

Zoning By-law Amendment & Consent Planning Justification Report

To:	Township of Adjala-Tosorontio
Attention:	Kartik Sally, Junior Planner
From:	James Hunter, Senior Planner and Joshua Morgan, MCIP, RPP
Date:	April 2025 (Revised July 2025)
Subject Property:	4492 Adjala-Tecumseth Townline & 4428 Adjala-Tecumseth Townline

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1.0 INTRODUCTION

MORGAN Planning & Development Inc. (MP&D) has been retained by **Alliston Interdenominational Christian School Society** (Landowner) and **John W. Downey** (Landowner) on behalf of the **Alliston Community Christian School (ACCS)** to review the land used planning policies which apply to the subject properties and to advise on suitability and viability of an expansion to the existing institutional use. Following the policy review, MP&D was further retained to prepare this Planning Justification Report and to facilitate the approval of the Planning Act applications.

Two (2) properties are subject to the applications, which are municipally known as 4428 Adjala-Tecumseth Townline and 4492 Adjala-Tecumseth Townline, in the Township of Adjala-Tosorontio.

Alliston Community Christian School (ACCS) has been an independent educational institution for over 40 years. As the Alliston area and its surroundings continue to grow, the demand for enrollment at the school has steadily increased. With current facilities nearing full capacity, there is a strong desire to acquire additional land and expand to meet this growing need.

The objective of these applications is to secure the necessary planning approvals to expand the institutional facilities of Alliston Community Christian School (ACCS), located at 4428 Adjala-Tecumseth Townline. As outlined in this report, ACCS is acquiring a portion of the adjacent property at 4492 Adjala-Tecumseth Townline to facilitate the expansion.

The purpose of this Planning Justification Report (PJR) is to provide an overview of the development proposal and review the subject applications in the context of applicable Provincial and Municipal policies to provide rationale for the approval.

2.0 SUBJECT LANDS

Two (2) properties are subject to the applications, which are municipally known as 4428 Adjala-Tecumseth Townline and 4492 Adjala-Tecumseth Townline.

4428 Adjala-Tecumseth Townline (ACCS site) contains the following land uses:

- The primary use of the property is the Alliston Community Christian School (ACCS).
- Accessory recreational uses for the school are located in the rear yard (north-east portion of the site).
- Two (2) access points are provided from Adjala-Tecumseth Townline, connecting to the parking lot and drive aisle for the school.
- Servicing is provided by an existing septic system and private well on-site.
 - The septic system is in good condition but is approaching capacity with the current facility size and enrollment.
- The western portion of the site remains undeveloped, as the lands are heavily treed, with thick vegetation and a slope in grades located to the south-west of the school.

4492 Adjala-Tecumseth Townline (expansion site) contains various existing land uses, including:

- The northern portion of the property is densely wooded with thick vegetation, while the southern lands have sparse tree cover and minimal vegetation, mostly along the perimeter.
- Agricultural lands, farmed for seasonal crops (hay).
- A residential dwelling and accessory uses, with access provided from Adjala-Tecumseth Townline.
- A multi-use agricultural building is used by the owner for storing agricultural equipment, property maintenance equipment, and personal items.
- A large concrete pad which is currently utilized for outdoor open storage.
 - This area was occupied by a chicken barn (broiler barn), which was removed roughly 15 years ago.
 - Approximate size of 13 metres in width and 115 metres in length, with an area of roughly 1,415 m².
 - The area is fenced with a chain link and barbed-wire fence (6-feet / 1.8 metre), with a mesh material attached to provide privacy screening.
 - The area is currently occupied by automobiles from Trillium Ford, who have a 3-year lease (1.5 years complete) with the landowner to store overflow vehicles from their dealership. The lease may be renewed at the end of the 3-year term, subject to demand.

3.0 LOCATION

The surrounding land uses are categorized as follows:

North: Residential neighbourhoods within the community of Alliston, which is designated as the Primary Settlement Area for the Town of New Tecumseth.

East: Adjala-Tecumseth Townline is adjacent, with a 25-metre right-of-way. Agricultural lands are located to the east, with scattered rural residential uses. Further to the north-east are lands in the Town of New Tecumseth, including residential, retirement, and community recreational uses.

South: Rural and agricultural land uses. A forested area is adjacent, part of the adjacent parcel.

West: Rural and agricultural land uses, with scattered treed areas.

The subject lands and surrounding land uses are illustrated on *Figure 1* and *Figure 2*.

Figure 1. Subject Lands



Source: Simcoe Maps, GIS

Figure 2. Surrounding Land Uses



Source: Simcoe Maps, GIS

4.0 PLANNING OVERVIEW

4.1 County of Simcoe Official Plan

The County of Simcoe Official Plan (February 2023 Consolidation) designates the subject properties on Schedule 5.1 – Land Use Designations as follows:

- *'Rural'*
- *'Greenlands'*

4.2 Township of Adjala-Tosorontio Official Plan

The Township of Adjala-Tosorontio Official Plan (May 2023 Consolidation) designates the subject properties as follows:

- 4428 Adjala-Tecumseth Townline (ACCS site):
 - *'Rural'*
 - Overlays: *'County of Simcoe Greenlands'* and *'NVCA Fill Areas'* (Schedule C4)
- 4492 Adjala-Tecumseth Townline (expansion site):
 - *'Rural'*
 - *'Rural Residential'*
 - Overlays: *'County of Simcoe Greenlands'* (Schedule C4)

4.3 Township of Adjala-Tosorontio Zoning By-law

The Township of Adjala-Tosorontio Zoning By-law (03-57) zones the subject properties as follows:

- 4428 Adjala-Tecumseth Townline (ACCS site):
 - *'Institutional (I)'*
 - *'Open Space Conservation (OSC)'*
 - Overlays: *'Stream'* and *'NVCA Fill Areas'*
- 4492 Adjala-Tecumseth Townline (expansion site):
 - *'Rural (R)'*
 - *'Rural Residential (RR)'*

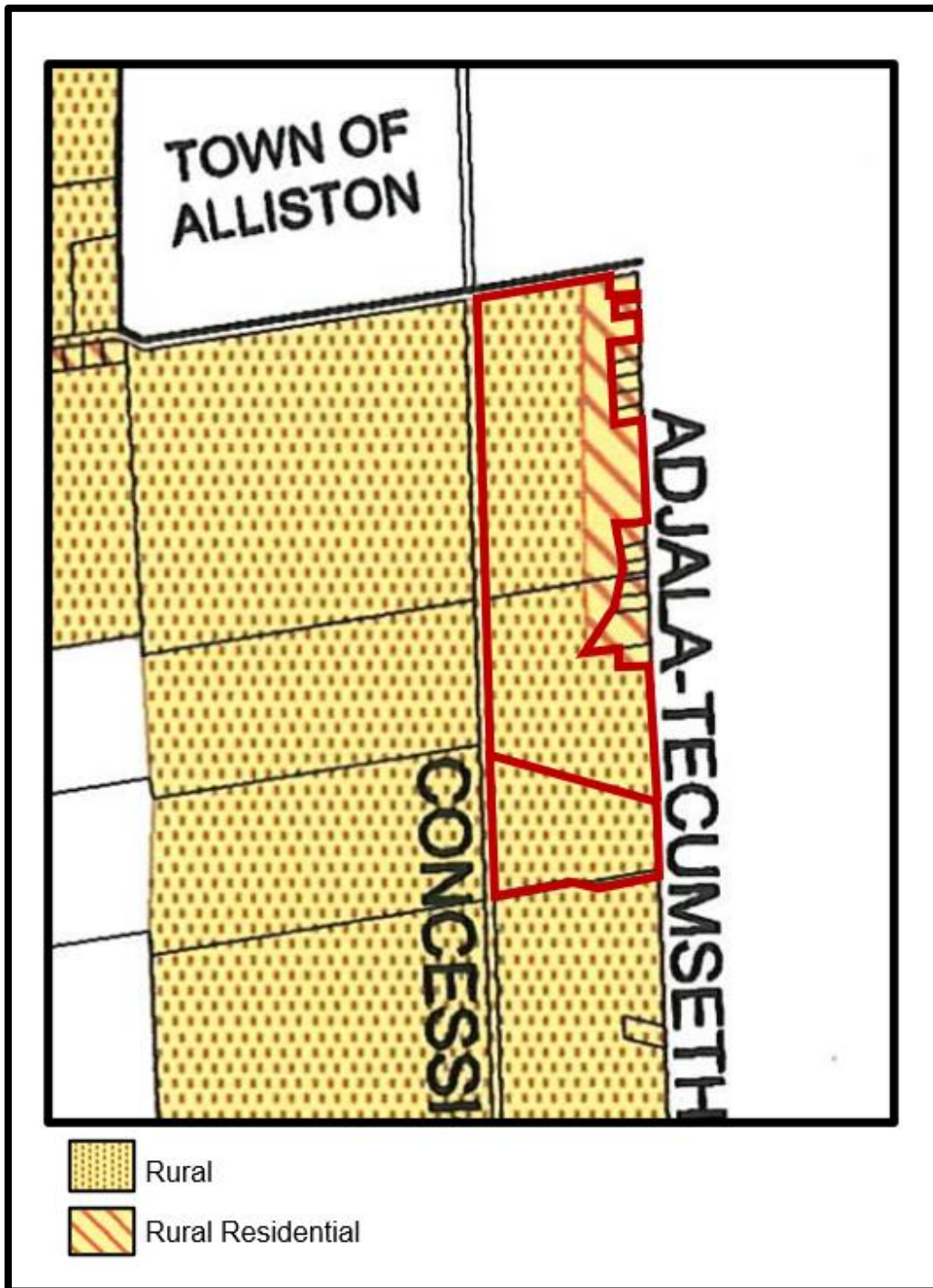
The land use designations and zoning are illustrated on **Figures 3, 4, and 5.**

