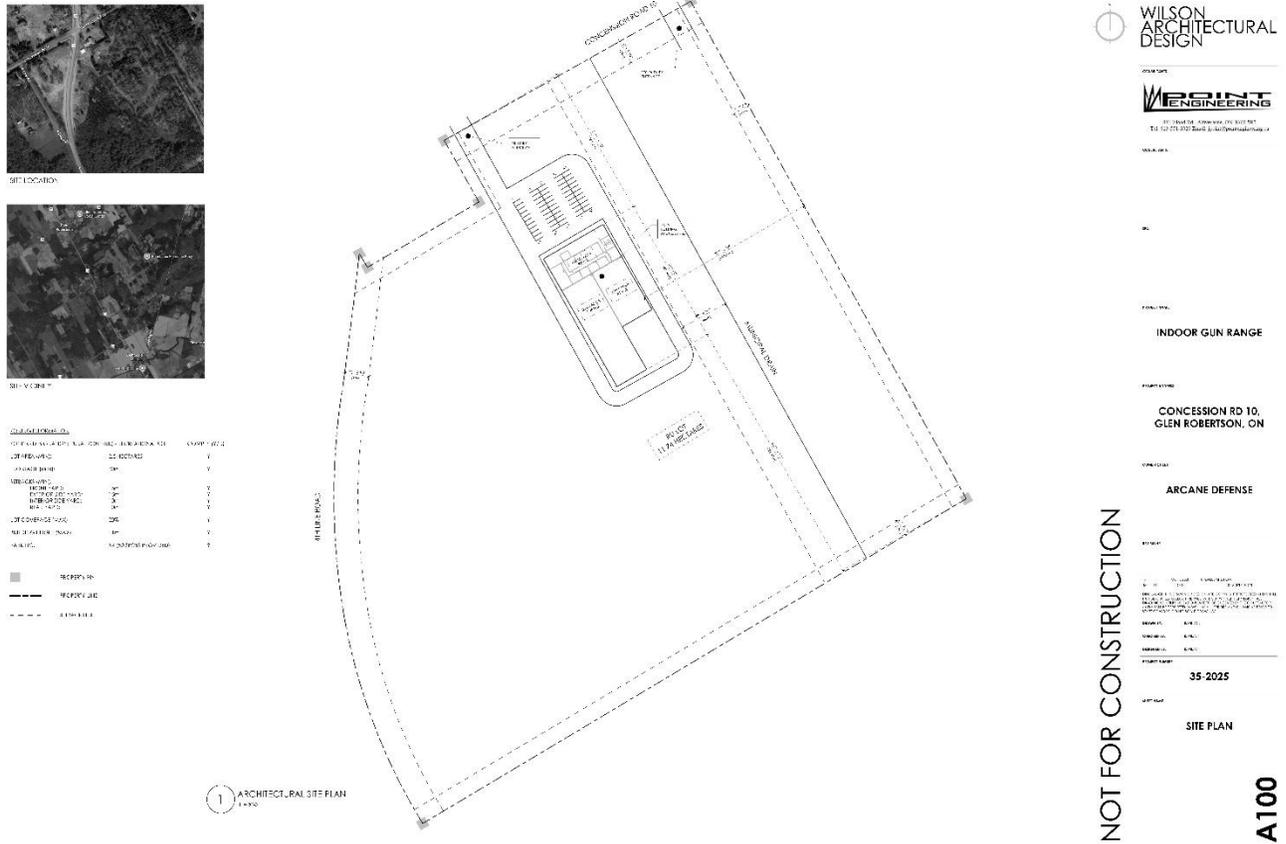


Figure 2. Site Plan (Source: Wilson Architectural Design)

4.0 Supporting Studies

4.1 Sound Transmission and Acoustic Mitigation Measures

An Engineering Review Letter assessing sound transmission and identifying acoustic mitigation measures, dated November 22, 2025, was prepared by Point Engineering in support of the proposed indoor firing range. The assessment reviews noise generated by firearm discharge and evaluates the proposed building design and acoustic treatments. The review confirms that, subject to the implementation of the recommended noise attenuation and mitigation measures, the development will conform with the Ontario Building Code sound transmission requirements (O. Reg. 332/12), the Ministry of the Environment, Conservation and Parks (MECP) Environmental Noise Guidelines (NPC-300), the Township of South Glengarry Nuisance By-law No. 20-2016, and the relevant noise and land use compatibility policies of the United Counties of Stormont, Dundas and Glengarry Official Plan.

The engineering review confirms that the indoor firing range shall be designed using a performance-based acoustic containment approach. Exterior walls, ceilings, and roof assemblies shall incorporate appropriate mass, damping, and sealing methods to minimize sound transmission, with all penetrations acoustically sealed. Interior finishes shall utilize durable, high-performance sound-absorbing materials to control reverberation, and mechanical systems shall incorporate noise control measures to prevent sound propagation. Further acoustic modeling shall be completed during the detailed design phase to confirm that sound levels comply with NPC-300 criteria for both Class 1 areas, where background sound levels are dominated by human activity and road traffic, and Class 2 areas, which exhibit a mix of Class 1 and Class 3 characteristics, combining elements of both human activity and quieter rural acoustic environments.

In response to staff comments, an updated Engineering Review Letter – Sound Transmission and Acoustic Mitigation Measures was prepared by Point Engineering, dated January 29, 2026. The updated letter addresses staff's request to demonstrate the anticipated noise impacts on surrounding land uses, including the existing residential dwelling located at 21914 Concession Road 10, which is situated within 100 metres of the proposed indoor firing range.

The updated review confirms that the proposed indoor firing range is designed using a “box-within-a-box” construction strategy to achieve a high level of airborne noise and vibration isolation. The primary firing range is structurally and acoustically decoupled from the surrounding building envelope. The inner shell incorporates acoustic panels specifically designed for noise reduction, significantly reducing reverberation and reflected impulse noise within the range. This inner enclosure is isolated from the outer structure through resilient connections and air gaps to limit structure-borne sound transmission. The exterior building envelope will consist of concrete masonry block construction combined with continuous exterior mineral wool insulation, further enhancing acoustic performance. Together, the high-absorption interior treatments, mass-loaded exterior walls, and decoupled assemblies are designed to attenuate peak impulse noise levels generated by firearm discharge to approximately 14.8 dBA outside of the firing range, and lower at the building exterior.

Based on standard acoustic calculations for similar facilities, the predicted exterior noise levels at the property line, including at 21914 Concession Road 10, are expected to be well below 45 dBA during daytime hours and 40 dBA during nighttime hours within Class 3 areas (rural area with an acoustical environment that is dominated by natural sounds), in compliance with the MECP NPC-300 environmental noise guidelines and the Township's noise by-laws. The updated letter notes that these estimates are conservative and will be further verified through detailed acoustic modeling during the detailed design phase.

Overall, the proposed design, combined with high Sound Transmission Class wall assemblies and additional mitigation measures, ensures that firearm noise will be effectively contained and attenuated. Noise emissions from the facility are anticipated to be indistinguishable from the typical rural ambient noise and will not adversely impact nearby residences and sensitive land uses.

4.2 Environmental Impact Study

An Environmental Impact Study (EIS) was prepared by BCH Environmental Consulting Inc. to evaluate potential environmental impacts associated with the proposed development on the subject site. The study included a review of aerial imagery and a detailed field survey conducted on August 27, 2025, which involved walking and assessing the site and adjacent lands to identify natural heritage features, species at risk (SAR), and associated habitats.

The site was found to contain a mix of forested, meadow, and wetland habitats, with evidence of historical disturbance creating a mosaic of treed and open areas.

A wetland was identified in the southwestern portion of the property, collecting surface water from a watercourse that runs north to south through the site. During the field visit, both the wetland and most of the watercourse were dry, with only small pockets of standing water and limited aquatic vegetation observed. The unevaluated wetland was determined to be small and not ecologically diverse, and therefore unlikely to qualify as significant under the Official Plan. The watercourse was identified as a man-made drainage ditch that may provide seasonal fish or amphibian habitat.

The EIS also identified two butternut trees, one located on-site and one on adjacent lands. Each requires a 21-metre setback; however, the proposed building envelope is located more than 131 metres from the nearest butternut tree, and no additional mitigation is required. Species use of the site was otherwise limited to SAR bats, for which timing restrictions have been recommended to avoid disturbance during sensitive periods.

The proposed development will maintain a minimum 30-metre vegetated setback from both the wetland and watercourse to prevent potential impacts related to sedimentation, hydrology, and water quality.

The woodland on the property forms part of a larger 85.56-hectare forest complex. Approximately 0.67 hectares will be cleared to accommodate development; however, this is not expected to affect the ecological function or significance of the feature, as the 21.08-hectare interior core, located on adjacent lands, will remain intact.

To protect breeding birds, vegetation removal should be avoided between March 31 and August 31. To prevent impacts to bats, trees greater than 10 centimetres in diameter should not be removed between March 15 and November 30, unless a qualified biologist confirms the absence of bats. If tree clearing occurs between December 1 and March 14, no bat impacts are anticipated.

All construction activities are recommended to be confined to the 0.79-hectare building envelope, with no works permitted within 21 metres of any butternut tree or 30 metres of the wetland or watercourse. Vegetation within these setback areas will remain naturally vegetated. Trees to be retained will have their critical root zones protected with temporary fencing, and measures will be implemented to prevent compaction, grading, or mechanical damage. Any exposed roots will be promptly covered or reburied, and pruning will be completed by a qualified arborist.

