
PLANNING JUSTIFICATION REPORT

APPLICATION FOR ZONE CHANGE & SITE PLAN APPROVAL
282A COUNTY HIGHWAY 5
ST. GEORGE, COUNTY OF BRANT



WEBB
PLANNING CONSULTANTS

DECEMBER 2021

1.0 INTRODUCTION

WEBB Planning Consultants are retained by CSG Properties Limited Partnership, the owners of the subject property, to co-ordinate the municipal planning approvals to facilitate the planned development of a 36 hectare parcel of land for employment uses.

The proposed development site is located within the St. George Primary Settlement Area, to the south of Highway No. 5 and generally west of the established developed area. The site has a total area of 36 hectares (89 acres) with approximately 20.0 metres of direct frontage onto Highway No. 5. The lands are presently vacant and cultivated for agricultural use.

According to the County's Official Plan, the subject property is within the Primary Urban Settlement Area Boundary and designated for Employment uses. The lands are subject to Site Specific Official Plan Policies wherein it is that acknowledged that municipal services are not anticipated to be provided over the time horizon of the current Official Plan and permitted industrial uses are to be limited to dry employment and industrial uses which are appropriate for partial services.

The property is currently Zoned as "A" – Agricultural Zone. An amendment to the Zoning By-law is necessary to change the Zoning to the "M2" - Light Industrial Zone which includes the intended warehousing as a permitted use. In addition to the Zone Change, implementation of the development proposal also requires the processing of an application for Site Plan Approval which will address detailed design and technical issues of the development.

The scope of the proposed development is illustrated by the accompanying Site Plan and Building Elevations prepared by JRI Architects. With development to proceed in phases, the lands are to be developed for two large industrial warehouses, each containing ancillary office space with areas set aside for parking, truck loading and staging areas. Building 1, located on the west portion of site, will be the initial phase of development with a floor area of 63,220 sq. metres.

The proposed development of the property has been reviewed by the County through an Application for Pre-consultation. The proposal was considered at a virtual meeting held on August 5th, 2021. The County issued a document outlining the required planning approvals and the scope of supporting plans and studies required to facilitate a comprehensive review of the development.

In addition to this PJR, a number of technical and design studies have been completed in support of the development proposal. Where appropriate, we have relied on the study findings and recommendations to inform our planning opinion with regard to matters of consistency and conformity with the applicable Planning Policy framework.

As illustrated by the contextual image below, the subject property is generally located on the south side of County Highway 5 in the south-west area of the St. George urban settlement. St. George is a historical community that has evolved from a small rural village centered on the intersection of Beverly Street West and Main Street - County Highway 5 and County Highway 13. The community has since evolved into one of the two Primary Urban Settlement Areas within Brant County, transforming into an urbanized community with existing and planned municipal infrastructure and broad range of uses and public service facilities.

[illegible]

The residential parcels along Highway 5 are characterized as strip development created through severance applications, developed to only a single property depth with a range of shapes and sizes. All of the parcels have direct access onto Highway 5, the orientation of the parcels abutting the subject property having their rear yards backing onto the subject lands.

The industrial area immediately to the east was a coordinated development to create a range industrial parcels fronting onto local industrial roads on the basis of partial services. The lands are developed with as a mix of light industrial uses with some operations including outdoor storage and operations. Prospect Street currently terminates in a cul-de-sac with no ability to connect to the subject property due to an intervening parcel of land that forms part of the larger agricultural property to the south.

The 36.0 hectare (89 acre) property is generally rectangular in shape with limited frontage onto Highway 5. The lands previously had additional frontage, a number of approved severance applications approved by the County have subsequently reduced the available frontage to just over 20.0 metres with suburban residential properties located to the east and west of the proposed primary access.

As illustrated by the following enlarged aerial photograph, the majority of the subject property has historically been cultivated for agricultural purposes with two remnant wooded areas located along the westerly and south-westerly portions of the property. The wooded areas are identified in the County Official Plan as constraints to development and are generally intended to be retained with appropriate buffers as recommended by the accompanying environmental studies. The mid-block woodlot is intended to be reduced in size with compensation provided along the westerly lot line.



FIGURE 2: SUBJECT PROPERTY

Preliminary consultation with the Grand River Conservation Authority (GRCA) has confirmed that there are watercourses and associated floodplains and wetland areas located both on and adjacent to the subject property. Portions of these features are within Regulated areas and will require the issuance of a Permit from GRCA prior to development. The accompanying EIS has been prepared in consultation with the GRCA, the study scope has addressed the features and issues noted in the preliminary comments and the findings of the EIS reflected in the layout of the development as illustrated on the Site Plan. An addendum to the EIS will be provided in early 2022 to reflect findings from additional field surveys.

The adjoining vacant agricultural lands abutting the subject property also form part of the larger employment area that is planned within St. George, it is understood that there are no active development applications underway at this time. To facilitate comprehensive development with the adjoining lands, County staff have identified the possibility of implementing a roads network to allow integration and access to the adjoining Highways and higher order arterial roads. This has been assessed by the accompanying Traffic Impact Study and is in part implemented by the proposed Site Plan layout.

3.0 DEVELOPMENT PROPOSAL

As illustrated by the following rendering, the build-out of the subject lands will establish two large industrial buildings having a total floor area in excess of 120,000 square metres comprising warehouse space and ancillary offices.

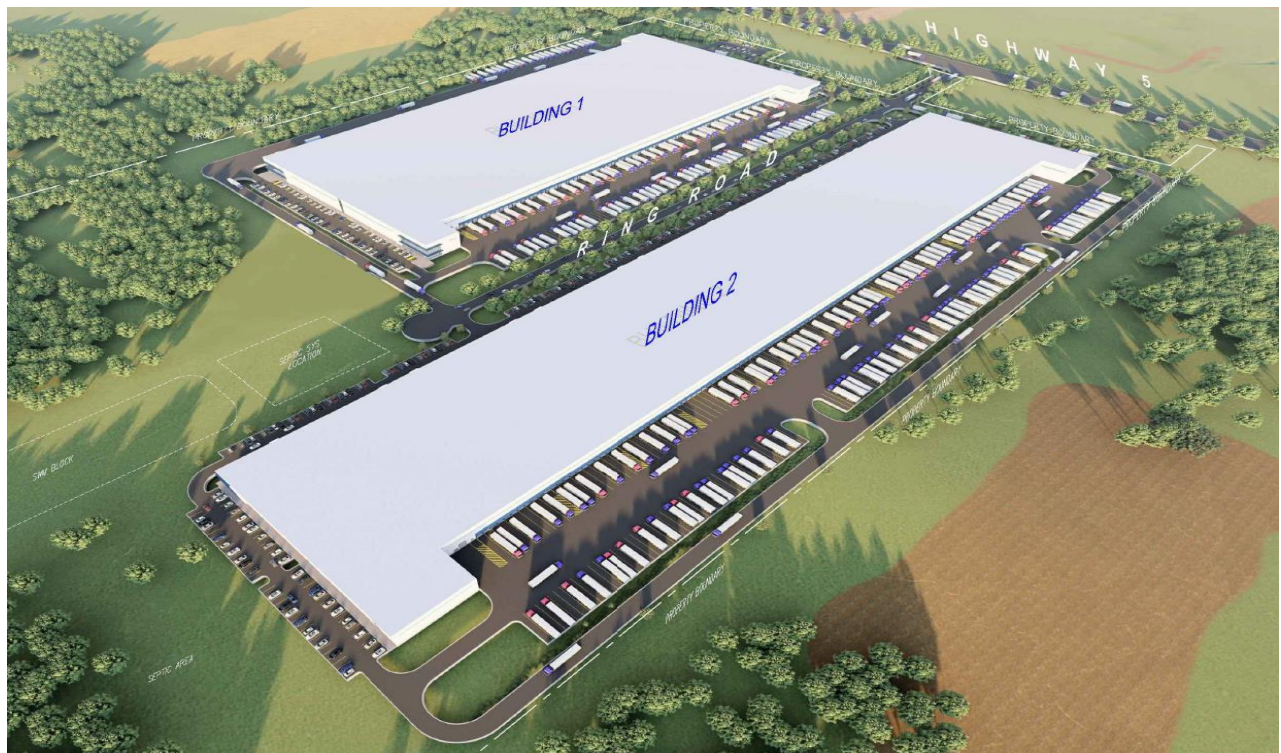


FIGURE 3: RENDERING OF FULL BUILD-OUT

The development is intended to proceed in phases with the initial phase to include construction of the primary site access to Highway 5 and Building 1, the westerly of the two buildings. The initial phase will include on-site infrastructure that will support both phases including a stormwater management facility at the southerly portion of the property, the sewage system and the area set aside for the septic field. The location of the SWM pond and septic system are illustrated on the following excerpt from the overall Site Plan.