Figure 3. County of Simcoe Official Plan – Land Use Designations (Schedule 5.1)



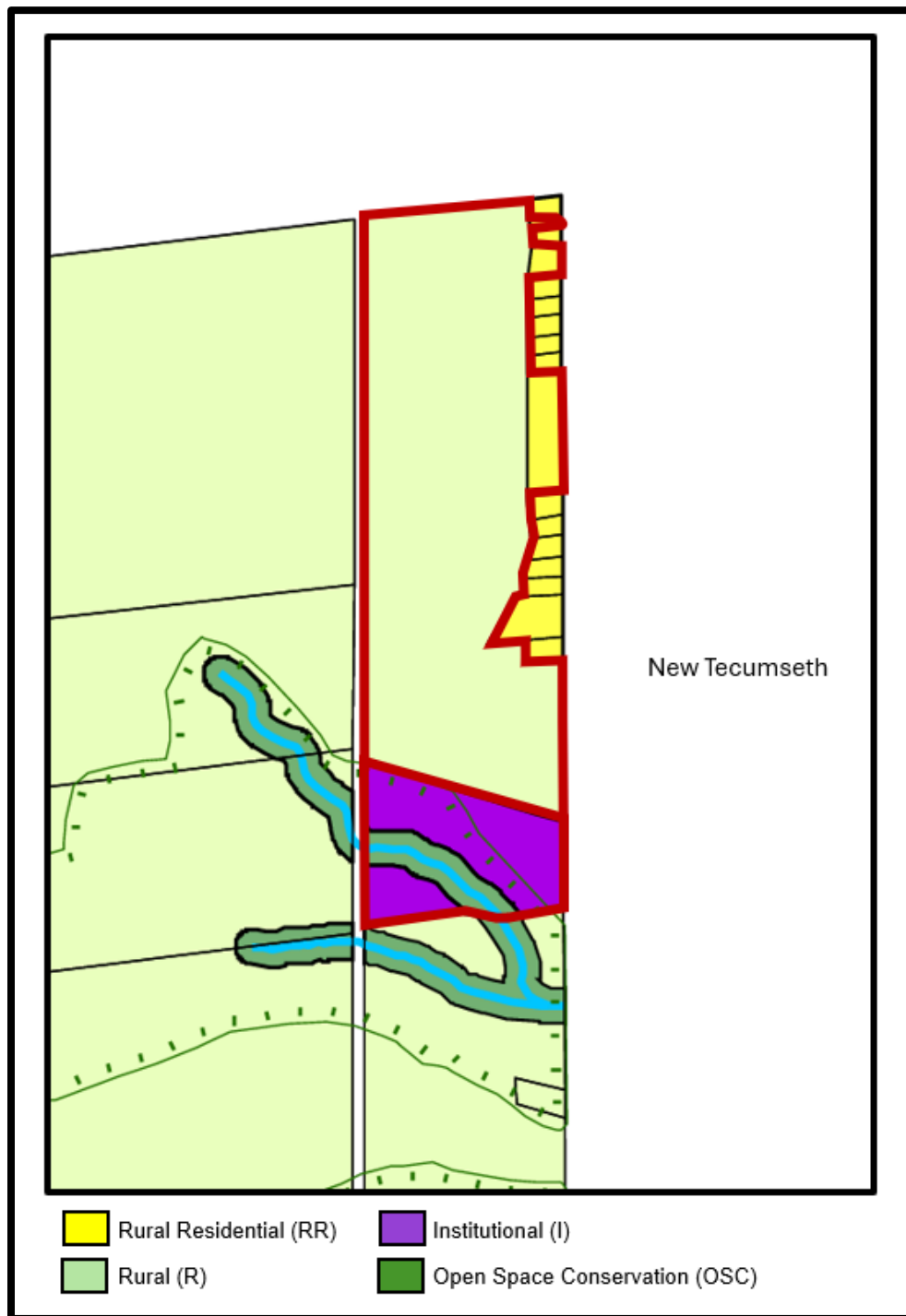
Source: County of Simcoe Official Plan – Schedule 5.1

Figure 4. Township of Adjala-Tosorontio Official Plan – Land Use (Schedule A-4)



Source: Adjala-Tosorontio Official Plan – Schedule A-4

Figure 5. Zoning By-law (Schedule A-4)



Source: Adjala-Tosorontio Zoning By-law 03-57 – Schedule A-4

5.0 OVERVIEW OF DEVELOPMENT PROPOSAL

The purpose of the subject applications is to secure planning approvals in order to expand the Alliston Community Christian School (ACCS), located at 4428 Adjala-Tecumseth Townline.

As previously noted, Alliston Community Christian School (ACCS) has been an independent educational institution for over 40 years. As the Alliston area and its surroundings continue to grow, the demand for enrollment at the school has steadily increased. With current facilities nearing full capacity, there is a strong desire to acquire additional land and expand to meet this growing need.

The existing school serves students from kindergarten to grade eight (8) and has a capacity of approximately 150 individuals, with around 120 being students. While there is growing demand for additional student enrollment, the current facility is unable to accommodate this need. In response to the expanding needs of the community, the institution aims to develop a new facility that will serve both elementary and middle school education.

Renovating and expanding the existing facility would require significant investment. Provided this, the decision is to build a new facility that meets current standards and has the capacity to accommodate the growing demands of enrollment, with consideration of a middle school.

As indicated in the land use and aerial maps, the ACCS property at 4428 Adjala-Tecumseth Townline is surrounded by natural heritage features and dense wooded areas. Consequently, the proposed expansion should occur on a different property, situated away from these sensitive areas, to ensure the development aligns with proper planning principles that safeguard the natural environment.

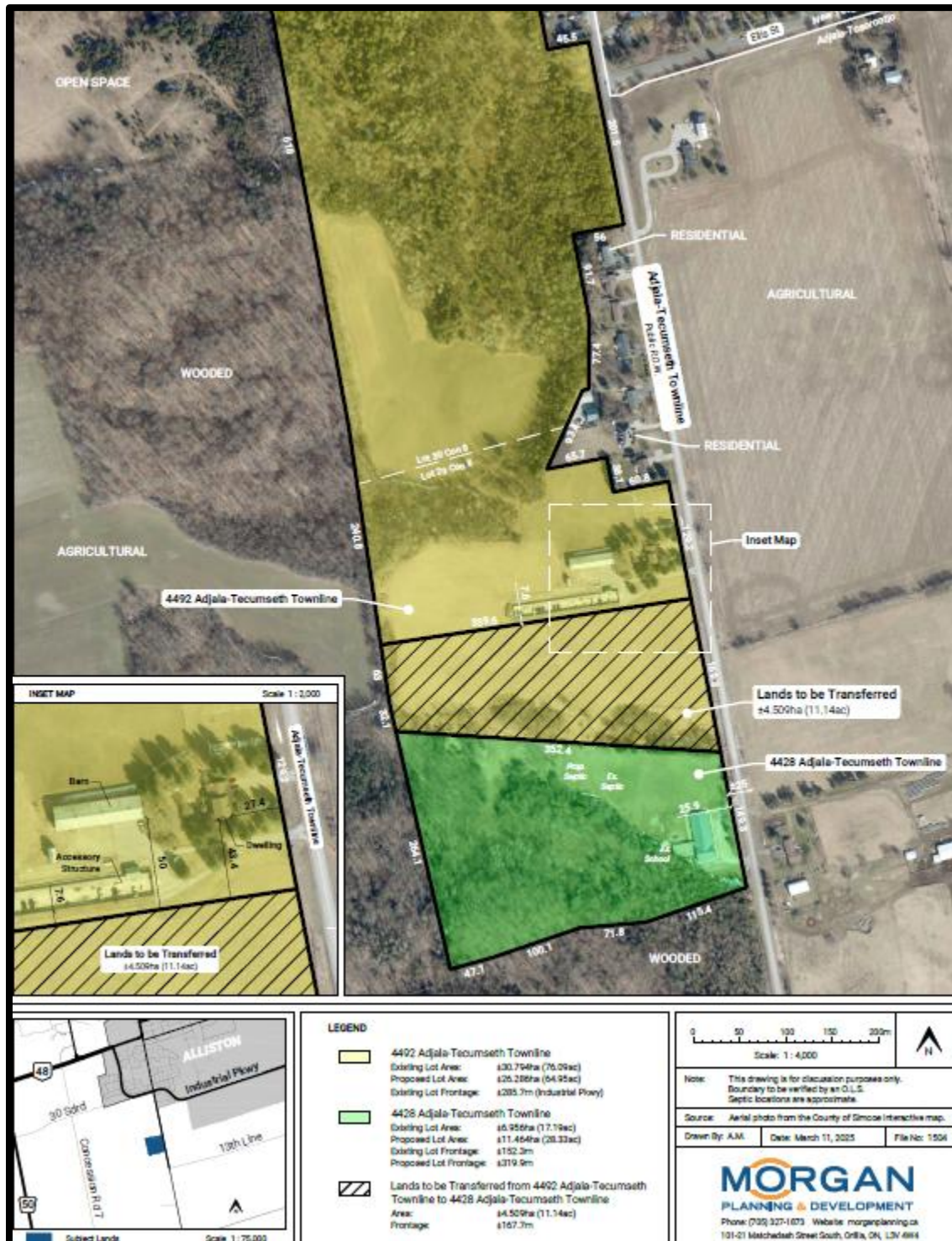
In order to achieve the proposed development, the Alliston Interdenominational Christian School Society (owner of Alliston Community Christian School) has acquired 4.5 hectares (11 acres) of land from John W. Downey (adjacent landowner), municipally known as 4492 Adjala-Tecumseth Townline. Refer to **Figure 6**.