Vegetation removal will be minimized, and proper site drainage maintained to prevent standing water that could attract wildlife. Construction staff will receive training on identifying and responding to species at risk, with immediate work stoppage required if any are encountered.

Overall, the EIS concluded that with the recommended setbacks and mitigation measures in place, the proposed development is not expected to result in any negative impacts to natural heritage features, species at risk, or their habitats.

4.3 Geotechnical Subsurface Investigation

A Geotechnical Subsurface Investigation was completed for the subject site by St. Lawrence Testing & Inspection Co. Ltd. The investigation included a site visit by a Geotechnical Engineer on October 17, 2025, with a summary letter of findings issued on October 23, 2025.

Two test pits were excavated in the northeast and southwest corners of the proposed building area. The investigation identified topsoil within the first 300 mm (12 inches), underlain by brown, moist, silty gravelly sand till with cobbles extending to a depth of approximately 0.91 m (3 feet).

Based on the proposed building design and local frost depth, it was recommended that footings be placed at a minimum depth of 1.37 m (4.5 feet) below grade. In areas beneath the shooting range slab and administrative area (if slab proposed), the topsoil should be fully removed. The subgrade should be prepared with Granular B Type 2 compacted in maximum 250 mm lifts to 95% Standard Proctor Density, with a final 150 mm layer of Granular A compacted to the same standard.

The report concludes that the recommended compaction methods and material specifications should be adhered to during construction, and that field testing be conducted to verify compliance with these standards.

4.4 Phase 2 Environmental Site Assessment

St. Lawrence Testing and Inspection Co. Ltd. conducted a Phase 2 Environmental Site Assessment (ESA) for the subject site in September 2020. The ESA was completed prior to the sale of the property to determine whether any soil contamination was present as a result of the site's former use as a salvage yard for the storage of scrap vehicles, and to assess the site's suitability to support future commercial or residential uses from an environmental perspective.

As part of the assessment, the consultant reviewed historical aerial photographs and satellite imagery to identify areas where vehicles had been stored on the property. In October 2020, the consultant returned to the site to conduct field investigations, including the excavation of test pits on the western portion of the property where vehicles had historically been located. No evidence of foreign debris or notable hydrocarbon odours was observed in the soil at any of the test pit locations.

Soil samples were collected and submitted for laboratory analysis to test for benzene, toluene, ethylbenzene, and xylene (BTEX), as well as petroleum hydrocarbon (PHC) fractions. The results were compared to the Ministry of the Environment, Conservation and Parks (MECP) Ontario Regulation 153/04 Table 2 standards for both commercial and residential properties with coarse-textured soil and potable groundwater.

All soil samples were found to meet the Table 2 standards for both PHCs and metals. Based on these findings, St. Lawrence Testing and Inspection Co. Ltd. concluded that, in their opinion, the soil quality on the subject site meets the Ontario Regulation 153/04 Table 2 criteria for both commercial and residential land uses.

5.0 Policy + Regulatory Review

5.1 Planning Act, R.S.O. 1990, c. P. 13

The *Planning Act* (the “Act”) is provincial legislation which establishes the framework and rules for land use planning in the province of Ontario. The Act outlines rules and requirements for a range of matters, including the roles and responsibilities of municipal governments in the planning process and the broader rules regarding land use planning in the Province, among other things.

Part I, Section 2 of the Act outlines matters of provincial interest which municipalities and the Tribunal shall have regard to. Relevant matters of provincial interest include the following:

- (a) *the protection of ecological systems, including natural areas, features and functions;*
- (e) *the supply, efficient use and conservation of energy any water;*
- (f) *the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;*
- (h) *the orderly development of safe and healthy communities;*
- (l) *the protection of the financial and economic well-being of the Province and its municipalities;*
- (n) *the resolution of planning conflicts involving public and private interests;*
- (o) *the protection of public health and safety;*
- (p) *the appropriate location of growth and development;*
- (q) *the mitigation of greenhouse gas emissions and adaptation to a changing climate.*

The proposed development has regard for the matters of provincial interest contained in Part I, Section 2 of the Act. The proposal introduces a recreational commercial use (an indoor firing range) that is compatible with and suitable for the range of uses contemplated within the “Rural District” designation. The subject site is adequately sized to accommodate the proposed 0.79-hectare building envelope, while exceeding the minimum 30-metre setback from the on-site watercourse and wetland. The Environmental Impact Study (EIS) confirmed that the limited tree removal required for construction will not negatively affect the ecological significance or function of the adjacent woodland. The proposed development also upholds public health and safety objectives. The indoor firing range will be constructed using pre-fabricated materials engineered to meet federal safety and technical standards for such facilities, ensuring secure and compliant operation. A Geotechnical Subsurface Investigation determined that, despite the presence of organic soils with poor drainage, the proposed one-storey slab-on-grade building can be safely supported when constructed in accordance with the recommended foundation design and compaction methods. Furthermore, an Engineering Review Letter prepared by Point Engineering dated November 22, 2025 and an updated letter dated January 29, 2026, which assessed sound transmission and acoustic mitigation, confirms that the facility will not cause adverse noise impacts on surrounding residential areas. Operations will occur entirely indoors within a sound-attenuated structure designed to meet or exceed the sound isolation requirements of the Ontario Building Code and NPC-300, preventing off-site firearm noise transmission and ensuring compatibility with surrounding land uses, provided that the mitigation measures outlined in Section 3 of the letter are implemented through the Site Plan Control process. The development maintains the majority of existing vegetation on the site, which will provide natural buffering and visual screening, further minimizing potential compatibility concerns. Overall, the proposal has regard for the matters of provincial interest set out in Part 1, Section 2 of the *Planning Act*, supporting a safe, compatible, and environmentally responsible form of rural development.

It is our opinion that the proposed development has proper regard for the criteria found in Part 1, Section 2 of the *Planning Act*.

5.2 Provincial Planning Statement, 2024

The PPS 2024 provides policy direction on provincial interests in land use planning and development, serving as a cornerstone of Ontario's policy-led planning framework. This document establishes the foundational policies for guiding land development and uses across the province.

Chapter 2 of the PPS emphasizes the importance of fostering strong, sustainable, and competitive communities. Sections 2.5 and 2.6 address rural areas and rural lands within municipalities, recognizing their contribution to a diverse economic base while maintaining rural character. Section 2.5 provides policy direction for rural areas in municipalities, defined as “*a system of lands within municipalities that may include rural settlement areas, rural lands, prime agricultural areas, natural heritage features and areas, and resource areas.*” It promotes diversification of the economic base and employment opportunities through goods and services, as well as sustainable and diversified tourism that leverages historical, cultural, and natural assets.

Section 2.6 addresses rural lands in municipalities, defined as “*lands located outside settlement areas and outside prime agricultural areas.*” This section supports a broad range of rural land uses, including recreational commercial uses, provided that development is appropriate for the level of infrastructure that is planned or available and does not require or promote the unjustified expansion of infrastructure or municipal services.

Chapter 3 of the PPS focuses on infrastructure, public service facilities, and land use compatibility. Section 3.5 highlights the importance of planning sensitive land uses to minimize potential adverse effects such as odour, noise, and contaminants, thereby protecting public health and safety.

The proposed Official Plan and Zoning By-law Amendment, which facilitates the establishment of an indoor firing range within an existing rural area, is consistent with the PPS, 2024. The proposed use represents an appropriate form of rural economic diversification as a recreational commercial use that maintains the rural character of the area. By locating the facility outside a designated rural settlement area, on a large rural lot, and at an adequate distance from nearby residential properties, the proposal minimizes potential land use conflicts and environmental impacts. The development is therefore compatible with its surroundings and aligns with the PPS's intent to promote safe, sustainable, and appropriately located rural economic activities.

Chapter 4 of the PPS emphasizes the wise use and management of resources. Section 4.1 focuses on protecting natural features and areas for the long term. The proposed development is not expected to negatively impact natural heritage features on or adjacent to the site, including their ecological functions. The site is not located within significant woodlands, and the supporting Environmental Impact Study (EIS) has demonstrated that no negative impacts will occur to significant natural features, including woodlands and wetlands, or their associated ecological functions. The proposed development is also not located within the habitat of any endangered or threatened species and maintains appropriate setbacks from identified natural features.

Section 5 of the PPS addresses public health and safety by directing development away from natural and human-made hazard lands, including floodplains, erosion-prone areas, and lands with unstable soils. Organic soils have been identified on portions of the subject property; however, the proposed development is situated outside these areas. Appropriate stormwater management measures and site engineering will ensure adequate drainage and soil stability, allowing the development to be safely accommodated on-site.

Overall, the proposed development is consistent with the Provincial Planning Statement, 2024. It promotes compatible land use, supports rural-based recreational and commercial opportunities, and ensures appropriate mitigation of potential impacts such as noise and drainage. The proposal reinforces the continued viability of the County's Rural District designation while contributing to a diversified and sustainable rural economy.

It is our professional planning opinion that the proposal is consistent with the Provincial Planning Statement (2024).