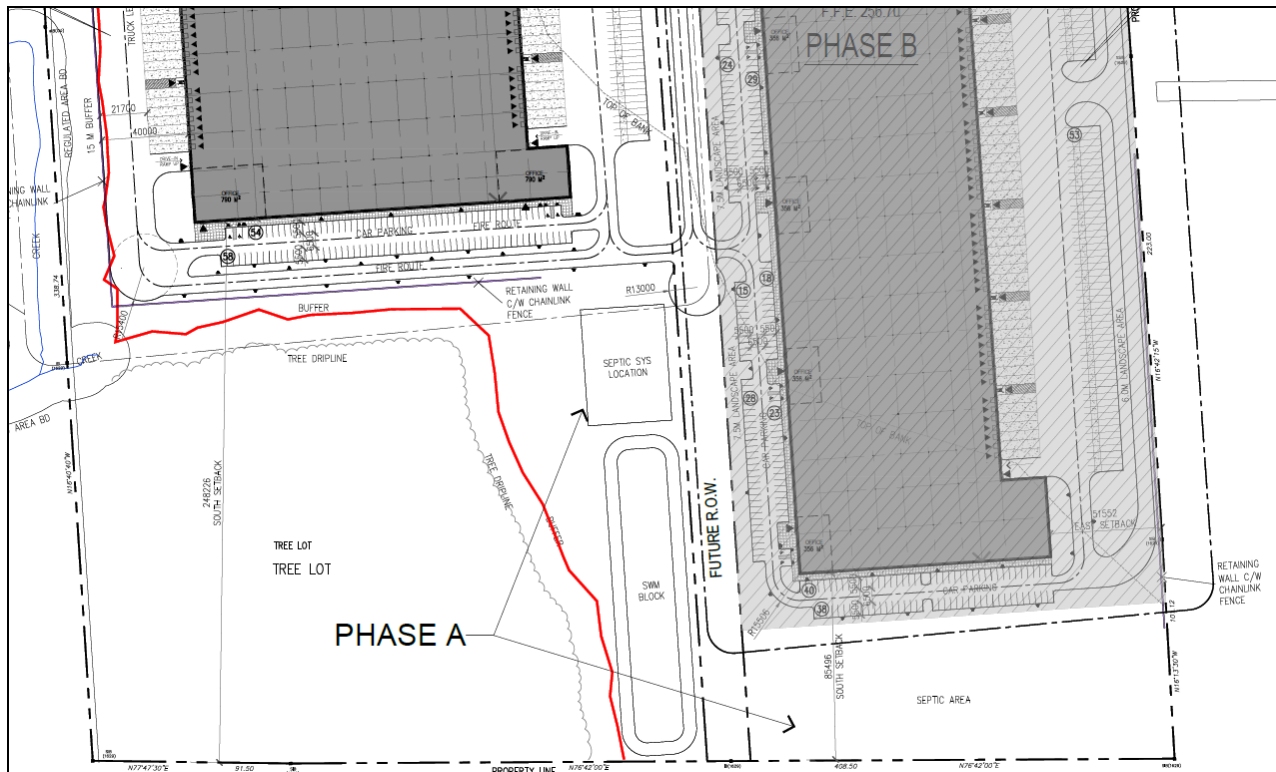


FIGURE 4: SOUTH PORTION OF DEVELOPMENT

To provide for integrated development with adjoining lands, the Site Plan is organized with the extension of the primary access road to extend the full depth of the property to facilitate its potential to function as a future municipal street. The access road is designed with a 20.0 metre wide cross section and in the interim will function as a private access, terminating in a cul-de-sac. The further extension of the road to the south limit of the property and transfer to the municipality as a public street will be advanced in conjunction with the second phase of development.

As the development site abuts existing residential uses located along Highway 5, the Site Plan and components of the development are designed to minimize impacts and achieve compatibility with these adjoining uses.

The following enlargement illustrates the northerly portion of the development that adjoins the rear of the residential properties fronting onto Highway 5. To minimize potential impacts, the

site design proposes building setbacks significantly greater than would otherwise be required by the Zoning Bylaw – 45 metres for Building 1 and 51 metres for Building 2. The space between the buildings and the lot line will be occupied by a limited amount of surface parking and include extensive landscaping for the purpose of screening and buffering.

All truck loading areas, trailer parking and staging areas are located interior to the site to provide separation from the adjacent residential areas. A combined total of 774 parking spaces have been provided for the two buildings which represents a reduction from the number of parking spaces that would be required by the Zoning By-law. The proposed supply is deemed appropriate based on the intended warehouse uses and is supported by a parking analysis that is included in the accompanying Traffic Impact Study.

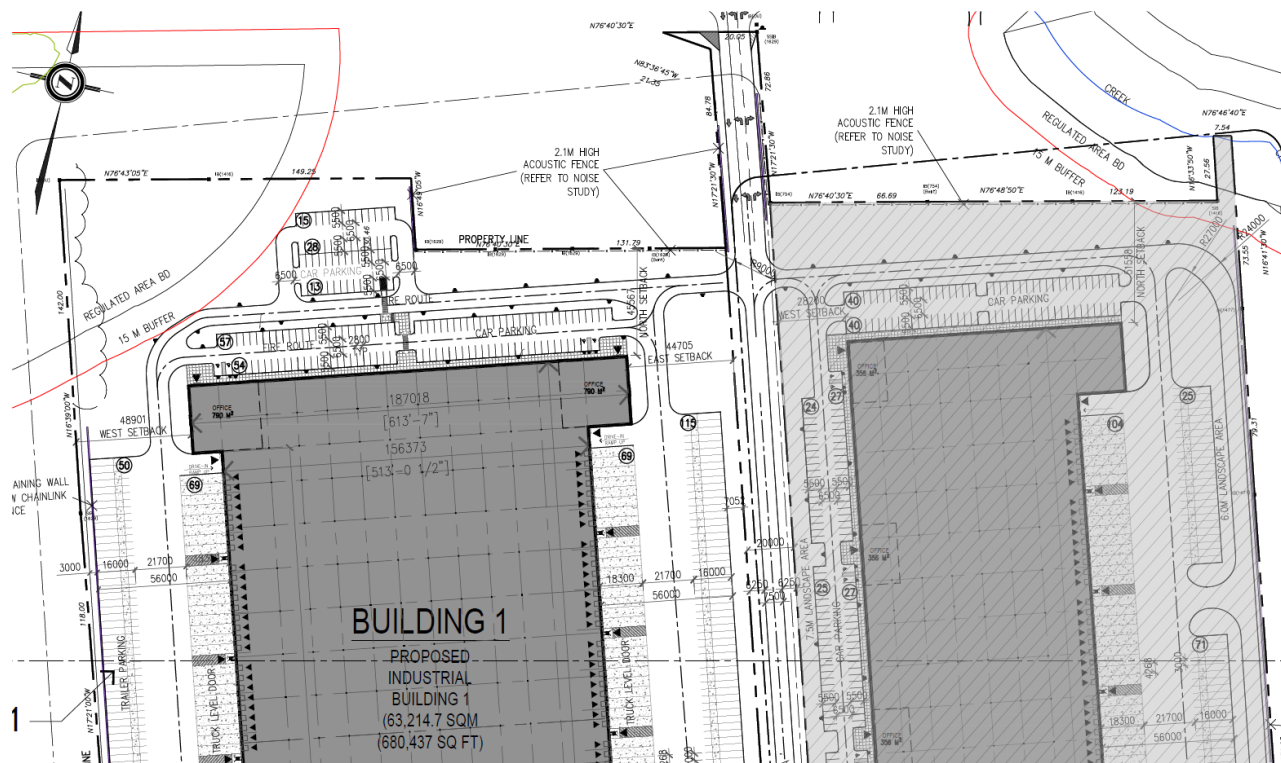


FIGURE 5: NORTHERLY EXTENT OF SITE DEVELOPMENT

Implementing the recommendations of the supporting studies, further mitigation measures are proposed to ensure compatibility. Consistent with the recommendations of the accompanying Noise study, a 2.1 metre high acoustic noise wall will be constructed along the north lot line to provide further buffering and mitigation from potential noise impacts. A Photometrics Plan has also been prepared and has guided the lighting proposed for the surface parking areas to minimize the potential for light trespass onto neighbouring properties. The detailed recommendations of these studies are proposed to be reviewed with County Staff and implemented through the Site Plan Approval process.

4.0 PLANNING POLICY FRAMEWORK

The proposed development has been considered in the context of the applicable planning policy framework which includes the Provincial Policy Statement (PPS) and the Growth Plan for the Greater Golden Horseshoe. The local policy and regulations are outlined in the County of Brant Official Plan and the County's comprehensive Zoning By-law.

The following discussion summarizes the applicable framework and provides our opinion with respect to consistency and conformity.

4.1 Provincial Policy Statement (2020)

On February 28, 2020, the Ministry of Municipal Affairs and Housing released the Provincial Policy Statement, 2020, which came into effect on May 1, 2020. As all decisions on or after that date under the Planning Act, or that affect a planning matter will be required to be consistent with the new PPS, the following discussion will focus on the new PPS.

The proposal is consistent with Policy 1.1: Managing and Directing Land Use to Achieve Efficient and Resilient Development and Land Use Patterns.