The proposed plan for the acquired lands includes the following:

- New institutional building.
- New septic and well to provide private services.
- Parking areas and new access points from Adjala-Tecumseth Townline.
- Recreational facilities, which may include a gymnasium, landscaped open spaces, sports courts, soccer fields, an athletic field, and an adjacent track.

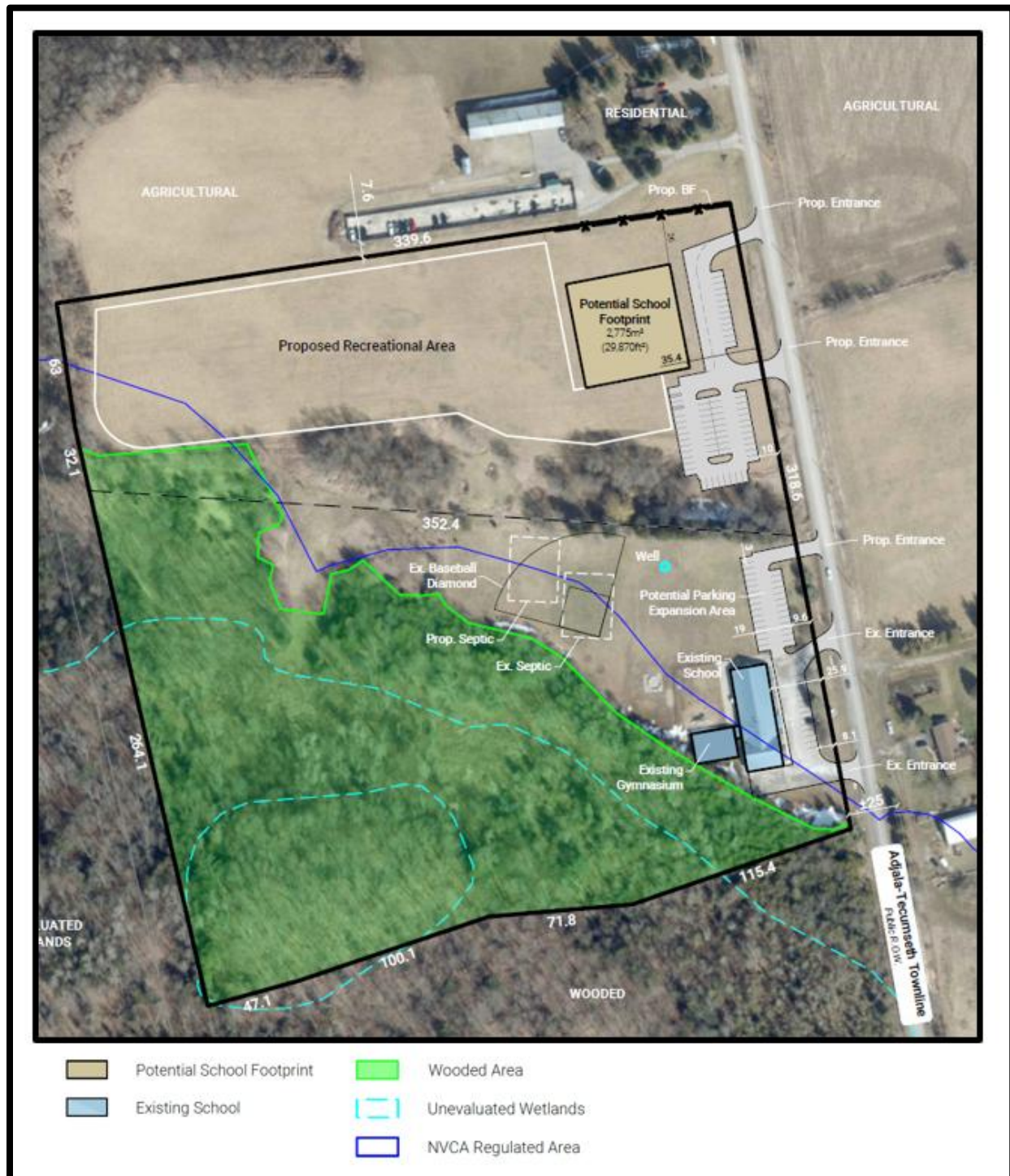
A Concept Plan has been provided with the submission. This is preliminary and subject to change, as the needs of the new facilities are not yet established. Refer to **Figure 7**.

Figure 6. Consent Plan (Boundary Adjustment)



Source: MP & D

Figure 7. Concept Development Plan



Source: MP & D

6.0 PLANNING INSTRUMENTS

6.1 Consent Application (Boundary Adjustment)

The purpose of the Consent Application is to alter the boundaries of the two properties through a boundary adjustment, without creating a new lot.

4.5 hectares (11 acres) of land from 4492 Adjala-Tecumseth Townline will be transferred to 4428 Adjala-Tecumseth Townline (the adjacent property).

The additional land of 4.5 hectares is subject to the development of the new ACCS site, as overviewed in this report.

The proposed boundary adjustment is illustrated previously in *Figure 6*.

6.2 Zoning By-law Amendment Application

The purpose of the Zoning By-law Amendment (ZBA) application is to rezone the subject lands as follows:

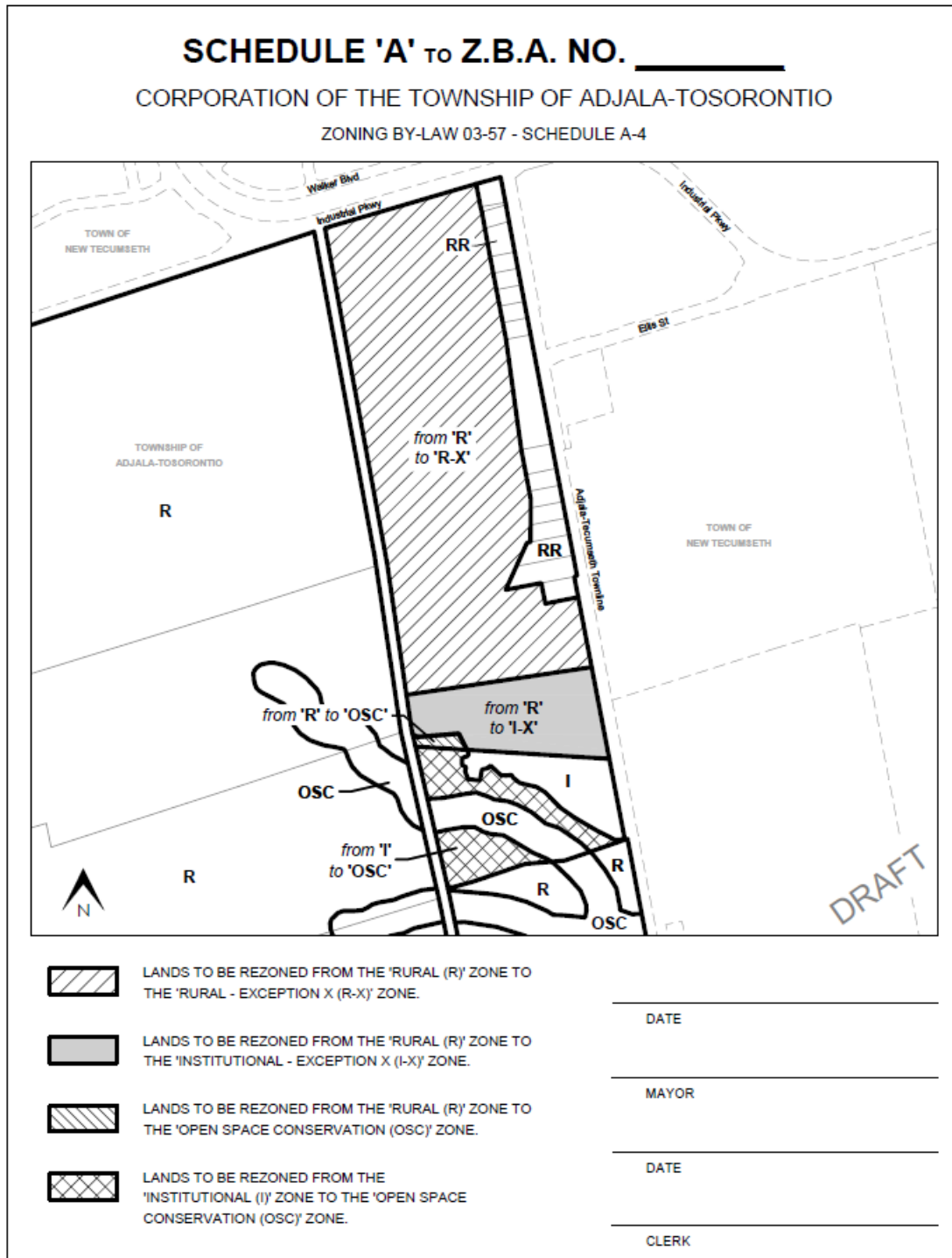
- Rezone part of 4492 Adjala-Tecumseth Townline from the ‘**Rural (R)**’ zone to the ‘**Institutional – Exception (I-X)**’ zone.
- Rezone part of 4492 Adjala-Tecumseth Townline from the ‘**Rural (R)**’ zone to the ‘**Open Space Conservation (OSC)**’ zone.
- Rezone 4492 Adjala-Tecumseth Townline from the ‘**Rural (R)**’ zone to the ‘**Rural – Exception (R-X)**’ zone.
- Rezone part of 4428 Adjala-Tecumseth Townline from the ‘**Institutional (I)**’ zone to the ‘**Open Space Conservation (OSC)**’ zone.