5.3 United Counties of Stormont, Dundas and Glengarry Official Plan

The United Counties of Stormont, Dundas and Glengarry Official Plan (OP) sets goals and objectives for development in the County until the year 2037. It establishes a policy-driven framework for land-use planning in the County and its six lower-tier municipalities. The OP was adopted by County Council on July 17, 2017 and approved by the Ministry of Municipal Affairs and Housing on February 4, 2018. The February 2025 consolidation of the OP is the most readily available version on the County's website. The OP references herein are from the 2025 consolidation.

The following sections of the OP are reviewed in relation to the proposal:

- / Section 3: Community Growth and Settlement
- / Section 4: Public Services and Infrastructure
- / Section 5: Resource Management
- / Section 6: Public Health and Safety
- / Section 8: Implementation

Section 3: Community Growth and Settlement

Section 3 of the Official Plan (OP) outlines the strategic objectives and policy direction for land development within the County. It establishes that the County is primarily rural in character, containing a number of urban and rural settlements. Growth and development are intended to be directed toward settlement areas, while rural lands are to be used primarily for resource-based activities, with opportunities for other compatible uses, provided they do not conflict with resource uses and can be adequately serviced.

Schedule A6 of the OP identifies the County's intended land use structure, highlighting areas where growth and development are anticipated. Table 3.2 – Rural Area and Settlement Area Designations – further clarifies which land use designations on Schedules A1 to A6 constitute the County's Rural Area and Urban Settlement Areas.

The subject site is designated "Rural District" and "Salvage Yard District" on Schedule A6 – Land Use, Township of South Glengarry – of the OP. According to Table 3.2, both designations form part of the County's Rural Area. Accordingly, the subject site is located within the Rural Area of the County.



Figure 3. Land Use – Schedule A6 Township of South Glengarry (Source: SDGExplorer, annotated by Fotenn Planning + Design)

Section 3.3 of the OP defines “Rural Lands” as lands that are not located within a designated settlement area or within a prime agricultural area. These lands are characterized by wide open spaces, a countryside setting with cross-road settlements, scattered residential uses, woodlands, pits and quarries, and a variety of other rural-type uses. Rural lands are classified in the OP by several Land Use Districts, each of which constitutes a separate land use designation. Development within these areas is typically serviced by individual on-site water supply and sewage disposal systems, which must conform to the policies of Section 4.3.3 of the OP.

Section 3.4.1 of the OP outlines the Land Use Districts established on Schedules A1 through A6, which include the following major land use categories: Residential, Commercial, Employment, Rural, Airport, Salvage Yard, Rural Settlement Area, and Special Land Use District Overlay. The subject site is designated “Rural District” and “Salvage Yard District” on Schedule A6 of the OP.

Section 3.4.5 of the OP further defines the “Rural Area” of the Counties, which includes the “Rural District”, “Employment District”, “Airport District”, “Salvage Yard District”, and “Resource Lands” land use designations. Within the Rural Area, Section 3.5.1 guides the design and development of permitted land uses identified in Table 3.5.

Section 3.4.6 provides policy direction for the “Rural District” land use designation, including the range of permitted uses in accordance with the zoning by-law and the criteria for considering new uses through a zoning by-law amendment. The “Rural District” is intended to accommodate a variety of land uses appropriate for a rural setting, including farms, forests, small industries, golf courses, and small clusters of residential and commercial development. The intent of this designation is to allow a mix of compatible uses that maintain the rural character of the area while ensuring that limited residential development does not preclude ongoing agricultural or non-residential activities.

Section 3.4.6 specifies that the “Rural District” designation permits a variety of land uses, including but not limited to residential and commercial development, with the intent of accommodating uses that are appropriate in a rural context. This section further notes that a Zoning By-law Amendment is required to permit additional uses, and that when considering such amendments, the following matters must be evaluated:

A zoning By-law amendment will be required where any of the following uses are proposed in the Rural District where not otherwise permitted:

c. New recreational commercial and non-profit uses, such as golf courses, driving ranges, mini putt operations, campgrounds, outdoor theme parks, sports fields or similar uses;

The proposed Recreational Commercial Establishment; specifically, an indoor firing range with associated accessory uses is not currently permitted under the existing zoning and therefore necessitates a Zoning By-law Amendment. The proposed use is recreational and commercial in nature and aligns with the range of uses contemplated within the “Rural District” designation, which provides flexibility for low-intensity recreational and commercial activities suited to rural areas. The “Rural District” designation is also appropriate for accommodating this use, as it helps mitigate potential land use compatibility conflicts with nearby sensitive uses while maintaining the rural character of the surrounding area.

d. Other new non-residential uses that would not be better located within a Settlement Area and which are in keeping with the rural character or those uses that meet the needs of the travelling public, such as a restaurant, gas station, motel, retail or similar use;

The proposed use is a non-residential use appropriately located within the “Rural District”. The rural context characterized by larger lot sizes and fewer residential properties (sensitive and uses) are located within close proximity thereby reducing the potential for adverse impacts and land use compatibility conflicts with surrounding land uses. The proposed development is designed to comply with applicable zoning performance standards and will maintain the established rural character of the area. Furthermore, the proposed indoor firing range functions as a recreational commercial establishment, a use that aligns with the intent of the “Rural District” designation by supporting low-impact, recreational, and employment-generating activities that are suitable for a rural setting.

When considering an application to amend the zoning By-law to permit a new use identified above, the following matters must be considered:

Section 3.4.6 – Rural Land Use District – matters to be considered when considering an application to amend the zoning By-law to permit a new use

Policy	Response
<p><i>a. The use would not be better located in a Settlement Area or the urban area;</i></p>	<p>Based on a review of the Provincial Planning Statement (2024) and Sections 3.2 (Settlement Area Policies) and 3.3 (Rural Lands) of the Official Plan, the proposed use is appropriately located within the Rural District and would not be better situated within a Settlement Area or Urban Area. Locating the proposed use in a rural context helps protect sensitive land uses, such as residential dwellings, from potential land use incompatibilities and conflicts. Additionally, the proposed indoor firing range is characteristic of development suited to a rural setting. It has been designed to be compatible with the surrounding rural character, to minimize potential impacts on adjacent properties, and to align with the range of non-residential commercial uses permitted in the Rural District through a site-specific zoning by-law amendment.</p>
<p><i>b. The volume and pattern of traffic flow anticipated from the development will not interfere with the proper functioning of the local road network;</i></p>	<p>The proposed development is not expected to generate traffic volumes that would interfere with the proper functioning of the County or Township road network, including 4th Line Road (a County road) and Concession Road 10 (a Township road). Through pre-consultation with municipal staff, it was confirmed that a Traffic Impact Study was not required as part of the application submission, given the anticipated low traffic generation associated with the proposed use. The development includes the provision of approximately 50 parking spaces and will be accessed via a new primary entrance from Concession Road 10, ensuring safe and efficient vehicle circulation to and from the site.</p>
<p><i>c. The privacy of adjacent landowners or the mediation 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</i></p>	<p>The proposed use, as a Recreational Commercial Establishment consisting of an indoor firing range, has been designed to minimize potential adverse impacts on adjacent properties and landowners. The indoor firing range will be a purpose-built, prefabricated structure engineered to reduce noise to the greatest extent possible. All activities associated with training, operation, and discharge of firearms will occur entirely within the enclosed facility, which will also provide visual screening from surrounding properties. The subject site is a large rural lot, and the building is proposed to be located centrally on the property, further reducing potential impacts on nearby residential and rural properties. The development is not anticipated to generate substantial traffic on adjacent roads, and sufficient on-site parking is provided to accommodate expected vehicle volumes. An Engineering Review Letter prepared by Point Engineering, dated November 22, 2025, recommends a performance-based building design to ensure effective noise containment using appropriate exterior and interior materials. An updated January 29, 2026, review confirms that, with the implementation of the recommended mitigation measures, the indoor firing range is expected to comply with MECP NPC-300 criteria, prevent off-site noise transmission, avoid adverse impacts on surrounding residential uses, and conform with municipal zoning and Official Plan policies regarding noise and land use compatibility. These noise attenuation and mitigation measures will be implemented through detailed design and secured through a Site Plan Control Agreement with the municipality.</p>
<p><i>d. The potential for reducing possible impacts on neighbouring agricultural uses or nearby rural residential or settlement areas, where relevant;</i></p>	<p>The proposed development and use of the subject site as an indoor firing range is not anticipated to have adverse impacts on neighbouring agricultural operations or nearby rural residential properties. The nearest agricultural property to the south is located approximately 410 metres from the proposed facility. While rural residential properties are closer, the facility has been designed to comply with all Rural Zone performance standards and is adequately screened to minimize potential impacts. Furthermore, it is anticipated review has confirmed that the</p>

	proposed development can be adequately serviced by private water and sewage systems, with no anticipated impacts on surrounding wells or septic systems associated with existing rural residential properties. The proposed use as well as the design and location of the building conforms to intent of the “Rural District” designation to accommodate appropriate uses for the rural setting.
<i>e. The development is in keeping with the surrounding rural character and landscape;</i>	The proposed development is rural in nature and minimizes any potential impacts on settlement areas, while still providing a needed service to the rural area. The proposed building is purpose-built for the proposed use and is strategically located on-site to mitigate for any potential impacts to adjacent properties.
<i>f. All relevant servicing, design and compatibility and environmental protection policies of this plan;</i>	The proposed development has been evaluated in accordance with the relevant servicing, design, compatibility, and environmental protection policies of the Official Plan. In accordance with Section 4.3.3, it is anticipated that the subject site can be adequately serviced by private well and septic systems without adversely affecting the quantity or quality of groundwater or nearby wells on surrounding properties. The proposal has also been reviewed against the design and compatibility policies of Section 3.5.1.4, confirming that appropriate measures such as landscaping, buffering, and screening have been incorporated to ensure land use compatibility with adjacent properties. In addition, potential impacts to adjacent natural heritage features have been assessed in accordance with Section 5.5, and natural hazards identified under Section 6.2 of the Official Plan have been appropriately considered and mitigated through the proposed site design.
<i>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,</i>	The proposed development does not propose any noxious uses.