As stated in Policy 1.1.1, healthy, liveable and safe communities are sustained by promoting efficient development and land use patterns, accommodating an appropriate range and mix of uses including employment, promoting cost effective development patterns to minimize land consumption and servicing costs, and ensuring the necessary infrastructure and public service facilities are or will be available to meet current and projected needs. In addition, Policy promotes development and land use patterns that conserve biodiversity and prepare for regional and local impacts of a changing climate

The proposal is consistent with Policy 1.1.1 as the proposal maintains the primary intent of the lands for employment uses within the larger employment area and implements planned extensions of municipal infrastructure in an efficient and coordinated manner. The design of the site and proposed building considerations are intended to achieve objectives for an eco-industrial park that anticipates a changing climate by directing development away from natural hazards and protecting natural heritage resources.

The proposal is consistent with the Settlement Area Policies of Section 1.1.3 as the property is within a designated settlement area which is the intended location to focus growth and development. The proposed employment uses will maintain the pattern for a mix of land uses within the settlement area that is appropriate for and efficiently uses the available and planned infrastructure and public service facilities. The design of the site promotes alternative transportation and is transit supportive to the extent possible.

Policies for Employment, Section 1.3, state that municipalities shall promote economic development and competitiveness by providing for an appropriate range and mix of

employment uses to meet long term needs, maintaining a range and choice of suitable sites for employment uses which support a wide range of economic activities.

Policy 1.3.2 - Employment Areas, calls for planning authorities to plan for, protect and preserve employment areas for current and future uses and ensure the provision of the necessary infrastructure. The long term operational and economic viability for industrial uses within employment areas is achieved by separation and mitigation from sensitive land uses.

The Employment Area Policies of the County's Official Plan implements this Policy by establishing a significant area to be planned and serviced to accommodate employment uses and a restriction on sensitive land uses from establishing in this area. With regard to securing the necessary infrastructure, these specific matters will be secured through the appropriate Conditions of Site Plan Approval.

Specific to infrastructure and public service facilities, Policy 1.6, the proposal is consistent with Policy 1.6.1. for the optimization of existing infrastructure and facilities and planning for new infrastructure to be coordinated with the land use planning process

As stated by Policy 1.6.2, planning authorities are to promote Green Infrastructure to complement traditional infrastructure. The proposed development implements a range of innovative design measures for elements including SWM, use of LID's and the delineation and protection of existing natural heritage features and systems all of which are included as defined forms of Green Infrastructure.

To address the Natural Heritage Policies of Section 2.1, the appropriate environmental studies have been completed in consultation with the Grand River Conservation Authority and County Staff. The studies include the delineation of the adjoining woodlots and wetland features and the establishment of appropriate buffers. No development will occur in these areas in keeping with Policy 2.1.5 with the proposed development of the adjacent lands confirmed as appropriate.

With respect to Archaeology, an Archaeological Assessment has been by Lincoln Environmental Consulting Group. As no resources were identified by the Assessment, the study concluded no further study is recommended.

To ensure the site contains no contaminants in land or water, a Phase 1 Environmental Assessment has been completed. The assessment was completed to assess the potential for contaminants and confirms the lands are suitable for their intended uses consistent with Policy 3.2 – Human Made Hazards.

On the basis of the above discussion, it is our opinion that the proposed draft plan of subdivision is consistent with the Policies of the PPS (2020).

4.2 Growth Plan for the Greater Golden Horseshoe (2020)

The proposed development has been considered in the context of the applicable policies of Places to Grow - the Growth Plan for the Greater Golden Horseshoe.

The proposal conforms with Part 2 of the Plan - Policies for Where and How to Grow, and specifically, the Policies for Managing Growth - Section 2.2.1, the Employment Policies of Section 2.2.5, and the Policies for Designated Greenfield Areas, Section 2.2.7.

The Policies for Managing Growth state that the vast majority of forecasted growth shall be directed to settlement areas having a delineated built boundary, having existing or planned municipal water and wastewater systems, and capable of supporting the achievement of complete communities. The subject site is within a designated settlement area with municipal services in place and planned to accommodate growth.

Policy 2.2.1.4 states that the application of the Policies of the Growth Plan will support the achievement of complete communities that feature a diverse mix of land uses, provide a diverse range and mix of housing options, and expand convenient access to transportation options, public service facilities, open space and recreational facilities.

Policy for Employment Areas, Policy 2.2.5, promotes economic development and competitiveness in the GGH by ensuring the availability of sufficient land in appropriate locations for a variety of employment to accommodate forecasted growth. The proposal conforms with this Policy based on the compliance with the Official Plan Policies and proposed Zoning that will accommodate primary employment uses including warehousing and accessory offices.

As the property is located outside of the built-up area boundary, Policy 2.2.7 - Designated Greenfield Areas applies. Policy 2.2.7.1 states that new development in designated greenfield areas will be planned and designed in a manner that supports the achievement of complete communities, supports active transportation, and encourages the integration of sustained viability of transit.

This development proposal conforms with the intent for new development that is planned and designed to achieve complete communities. The proposal is located within a designated employment area with close proximity to a range of ancillary uses that cater to the businesses and employees of the business park.

Policies for Infrastructure to support growth are contained in Part 3 of the Plan. It is noted that the subject proposal can be accommodated by the existing and planned municipal services including water and stormwater systems. In the interim, sanitary services will be provided by a private treatment system. This approach supports the principle that significant cost savings can be achieved by ensuring that existing infrastructure, including municipal services, is optimized before new infrastructure is built.

Policies for the protection of the Natural Heritage System and Cultural Heritage Resources are outlined in Part 4.2 of the Plan – policies for Protecting What is Valuable. As noted in the preceding discussion of the PPS, it is noted that the subject property is adjacent to a natural heritage feature which has been investigated in collaboration with the local Conservation Authority and County staff. Permits from the Grand River Conservation Authority will be required as a Condition of Development Approval, ensuing matters including stormwater management and water balance are implemented.

With regard to Cultural Heritage Resources, Policy 4.2.7, the preceding discussion of PPS consistency outlined the completion of the appropriate studies and assessments to ensure the provincial interest in heritage resources and archaeology is addressed.

On the basis of the above discussion, it is our opinion that the proposal conforms to the Policies of the Growth Plan.

4.4 County of Brant Official Plan – Current

4.4.1 Overview and Applicable Designations

The current Official Plan of the County of Brant was adopted in September 2010. The County is preparing a new Official Plan to achieve conformity with updates to Provincial Policy, in particular the Growth Plan, the timing for adoption of the new Official Plan is anticipated as early 2022.

According to Schedule A-2 the Land Use Plan for St. George, the subject property is located within the St. George Primary Urban Settlement Area Boundary and designated as Employment. The property is within the area subject to Site Specific Policy Area 22 (SSPA 22) and outside the delineated Built Boundary. The abutting residential properties along Highway 5 are designated as Suburban Residential.

Schedule B identifies the road network hierarchy with Highway 5 identified as a Rural Arterial Road. The Schedule does not identify any existing or proposed roads within the limits of the subject property or on the adjoining employment lands to the south and west.

Schedule C-2 identifies the Natural Heritage System Features and Development Constraints for lands within the Settlement Area. The existing hedgerows on the subject property and wooded areas are identified as Woodlands & Vegetation. The creek to the north east is identified as Hazardous Lands with a wetland pocket located to the east of Commerce Drive.

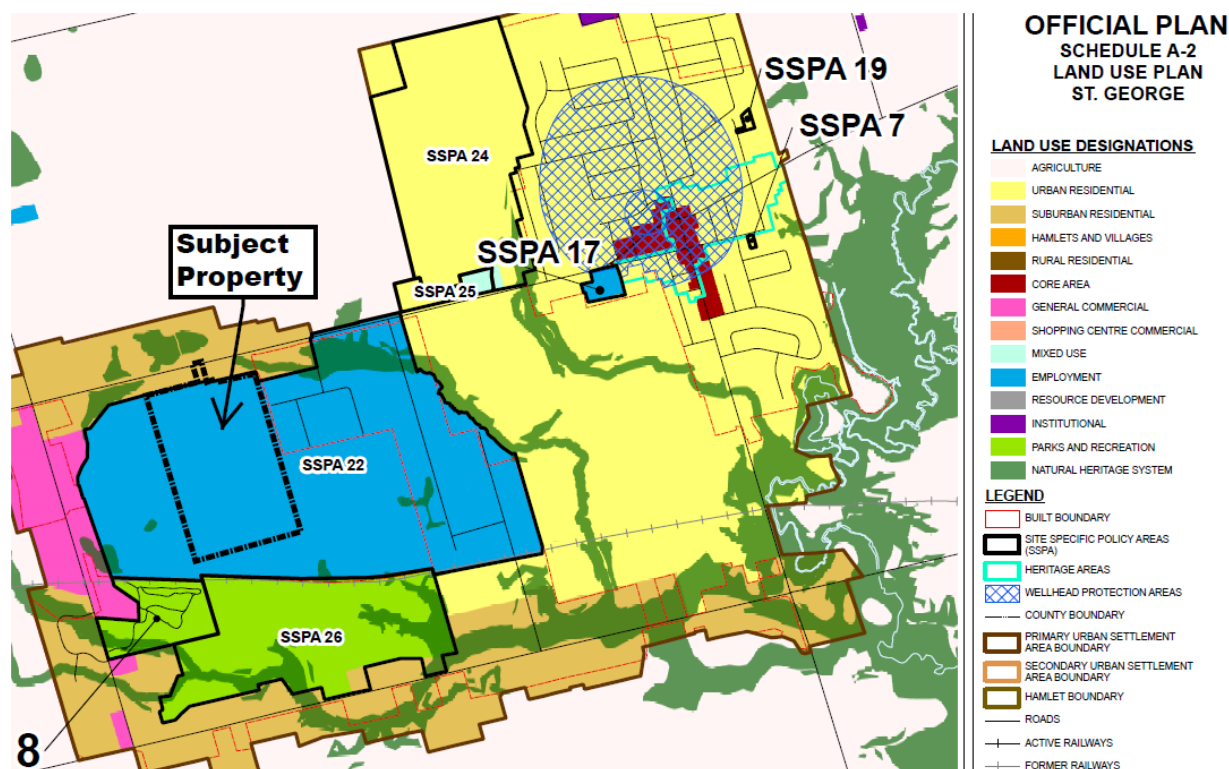


FIGURE 6: SCHEDULE A-2 – ST. GEORGE LAND USE PLAN

4.4.2 Planning Strategy

Section 2.0 of the Plan outlines the components of the County's Planning Strategy which establishes an integrated long-term approach to all aspects of planned changes and physical development of the County. The key components include policies for Growth Management, Natural Heritage, Economic Development and General Development.