A detailed explanation of the amendments is included later in this report.

The draft Zoning By-law Amendment Schedule is included as *Figure 8*, illustrating the lands subject to the rezoning and proposed zones.

A Draft Amendment is attached to this report as *Appendix C*.

Figure 8. Draft Zoning By-law Amendment Schedule



Source: MP & D

7.0 CONSULTATION

Before pursuing the formal applications to the Township, various forms of consultation occurred between the Applicants and Township. This included informal correspondence in December 2024 and January 2025 to obtain preliminary support.

A formal Pre-Consultation Application was submitted to the Township on March 6th, 2025. The application, a Planning Memo overviewing the proposal, and preliminary drawings were submitted for staff to review and comment.

A Consultation Meeting was held between Township staff and MORGAN Planning & Development Inc. (MP&D) on March 13th, 2025. The comments and requirements established through the Pre-consultation process have been included and addressed by the subject application.

MORGAN Planning & Development Inc. (MP&D) continued correspondence with the Township staff until time of the submission.

8.0 SUPPORTING TECHNICAL STUDY: SCOPED EIS

Roots Environmental Inc. ('Roots') was retained by the applicant's / landowners to complete a Scoped Environmental Impact Study (SEIS) for the subject lands and related development proposal. The purpose of the SEIS is to identify the presence of any natural heritage features on the site or adjacent lands of 120 metres, assess any impacts resulting from the proposed development, and identify any preventative, mitigative or remedial measures to ensure no negative impacts.

The following provides a summary of the Scoped Environmental Impact Study (SEIS).

The following four (4) natural heritage features have been identified on the site and adjacent lands:

- Unevaluated Wetlands.
- Significant Woodlands.
- Significant Wildlife Habitat.
- Fish Habitat.

As illustrated in Figure 5 of the SEIS, all development will occur outside the mapped limits of the unevaluated wetlands, therefore, no direct impacts are anticipated.

Significant Woodlands are present within the southwest corner of the proposed severance area and adjacent lands. As all future development will occur outside the limits of the Significant

Woodlands, with a 10-metre setback to be maintained and restored with native vegetation, no negative impacts are anticipated resulting from the proposed development. The SEIS further recommends that a Tree Preservation Plan should be completed at the time of development.

Potential wildlife habitats are present within adjacent lands to the south and south-west of the proposed severance area. Given the planned area for development and setbacks recommended, there will be no direct removal of these features resulting from the proposed future development.

An intermittent watercourse is located within adjacent lands to the proposed development. There will be no direct alterations to this watercourse or in-water works resulting from the proposed development.

Provided mitigation measures in the SEIS are implemented, we anticipate no negative impacts to identified natural heritage features on and within adjacent lands to the development.

8.1 NVCA REVIEW

Figure 9 demonstrates the Nottawasaga Valley Conservation Authority (NVCA) and their regulated areas (red hatch). Based on mapping produced by the NVCA, the 4492 property is partially located in an area subject to Ontario Regulation 41/24, and the 4428 property is largely within the regulated area. A watercourse is also mapped at the south-west corner of the 4428 lands.

A permit under O. Reg. 41/24 to the Conservation Authorities Act will be required by the Nottawasaga Valley Conservation Authority for any development and site alteration within a Regulated area. There is however no development or site alteration proposed within the Regulated Areas.

The mapping produced by the NVCA further demonstrates the vitality of the expansion to the north in order to avoid areas with sensitive features and their related ecological functions.

Figure 9. NVCA Mapping – Regulated Areas



Source: NVCA Interactive Map

9.0 PLANNING ANALYSIS

In formulating the planning rational for the proposed development, the following documents have been reviewed in their entirety:

- The Planning Act (1990)
- Provincial Planning Statement (2024)
- County of Simcoe Official Plan (February 2023 Consolidation)
- Township of Adjala-Tosorontio Official Plan (May 2023 Consolidation)
- Township of Adjala-Tosorontio Zoning By-law (03-57)

The following subsections provide further detail of the most salient policies related to the proposed development.

9.1 The Planning Act, R.S.O. 1990, Chapter P.13

The Planning Act (the Act) is provincial legislation that outlines the framework for land use control, specifying who is responsible for managing land use decisions. The Act supports sustainable development by balancing economic growth, environmental preservation, and the creation of healthy communities, all within a provincial framework that prioritizes provincial interests and fairness.

The following table provides an overview of the Provincial Interest as outlined in Section 2 of the Planning Act.

Section 2 of the Planning Act (Provincial Interest)

The Minister, the council of a municipality, a local board, a planning board and the Tribunal, in carrying out their responsibilities under this Act, shall have regard to, among other matters, matters of provincial interest such as,

MP&D Comment:

<i>(a) the protection of ecological systems, including natural areas, features and functions;</i>	A Scoped Environmental Impact Study (SEIS) was conducted for the subject lands, identifying key features and establishing development limits. These limits are outlined in the Concept Development Plan and enforced through the Zoning By-law Amendment, ensuring the protection of the systems and features identified within the study area.
<i>(b) the protection of the agricultural resources of the Province;</i>	The subject lands are identified as rural lands in the Township and are located adjacent to the Town of Alliston, a residential area.

	<p>Agricultural mapping by the Ministry of Agriculture, Food, and Agribusiness reveals that the subject lands contain 'Class 3' and 'Class 5' soils. These classes are lower priority and have limits for agricultural operations.</p> <p>The applications propose the removal of 4.5 hectares of farmed (crop) land for ACCS. Given that the 4492 property does not support significant farming operations, the removal of these 4.5 hectares is not anticipated to impact the viability of the property or surrounding agricultural operations.</p>
<i>(c) the conservation and management of natural resources and the mineral resource base;</i>	There are no identified features on the property.
<i>(d) the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;</i>	The subject lands have been historically farmed with no signs of interest.
<i>(e) the supply, efficient use and conservation of energy and water;</i>	The development of the ACCS expansion is subject to Site Plan Control (SPC) with the Township. This process will evaluate the efficient supply and use of energy and water.
<i>(f) the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;</i>	The subject lands are located on rural lands where private service levels are supported, and where it can be sustained. In addition, the lands are located with access to Adjala-Tecumseth Townline, which is capable of accommodating any projected traffic from the site.
<i>(g) the minimization of waste;</i>	The development of the ACCS expansion is subject to Site Plan Control (SPC) with the Township. This process will evaluate the minimization of waste.
<i>(h) the orderly development of safe and healthy communities;</i>	The subject lands are located in an area suitable for the orderly development of safe and healthy communities. Additionally, the site will incorporate safe transportation methods to ACCS and be designed with a focus on pedestrian safety.

<i>(h.1) the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;</i>	The proposed building must conform with the Ontario Building Code (OBC) and the Accessibility for Ontarians with Disabilities Act (AODA).
<i>(i) the adequate provision and distribution of educational, health, social, cultural and recreational facilities;</i>	The subject lands are adjacent to the Settlement Area of Alliston, where the proposed land use will support the rapid growth of the community. There is a clear need and demand for the ACCS expansion to provide suitable facilities to accommodate the increasing enrollment at the school, and anticipated enrollment.
<i>(j) the adequate provision of a full range of housing, including affordable housing;</i>	Not applicable.
<i>(k) the adequate provision of employment opportunities;</i>	The expansion of ACCS will create various employment opportunities. As the institution grows and enrollment increases, there will be a need for additional staff to support the expanded operations.
<i>(l) the protection of financial and economic well-being of the Province and its municipalities;</i>	ACCS has been an independent educational institution for over 40 years. To minimize financial burdens on the province and municipality, ACCS is responsible for securing funding for its expansion. As the area continues to grow, increasing enrollment pressures are emerging, and ACCS will help alleviate some of this demand by expanding its capacity.
<i>(m) the co-ordination of planning activities of public bodies;</i>	Not applicable.
<i>(n) the resolution of planning conflicts involving public and private interests;</i>	There are no projected conflicts involving public and private interests.
<i>(o) the protection of public health and safety;</i>	The proposed development aims to utilize land that is suitable for its intended use, with no identified risks to public health or safety.
<i>(p) the appropriate location of growth and development;</i>	The subject lands are suitable for the proposed use. The expansion of the institution will support the area's growth and provide educational services in a location that is well-served by appropriate infrastructure.