<p><i>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.</i></p>	<p>The EIS identified that the on-site woodland forms part of a larger 85.56-hectare woodland complex. The portion located on the subject site represents the peripheral edge of this woodland, rather than its interior core. The proposed development will require the removal of approximately 0.67 hectares of tree cover; however, with 84.89 hectares of woodland remaining post-removal, the feature will continue to meet the threshold for significance. The EIS found that the limited tree removal will not negatively impact the ecological function or overall significance of the woodland, as its interior and core habitat areas will remain intact.</p> <p>Indirect impacts to the woodland, such as disturbance to species at risk or migratory birds during breeding seasons, can be effectively mitigated by restricting vegetation removal to within the defined building envelope and avoiding clearing activities during sensitive periods. Implementation of the mitigation measures outlined in the EIS will ensure that potential impacts are minimized.</p> <p>In addition, a Site Plan Control application will be required. Through this process, a detailed site design and layout; including grading, lighting, landscaping, and fencing, will be reviewed to ensure that natural features are protected and that the development maintains appropriate screening and compatibility with adjacent properties. The proposed building envelope exceeds the required setbacks from natural features, including the identified wetland and watercourse, and the 30-metre setback area will remain in a naturally vegetated state to further support environmental protection.</p>
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Section 3.5 of the OP outlines the permitted uses within the County's land use designations identified on Schedules A1 to A6. Table 3.5 – Designations and Associated Permitted Uses – permits a range of commercial uses within the "Rural District," including recreational and resort commercial uses that support the tourism and leisure industries, as well as highway commercial uses located on major roads. The proposed use qualifies as a recreational commercial establishment, intended to serve the tourism and leisure industries by providing safe, structured firearms training and recreational opportunities. In addition to serving the general public, the facility is also intended to accommodate law enforcement and other government agencies for training purposes, thereby reducing the need for travel to facilities elsewhere in Eastern Ontario. Table 3.5 also identifies the permitted uses for the "Salvage Yard District" designation, which applies to a portion of the subject site where the indoor firearms range is proposed. Permitted uses in this designation are limited to the salvaging of materials (e.g., vehicles, building materials, non-hazardous waste, and junk) and associated retail, shipping, and receiving activities. These permitted uses are narrow in scope and do not encompass the proposed recreational commercial use. Accordingly, an Official Plan Amendment (OPA) is required to redesignate the portion of the site to the "Rural District" designation to permit the proposed use, along with a corresponding Zoning By-law Amendment (ZBA) to permit a recreational commercial establishment. The proposed amendments are consistent with the intent of the "Rural District" designation and the related policies of Sections 3.4.6 and 3.5 of the Official Plan.

Section 3.5.1 of the OP mentions that in review of planning applications the following planning principles shall apply to any or all development.

3.5.1.1 Adequate Lot Size

The lot size shall be adequate for all existing, proposed, or potential future land uses including the expansion of buildings and structures above and below ground and any associated private water and sewer services. The lot shall meet all requirements for setbacks, including setbacks from natural hazards such as flood plains, parking and loading facilities, storage and display areas, signs, lighting, landscaping, buffering or screening, infrastructure and safe access and egress, where these requirements apply. Where appropriate, the approval authority shall require studies (e.g. servicing options report, geotechnical study, flood plain survey, or hydrogeological study and terrain analysis) to support the proposed lot size and ensure that

there will be no negative impacts on groundwater quality and quantity (e.g. in areas subject to the Clean Water Act), and that development will be directed away from natural hazards.

The subject site has an area of approximately 11.7 hectares, well above the minimum 2.5-hectare requirement for the Rural (RU) Zone in the Township's Zoning By-law, providing sufficient space for the proposed development, associated parking, and private servicing systems, including well and septic. The 0.79-hectare building envelope exceeds all applicable zoning setbacks and maintains a minimum 30-metre vegetated buffer from the on-site wetland and watercourse. The Environmental Impact Study (EIS) identified two butternut trees—one on-site and one on adjacent lands—requiring a 21-metre setback, with the nearest butternut located 131 metres from the building envelope, ensuring full compliance and no anticipated impacts. The EIS also noted areas of organic soils, and a Subsurface Geotechnical Investigation confirmed that the proposed slab-on-grade building can be structurally supported with footings constructed 1.37 metres below grade and compacted granular materials, in accordance with geotechnical recommendations. The identified building envelope is large enough to accommodate this facility, associated parking and services (well and septic).

3.5.1.2 Servicing Capacity

Servicing capacity shall be available and adequate to support existing and proposed uses as set out in Section 4 of this Plan for both public service uses and infrastructure. Servicing capacity will be considered at all stages of the planning process to ensure efficient use and optimization of existing sewage and water services. (e.g. a calculation on the uncommitted reserve capacity for water supply and sewage disposal is a pre-requisite to approving a multiple lot/unit development in an urban settlement area). Similar calculations or assessments should be done for school capacity and waste management services.

The proposed development can be adequately serviced to accommodate the intended use without any anticipated negative impacts on surrounding properties. Section 4 of the Official Plan provides policy direction for public services and infrastructure within the County, with Section 4.3.3 specifically addressing water supply and sewage disposal systems. A review of these policies confirms that the proposed development complies with all applicable servicing requirements. The development will be privately serviced by an on-site well and septic system. No constraints related to servicing capacity have been identified.

3.5.1.3 Frontage and Access

All uses shall have frontage on, and direct access to, an open and maintained public road ... Any new development which proposes access to, or fronts on, a public road (Provincial Highway, County or Local Road) must satisfy all requirements of the transportation authority(ies) (See Section 4.3.6 - Transportation). Further, the proposed access should not negatively impact the safety and efficiency of any type of public or private road.

The subject site maintains approximately 354 metres of frontage along 4th Line Road (a County Road) and approximately 171 metres of frontage along Concession Road 10 (a Township Road), exceeding the minimum frontage requirements of the Rural (RU) Zone in the Township's Zoning By-law. Policies of Section 4.3.6 of the Official Plan, including Sections 4.3.6.2.1 (Development Adjacent to County Roads) and 4.3.6.3 (Township Roads), have been reviewed and are satisfied by the proposed development. Vehicular access is proposed from Concession Road 10, with the detailed design of the entrance to be further evaluated through the Site Plan Control and entrance permit processes in consultation with the Township and County. The proposed development is not anticipated to generate a significant increase in traffic on the local road network, and adequate on-site parking is proposed to accommodate demand. As such, the development is not expected to negatively impact the safety, function, or efficiency of adjacent public roads.

3.5.1.4 Measures for Landscaping, Buffering, Screening and Land Use Compatibility

This Plan promotes land use compatibility and encourages compatible land uses adjacent to each other. Where this is not possible or where development involves the expansion of existing adjacent incompatible uses, landscaping, buffering and screening techniques should be used to mitigate adverse effects, noise, visual impacts and conflicts between land uses and may also be used to improve aesthetics or to enhance the quality of development in urban or rural areas.

Landscaping, buffering, screening or attenuation measures may include setbacks, berms, fencing, vegetation, natural land forms or a combination of these measures. Site planning will also promote compatibility. This can be achieved by placing parking, loading, open storage or noisier or other objectionable areas away from adjacent or nearby residential uses (e.g. locating access points so that traffic to commercial/industrial areas will be diverted from residential streets).

The proposed use and development are compatible with the intent of the “Rural District” designation and maintain the established character of the surrounding rural area. The proposed indoor firing range will be centrally located on the subject site, providing substantial separation from all property lines and adjacent properties. The facility will consist of a purpose-built, pre-fabricated structure designed specifically for indoor firearms discharge, incorporating construction methods and materials intended to minimize potential impacts such as noise. The Engineering Review Letter prepared by Point Engineering confirms that, through the implementation of recommended attenuation and mitigation measures secured through detailed site and building design and the Site Plan Control process, the proposed use will meet or exceed the sound isolation requirements of the Ontario Building Code and NPC-300, will adequately prevent off-site firearm noise transmission, and will ensure compatibility with surrounding residential land uses. Additionally, through this process, detailed site layout, landscaping, screening, and buffering measures will also be finalized to ensure the proposed use remains compatible with adjacent rural and residential properties and aligns with the Official Plan’s objectives for mitigating visual, acoustic, and functional impacts between land uses.

3.5.1.8 Site Plan Control

Local Municipalities may designate by By-law specific areas or land uses within the Municipality as site plan control areas under Section 41 of the Planning Act (see Section 8.12.10.1 - Site Plan Control).

The proposed use and development will be subject to Site Plan Control in accordance with Section 8.12.10.1 of the Official Plan, which identifies all commercial uses as being subject to Site Plan Control. A Site Plan Control application will be submitted to the Township of South Glengarry to address matters such as site layout, access, parking, landscaping, lighting, buffering, and overall design to ensure compliance with municipal standards and compatibility with the surrounding rural area.