Based on Growth Plan in effect at the time of adoption, the Plan establishes growth targets to the horizon year of 2031. The total population projection is 47,000 with an employment projection of 19,000 jobs, a population increase of 35% and jobs growth of 21% over the 2001 – 2031 growth period.

Lands outside the Built-Boundary are categorized as the Designated Greenfield Area and subject to policies to achieve minimum density targets. On adoption, the minimum density target of the Plan was not less than 30 residents and jobs combined per hectare, increasing to 40 residents and jobs combined per hectare by 2022.

The Community Structure of the County is comprised of Primary and Secondary Urban Settlement Areas, Hamlets & Villages, Rural Residential Areas, and Agricultural Areas.

The Primary Urban Settlement Areas – Paris, St. George and Cainsville, generally have full municipal services and are intended to accommodate the majority of growth and function as the primary activity centres. The primary Urban Settlement Areas Policies of Section 2.2.3.1.1 set out more detailed Policies which confirm a sufficient land supply to accommodate the projected population and employment growth of the County to the horizon year of 2031, reaffirming the role of these areas as the location to accommodate the majority of growth and development. These areas are to develop as complete communities by accommodating a mix and range of urban land uses including residential, commercial, employment, community and open space uses.

The Natural Heritage System is a land use designation that applies to a range of features including significant habitat of endangered or threatened species, Provincially significant wetlands and habitat, hazardous sites and hazardous lands. The designation is identified on Schedule A and in greater detail on Schedule C. Development is generally precluded from these features and areas.

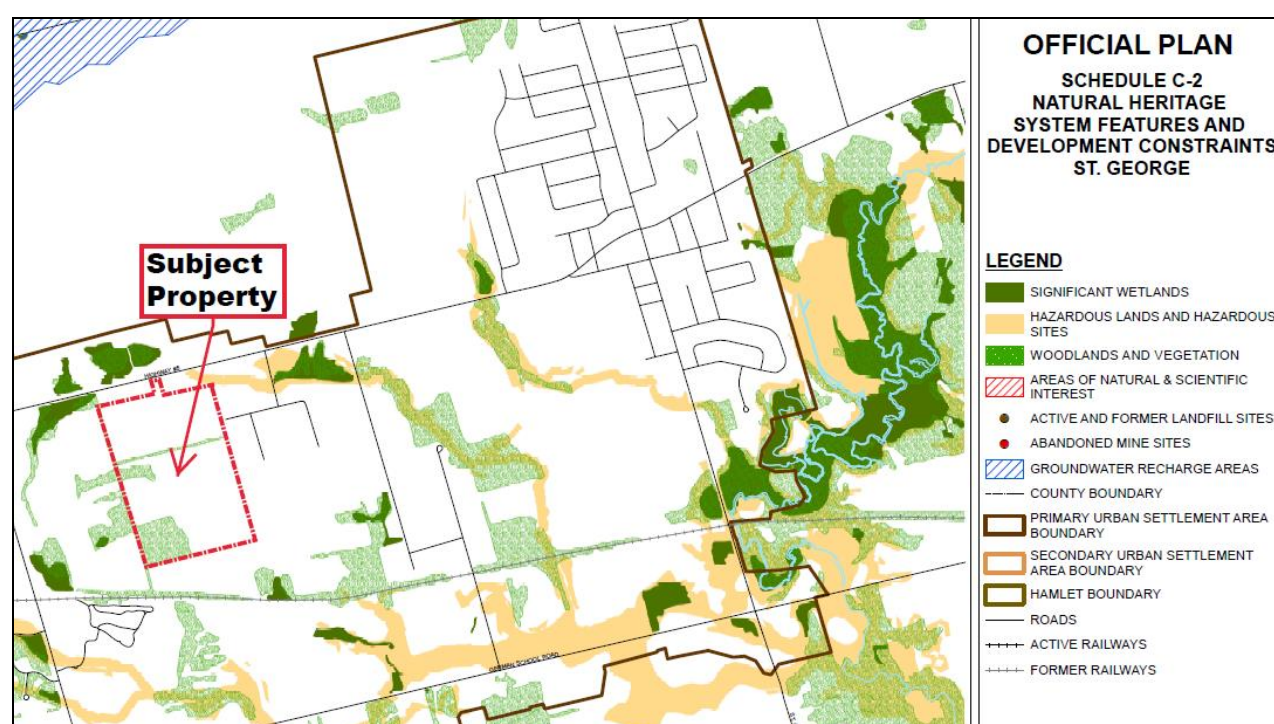


FIGURE 7: SCHEDULE C-2: ST. GEORGE NATURAL HERITAGE SYSTEM

Additional natural heritage features and areas surrounding the Natural Heritage System represent a constraint of development. Certain types of development may be permitted within these areas subject to addressing specified Criteria of the Plan including the completion of detailed Environmental Impact Studies (EIS) in keeping with Policy 2.3.2.2 – Development and Site Alternation.

There are no Natural Heritage System designations applicable to the subject property according to Schedules A-2 and C-2. Schedule C-2 does identify Natural Heritage Features on adjoining lands to the east and constraints to development within the limits of the subject property in the form of linkages and woodlands. An EIS has been prepared in accordance with the Policies of the Plan and confirms that the development will not result in negative impacts on the natural heritage features and areas or on their ecological functions.

General Economic Development Policies are outlined in Section 2.5 of the Plan, employment lands identified as one of many components of an overall economic development strategy for the County. The role of the policies of the Plan is to ensure an appropriate land use framework to accommodate evolving land needs as they relate to economic activity. Specific to intensive employment uses, these shall be directed to lands designated employment and located adjacent to or in close proximity to Provincial Highways and major arterial roads where an appropriate level of County services are provided.

4.4.3 Land Use Policies

The detailed policies for the various land use designations are set out in Section 3.0 of the Plan. General policies state that development shall be subject to the other policies of the Plan including the provision of appropriate services and the evaluation of any natural features that may be a constraint to development. Policies state that new development may be subject to Site Plan Control which is assumed to apply to the subject proposal given the scale of the development.

Policies for the Employment designation are set out in Section 3.12 of the Plan. The primary employment form in the designation shall be limited to prestige, light and heavy industrial uses. The proposed warehousing and logistics use is categorized as a light industrial use as there is no manufacturing or processing and no outdoor storage of goods and materials. This categorization complies with criteria where employment uses are located adjacent to Provincial Highways or Arterial Roads, with direction that such areas are generally restricted to prestige or non-noxious uses. Additional site design consideration including setbacks, landscaping, and signage to be reviewed at the Site Plan stage.

Recognizing the potential for compatibility with adjoining sensitive land uses, Policies recognize the applicability of the MOE land use compatibility Guidelines and completion of supporting studies to address the potential for adverse effects such as noise, vibration, lighting and visual impacts. As the proposed development does introduce a use with associated large volumes of truck traffic, studies have been completed to demonstrate that planned development will not create incompatibilities with the adjacent residential land uses.

To further mitigate potential impacts, Policies require that new development shall provide adequate on-site parking and locate such uses to avoid conflicts with sensitive land uses. Site Design shall consider pedestrian circulation, the provision of facilities to promote cycling and walking, and incorporation of appropriate and adequate landscaping and other forms of buffering to enhance parking areas and associated lighting.

As noted, the subject property and adjoining employment lands are within the area subject to Site Specific Policy Area 22. As stated by the pre-ambles to Section 4.0 of the Plan, SSPA's are applied in certain circumstances where areas of the County warrant specific land use direction, such policies taking precedence in the case of conflict with other policies of the Plan.