<i>(q) the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;</i>	The proposed development will be designed with sustainability in mind and will incorporate appropriate transportation solutions to support its intended use.
<i>(r) the promotion of built form that:</i> <i>(i) is well-designed,</i> <i>(ii) encourages a sense of place, and</i> <i>(iii) provides for public spaces that are of high quality, safe, accessible, attractive and vibrant;</i>	When the development proceeds, the ACCS expansion is subject to Site Plan Control (SPC) and Building Permit review with the Township. These items will be reviewed for compliance.
<i>(s) the mitigation of greenhouse gas emissions and adaptation to a changing climate</i>	By locating educational facilities close to the surrounding community, transportation distances are shortened, reducing emissions. Additionally, the facility can be designed with environmental conservation measures to further minimize its ecological impact.

It is the opinion of the undersigned that the proposed development and associated applications have regard for matters of provincial interest.

9.2 Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS, 2024) provides policy direction on matters related to land use planning and sets the policy foundation for regulating the development and use of all land in the province.

The most directly applicable policy areas affecting the proposed development are reviewed below.

Section 2.1 Planning for People & Homes

Policy 2.6.1.a) *Planning authorities should support the achievement of complete communities by:*

- *Accommodating an appropriate range and mix of land uses, housing options, transportation options with multimodal access, employment, public service facilities and other institutional uses (including schools and associated child care facilities, long-term care facilities, places of worship and cemeteries), recreation, parks and open space, and other uses to meet long-term needs;*

MP&D Comment: The applications will support the achievement of a complete community by expanding an existing institutional facility to accommodate the long-term demands of a growing community.

Section 2.4 Strategic Growth Areas

Policy 2.4.1. *Planning authorities are encouraged to identify and focus growth and development in strategic growth areas.*

To support the achievement of complete communities, a range and mix of housing options, intensification and more mixed-use development, strategic growth areas should be planned:

- a) to accommodate significant population and employment growth;*
- b) as focal areas for education, commercial, recreational, and cultural uses;*
- c) c) to accommodate and support the transit network and provide connection points for inter-and intra-regional transit; and d) to support affordable, accessible, and equitable housing.*

MP&D Comment: The subject lands are not within a Settlement Growth Area (SGA), but they are adjacent to the Alliston Settlement Area (an SGA). While the surrounding area is designated and planned for growth, there is a shortage of institutional facilities to support the projected long-term

expansion. The need for additional educational facilities is identified as crucial to accommodate and sustain this growth.

Section 2.5 Rural Areas in Municipalities

- Policy 2.5.1 *Healthy, integrated and viable rural areas should be supported by:*
- *Building upon rural character, and leveraging rural amenities and assets;*
 - *Using rural infrastructure and public service facilities efficiently;*
 - *Promoting diversification of the economic base and employment opportunities through goods and services, including value-added products and the sustainable management or use of resources;*

MP&D Comment: The applications support the expansion of an existing educational institution on lands that can accommodate this growth, while simultaneously providing both employment and educational opportunities within the community.

Section 2.6 Rural Lands in Municipalities

- Policy 2.6.1 *On rural lands located in municipalities, permitted uses are:*
- *Other rural land uses (g).*

MP&D Comment: The subject applications support a complimentary and compatible land use on rural lands.

- Policy 2.6.2-2.6.3 *Development that can be sustained by rural service levels should be promoted.*
Development shall be appropriate to the infrastructure which is planned or available, and avoid the need for the uneconomical expansion of this infrastructure.

MP&D Comment: The proposed development can be sustained by rural service levels. Appropriate infrastructure is available through private services without the need for public infrastructure investment.

- Policy 2.6.4 *Planning authorities should support a diversified rural economy by protecting agricultural and other resource-related uses and directing non-related development to areas where it will minimize constraints on these uses.*

MP&D Comment: The applications support a diversified rural economy while protecting viable agricultural lands from incompatible land uses.

Policy 2.6.5 *New land uses, including the creation of lots, and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.*

MP&D Comment: In addition to the Provincial Planning Statement (PPS), Minimum Distance Separation (MDS) is addressed in the County Official Plan, Township Official Plan, and Township Zoning By-law. After reviewing the relevant policies, a detailed assessment was conducted using AgriSuite. Applying the OMAFRA calculations, the MDS 1 standards identified one property of interest, located across Adjala-Tecumseth Townline to the east, municipally known as 4387 Adjala-Tecumseth Townline (New Tecumseth). This 72-acre (29-hectare) property is primarily used for seasonal cash crops, with a barn situated centrally on the land. A review of online aerial imagery indicates that livestock were present on the property until 2024. During a site visit in February 2025, and after speaking with the applicant, it was confirmed that livestock operations are no longer active, as the property is in the process of being sold. As an agricultural property, a detailed evaluation is provided through the Minimum Distance Separation Calculation Report and Minimum Distance Separation Justification Letter by Orion Environmental Solutions. The By-Law Amendment attached to this report addresses the MDS setbacks.

Section 2.8 Employment

Policy 2.8.1.1 *Planning authorities shall promote economic development and competitiveness by:*
a) *Providing for an appropriate mix and range of employment, institutional, and broader mixed uses to meet long-term needs;*

MP&D Comment: The development and expansion of ACCS will effectively address the long-term institutional needs of the community.

Section 2.8 Sewage, Water and Stormwater

Policy 3.6.4 *Where municipal sewage services and municipal water services or private communal sewage services and private communal water services are not available, planned or feasible, individual onsite sewage services and individual on-site water services may be used provided that site conditions are suitable for the long-term provision of such services with no negative impacts.*

MP&D Comment: Municipal services are not available for the subject lands, as they are located on rural lands and adjacent to a Settlement Area (serviced). On-site private will be utilized to service the proposed development. To be designed for SPA, private services are sustainable for the intended use.

Policy 3.6.8 Planning for stormwater management shall:

- a) be integrate with planning for sewage and water services and ensure that systems are optimized, feasible and financially viable over the long term;*
- b) minimize, or, where possible, prevent increase in contaminant loads;*
- c) minimize erosion and changes in water balance, and prepare for the impacts of a changing climate through the effective management of stormwater, including the use of green infrastructure;*
- d) mitigate risks to human health, safety, property and the environment;*
- e) maximize the extent and function of vegetative and pervious surfaces; and*
- f) promote stormwater management best practices, including stormwater attenuation and re-use, water conservation and efficiency, and lot impact development.*

MP&D Comment: Detailed servicing and stormwater management reports / plans will be provided with detailed design to ensure the above policies are met.

Section 4.0 Wise Use and Management of Resources

Section 4.1 Natural features and areas shall be protected for the long term.

Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4, 4.1.5, and 4.1.6 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

Policy 4.2.2 Development and site alteration shall be restricted in or near sensitive surface water features and sensitive ground water features such that these features and their related hydrologic functions will be protected, improved or restored, which may require mitigative measures and/or alternative development approaches.

MP&D Comment: A Scoped Environmental Impact Study (SEIS) was completed for the subject lands and the associated development proposal. By identifying features adjacent to the proposal, development boundaries were established to ensure no negative impacts on the natural features or their ecological functions.

Section 4.3 Agriculture

Policy 4.3.2.3 New land uses in prime agricultural areas, including the creation of lots and new or expanding livestock facilities, shall comply with the minimum distance separation formulae.

MP&D Comment: As reviewed prior in this report, MDS requirements are satisfied through justification and amendment incorporation.

Policy 4.3.3.2 Lot adjustments in prime agricultural areas may be permitted for legal or technical reasons.

MP&D Comment: The retained rural lot, which continues to support agricultural uses, is being maintained. The boundary is being adjusted through a Consent Application, with no impact on the agricultural activities.

Policy 4.3.5.2 Impacts from any new or expanding non-agricultural uses on the agricultural system are to be avoided, or where avoidance is not possible, minimized and mitigated as determined through an agricultural impact assessment or equivalent analysis, based on provincial guidance.

MP&D Comment: The subject applications aim to obtain planning approvals for the expansion of an existing land use (ACCS) on rural lands. The expansion area is currently farmed but does not include specialty crops and is considered lower priority for productive farming. Since this is an expansion of an existing use, there are no alternative locations available, as the institution's operations must be consolidated.

Section 4.6 Cultural Heritage and Archaeology

Policy 4.3.3.2 Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.

Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.

MP&D Comment: The expansion lands are vacant and have historically been used for seasonal crops. Given the extensive history of tilling and standard farming practices, no concerns regarding resources or cultural heritage are anticipated on the lands.

Section 5.0 Protecting Public Health and Safety

Policy 5.2.1 Planning authorities shall, in collaboration with conservation authorities where they exist, identify hazardous lands and hazardous sites and manage development in these areas, in accordance with provincial guidance.

Policy 5.2.6 Development shall not be permitted to locate in hazardous lands and hazardous sites where the use is: a) an institutional use including hospitals, long-term care homes, retirement homes, preschools, school nurseries, day cares and schools;

MP&D Comment: As discussed throughout this report, lands subject to new development are appropriately setback from areas of concern, including a wooded area with a watercourse and considerable slopes on the north-west portion of the 4428 Adjala-Tecumseth Townline property. Public health and safety are protected.

It is the opinion of the undersigned that the development and associated applications, are consistent with the policy direction provided by the Provincial Planning Statement.

9.3 County of Simcoe Official Plan

The Official Plan of the County of Simcoe provides a policy context for land use planning taking into consideration the economic, social, and environmental impacts of land use and development decisions.

The County of Simcoe Official Plan (February 2023 Consolidation) designates the subject properties on Schedule 5.1 – Land Use Designations as follows:

- ***‘Rural’***
- ***‘Greenlands’***

Lands subject to development of ACCS are under the 'Rural' designation.