3.5.1.9 Environmental Approvals

...This Plan promotes design and development which serves to protect or enhance the natural environment, the conservation of ecosystems, adaptation and mitigation of climate change, and designing with nature or ‘green’ planning. This includes low impact development stormwater management strategies. Efforts should be made to retain significant woodlands and tree cover, wetlands, valleylands, scenic views, unique landforms, and wildlife habitat in both urban and rural settings.

The proposed development has been designed to preserve and protect adjacent natural features, as further discussed in the review of Section 5.5 – Natural Heritage Features and Areas. The Environmental Impact Study (EIS) concluded that the proposed setbacks from on-site natural heritage features, including a wetland, significant woodlands, and a watercourse, are appropriate and that no negative impacts are anticipated as a result of the proposed development. These features are intended to be retained, protected, and integrated into the site design.

Section 4: Public Services and Infrastructure

Section 4 of the Official Plan (OP) establishes the objectives and policy direction for the provision of public services and infrastructure within the County. Infrastructure includes physical services such as water and sewage systems, roads, waste disposal facilities, utilities, and communications networks. The Plan provides both the County and local municipalities with mechanisms to ensure the cost-effective and efficient delivery of public services and infrastructure, to guide the location and phasing of development based on service availability and capacity, and to minimize land use conflicts associated with infrastructure and facility placement.

Section 4.2 of the OP provides direction on the implementation of public services and physical infrastructure, while Section 4.3.3 outlines policies for water supply and sewage disposal systems. Individual on-site water and

sewage systems may be used where a site is suitable for their long-term function and where no negative impacts are anticipated.

The proposed development has been evaluated through a servicing letter, which confirms that it can be adequately serviced by private well and septic systems for the intended use, with no negative impacts anticipated on adjacent properties or on groundwater quantity and quality—both during construction and long-term operation. Additionally, the Phase 2 Environmental Site Assessment (ESA) determined that the soil meets Ontario Regulation 153/04 Table 2 standards for both commercial and residential land uses, confirming that the site is suitable for development and can be safely serviced by private systems.

Section 4.3.4 of the OP outlines policies for stormwater management in both urban and rural areas. It requires that stormwater management be incorporated into all new commercial developments. The intent of this policy is to ensure that best management practices are applied in the design, construction, and maintenance of stormwater management systems so that post-development flows are maintained at pre-development levels, the natural characteristics and water quality of receiving streams are preserved or enhanced, and downstream flooding or erosion is prevented. As the proposed development is commercial in nature, detailed stormwater management design is anticipated to be required as part of the future Site Plan Control application. Should the Official Plan Amendment and Zoning By-law Amendment be approved, the subsequent Site Plan submission will include the necessary technical studies related to stormwater management, servicing, and associated impacts to demonstrate that the proposed development meets all applicable policy and technical requirements.

Section 4.3.6 of the OP provides policies related to transportation infrastructure, including County Roads and Township Roads. Section 4.3.6.2.1 outlines the criteria for development adjacent to County Roads. These criteria are not applicable in this case, as no new entrances are proposed along 4th Line Road (a County Road), and no new residential lots are proposed to be created.

Section 4.3.6.3 provides policy direction for Township Roads. Concession Road 10 is identified as a Township Road, and the proposed development is to be accessed via a new entrance from Concession Road 10. The policies note that the Municipality may require a Traffic Impact Study prior to approving a new entrance or any modification to an existing access on a Township Road. Through pre-consultation with County and Township staff, it was determined that a Traffic Impact Study was not required in support of this application.

Section 5: Resource Management

Section 5 of the Official Plan provides policies and objectives for the management and protection of natural resources and heritage features with ecological value. The purpose of this section is to conserve, protect, and enhance the natural environment, including significant natural heritage features, areas, and systems.

Section 5.5 outlines detailed policies for natural heritage features and areas, which collectively form the County's natural heritage system. Significant features are identified on the Land Use Schedules and include winter deer habitat, nesting sites, and fish spawning areas. The Official Plan acknowledges that these ecosystems evolve over time and that new features may be identified through updated mapping and field studies.

Schedule A6 identifies a designated watercourse traversing the subject site. This feature enters the property from the north at Concession Road 10, runs south through the site to the southern boundary, and then turns west before terminating at 4th Line Road. This watercourse is known as the "McDougal Municipal Drain" and is defined in Section 3.39(7) of the Zoning By-law as an area of direct or indirect fish habitat.

Schedule B2 of the Official Plan identifies significant woodlands along the eastern portion of the subject site, extending from heavily treed lands on the adjacent eastern property. Tree cover becomes less continuous toward the centre of the site. The County's forest cover mapping—updated using 2014 aerial imagery—was used to delineate Schedule B2 and identifies significant woodlands in accordance with the Natural Heritage Reference Manual criteria. In addition, provincial natural heritage mapping identifies an unevaluated wetland located in the southwestern portion of the subject site.



Figure 4. Constraints Schedule B2 – Significant Woodlands (Source: SDGExplorer, annotated by Fotenn Planning + Design)

Section 5.5.2 provides policy direction for development adjacent to natural heritage features. It states that no development or site alteration shall be permitted on adjacent lands unless an Environmental Impact Study (EIS) demonstrates that there will be no negative impacts on the natural features or their ecological functions. Adjacent lands are defined as:

- / within 120 metres of a locally significant wetland;
- / within 120 metres of the seasonal high-water mark of fish habitat; and
- / within 120 metres of a significant woodland.

An Environmental Impact Study (EIS) was prepared in support of the proposed development to evaluate potential impacts on natural heritage features. The study identified several features on the subject site, including a wetland, woodland, and watercourse. The wetland located in the southwestern portion of the site was determined not to be locally significant and was recommended to be maintained with a minimum 30-metre vegetated setback. The EIS also concluded that the wetland does not provide suitable habitat for fish, amphibians, or turtles due to the absence of standing water and lack of basking or breeding conditions. The on-site watercourse, which flows through the property from north to south and east of the proposed development, was identified as a man-made drainage feature that may provide limited seasonal fish and amphibian habitat. Although no fish sampling was completed, the EIS determined that a 30-metre setback from the edge of the watercourse is sufficient to protect hydrology and water quality. The proposed development maintains this buffer, ensuring no anticipated impacts on the function or integrity of the wetland or watercourse. The EIS also assessed the woodland on the subject site, which forms part of a larger significant woodland complex located on adjacent properties. The portion of woodland within the development area is on the periphery and does not constitute part of the interior or core habitat. The proposed 0.79-hectare building envelope will result in limited tree removal, not enough to alter the size or ecological significance of the overall woodland. As such, the EIS concluded that the proposed development will maintain the significance and ecological functions of the woodland and will not result in negative impacts to adjacent natural heritage features.

Section 5.5.4 provides policy direction for significant woodlands, emphasizing their conservation and protection. Woodlands identified on Schedule B2 represent areas deemed significant based on criteria from the Natural Heritage Reference Manual. The subject site contains a portion of significant woodland along its eastern boundary. Section 5.5.4.4 directs rural commercial or industrial uses to be located away from woodlands, except where the use demonstrates a dependency on the resource, such as golf courses, campgrounds, or other outdoor recreational uses. Where a non-residential use must be located adjacent to woodlands, an Environmental Impact Study must assess the significance of the vegetative community, species composition, tree health, potential water table impacts, wildlife habitat, and corridors, and identify measures to sustain the woodland ecosystem. Implementation may include a Tree Conservation Plan, which can be required as part of Site Plan Control or a site alteration by-law.

The proposed development has been designed to locate all buildings centrally within the subject site, away from identified natural heritage features, including the significant woodland along the eastern boundary. The Environmental Impact Study confirms that no negative impacts are anticipated to the woodland or its associated habitat and that the proposed setbacks are adequate. Measures such as a Tree Conservation Plan will be implemented prior to the execution of a Site Plan Control Agreement to ensure compliance with the Official Plan policies and the long-term protection of the woodland ecosystem.

Section 5.5.6 provides policies applicable to wetlands. Unclassified or evaluated wetlands shall be protected based on their classification as determined by the applicable evaluation manual, whether provincially or locally significant. Where a provincially significant wetland is identified, the Official Plan and implementing zoning by-law shall be amended to reflect its classification. While no wetland is identified on the Official Plan schedules for the subject site, the property contains a wetland in the southwestern portion, near 4th Line Road and the southern property line. This feature is identified as an unevaluated wetland in provincial natural heritage mapping. The Environmental Impact Study has confirmed the presence of this wetland and determined that it is neither provincially nor locally significant. The proposed development maintains a minimum 30-metre setback from the high-water mark of the wetland, which is sufficient to avoid any anticipated impacts on the wetland or its ecological functions.

Section 5.5.7 requires that an Environmental Impact Study (EIS) be prepared in support of a planning application for an Official Plan Amendment and Zoning By-law Amendment, where applicable. The County and Township have required an EIS for this combined application, which has been prepared accordingly. The purpose of the EIS is to assess the potential impacts of the proposed development on natural heritage features and to determine whether the development should be permitted in whole or in part. The assessment is conducted by a qualified professional.