The specific details for SSPA 22 are below:

4.1.22 SITE SPECIFIC POLICY AREA 22 ST. GEORGE SECONDARY URBAN SETTLEMENT AREA-EMPLOYMENT DESIGNATION

a. There are no municipal wastewater services anticipated to be provided to the Employment Area within the St. George Secondary Urban Settlement over the horizon of this Plan. Accordingly, permitted uses shall be limited to dry employment and industrial uses which are appropriate for partial services and do not result in excessive amounts of wastewater. Dry industrial and employment uses are considered to be those uses in which the principal source of wastewater is related to domestic purposes, and minimal wastewater is produced from industrial processing, washing, cooling or other purposes.

b. The Zoning By-law will specifically define the dry employment and industrial uses that are permitted, as well as the lot and building requirements that are appropriate for partial services.

c. The County will encourage the application of water conservation technologies as well as low impact development principles.

Consistent with Pre-consultation discussions with County staff and subsequent completion of the supporting technical studies, it has been verified that the intended uses fall within the category of dry industrial uses and the technical studies support the use of partial services. The County's Zoning by-law does not currently define 'dry industrial' uses or provide direction on lot and building requirements. The need to include any site specific regulations in this regard will be investigated through the review of the subject applications.

4.4.4 Infrastructure, Services and Facilities

Policies for infrastructure, services and facilities are outlined in Part 5.0 of the Plan. With regard to the provision of services, Policy 5.1 outlines the hierarchy for the provision of water and sanitary services with the preferred servicing strategy for St. George being full municipal services. As noted in the preceding discussion, certain portions of St. George are subject to Special Policies that acknowledge development may proceed on the basis of partial services.

As detailed in the accompanying supporting technical studies, the initial phase of development will proceed on the basis of partial services. Acknowledging the intended uses

satisfy the intent for dry industrial uses which do not result in excessive amounts of wastewater, the proposed servicing scheme is to connect to the existing municipal water system and develop a private wastewater treatment system. The accompanying technical studies are provided in support of the preferred servicing strategy, their review and approval subject to securing all necessary municipal and provincial approvals.

In summary, it is our opinion that the proposed development complies with the applicable policies of the Official Plan. The rezoning application to the M2 Zone category will implement the appropriate Regulations to guide the use of the lands. The Site Plan has been designed to implement the intent of the Official Plan which is to encourage appropriate employment growth with detailed design considerations to ensure compatibility with adjoining land uses.

4.5 Draft Official Plan – “A Simply Grand Plan”

The County of Brant is currently preparing a new Official Plan as required for conformity with the updated Growth Plan. The County is presently refining the draft document following broad public consultation, the Plan is anticipated to come forward for approval early in 2022.

The Transition Policies contained in the new Plan confirm that Planning Applications submitted and deemed complete prior to Ministerial approval shall be reviewed under the Policies of the 2012 Official Plan. While the current proposal will be considered under the 2012 Plan, the following discussion provides a brief overview of the applicable Policies to demonstrate the proposal achieves general compliance with the draft policies.

The Growth Management Policies of the new Plan have been updated to reflect growth targets to the horizon year of 2051 with the County’s population and employment base to reach 59,000 residents and 26,000 jobs by the year 2051. The two Primary Settlement Areas – Paris & St. George are planned to accommodate the majority of growth through intensification within the Delineated Built-up Area and development in the Designated Greenfield Areas.

As illustrated by the Following Figure 8, an excerpt from Schedule 1B – Growth Management, the subject property is located outside the Delineated Built-up Area and within a Designated Greenfield Area. The figure also confirms the continued land use designation of General Employment with the wooded areas of the site shown as a key component of the County Natural Heritage System.

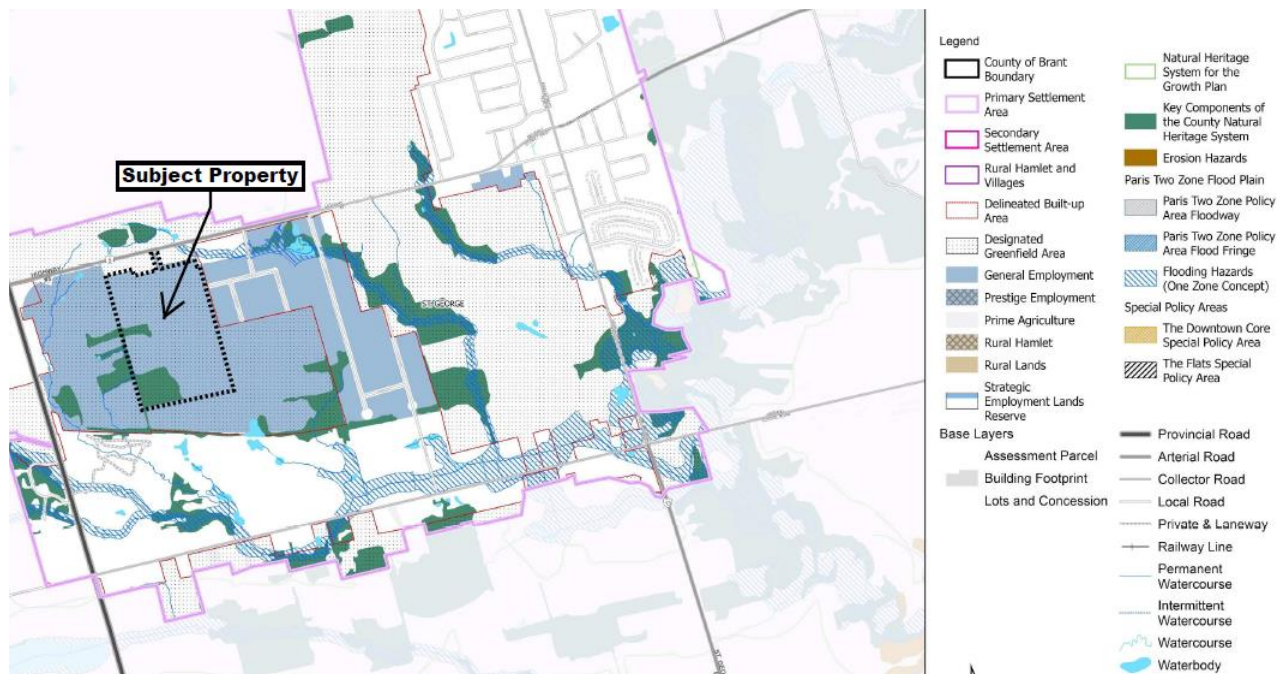


FIGURE 8: SCHEDULE 1B – GROWTH MANAGEMENT

Figure 9, an excerpt from Schedule 2B – Designated Greenfield Area, builds upon the information conveyed by Schedule 1B, showing the property as outside the Built Boundary and part of the Designated Greenfield Area.

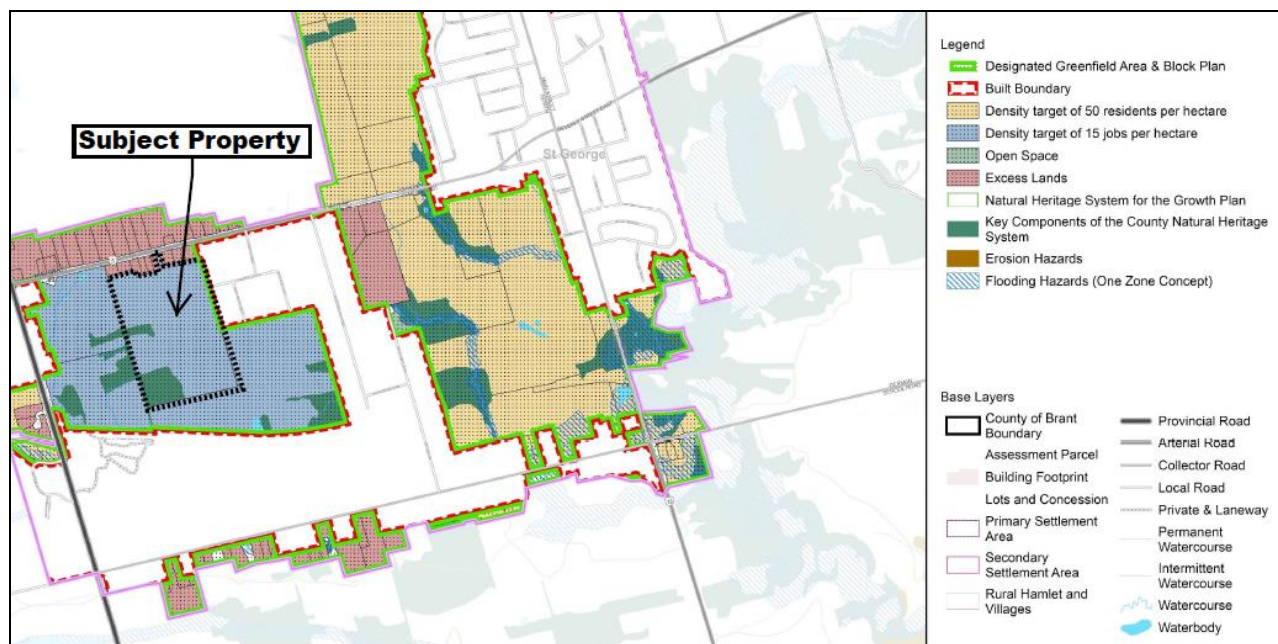


FIGURE 9: SCHEDULE 2B - GROWTH MANAGEMENT

In conformity with the Growth Plan, the property is subject to a Density Target overlay applicable to the Employment Lands indicating a minimum Density Target of 15 jobs per hectares. Consistent with the Policies of the Growth Plan, the Density Target is to be measured across the totality of the Greenfield Area.