The most directly applicable policy areas affecting the proposed development are reviewed below.

Section 3.3 General Development Policies

Policy 3.3.5 Consents for the purpose of legal or technical reasons and consolidation of land holdings may be permitted but shall not be for the purpose of creating new lots except as otherwise permitted in this Plan, Provincial policies and legislation.

MP&D Comment: The proposed consent will adjust the boundaries of the two properties without the creation of a new lot.

Policy 3.3.7 Development, including lot creation, is discouraged outside of but adjacent to, or in close proximity to settlement area boundaries in order to enable the efficient expansion of settlement areas. Where lands are designated Rural within one kilometre of a primary settlement area, the land use policies for prime agricultural areas shall apply. In certain circumstances, the existence of natural or human-made boundaries can be considered justification for an increase or decrease in the one kilometre distance as established in the local municipal official plan. Where a rural employment area exists in accordance with 3.7.6 or where an expansion of same is proposed in accordance with 3.7.7, the Rural policies shall apply.

MP&D Comment: The 4492 Adjala-Tecumseth Townline property is adjacent to a Settlement Area (within 1-kilometer), however, the development of the ACCS expansion will not affect the growth or future expansion of the Settlement Area. Additionally, the northern portion of the property is heavily treed with expected natural heritage features, therefore, the property is not a prime candidate for an expansion; given the other properties in the area available to accommodate growth.

Policy 3.3.15 Despite anything else in this Plan, except Section 4.4 as it applies to mineral aggregate operations only, development and site alteration shall not be permitted:

- i. In significant wetlands and significant coastal wetlands.*
- ii. In the following unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions: Significant woodlands, significant valleylands, significant wildlife habitat, significant areas of natural and*

scientific interest (ANSIs), and coastal wetlands (not covered by 3.3.15 i) above).

- iii. In the following regional and local features, where a local official plan has identified such features, unless it has been demonstrated that there will be no negative impacts on the natural heritage features or their ecological functions: wetlands 2.0 hectares or larger in area determined to be locally significant by an approved EIS, including but not limited to evaluated wetlands, and Regional areas of natural and scientific interest (ANSIs).*
- iv. In fish habitat except in accordance with provincial and federal requirements.*
- v. In habitat of endangered species and threatened species, except in accordance with provincial and federal requirements.*
- vi. On adjacent lands to the natural heritage features and areas listed above, unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.*

Policy 3.3.17 Subject to the findings and recommendations of an EIS, satisfactory to the appropriate authorities, the County encourages an area of environmental constraint and buffer areas to be maintained as single ownership, where appropriate. Notwithstanding this policy, local municipalities may utilize alternative implementation measures to ensure the integrity of the environmental features and its buffers.

MP&D Comment: The development of the properties was reviewed in detail through the SEIS by Roots Environmental. As a result of this report, limits of development were established, including a buffer setback. Provided mitigation measures in the SEIS are implemented, we anticipate no negative impacts to identified natural heritage features on and within adjacent lands to the development.

Policy 3.3.20 The County shall require proponents of commercial, industrial, institutional, or residential (5 or more lots or units) development applications to undertake and implement a Traffic Impact Study (TIS) to the satisfaction of the appropriate road authorities when the proposed development is on or would affect County Roads as determined through pre-consultation with the County. The main purpose of the Traffic Impact Study is to examine the impact of traffic generated by the proposed development at its access, at nearby intersections and interchanges to determine any necessary highway design improvements required. The Traffic Impact Study will assess the existing traffic conditions and the

traffic volumes generated by the proposed development at the date of opening, 5 and 10 years horizons beyond full build-out of the site.

MP&D Comment: Traffic projections and site access will be reviewed through a Traffic Impact Study, which will be completed during the site plan approval process.

Section 3.7 Rural Designation

Policy 3.7.2 To encourage maintenance, protection, and restoration of significant natural heritage features and functions and to conserve the built heritage resources and cultural heritage landscapes associated with rural and agricultural areas.

MP&D Comment: All natural heritage features and functions are maintained with the proposal.

Policy 3.7.2. 3.7.4 Lands in the Rural designation shall be the focus of rural and agricultural land uses. The following are permitted in the Rural designation: Other rural land uses.

MP&D Comment: The proposed development is an expansion of ACCS, which is compatible with the rural landscape and permitted on rural lands.

Policy 3.7.10 Development in rural areas should wherever possible be designed and sited on a property so as to minimize adverse impacts on agriculture and to minimize any negative impact on significant natural heritage features and areas and cultural features.

MP&D Comment: The proposed development has been considered to minimize any impacts on agriculture and natural heritage features.

Section 3.8 Greenlands Designation

Policy 3.8.6 To ensure that the Greenlands designation complements and supports the natural heritage systems established in provincial plans and is linked with the natural heritage systems of adjacent jurisdictions, and to require local municipalities to identify and protect natural features and ecological functions that in turn complement and support the Greenlands.

MP&D Comment: The proposal supports the protection of the natural heritage system under the Greenlands designation.

Policy 3.8.7 To ensure that the location, scale, and form of development respect and support the protection of the County's natural heritage system.

MP&D Comment: As determined by the SEIS, the location of the development has been established to support the natural heritage system. The scale and form will be evaluated through detailed design, reflecting the established setbacks and limits of development.

Policy 3.8.10 The County's natural heritage system primarily includes the following natural heritage features and areas, wherever they occur in the County:

- a) Habitat of endangered species and threatened species;*
- b) Significant wetlands, significant coastal wetlands, other coastal wetlands, and all wetlands 2.0 ha or larger in area which have been determined to be locally significant, including but not limited to evaluated wetlands;*
- c) Significant woodlands;*
- d) Significant valleylands;*
- e) Significant wildlife habitat;*
- f) Significant Areas of natural and scientific interest (ANSIs);*
- g) Regional Areas of natural and scientific interest (ANSIs);*
- h) Fish Habitat;*
- i) Linkage areas in accordance with Section 3.3.16; and,*
- j) Public lands as defined in the Public Lands Act.*

The County's natural heritage system is generally identified as the Greenlands designation on Schedule 5.1.

MP&D Comment: The SEIS identified four (4) natural heritage features on the site and adjacent lands:

- *Unevaluated Wetlands*
- *Significant Woodlands*
- *Significant Wildlife Habitat*
- *Fish Habitat*

As overviewed by the SEIS, all development will occur outside the features and buffers are implemented, therefore, no impacts are anticipated.

Policy 3.8.11 The mapping of the Greenlands designation on Schedule 5.1 is approximate, and does not reflect certain features such as habitat of endangered species and threatened species, or new or more accurate information identifying natural heritage features and areas. Any minor adjustment to the Greenlands designation as determined through more detailed mapping, field surveys, the results of an EIS, information received

from the Ministry of Natural Resources and Forestry or conservation authorities or local municipal official plans will not require an amendment to this Plan.

MP&D Comment: As stated in the policy, the boundaries of the Greenlands designation are approximate, with the exact limits determined through the SEIS. The SEIS results align with the Greenlands mapping provided in the County Plan, ensuring consistency between the SEIS and the County Official Plan mapping.

Section 4.5 Resource Conservation

*Policy 4.5.9 Development shall generally be directed to areas outside of:
b) hazardous lands adjacent to river, stream and small inland lake systems which are impacted by flooding hazards and/or erosion hazards;*

MP&D Comment: The proposal maintains separation to a stream located entirely within the woodlands of the 4428 property.

*Policy 4.5.12 Development shall not be permitted to locate in hazardous lands and hazardous sites where the use is:
a) an institutional use including hospitals, long-term care homes, retirement homes, pre-schools, school nurseries, day cares and schools;*

MP&D Comment: The lands subject to the ACCS expansion are not located near hazardous lands or related concerns.

Policy 4.5.38 Where the policies of this Plan require, or an EIS recommends, any development setback or area of environmental constraint on the shoreline of any water body, the County will, where appropriate, encourage re-vegetation or forest restoration with native species within the required setback.

MP&D Comment: The proposed development protects lands with features, which is further enforced by the proposed amendments and rezoning of lands to 'OSC', included with the Draft Zoning By-law Amendment.

Policy 4.6.5 Development and site alteration shall not be permitted on lands containing archaeological resources or areas of archaeological potential unless significant archaeological resources have been conserved.

MP&D Comment: The subject lands are not identified for containing archaeological concern. Should artifacts or evidence arise through the development process, appropriate action will be taken.

Section 4.7 Infrastructure: Sewage and Water Services

Policy 4.7.5 Where full municipal sewage services and municipal water services are not provided, municipalities may allow the use of private communal water services and private communal sewage services.

MP&D Comment: Private services are required for the site, as municipal services are not available or feasible at the time of this application.

Policy 4.7.18 Any servicing capability study, servicing feasibility study, or hydrological study must be prepared to the satisfaction of the County and local municipality in consultation with relevant agencies.

MP&D Comment: A servicing study will be provided for detailed design.

It is the opinion of the undersigned that the development and associated applications, are consistent with the policy direction provided by the County of Simcoe Official Plan.

9.4 Township of Adjala-Tosorontio Official Plan

The Official Plan establishes the pattern which development within the Township should follow during the planning period.

