

July 22<sup>nd</sup>, 2022

File No.: 2021-40

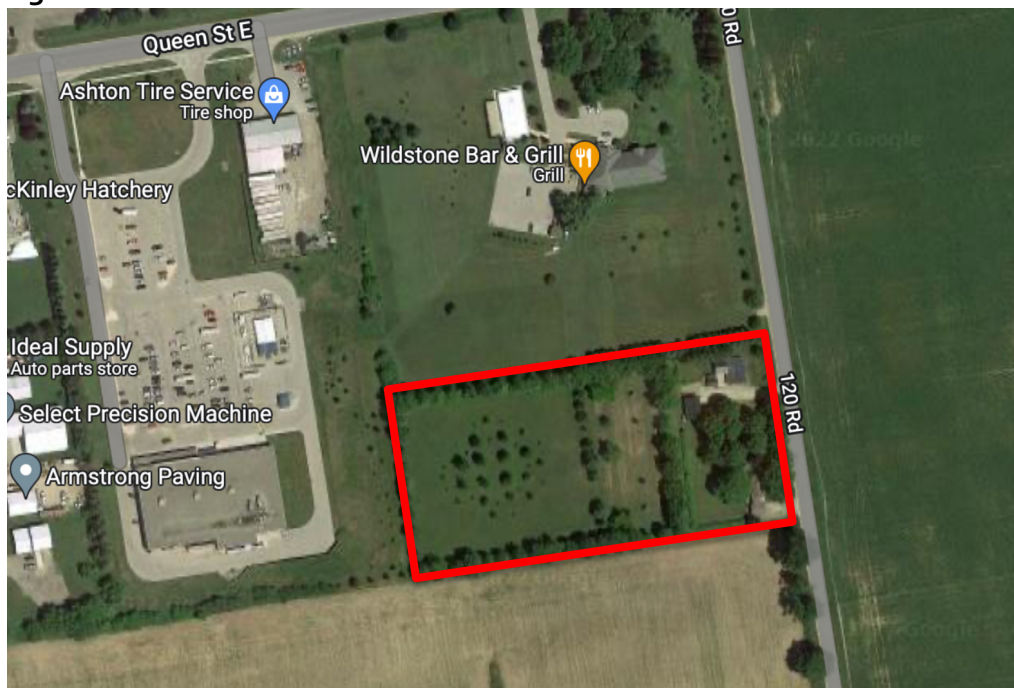
Morgan Dykstra  
Public Works & Planning Coordinator  
Town of St. Marys  
175 Queen Street East  
St. Marys, ON  
N4X 1B6

**RE: Planning Justification Letter  
Zoning By-law Amendment Application  
50 and 60 Road 120, St. Marys**

On behalf of C & C Management ("Owner") we are pleased to submit a Zoning By-law Amendment Application ("Application") for a portion of land known municipally as 50 and 60 Road 120, St. Marys (herein referred to as the "Site").

The Site is 1.87 hectares in size with 92.4 metres of frontage on Road 120. There are two existing single detached dwellings on the Site, oriented to Road 120, with individual driveways, septic beds, and wells. The rear portion of the Site is vacant. The land surrounding the Site includes a mix of commercial and agricultural uses.

**Figure 1: Site**



Source: Google Maps, 2022

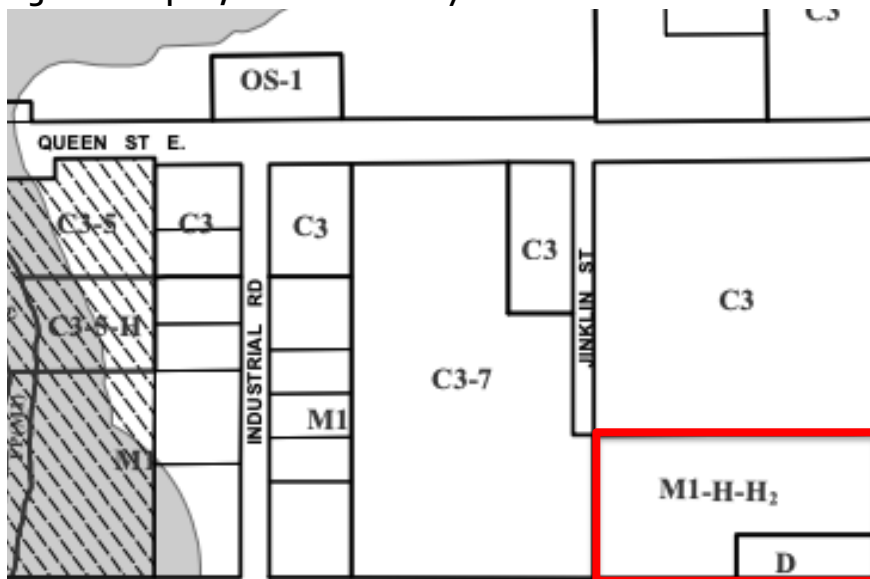
The Owners have submitted a Site Plan Application to the Town of St. Marys to permit the construction of a self-storage facility ("Proposed Development") on the Site. As illustrated on the attached Site Plan (GRIT Engineering, May 13<sup>th</sup>, 2022), the development will include the following:

- Eight (8) self-storage buildings with 3,566.08 square metres of floor area
- Self-storage teller building with 9 square metres of floor area
- Outdoor storage
- 112 off-street parking spaces
- Stormwater Management (dry swale)
- Snow storage areas
- Retention of the existing residential dwellings

While the entire Site is designated as "General Industrial" in the Town of St. Marys Official Plan, the land is split zoned, as illustrated below. Most of the Site is zoned "Light Industrial (M1)", with a small southern portion is zoned "Development (D)". The purpose of the Zoning By-law Amendment Application is to rezone the portion of the Site zoned "Development (D)" to "Light Industrial (M1)" to align with the zoning on the remaining portion of the Site and to conform to the Official Plan designation.

As outlined in the submission requirements from the Town, a Planning Justification Letter is required in support of the Zoning By-law Amendment Application and the intent of this letter is to fulfill said requirements.

**Figure 2: Map 10, Town of St. Marys**



Source: Town of St. Marys Zoning By-law (\*note the H and H2 were removed in 2021)

As outlined in the submission requirements from the Town, a Planning Justification Letter is required in support of the Zoning By-law Amendment Application and the intent of this letter is to fulfill said requirements.

## Planning Policy Framework

This section of the Planning Justification Letter provides an overview and assessment of the relevant planning policies to the proposed Application.

### Planning Act, R.S.O. 1990, CHAPTER P.13

In our opinion, the Application has regard for matters of public interest, as provided in the Planning Act, R.S.O. 1990, CHAPTER P.13 and are appropriate to proceed. The Application provides for the efficient use of land within the settlement area and will facilitate the construction of an industrial use on land designated for said purpose.

### Provincial Policy Statement, 2020

The Provincial Policy Statement (“PPS”), 2020 is a province-wide policy document that sets out the government’s land use vision for the built environment and the management of land and resources. The overarching intent of the PPS is to “provide for appropriate development while protecting resources of provincial interest, public health and safety, and the quality of the natural and built environment.” The document is to be read in its entirety and all relevant policies are to be considered.

Section 1.1 of the PPS outlines the general policies for the development of efficient and resilient land use patterns and growth. Specifically, Section 1.1.1 c) outlines the policies to create sustainable, healthy, liveable and safe communities, including: avoiding development and land use patterns that would prevent the efficient expansion of settlement areas in those areas which are adjacent or close to settlement areas.

Section 1.3 outlines the policies for employment areas, stating that “planning authorities shall promote economic development and competitiveness by:

- a) providing for an appropriate mix and range of employment and institutional, and broader mixed uses to meet long-term needs;
- b) providing opportunities for a diversified economic base, including maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities and ancillary uses, and take into account the needs of existing and future businesses;
- d) encouraging compact, mixed-use development that incorporates compatible employment uses to support liveable and resilient communities, with consideration of housing policy 1.4; and
- e) ensuring the necessary infrastructure is provided to support current and projected needs.

Section 1.7 of the PPS provides a detailed list of policies to support long-term economic prosperity in the Province, including the promotion of economic development and community investment-readiness.

It is our opinion that the Application is consistent with the PPS, implementing the planned function and use of the Site for industrial purposes, and supporting the development of industrial land in the Town. The Site

has access to existing public infrastructure, including roads and municipal services should they be required in the future. Matters related to land use compatibility have been addressed through the siting of industrial land adjacent to non-industrial uses, including commercial and agricultural uses.

Town of St. Marys Official Plan, 1987

The Town of St. Marys Official Plan ("OP"), adopted in 1987 (Consolidated October 1, 2007), provides a series of policies to "ensure that St. Marys continued to attract new development in balance with preserving the Town's character and charm." It is noted that the Town approved a new Official Plan on April 12<sup>th</sup>, 2022; however, the plan has yet to be approved by the Ministry of Municipal Affairs and Housing and therefore the 1987 OP remains in force and effect.

The Site is designated "General Industrial" on Schedule A to the OP. This designation has been maintained in the new Official Plan.

General goals and principles of the Official Plan (Section 2.1), applicable to the Proposed Development include:

2.1.6 Sufficient land will be allocated to attract a diversity of new light industry in locations which can be efficiently serviced.

2.2.1.1 To encourage the retention of existing business and the establishment of new diversified business through the creation of a business-friendly culture.