The Land Use Map for the St. George Primary Settlement Area is illustrated by Schedule 3 B, Figure 10 as below. The subject property remains designated as General Employment consistent with the current Official Plan, the wooded areas on the property designated as Key Components of the County Natural Heritage System.

The applicable Land Use Policies for General Employment Designation confirm the designation is intended to accommodate a range of light, heavy and prestige industrial uses with the specific permitted uses including Warehousing. The General Policies include the requirement for Site Plan Control to address overall site design and considerations for land use compatibility.

With regard to servicing, it is noted that the new Official Plan does not carry forward the prior Site Specific Policy Area # 22 that applied to lands with the St. George Employment Area. The effect of SSPA #22 was to acknowledge that the timing of full municipal services was unknown and that dry industrial uses would be permitted to develop on the basis of partial services. However, the Infrastructure Policies outlined in Section 8.0 of the draft Plan do confirm partial services are a viable alternative including the St. George Primary Settlement Area. In support of the proposed development, the accompanying technical studies confirm the proposed partial servicing is sustainable and will not result in any adverse impacts.

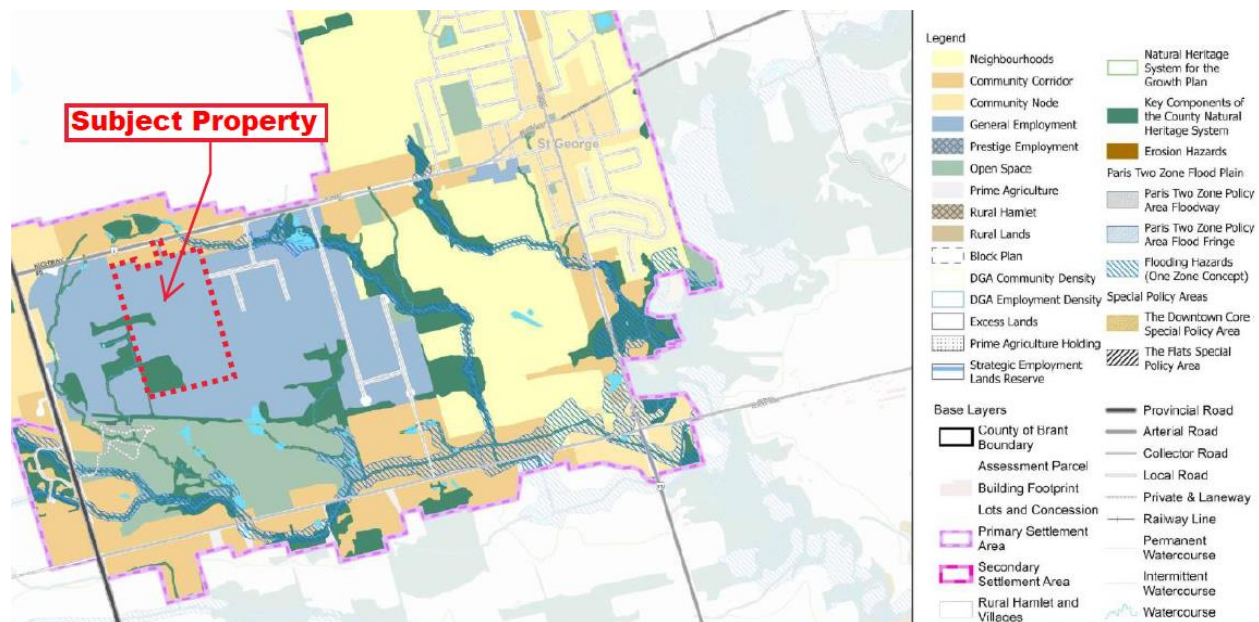


FIGURE 10: SCHEDULE 3B – LAND USE

In summary, it is our opinion that the proposed development of the property for an employment use maintains general compliance with the Policies of the County's draft Official Plan. The intended uses will contribute to the planned minimum employment targets for the Greenfield Area and are appropriate to develop on the basis of partial services. Through the Site Plan Approval process, detailed considerations of appropriate site design including landscaping, lighting, and locating of activity areas such as truck loading and staging will have regard for ensuring matters of land use compatibility are achieved.

4.6 Zoning

As illustrated by Figure 11, an excerpt from the Zoning Schedules, the subject property is presently Zoned by the County's Comprehensive Zoning By-law as "A" – Agricultural Zone. The adjoining industrial properties to the east are Zoned as "M3" – Heavy Industrial and the residential properties fronting onto County Road 5 as "SR" – Suburban Residential Zone.

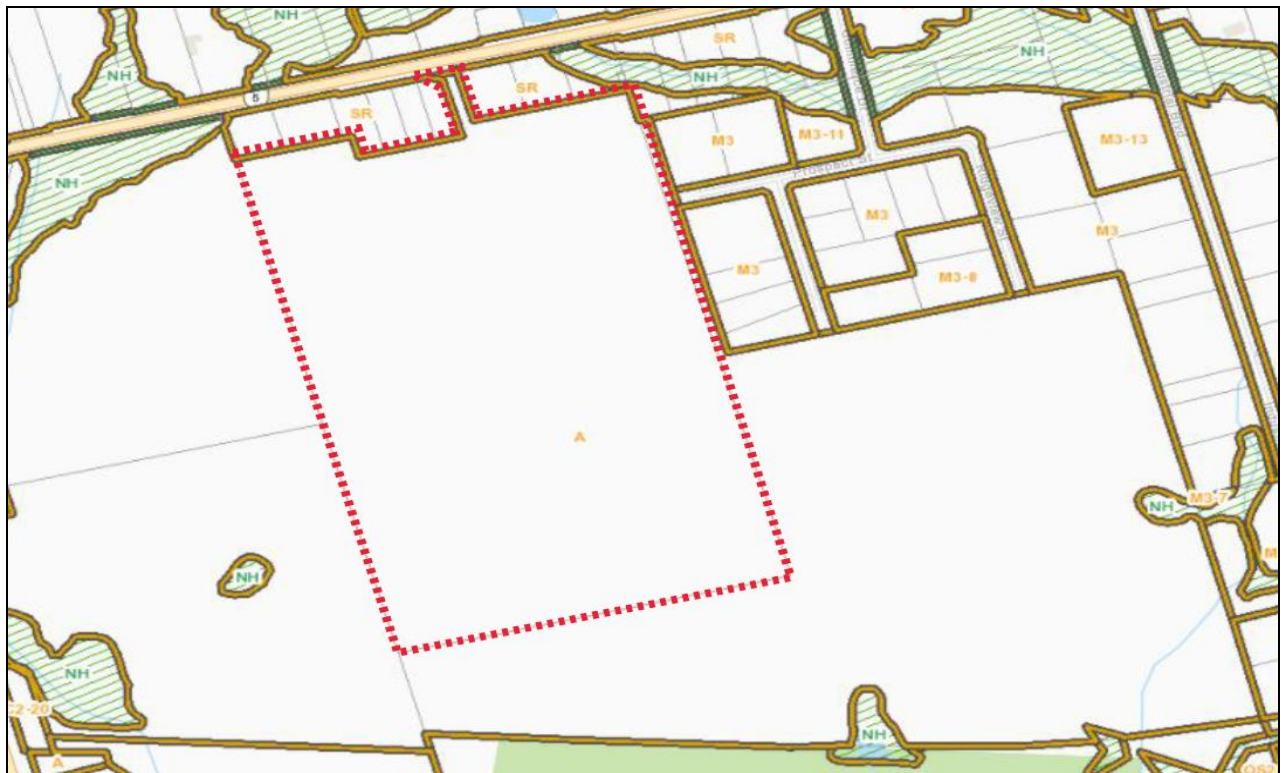


FIGURE 11: ZONING MAP

Implementation of the development requires an amendment to the Zoning By-law to permit the intended uses and scale of development. Having regard for the primary intended use of the property for warehousing and the applicable Policies of the General Employment designation of the Official Plan, it is our recommendation that the subject lands be rezoned to the "M2" – Light Industrial Zone which includes warehousing as permitted use.

It is our opinion that the “M2” Zoning generally complies to the intent of the Official Plan and designation of the property as “Employment”. Further, Site Specific Policy Area No. 22 is specifically intended to limit the permitted uses to dry employment and industrial uses which are appropriate for partial services and do not result in an excessive amount of wastewater. It is recommended that the overall scope of permitted uses of the “M2” Zone be further reviewed through the processing of the applications and modified as necessary to ensure the intent of Policy Area No. 22 is maintained.

As summarized by the following table, the proposed development of the property for two warehouse buildings with surface parking, truck parking and staging areas, and on-site landscaping generally complies with the Zoning By-law. The exception is on-site parking wherein the proposal is recommending a modification to the Zoning Regulations that aligns with best practices and avoids a significant oversupply of parking based on the particulars of the proposed warehouse use. A Parking Analysis has been completed as a component of the accompanying TIS and provides further rationale in support of the site specific modification.