The Township of Adjala-Tosorontio Official Plan (May 2023 Consolidation) designates the subject properties as follows:

- 4428 Adjala-Tecumseth Townline (ACCS site):
 - *'Rural'*
 - Overlays: *'County of Simcoe Greenlands'* and *'NVCA Fill Areas'* (Schedule C4)
- 4492 Adjala-Tecumseth Townline (expansion site):
 - *'Rural'*
 - *'Rural Residential'*
 - Overlays: *'County of Simcoe Greenlands'* (Schedule C4)

The lands subject to the applications are designated as *'Rural'*.

The most directly applicable policy areas affecting the proposed development are reviewed below.

Section 2.3 Growth Strategy

Policy 2.3.1 Development in the RURAL designation will be restricted to a mix of agricultural, recreational, low density residential and appropriate commercial, institutional and industrial uses that are subject to development controls designed to preserve and enhance the existing rural character.

MP&D Comment: The proposed development aims to secure planning approval for an institutional use that will both preserve and enhance the area's existing rural character while benefiting the surrounding community.

Section 3.3 Agricultural and Rural Character

Policy 3.3.3 In the designated RURAL or RURAL RESIDENTIAL areas, the protection of character is not as easily achieved. The policies developed to do so must specifically identify the character that is to be protected and establish controls which will protect the area. These policies should include requirements for a variety of lot sizes, mixed agricultural and rural uses and a discontinuous development pattern. Controls to ensure that development is appropriate can be implemented through zoning provisions, restrictions on subdivision development, site plan control and environmental reviews. Guidelines covering acceptable development standards may be prepared by the Township and made available to persons contemplating rural development projects following approval of this plan.

MP&D Comment: The proposed development will preserve the rural character of the area. To facilitate this, the Official Plan encourages a range of complementary land uses, guided by appropriate development controls, such as the Zoning By-law. The proposed development complies with these requirements, ensuring that key elements like lot sizes, setbacks, and building placement are properly addressed.

Section 4.4 Rural Designation

Policy 4.4.2.3 The dominant consideration in addressing development proposals in the RURAL designation will be the impact on the rural character of the Township and on surrounding agricultural operations. Preservation of the open, natural appearance of the countryside will be a priority. To achieve

this, a traditional dispersed development pattern will be encouraged. When residential severances are proposed, the zoning amendment process, subdivision approval process and site plan control process may be used to ensure that the development is in keeping with the rural character.

MP&D Comment: This report evaluates the proposed development to demonstrate that the land uses will preserve the rural character of the area while safeguarding surrounding agricultural operations. To ensure these objectives are met, the Zoning By-law Amendment, Site Plan Approval, and Building Permit processes will assess the site and its associated built form.

Policy 4.4.3.2 **Permitted uses:** *Certain other uses may also be appropriate on lands in the RURAL designation but, because their location is not predictable, their potential off site impacts and their potential impact on the rural character cannot be determined in advance, they should only be allowed by site specific zoning amendment. Such uses include but are not limited to:*

- *Other institutional uses such as public schools, churches, cemeteries, community halls, municipal buildings, works yards.*

MP&D Comment: This report is provided in support of a Zoning By-law Amendment (ZBA) application to expand the ACCS institution, with proposed amendments to zone the lands for such uses.

Policy 4.4.4.4 *Consent applications for boundary line adjustments may be considered provided the intent and purpose of this Plan is maintained.*

MP&D Comment: This report is in support of a Consent application for a Boundary Adjustment. Conformity with the intent and purpose of the Official Plan is justified through this report.

Policy 4.4.4.11 *Minor institutional uses existing or proposed in the RURAL designation are subject to the following conditions:*

- *Existing institutional uses will be reviewed by Council to determine if rezoning or site plan control measures are required to minimize or control impacts on the environment or the surrounding community; and*
- *New institutional uses, other than those expressly permitted by Section 4.4.3.1 will require an official plan amendment, site specific zoning amendment and site plan control.*

MP&D Comment: To facilitate the proposed development, an expansion of the ACCS lands is required through a Consent (Boundary Adjustment) application. Concurrently, a Zoning By-law Amendment will be required to rezone the lands to 'Institutional (I)' via site-specific zoning. Additionally, Site Plan Control application will be required at a later stage to manage the physical development of the site as the proposal progresses.

Section 6.1 Conservation, Hazard and Natural Heritage

Policy 6.1.1, 6.1.2 The areas affected by this section are identified on Schedules C1 to C7. Lands fall into one or more of four groups:

- *Lands that are within the fill lines set out under the Conservation Authorities Act;*
- *Significant Wetlands as identified by the Ministry of Natural Resources;*
- *Environmentally Significant Areas (ESA's) as identified by either the NVCA or the TRCA;*
- *Areas of Natural and Scientific Interest as identified by the Ministry of Natural Resources; and*
- *County of Simcoe Greenlands.*

Together these designations cover the specific areas where constraints to development and significant natural features requiring protection are found.

MP&D Comment: 'County of Simcoe Greenlands' and 'NVCA Fill Areas' are identified on the subject properties by Schedule C4. Through technical review, the lands subject to the expansion are outside of these areas.

Policy 6.3.1 The effect on lots of record of being included within a conservation overlay on Schedules C1 to C7 will be to ensure that the construction of buildings or structures, or the use of lands will be accomplished in a way that protects the environment.

MP&D Comment: Development of the properties triggered a SEIS, which was completed by Roots Environmental. Through the analysis and recommendations provided in the SEIS, the proposal will protect the environment.

Policy 6.4.1 It is intended that Official Plan policies, subdivision control procedures, zoning by-laws and site plan control will be used by the Township where necessary to ensure that conservation requirements are met. It is not intended, however, that areas identified on the overlay will be prevented from being included in lots that are appropriate in the particular

designation in which the development is to occur, provided the development meets the requirements of the County, Nottawasaga Valley Conservation Authority or the Toronto Region Conservation Authority and/or the Ministry of Natural Resources. In the case of draft plans of subdivision, lot lines should not extend into wetlands, the regional flood plain, or erosion areas below the top-of-bank of steep slopes in association with a watercourse.

MP&D Comment: The proposed Zoning By-law Amendment and Consent application implement development controls that align with the applicable policies of the Official Plan. Additionally, the SEIS and applications will undergo review by the NVCA, and site development will be approved by the NVCA before permits are issued.

Policy 6.4.10 No development or site alteration shall be permitted within or adjacent to lands identified as County of Simcoe Greenlands, Environmentally Sensitive Areas (ESAs) or Areas of Natural and Scientific Interest (ANSIs), except in accordance with the results and recommendations of an Environmental Impact Statement (EIS) approved by the Township, County and Conservation Authority, which demonstrates that there will be no negative impacts on the natural features or the ecological functions of the areas. Adjacent lands shall be considered to be all lands within a minimum of 50 metres from the boundaries of the above features.

MP&D Comment: As noted above, a scoped Environmental Impact Statement (SEIS) has been completed in support of the proposal. It will be reviewed and approved by the Township and NVCA.

Policy 8.17.4 New development should occur in a manner that conserves and enhances cultural heritage and archaeological resources. Cultural heritage resources include archaeological sites, buildings and structures remains of identified historical and architectural value, heritage landscapes and rural and settlement areas of identified value.

MP&D Comment: At the time of this application, there are no known cultural heritage and archaeological resources identified on the subject lands. Should any be uncovered through the development process, the Ministry (MTCS) will be notified, and a study will be completed by a qualified professional.

It is the opinion of the undersigned that the development and associated applications, are consistent with the policy direction provided by the Township's Official Plan.

9.5 Township of Adjala-Tosorontio Zoning By-law

The Township of Adjala-Tosorontio Zoning By-law (03-57) implements the objectives and policy direction of the Official Plan.

The Zoning By-law (03-57) (Schedule A-4) zones the subject properties as follows (shown previously on *Figure 5*):

- 4428 Adjala-Tecumseth Townline (ACCS site):
 - *'Institutional (I)'*
 - *'Open Space Conservation (OSC)'*
 - Overlays: *'Stream'* and *'NVCA Fill Areas'*
- 4492 Adjala-Tecumseth Townline (expansion site):
 - *'Rural (R)'*
 - *'Rural Residential (RR)'*

The lands subject to the applications and associated future development are currently zoned as *'Rural (R)'* and *'Institutional (I)'*.

9.6 Zoning By-law Amendment (ZBA)

A Zoning By-law Amendment (ZBA) application has been submitted to the Township. The intent of the ZBA is to rezone the lands for the appropriate land use. To achieve this, the ZBA is required to:

- 1) Rezone part of 4492 Adjala-Tecumseth Townline from the *'Rural (R)'* zone to the *'Institutional – Exception (I-X)'* zone.
- 2) Rezone part of 4492 Adjala-Tecumseth Townline from the *'Rural (R)'* zone to the *'Open Space Conservation (OSC)'* zone.
- 3) Rezone lands known as 4492 Adjala-Tecumseth Townline from the *'Rural (R)'* zone to the *'Rural – Exception (R-X)'* zone.
- 4) Rezone part of 4428 Adjala-Tecumseth Townline from the *'Institutional (I)'* zone to the *'Open Space Conservation (OSC)'* zone.

A Draft Zoning By-law Amendment and Schedule is included as *Appendix C*.

Table 1 and **Table 2** provide a Zoning Matrix to the applicable zones.