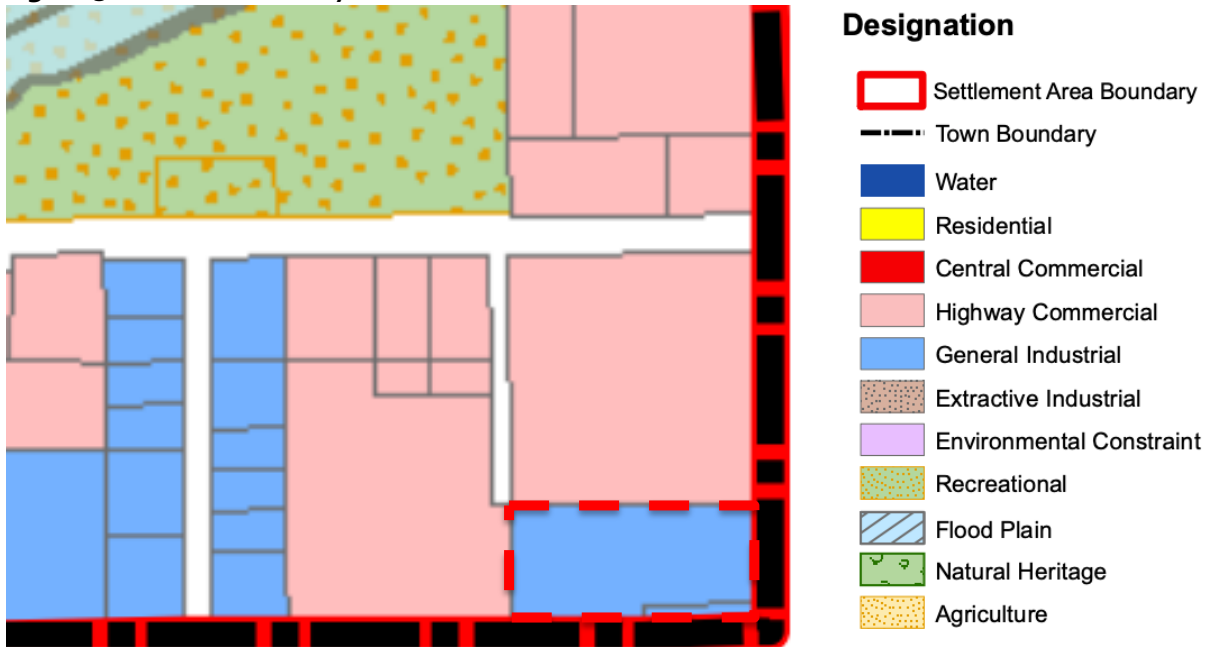
2.2.2.4 Council will ensure an adequate supply of available serviced land at all times and may enter into the marketplace, through the purchase of vacant land, for the development of industrial or commercial lands.

Section 3.4 of the OP provides specific policies related to the "General Industrial" designation. Objectives include encouraging the development of light industry as well as providing, servicing, protecting, and preserving lands in the "General Industrial" designation as an industrial employment area. Permitted uses include manufacturing, processing, warehousing, wholesaling, repair, servicing, transportation terminals, communication facilities, and research and development facilities, and goods storage facilities.

The OP defines Class 1 (Light Industry) uses are those that are self-contained, small scale and low probability of point source of fugitive emissions (noise, dust, vibration, or odour). Under the definition in Section 3.4.2.2.1 of the OP, the Proposed Development would be considered a Class 1 industrial use.

Section 3.4.2.7 of the OP requires Site Plan Approval for industrial uses which address building locations, landscaping, buffering, parking and vehicle movements, lighting, and drainage.

**Figure 3: Town of St. Marys Official Plan (Schedule A)**



Source: Town of St. Marys Official Plan

It is our opinion that the Application conforms to the OP by implementing the overall intent for the Site to be utilized for industrial uses that minimize servicing requirements, supports business growth in the community and is compatible with surrounding land uses, being commercial and agricultural.

A Site Plan Application has been submitted that to address matters set out in the OP, including servicing, landscaping, parking, screening, and overall site circulation.

Town of St. Marys Zoning By-law, 1997

The Town of St. Marys Zoning By-law (By-law), adopted in 1997, zones the Site as M1 and D. The purpose of the Zoning By-law Amendment Application is to rezone the portion of the Site zoned as D to M1, providing for a consistent zone across the Site that conforms to the OP designation and would permit the Proposed Development over the entire property.

The existing D zone applies to the southeastern portion of the Site, likely intended to acknowledge the existing residential dwelling. In this regard, Section 28 of the By-law states that “no personal shall within any D zone use any land or erect, alter, or use and building or structure for any purpose” except those that are existing. With a known industrial development, proposed for the entire Site through a Site Plan Application, it is our opinion that it is appropriate to rezone the land to M1.

The Proposed Development and the Site Plan comply with all applicable zoning provisions in the M1 Zone.

## Summary

In our opinion, the Zoning By-law Amendment Application is appropriate, represents good land use planning and is in the public interest as it implements the Official Plan designation and provides for industrial development and growth in the Town of St. Marys. Appropriate access and servicing are available to support the Proposed Development and all required provisions of the Zoning By-law have been complied with.

We trust this letter can be accepted as part of the existing Application. Should you have any questions or comments, please let us know and we would be happy to discuss further.

Kind regards,



Caroline Baker, MCIP, RPP  
Principal

c.c. Candice King, C & C Management