The EIS generally includes the following components: identifying the specific needs of the study, such as mapping key natural heritage features and functions, ecological linkages, and study area boundaries; describing the proposed development, including land use, building type, size, location, excavation, site grading, landscaping, drainage/stormwater works, and water and sewage systems, in relation to environmental considerations; assessing the impact of the development on natural features and ecological functions on and adjacent to the site, including wildlife, fish, vegetation, soil, surface and groundwater resources, and air, during and after development or site alteration; identifying required mitigation and monitoring measures; quantifying any residual impacts that cannot be mitigated; and providing a professional conclusion and recommendation regarding whether negative impacts on natural features and ecological functions are anticipated and whether ongoing monitoring is required.

An Environmental Impact Study (EIS) has been prepared by a qualified professional in support of this application. The study comprehensively identified the natural heritage features, species, and ecological functions present on the subject site. The findings of the EIS conclude that the proposed development can be accommodated on the site without causing negative impacts to these features. Furthermore, the development is capable of being operated in the long term in a manner that preserves and protects the natural heritage features and ecological functions of the property.

Section 6: Public Health and Safety

Section 6 of the Official Plan addresses both natural and human-made hazards. Natural hazards include flooding, erosion, unstable bedrock, and slope failure. Conservation Authorities play a regulatory role in managing and permitting development in areas affected by these hazards and should be consulted early in the development process. The policies of this Plan are intended to safeguard public health and safety by directing development away from hazardous areas and ensuring that, where development or mitigation is permitted, it is undertaken in a physically and environmentally sound manner.

Schedule B1 – Natural Hazards and Features – identifies the presence of organic soils on a portion of the eastern area of the subject site.



Figure 5. Constraints Schedule B1 – Natural Hazards and Features (Source: SDGExplorer, annotated by Fotenn Planning + Design)

Section 6.2 provides policy direction for specific natural hazards. In particular, Section 6.2.3 classifies organic soils as those typically formed in water-saturated environments (e.g., wetlands), where limited air exposure prevents the decomposition of vegetative material. These soils may lack sufficient structural strength to support buildings or structures and are therefore considered hazardous lands. Development is to be directed away from lands identified as containing organic soils unless it can be demonstrated, through acceptable engineering methods, that the hazard can be effectively mitigated without creating additional environmental risks.

Although areas of organic soils have been identified on-site, geotechnical investigations have determined that the hazards associated with organic soils on-site can be effectively mitigated to satisfy the Ontario Building Code (OBC) requirements for on-site water and wastewater treatment systems.

Section 8: Implementation

Section 8 of the United Counties of Stormont, Dundas and Glengarry Official Plan outlines the tools available to the County to implement its policies. It references various provincial statutes and regulations that support the implementation of planning objectives; however, it does not include all legislation, particularly those administered by the federal or provincial governments.

Section 8.12 of the Official Plan identifies how the County utilizes provisions of the *Planning Act* to implement its policies. Specifically, Section 8.12.1 states that an Official Plan Amendment (OPA) is required where a change in land use designation is proposed on the Land Use Plan Schedules, in accordance with Sections 17 and 22 of the *Planning Act*.

The proposed use of the subject property as a Recreational Commercial Establishment, consisting of an indoor firing range with accessory uses, requires an amendment to the Official Plan to change the land use designation from “Salvage Yard District” to “Rural District” as shown on Schedule A6 of the Official Plan. This redesignation is necessary to permit the proposed use and associated development in conformity with the broader intent of the “Rural District” policies.

Section 8.12 also outlines the requirement for proponents to consult with the County and the local municipality prior to submitting an application to determine the need for an amendment and identify the necessary supporting materials. In accordance with this policy, a formal pre-consultation meeting was held with County and Township of South Glengarry staff on August 21, 2025. Through this process, it was confirmed that an OPA would be required to facilitate the proposed development, along with a Zoning By-law Amendment (ZBA) and Site Plan Control application. The required background and technical studies were also identified at that time.

Section 8.12.6 provides implementation policies pertaining to Zoning By-laws under Section 34 of the *Planning Act*, noting that a municipality may require pre-consultation prior to accepting a zoning by-law amendment application. This was confirmed at the pre-consultation meeting on August 21, 2025, where staff noted that a combined OPA and ZBA would be required to support the proposed development and to apply a site-specific Rural (RU) Zone to the subject site to permit the proposed use in conjunction with the OPA.

Section 8.12.10 provides implementation policies pertaining to Site Plan Control under Section 41 of the *Planning Act*. This section allows the local municipality—in this case, the Township of South Glengarry—to designate Site Plan Control Areas and require Site Plan Control approval for commercial uses. The Township of South Glengarry has an approved Site Plan Control By-law that applies to the proposed use and development. Accordingly, the proposed development will be subject to a future Site Plan Control application, a process that allows the Township to ensure that land development occurs in a safe, functional, and orderly manner. It also ensures that development standards approved by the Township and other agencies are implemented and maintained. Any conditions and requirements stipulated in a subsequent Site Plan Control Agreement, such as a road widening, will be addressed and complied with as part of that process.

All required applications and supporting materials have been prepared and submitted as part of this proposal in accordance with the Official Plan’s implementation policies.

It is our professional planning opinion that the proposal conforms to the Untied Counties of Stormont, Dundas and Glengarry Official Plan.

6.0 Current + Proposed Zoning

The subject site is currently zoned Rural (RU) under the Township of South Glengarry Zoning By-Law No. 38-09. The Rural (RU) Zone permits a broad range of rural-based uses, including but not limited to single-detached dwellings, agricultural uses, farm produce outlets, home industries, and rural home businesses.

A “Recreational Commercial Establishment” is not a permitted use within the Rural (RU) Zone. This use is currently only permitted within the Township’s commercial zones (CC, CG, CI, and CH). Accordingly, a Zoning By-law Amendment (ZBLA) is required to permit a *Recreational Commercial Establishment* on the subject property.

The Zoning By-law defines a *Recreational Commercial Establishment* as:

“An establishment, premises, or building where any recreational, social, or cultural uses are operated commercially for profit on lands in private ownership, such as health clubs, athletic clubs, open or enclosed

skating or curling rinks, open or enclosed pools, open or enclosed badminton or tennis courts, squash courts, bowling alleys, gymnasias, band shells or open air theatres, and other similar uses, but does not include a casino or bingo hall. Go-kart, motorcycle, all-terrain vehicle riding facilities, or similar uses may be permitted subject to approval of a noise study or any other study deemed appropriate by the Township.”

The proposed indoor firing range satisfies this definition, as it constitutes a recreational use operated commercially for profit on privately owned lands. In support of the proposed amendment, an Engineering Review Letter assessing sound transmission and identifying acoustic mitigation measures, along with other supporting technical studies, has been prepared and submitted to demonstrate that the proposed use can be appropriately accommodated on the site without adverse impacts on surrounding properties or the natural environment, with appropriate mitigation measures in place.

Part 10 of the Zoning By-law outlines the permitted uses and performance standards for Rural Zones. While the proposed development does not conform to the list of permitted uses and therefore requires a zoning amendment, it complies with all performance standards of the Rural (RU) Zone and does not require relief from any performance standards of RU Zone.

Additionally, Part 3 of the Zoning By-law identifies general provisions that apply throughout the Township, including special setback requirements from watercourses, wetlands, and areas of organic soils. The proposed development is designed to maintain a minimum setback of 30 metres from the municipal drain, which is classified as a watercourse and fish habitat under the Zoning By-law, and is also set back more than 30 metres from the wetland feature located on the subject property.

Although areas of organic soils have been identified on-site, geotechnical investigations have determined that these conditions can be effectively mitigated to satisfy the Ontario Building Code (OBC) requirements for on-site water and wastewater treatment systems.

In terms of parking, Part 4 of the Zoning By-law requires one (1) parking space per 25 square metres of gross floor area (GFA) for all other uses not listed in Section 4.1. Given that a significant portion of the building (approximately 2,275 square metres) will be occupied by the enclosed firing range area, which is not used as leasable or regularly occupied business space, it is reasonable to calculate parking requirements based on the administrative and publicly accessible areas only (approximately 975 square metres, including the lobby, canteen, training rooms, and offices). Based on this calculation, 39 parking spaces would be required, and the 50 spaces proposed are considered sufficient to accommodate the proposed use.

The proposed Zoning By-law Amendment therefore seeks to establish a site-specific Rural Exception (RU-X) Zone applicable to the subject property, explicitly permitting a *Recreational Commercial Establishment* in the form of an indoor firing range.

The subject site has sufficient land area to accommodate the proposed use and associated site functions, demonstrating that the amendment represents an appropriate and compatible form of development for the property.