Regulation	Required	Building 1	Building 2
Min. Lot Area	1,100 sq m	19,950 sq. m.	14,095 sq. m
Min. Lot Frontage	20 m	20.0 m	20.0 m
Min. Street Setback	6.0 m	44.7 (East)	28.2 (West)
Min. Interior Setback	3.0 m	45.6 m (North) 248.4 m (South)	51.6 m (North) 85.5 (South)
Min. Rear Yard	8.0 m	48.9 m (West)	51.6 m (East)
Min. Yard abutting Res. Zone	10.0 m	45.6m (North)	51.6 (North)
Max. Lot Coverage	60%	31.6%	28.54%
Min. Landscape Open Space	10%	26.6%	24.1%
Max. Building Height	12.0 m plus 1.0 increased yard setback	14.3 m.	14.3 m
On-site Parking	1 spaces/100 sq m GFA Warehouse plus 1/30 Office	491 spaces	279 spaces
Barrier Free Parking	4% of Required	16	16

TABLE 1: ZONING COMPLIANCE

It is noted that the existing natural heritage features have not been mapped and zoned into an applicable Open Space or Natural Heritage Zone. It is anticipated that the rezoning Application for the proposed industrial development will include amendments to the By-law to recognize the limits of these features. The boundaries including applicable setbacks will be established pursuant to the accompanying Environmental Impact Assessment which provides detailed recommendations based on the field work and analysis and consultation with the Grand River Conservation Authority and County Natural Heritage staff.

5.0 SUPPORTING STUDIES

The scope of the studies that are required to accompany submission of the planning applications were identified through the Pre-Consultation process. The required studies and plans are intended to facilitate a comprehensive review of the proposed development and where applicable provide information that has guided the proposed site layout and informed the planning opinion. The following discussion provides a brief overview of the key studies that are provided in support of the proposal.

5.1 Environmental Impact Statement, Dougan & Associates

Dougan & Associates are retained to complete a comprehensive EIS in support of the proposed development, their work is complemented by a Geomorphological Assessment completed by Geoprocess Research Associates that has evaluated potential downstream erosion associated with the proposed SWM.

It is noted that the Terms of Reference for these studies were developed in collaboration with the GRCA and County Natural Heritage staff who provided their input and sign-off on the scope of work.

The studies have evaluated all aspects of the development lands including natural heritage features that are located within and adjacent to the subject lands. Existing vegetation has been inventoried and a tree management plan prepared as part of the EIS. Where applicable, the EIS has recommended appropriate development setbacks from certain features, these setbacks have been incorporated into the proposed Site Plan.

An addendum to the EIS will be provided early in 2022 that will reflect additional field work that is presently underway to ensure that the scope of the assessment has encompassed the agreed time frames for field assessments.

5.2 Functional Servicing Report – Meritech Engineering

Meritech Engineering are retained by the owners to provide civil engineering services in support of the proposed development. Meritech have completed a Preliminary Servicing Report in support of the proposal which addresses the specific matters that were identified at the Pre-consultation phase including storm water management, the provision of water and sanitary services, preliminary grading, servicing and erosion & sedimentation control plans.

The Report provided by Meritech provides an overview of the proposed site services and stormwater management that is proposed for the development and is intended to be read in conjunction with related technical reports including geotechnical, hydrogeological, and geomorphological reports. These additional reports characterize site conditions and provide details in support of the proposed engineering design.

The stormwater scheme for the property is to capture and treat all stormwater on-site with controlled discharge to a tributary of Fairchild Creek located mid-block on the west boundary of the property. The Geomorphological Assessment completed by Geoprocess has been prepared for the purpose of evaluating downstream conditions in response to preliminary SWM comments provided by the Grand River Conservation Authority.

Municipal water services are available and proposed to be extended to service the subject property. The existing service that terminates at Commerce Drive will be extended into the site and designed in accordance with County Standards to ensure the development has adequate flows for a potable water supply and firefighting purposes.

At present there are no municipal sanitary sewers that are capable of servicing the subject property. In the alternative a private in-ground septic system is proposed to service the buildings with Flowtech providing the preliminary design materials.

5.3 Traffic Impact Study, JD Engineering

JD Engineering are retained by the owners to undertake a Traffic Impact Study in support of the development proposal, the initial scope of work having been reviewed with County staff. The TIS undertook an analysis of existing conditions, review of the proposed development, and consideration of future traffic forecasts. This analysis provided the basis for any recommendations required to improve future traffic conditions.

The TIS has also considered the proposed conceptual road network improvements that may be necessary to facilitate the orderly development of the adjoining lands. It is noted that the proposed development proposal has accommodated the primary component of the recommended network, the north-south connection through the site that will provide the lands to the south a connection to Highway No. 5, detailed design to consider elements to discourage truck traffic from existing to the south to German School Road.

The Study conclusions confirm the requirements for off-site transportation improvements as limited to the proposed intersection of the new north-south street intersection at Highway 5 which is proposed to operate with one-way stop control and turning lanes. The Study concludes that the proposed development will not cause any operational issues and will not add a notable delay or congestion to the local roadway network.

5.4 Noise Impact Study, Aeroustics

Aeroustics were retained by the proponent to undertake a Noise Impact Study to evaluate the potential impact of the development proposal on nearby noise-sensitive receptors.

The potential for noise impacts arises from the proposed operations of the two industrial buildings and specifically regular truck deliveries and idling at the loading bay areas as well as rooftop mechanical equipment. The predicted impact on the nearby residential properties has

been calculated in accordance with the Noise Guidelines of the Ministry of the Environment, Conservation & Sport, Publication NPC-300.

The Study findings confirm that the predicted sound levels at the noise sensitive receptors will not exceed the sound level limits specified in NPC-300 subject to the incorporation of recommended noise mitigation measures in the form of an acoustic barrier that is to be installed along the northerly lot boundary. Subject to the County's review and concurrence with the Study recommendations, the mitigation measures can be implemented as a Condition of Site Plan Approval.

5.5 Archaeological Assessment – Lincoln Environmental Consulting Group

Lincoln Environmental Consulting Group were retained by the owners to undertake a Stage 1-2 archaeological assessment of the subject property to meet the requirements of Provincial Policy. A prior Stage 1 Assessment had determined that the property exhibits a high potential for the identification and recovery of archaeological resources and a Stage 2 Assessment is therefore recommended.

The Stage 2 Assessment was completed on November 26th, 2021, under the guidance of a licensed archaeologist. No archaeological resources were identified during the stage 2 assessment of the study area and as such, no further archaeological assessment is recommended. The Provincial interest in archaeology is addressed.

A copy of the Assessment has been submitted to the Ministry of Tourism, Culture and Sport who have been requested to enter the report into the Provincial Register of Archaeological Reports.

6.0 PLANNING ANALYSIS AND CONCLUSION

CSG Properties Limited Partnership are proposing to develop this 36.0 hectare parcel of land for employment uses in keeping with the intent of the County's Official Plan.

The scope of the proposed development is illustrated by the accompanying Site Plan and Building Elevations prepared by JRI Architects. Development is proposed to proceed in phases, the lands are to be developed for two large industrial warehouses, each containing an ancillary office space with areas set aside for parking, truck loading and staging areas. Building 1, located on the west portion of site, will be the initial phase of development with a floor area of 63,220 sq. metres.

The subject property is within the Primary Urban Settlement Area Boundary and designated for Employment uses. The lands are subject to Site Specific Official Plan Policies wherein it is acknowledged that municipal services are not anticipated to be provided over the time horizon of the current Official Plan and permitted industrial uses are to be limited to dry employment and industrial uses which are appropriate for partial services.

Recognizing the potential for compatibility with adjoining sensitive land uses, studies have been completed to demonstrate that planned development will not create incompatibilities with the adjacent residential land uses with respect to noise and traffic issues.

The north boundary of the development adjoins the rear of the residential properties fronting onto Highway 5. The site design proposes building setbacks significantly greater than would otherwise be required by the Zoning By-law – 45 metres for Building 1 and 51 metres for Building 2 with the setbacks to be appropriately landscaped and a 2.1 metre high acoustic noise wall to be constructed along the lot line to provide further buffering and mitigation from potential noise impacts

The site design internalizes all major activity areas with truck loading, trailer parking and staging areas located interior to the site to provide separation from the adjacent residential areas. A combined total of 774 parking spaces have been provided for the two buildings which represents a reduction from the number of parking spaces that would be required by the Zoning By-law. The proposed supply is deemed appropriate based on the intended warehouse uses and is supported by a parking analysis that is included in the accompanying Traffic Impact Study. A Photometrics Plan has also been prepared and has guided the lighting proposed for the surface parking areas to minimize the potential for light trespass onto neighbouring properties.

Having regard for the supporting studies and proposed site design it is our opinion that the development of the property for employment uses complies with the Policies of the County's Official Plan. The intended uses will contribute to the planned minimum employment targets for the Greenfield Area and are appropriate to develop on the basis of partial services. Through the Site Plan review process, the above noted detailed considerations including landscaping, lighting, and location of activity areas such as truck loading and staging will be refined as necessary and implemented through the Conditions of Site Plan Approval.