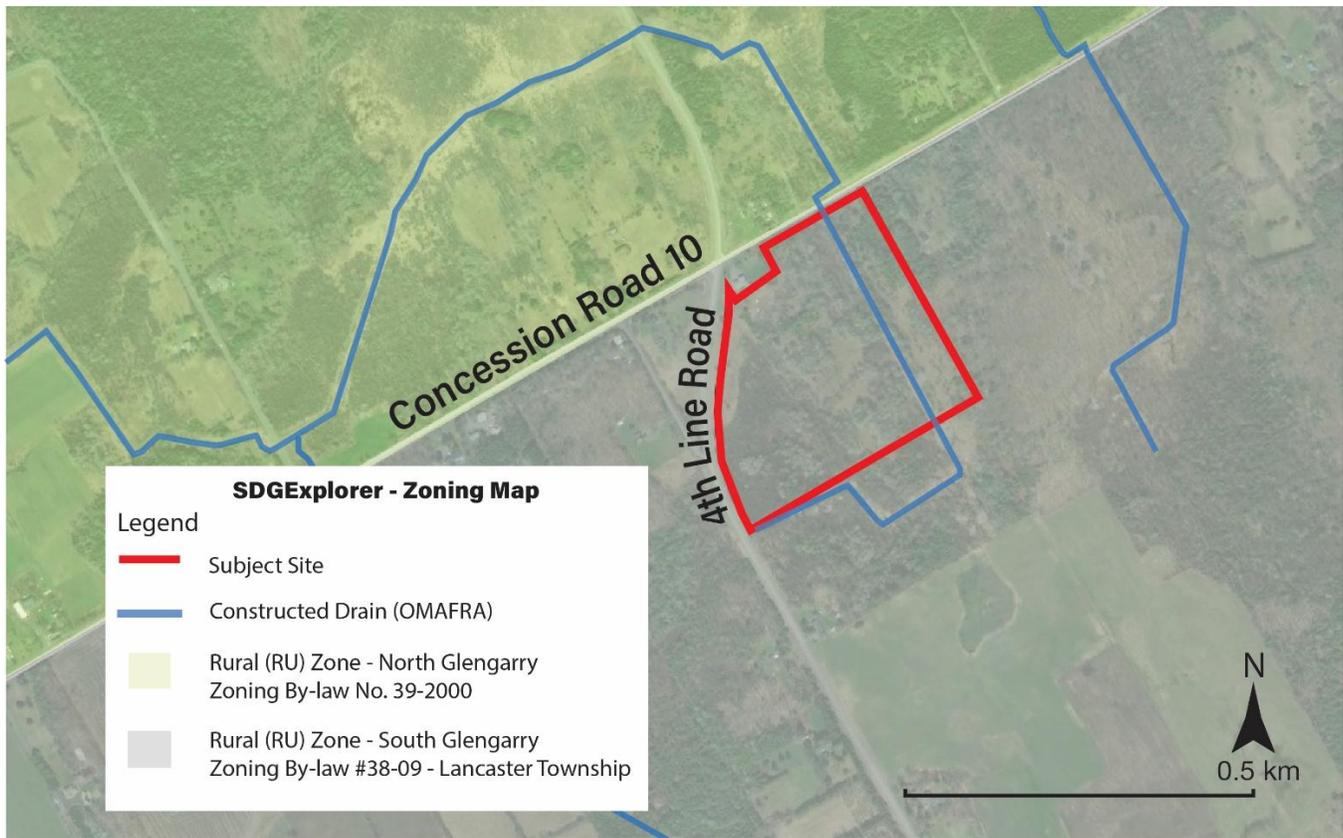


Figure 6. Township of South Glengarry Zoning Map (Source: SDGExplorer, annotated by Fotenn Planning + Design)

The Corporation of the Township of South Glengarry Zoning By-law No. 38-09 Part 10 Rural Zones			
Zoning By-Law	Permitted Uses	Proposed	Compliance
10.1 Permitted Uses in Rural Zones (RU Zone)	<ul style="list-style-type: none"> Agricultural Use Single Detached Dwelling Bed And Breakfast Cabin (Subject to a Temporary Use By-Law) Communications Facility Conservation Use Any Dwelling with a Maximum of 2 Dwelling Units (subject to a site specific zoning amendment) Farm Produce Outlet Equestrian Establishment (Riding Stable) Forestry Use Including a Sawmill Garden Suite Subject to a Temporary Use By-law 	<ul style="list-style-type: none"> Recreational Commercial Establishment 	No

	<ul style="list-style-type: none"> • Greenhouse or Garden Nursery Excluding Sales • Group Home Type 1 • Home Industry • Home Occupation/Rural Home Business • Kennel or Cattery as an Accessory Use Only • One Accessory Dwelling Unit to a Permitted Non-Residential Use • Golf Course – Driving Range • Recreational Trail • Sod Farm • Veterinary Establishment • Wayside Pit or Quarry <p>(v) Building supply store; and, (vi) An office associated with a permitted use.</p>		
Standards	Required (RU Zone)	Proposed	Compliance
10.2 Minimum Lot Area – Agricultural Use	2.5 hectares	11.74 hectares	Yes
10.2 Minimum Lot Area – Residential Use	0.4 hectares	11.74 hectares	Yes
10.2 Minimum Lot Frontage – Agricultural Use	60 metres	524 metres (combined)	Yes
10.2 Minimum Lot Frontage – Residential Use	40 metres	524 metres (combined)	Yes
10.2 Minimum Front Yard	15 metres	94.4 metres	Yes
10.2 Minimum Exterior Side Yard	15 metres	> 15 metres	Yes
10.2 Minimum Interior Side Yard (Non-Residential Uses)	10 metres	> 10 Metres	Yes
10.2 Maximum Building Height	11 metres	1 storey, less than 11 metres	Yes

10.2 Maximum Lot Coverage	20%	2.8%	Yes
10.2 Minimum Gross Floor Area	75 square metres	3251 square metres	Yes
The Corporation of the Township of South Glengarry Zoning By-law No. 38-09 Part 3 General Provisions			
Provision	Requirement	Proposed	Compliance
3.39 Special Setbacks (7) Watercourses	<p>(a) All water bodies (e.g. lakes, rivers, streams, Municipal Drains, and wetlands) are considered as areas of direct or indirect fish habitat. It is a policy to protect areas of fish habitat for their values in compliance with the federal Fisheries Act.</p> <p>(b) Development and site alteration shall not be permitted in fish habitat except in accordance with Provincial and Federal requirements.</p> <p>(c) Development and site alteration shall not be permitted within 30 metres of an area identified as fish habitat unless the ecological function of the area has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions, to the satisfaction of the Municipality and the Conservation Authority. No new development or site alteration shall be permitted within fifteen metres (15 m [48.75 ft.]) of fish habitat.</p> <p>(d) In addition to clause (c) development less than 30 metres from the top of bank of all watercourses, excluding Municipal Drains, may require a geotechnical investigation prepared by a qualified professional to ensure an erosion hazard can be safely overcome. The minimum set back will be fifteen metres (15 m [48.75 ft.]).</p>	<p>30 metres setback from municipal drain</p> <p>Greater than 30 metre setback provided from the high water mark of adjacent wetland</p>	Yes
3.39 Special Setbacks (11) Organic Soils	<p>Despite any other provision of this By-law, no building or structure shall be constructed, erected, altered, or used on land which is located or may be located on organic soils, which are identified on the approved Township of South Glengarry Schedule of the Official Plan and in the Soil Survey of Glengarry County (1957) by Richards and Wicklund, unless the proponent or applicant for development can demonstrate</p>	<p>The Geotechnical Investigation completed in support of the application found the soils present are stable to support the proposed building provided that recommendations are adhered to pertaining to compaction and materials.</p>	Yes

	conclusively using scientific approaches that the physical constraint can be mitigated or overcome and that the requirements of the Ontario Building Code Act, R.S.O. 1992, c.23 with respect to construction and the requirements of the Ontario Water Resources Act, R.S.O. 1990, c. O. 40 and the Environmental Protection Act, R.S.O. 1990, c. E.14 with respect to the installation of an individual on-site sewage and water treatment can be met.		
3.39 Special Setbacks (12) Wetlands	Development or site alteration within 120 metres of a PSW Zone will be subject to studies as identified within the County Official Plan. If it can be demonstrated that there will be no negative impacts on the wetland's natural features, ecological, and hydrologic functions, to the satisfaction of the Municipality and the Conservation Authority development or site alteration can occur no less than thirty metres (30 m [98.4 ft.]) of the wetland boundary.	No PSW has been identified on the subject lands or within the surrounding vicinity. A 90 metre setback is proposed from the wetland located in the southwestern portion of the subject lands.	Yes
The Corporation of the Township of South Glengarry Zoning By-law No. 38-09 Part 4 Parking and Loading Provisions			
Provision	Requirement	Proposed	Compliance
4.1	The proposed recreational commercial use is not listed in the table (Section 4.1) in Part 4 outlining the minimum number of required parking spaces based on use. As such, the minimum number of required parking spaces is 1 space for each 25 square metres of gross floor area. As such 130 parking spaces would be required based on gross floor area.	50 parking spaces provided	No
4.2	The parking ratios provided in Subsection (1) shall not be varied except where a Minor Variance has been granted by the Committee of Adjustment or through a Cash-In-Lieu of Parking Agreement prepared and executed pursuant to Section 40 of the Planning Act, R.S.O. 1990, c. P.13 as amended.	Given there is no specific parking requirement for the proposed use, we request Staff and Council consider waiving cash-in-lieu of parking. The proposed rate is based on similar facilities from the same owner, and as it is located in the rural area, it is not anticipated to cause on-street parking issues for the local community. Further, the GFA of the facility is tied to the proposed use of a firing range, which includes long, unoccupied areas that do not	Request to waive cash-in-lieu of parking

		directly correlate to the number of employees or patrons.	
4.3	<p>Designated parking spaces for disabled persons shall be provided in accordance with the provisions of this By-law and the Highway Traffic Act. Parking for disabled persons shall be provided in accordance with the following provisions:</p> <p>Number of Required Parking Spaces: 50-99, a minimum of 3 accessible parking spaces are required.</p> <p>Accessible Parking Spaces shall be hard surfaced</p>	To Comply	Yes
4.18	<p>For commercial uses 1 loading space is required for the first 500 square metres of Gross Floor Area with 1 additional loading space for every additional 1,000 square metres of GFA thereafter.</p> <p>As such, 1 loading space is required.</p>	0 Loading Spaces Proposed	No

7.0 Conclusion

The proposed development at 4th Line Road and Concession Road 10 in the Township of South Glengarry represents an opportunity to introduce a rural-based recreational commercial use that will contribute to the local economy while preserving the rural character of the area and minimizing potential impacts on surrounding properties and the natural environment.