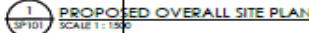
The County is working towards adopting a new Official Plan in early 2022, the transition Policies of the new Plan confirm that the subject applications shall be reviewed under the Policies of the 2012 Official Plan. As documented in this PJR, we have undertaken a review of the proposal in the context of the new Plan and it is our opinion that the proposal will conform in all regards.

The proposal has been reviewed having regard for the PPS and the Growth Plan and in our opinion all matters of Provincial interest have been addressed and the proposal is consistent with and conforms with the applicable Policies.

In conclusion, it is our opinion the proposal is appropriate for the orderly development of the property and represents good land use planning.

APPENDIX “A”

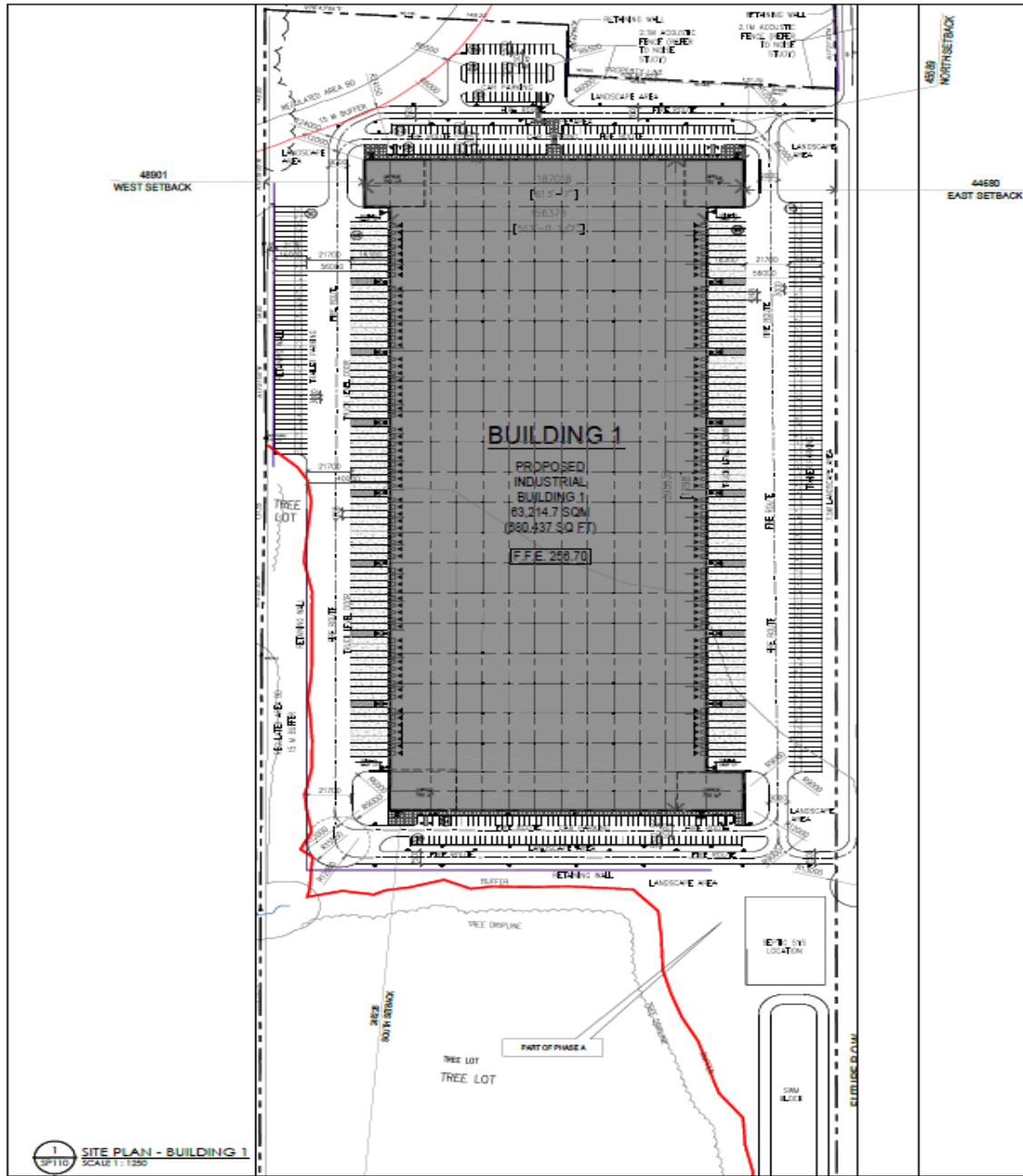
SITE PLAN AND RENDERINGS



PROPOSED YARD SETBACKS	MIN. (m)	PROPOSED (m)
NORTH (SIDE)	3.0	51.6
EAST (REAR)	7.5	51.6
SOUTH (SIDE)	3.0	85.5
WEST (REAR)	9.0	28.2

SI 101

SP101



SITE STATISTICS

285 HIGHWAY 5 ST. GEORGE, COUNTY OF BRANT, ONTARIO
BLOCK 2

EXISTING ZONING		A - Agricultural MD - Light Industrial			
PROPOSED BASE ZONING		COVERAGE %	HA	ACRE	SQ FT
TOTAL LOT AREA		100.00%	39.03	88.51	3,077,430.78
BLOCK 1*		95.38%	37.05	84.31	2,947,780.31
BLOCK 2*		36.12%	14.03	31.82	1,518,652.33
STREET WIDE (W)		5.49%	1.58	0.36	212,922.74
* Minimum Lot Area = 1,500 sqm					10,761.17

BLOCK 1

BLOCK 1 AREA		PERMITTED	PROVIDED	SQ FT	SQ M
BUILDING 1 GFA		80% (MAX.)	31.68%	680,437.4	63,214.7
OFFICE (INCLUDED IN BUILDING GFA)				34,031.9	3,166.7
PAVED AREA				572,734.2	53,229.8
LANDSCAPED AREA (PAVED + SOFT) INC. PROPOSED CONCRETE DRIVE AND BUFFER STRIPS AREA		10% (MIN.)	41.65%	824,614.4	62,112.4

PARKING		REQUIRED	PROVIDED
Paved (Asphalt) 18' x 8' (6.1m x 2.4m) = 1100 sqm per 1000 sqm of office space		100	478
BARRIER FREE (1% of car parking) **		4	30**
BIKE PARKING (1% of car parking)		5	10
LONG TERM BIKE PARKING (5%)		5	10
* Current MD zone parking requirement and calculation at 1:1000 sqm of Gross Floor Area for Warehouse			
** 8 - Type A (3.4m wide and 8-Type B (2.8m) provided			

LOADING SPACES		REQUIRED	PROVIDED
TRUCK LEVEL DOORLOADING SPACE *		0	138
TRAILER PARK (150)		138	145
DRIVE-IN		138	4
* Required Min. Loading Space = 2 + 1 per 10,000 sqm in excess to 7,000 sqm			

FIRE TRUCK ROUTE		MIN. (m)	PROPOSED (m)
		6	6.5

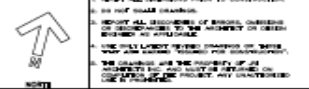
PARKING STALLS		MIN. (m)	PROPOSED (m)
		2.8 x 5.5	2.8 x 5.5

BUILDING HEIGHT ABOVE GRADE		MAX. (m) *	PROPOSED (m)
		13.7 **	13.7

* 11.2 of County of Brant zoning by-law states that if any portion of any building is erected above a height of 12.0 metres, the required yard dimensions shall be increased by 1.0 metres for each 1.0 metres by which such portion of the building exceeds 12.0 metres.

** Proposed building height exceeds 11.7 m from 12.0 maximum height requirement. However, the provided setbacks above additional building height per except from County of Brant zoning by-law 11.2.

PROPOSED YARD SETBACKS		MIN. (m)	PROPOSED (m)
NORTH (SIDE)		3.0	49.6
EAST (FRONT)		7.5	44.7
SOUTH (SIDE)		3.0	248.2
WEST (REAR)		6.0	98.9

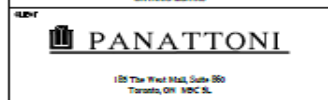
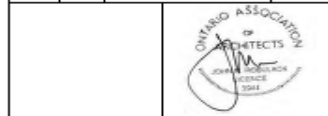


NOTE: SURVEY INFORMATION ILLUSTRATED ON THIS DRAWING WAS TAKEN FROM SURVEY FILE NO. A000000000, PREPARED BY SPBENT & ASSOCIATES & DESIGN LTD. ON NOV. 10, 2021.



KEY PLAN

1	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
2	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
3	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
4	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
5	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
6	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
7	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
8	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
9	NO. 1000	EXISTING FOR THE LANE INTERSECTION	
10	NO. 1000	EXISTING FOR THE LANE INTERSECTION	



NEW INDUSTRIAL DEVELOPMENT
285 HWY 5 ST. GEORGE,
COUNTY OF BRANT, ON

**SITE PLAN, SITE STATISTICS
BUILDING 1**

DATE: MS	
REVISION: JR	
SCALE: 1:1500	
DATE: SEPTEMBER 2021	
PROJECT NUMBER: 2021-00	DRAWING NUMBER: SP110