The subject site is currently designated “Salvage Yard District” and “Rural District” in the United Counties of Stormont, Dundas and Glengarry Official Plan. An Official Plan Amendment (OPA) is required to remove the “Salvage Yard District” designation and redesignate the entire property as “Rural District.” This amendment will permit a broader range of rural-based uses in accordance with Table 3.5 of the Official Plan, including the proposed Recreational Commercial Establishment—specifically, an indoor firing range with associated accessory uses.

A concurrent Zoning By-law Amendment (ZBA) is also proposed to establish a site-specific Rural Exception (RU-X) Zone. The amendment will permit the development of the indoor firing range, along with accessory components such as a retail store, canteen, and training facility.

Together, the proposed OPA and ZBA will enable a well-planned, appropriately located rural commercial use that aligns with the intent of the Official Plan, supports economic diversification, and enhances recreational opportunities within the Township of South Glengarry.

This Planning Justification Report, prepared by Fotenn Planning + Design on behalf of Arcane Defense, demonstrates that the proposed amendments are appropriate, justified, and have regard for matters of Provincial Interest outlined in Section 2 of the *Planning Act*. The proposal is consistent with the intent of the Provincial Planning Statement and conforms to the policies of the United Counties of Stormont, Dundas and Glengarry Official Plan. The development represents an appropriate form of rural commercial use that addresses public safety, land use compatibility, and environmental protection.

Respectfully submitted,



Jacob Bolduc, MCIP RPP
Associate



Scott Day, BURPI
Planner

Appendix A

Proposed Official Plan Amendment

By-Law Number 2026-___

**A By-Law To Amend The Official Plan For The United Counties of Stormont, Dundas and Glengarry
(Amendment Number ___, known municipally as Part Lot 8, Concession 9)**

Passed: [Date]

Whereas on [Date] Fotenn Planning + Design, on behalf of Arcane Defense, submitted an application for Official Plan Amendment for the property municipally known as Part Lot 8, Concession 9; and

Whereas a public meeting was held regarding this amendment on [Date], 2026;

Now Therefore the Council of The United Counties of Stormont, Dundas, and Glengarry, in accordance with the provisions of Section 17 of the Planning Act, R.S.O. 1990, c.P13, hereby enacts as follows:

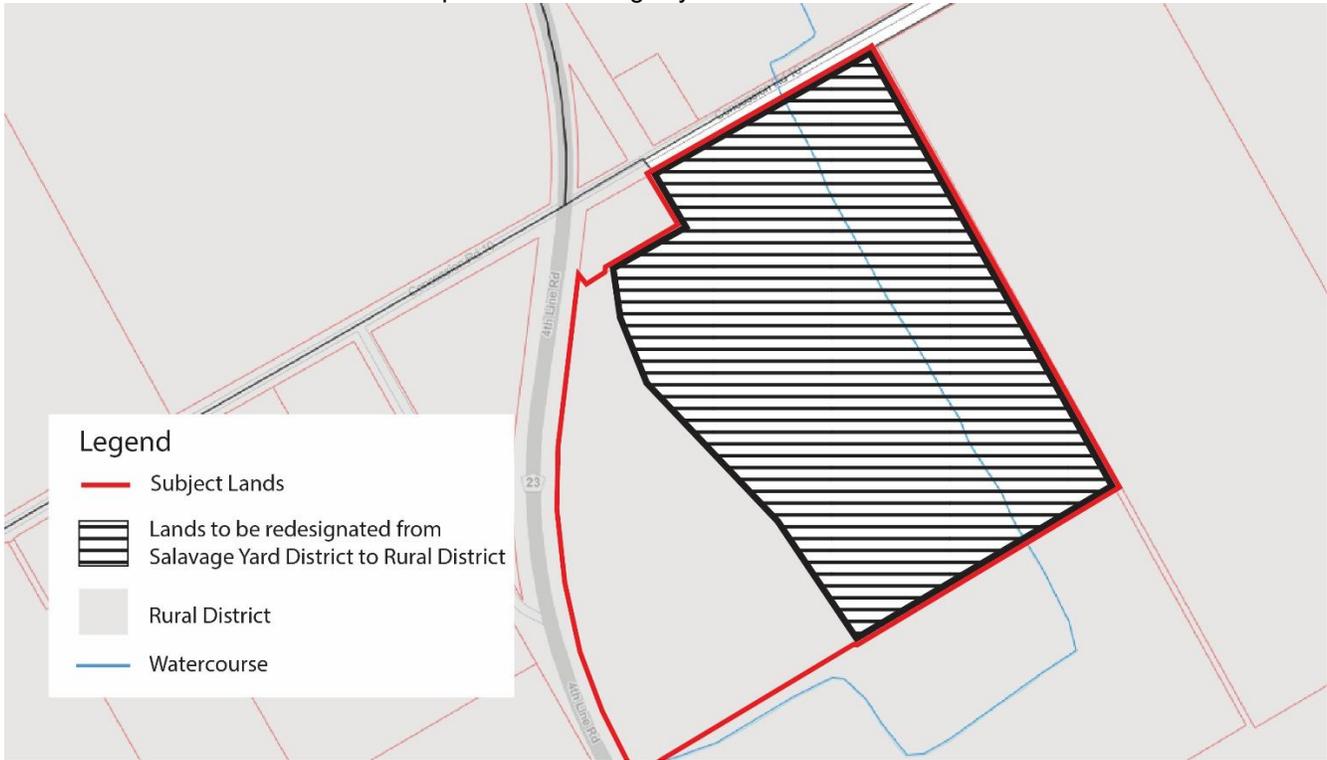
1. The Official Plan for the United Counties of Stormont, Dundas and Glengarry is hereby amended by the following changes which shall constitute Amendment No. [XXX] to the Official Plan for the United Counties of Stormont, Dundas and Glengarry.
 - (a) **Amend** Schedule 'LAND USE SCHEDULE A6 Township of South Glengarry', of the United Counties of Stormont, Dundas and Glengarry Official Plan, so as to amend the land use designation of a portion of the property located at Part Lot 8, Concession 9 from "Salvage Yard District" to "Rural District".

Given all Three Readings and Passed: [Date]

Kimberley Casselman
Director of Corporate Services/Clerk

Lachlan McDonald
Mayor

LAND USE SCHEDULE A6 Township of South Glengarry



Appendix B

Proposed Zoning By-law Amendment

By-Law Number 2026-XX

A BY-LAW TO AMEND BY-LAW 38-09, THE COMPREHENSIVE ZONING BY-LAW FOR THE TOWNSHIP OF SOUTH GLENGARRY

WHEREAS, the Municipal Act, 2001, c.25 S 5 (1) provides that the powers of a municipal corporation are to be exercised by its council;

AND WHEREAS pursuant to the provisions of Section 34 of the Planning Act, R.S.O. 1990, as amended, Council of the municipality may enact bylaws regulating the use of lands and the erection of buildings and structures thereon;

AND WHEREAS the Council of the Township of South Glengarry deems it advisable to amend By-law 38-09, a by-law that regulates the use of land and the use and erection of buildings and structures, as thereafter set forth.

NOW THEREFORE THE COUNCIL OF THE CORPORATION OF THE TOWNSHIP OF SOUTH GLENGARRY ENACTS AS FOLLOWS:

THAT By-law 38-09 is hereby amended as follows:

1. By-Law 38-09, entitled "The Comprehensive Zoning By-law for the Township of South Glengarry", as amended, is hereby further amended as follows:
2. Schedule RU-3 is amended by adding Exception Number RU-X, forming part of this By-Law; and
3. By adding the following Exception Zone RU-X to Section 10 – Exception Zones as follows:

Rural, Exception X (RU-X)

(Part Lot 8, Concession 9)

Despite the standards of Section 10.1, on lands zoned RU-X, the following additional permitted use shall apply:

- A Recreational Commercial Establishment (indoor firing range).

THAT despite the standards of Section 4.1, on lands zoned RU-X, the minimum number of required parking spaces shall be 50 spaces.

THAT Part 4 - "Parking and Loading Provisions", Section 4.18 – Minimum Number of Loading Spaces be amended by reducing the loading spaces required for Commercial uses Above 500m² in Gross Floor Area for the subject lands from 1 space to 0 spaces.

THAT all other applicable provisions of By-law 38-09, as amended, shall continue to apply.

THAT This by-law shall come into force and take effect on the day of final passing thereof.

READ A FIRST, SECOND, AND THIRD TIME, PASSED, SIGNED AND SEALE IN OPEN COUNCIL THIS [number] DAY OF [month] 2026.

Kelli Campeau
General Manager/Clerk

Lachlan McDonald
Mayor