Table 1: Zoning Matrix Institutional (I) Zone		
Provision	Required / Permitted	Proposed
Permitted Uses (9.1.1)	School	School
Landscape Buffer or Privacy Fencing (9.3)	Where the Institutional (I) Zone abuts a residential zone or residential use, either a continuous landscape buffer having a minimum width of 2.0 metres (6.6 feet) shall be provided abutting all common lot lines or a continuous 2.0 metre (6.6 feet) high tight board fence shall be provided along said lot lines.	Will comply (north & south). Shall be detailed for Site Plan Approval.
Frontage	Min. 30 m.	319 m.
Lot Area	Min. 0.4 ha.	11.4 ha. <ul style="list-style-type: none"> Existing: 6.9 ha. Acquired: 4.5 ha.
Lot Coverage	Max. 30%	Will comply. Approx. 4%
Front Yard Setback	Min. 7.5 m.	Will comply. 26 m. (existing) 35 m. (proposed)
Interior Side Yard Setback	Min. 3.0 m.	Will comply. 26 m. (north)
Exterior Side Yard Setback	Min. 7.5 m.	N/A
Rear Yard Setback	Min. 5.0 m.	Will comply. Approx. 250 m.
Building Height (Note 1)	Max. 14.0 m.	Will comply. Max. 14.0 m.
Parking Space Size	3.0 x 6.0 m.	Will comply.
Required Parking Spaces – Elementary School	1 space per 4.6 square metres (50 square feet) of gymnasium floor area	Will comply.
Required Parking Spaces – Secondary School	1 space per 4.6 square metres (50 square feet) of gymnasium floor area	Will comply.
Agricultural Setbacks		
MDS Requirements	Separation Distance of 394 m.	Min. 200 m.

Table 2: Zoning Matrix Rural (R) Zone		
Provision	Required / Permitted	Proposed
Permitted Uses (5.1)	<ul style="list-style-type: none"> Agricultural use. Single detached dwelling. 	<ul style="list-style-type: none"> Agricultural use. Single detached dwelling.
Accessory Uses to an Agricultural Use (5.1.2)	Open storage for farm vehicles and equipment.	Open storage for farm vehicles and equipment. Open storage for non-agricultural uses – including but not limited to automobiles.
All farm and non-farm development shall comply with the Minimum Distance Separation Formula as outlined within Section 3.22 of this By-law (5.3).	Notwithstanding any other provisions of this By-law to the contrary, lands to be rezoned from an Agricultural Zone or a Rural Zone to any Residential, Institutional, Commercial, Industrial or Open Space Recreation Zone, will comply with the MDS I (1.4)	Complies. Refer to assessment provided in this report.
Frontage	Min. 150 m.	285 m. (north - Industrial Parkway)
Lot Area	Min. 36 ha.	Existing: 30.8 ha. Proposed: 26.2 ha.
Lot Coverage	Max. 5.0%	Complies. Approx. 1% (existing)
Front Yard Setback	Min. 100 m.	800+ m. (north)
Interior Side Yard Setback	Min. 30 m.	145 m. (west)
Exterior Side Yard Setback	Min. 30 m.	73 m. (existing barn/shop) 75 m. (existing open storage)
Rear Yard Setback	Min. 30 m.	Open Storage: 7.6 m. (south)
Residential Standards		
Frontage	Min. 60 m.	285 m. (Industrial Parkway)
Lot Area	Min. 0.4 ha.	26.2 ha. (combined with agricultural lands)
Lot Coverage	Max. 10%	Complies. Approx. 1% (existing)
Front Yard Setback	Min. 20 m.	800+ m. (north)

Interior Side Yard Setback	Min. 3.0 m.	295 m. (west)
Exterior Side Yard Setback	Min. 5.0 m.	27 m. (east)
Rear Yard Setback	Min. 7.5 m.	43 m. (south)
Agricultural Structures (20-31)		
Front Lot Line Setback	Min. 100 m.	73 m.
Interior Lot Line Setback	Min. 30 m.	50 m.
Rear Lot Line Setback	Min. 30 m.	215 m.

9.7 Amendment Justification

The following provides a justification of the requested amendments, and site-specific exceptions as highlighted in Tables 1 and 2.

- 1) A portion of 4492 Adjala-Tecumseth Townline is proposed to be rezoned from the '*Rural (R)*' zone to the '*Institutional - Exception (I-X)*' zone, specifically for the 4.5 hectares of land being acquired for the expansion of ACCS. This amendment reflects the desired land use.
 - A. The exception requested is a **reduced setback to the MDS calculations for a new land use**. New land uses are required to evaluate the proposed use and location against the Minimum Distance Separation (MDS) requirements set by the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA). As evaluated through the Minimum Distance Separation Calculation Report by Orion Environmental Solutions, the distance measured from the lot line to the closest barn used for broilers is 230 metres and the distance from the manure storage is 310 metres, where MDS requires 394 metres. The subject Zoning By-Law Amendment application is therefore seeking an exception for the new land use in proximity to the existing agricultural uses. Given the longstanding land uses, the proposed expansion of the existing institutional facility, and the planning justification provided by Orion, the proposed exception is considered reasonable and supportive of compatible land use planning.
- 2) A portion of 4492 Adjala-Tecumseth Townline is proposed to be rezoned from the '*Rural (R)*' zone to the '*Open Space Conservation (OSC)*' zone. This amendment aims to define the development limits as established by the Scoped Environmental Impact Study (SEIS) and to preserve and protect these areas from future development.
- 3) 4492 Adjala-Tecumseth Townline (retained lands) is proposed to be rezoned from the '*Rural (R)*' zone to the '*Rural – Exception (R-X)*' zone. **Site-specific exceptions** are requested for the following:

- A. **Add "Open storage for non-agricultural uses" as a permitted use** on the property, specifically for the open storage area utilized for automobiles. The by-law permits a wide variety of storage uses for a rural property; however, automobiles is not specifically listed as a permitted use for storage. This amendment aims to permit the use through site-specific approval and to acknowledge the existing use.
 - B. **Recognize the property as an undersized rural lot** under the Zoning By-law standards for the '*Rural (R)*' zone. The '*Rural (R)*' zone requires a minimum lot area of 36.0 hectares for agricultural lands, whereas the property has an existing lot area of 30.8 hectares, which is proposed to be adjusted to 26.2 hectares. This 4.5-hectare adjustment will not impact the use of the property nor undermine the By-law's intent to ensure suitable lot sizes for rural land uses.
 - C. **Permit a reduced rear yard setback of 7.6 meters**, where the '*Rural (R)*' zone requires a 30-meter setback for lands used for agricultural use. This reduction specifically applies to the distance from the proposed lot line to the open storage area. A 30-meter setback is notably extensive, particularly when other permitted uses often require only a 10-meter setback. Therefore, the proposed 7.6-meter setback is considered reasonable. Furthermore, this reduction applies to only a short section (114 meters) of the open storage area, with the remainder of the property remaining undeveloped. Since the storage area is intended for passive use rather than active use, the reduced setback is deemed appropriate. To mitigate any visual impact, the area is enclosed with fencing and attached screening material. Overall, the reduced setback is minimal and less intrusive than the potential impact of intensive agricultural activities.
 - D. **A reduced front lot line setback of 73 metres is proposed for an existing agricultural building**, whereas By-law 20-31 requires a minimum setback of 100 metres. This exception is requested to recognize the existing location of the building, which was established prior to the current setback requirement. The reduced setback does not impact the functionality of the site and maintains the intent of the By-law by ensuring adequate separation from the front lot line.
- 4) A portion of 4428 Adjala-Tecumseth Townline is proposed to be rezoned from the '*Institutional (I)*' zone to the '*Open Space Conservation (OSC)*' zone, specifically for lands located in the south-west corner where natural heritage features were identified. This amendment aims to define the development limits as established by the Scoped Environmental Impact Study (SEIS) and to preserve and protect these areas from future development.

The amendments requested are reasonable and represent good land use planning.

10.0 CONCLUSION

The objective of the applications is to obtain the necessary planning approvals to expand the institutional facilities of Alliston Community Christian School (ACCS), located at 4428 Adjala-Tecumseth Townline. As outlined in this report, ACCS is acquiring a portion of the adjacent property located at 4492 Adjala-Tecumseth Townline to support the expansion.

As outlined and justified in this report, a **Zoning By-law Amendment (ZBA)** Application is necessary to rezone the lands to reflect the appropriate land uses. A simultaneous **Consent Application** is required to pursue a boundary adjustment, acquiring 4.5 hectares of 4492 Adjala-Tecumseth Townline and incorporating these lands into the ACCS property at 4428 Adjala-Tecumseth Townline.

It is also noted that a Site Plan Approval (SPA) application will be required from the Township following the approval of the aforementioned applications. This will involve a detailed design and approval process to regulate the development of the lands. The timing of this process is currently uncertain, as long-term planning and funding are needed to ensure the school's needs are met.

It is the professional planning opinion of the undersigned that the development represents good land-use planning. This opinion has been reached for the following reasons:

- The development is consistent with and conforms to all levels of applicable planning policy documents, as reviewed throughout this report.
- The applications are supported by a Scoped Environmental Impact Study (SEIS). The technical assessment has determined that the proposed development can proceed without impact on natural heritage features or functions.
- The subject property is located within a rural and agricultural area, where the existing and proposed land uses are compatible with the surrounding landscape.
- The proposed development will support the logical and appropriate expansion of Alliston Community Christian School (ACCS). This expansion will address the growing enrollment demands, serving the needs of the expanding Alliston community and surrounding areas.

Respectfully submitted,
MORGAN Planning & Development Inc.



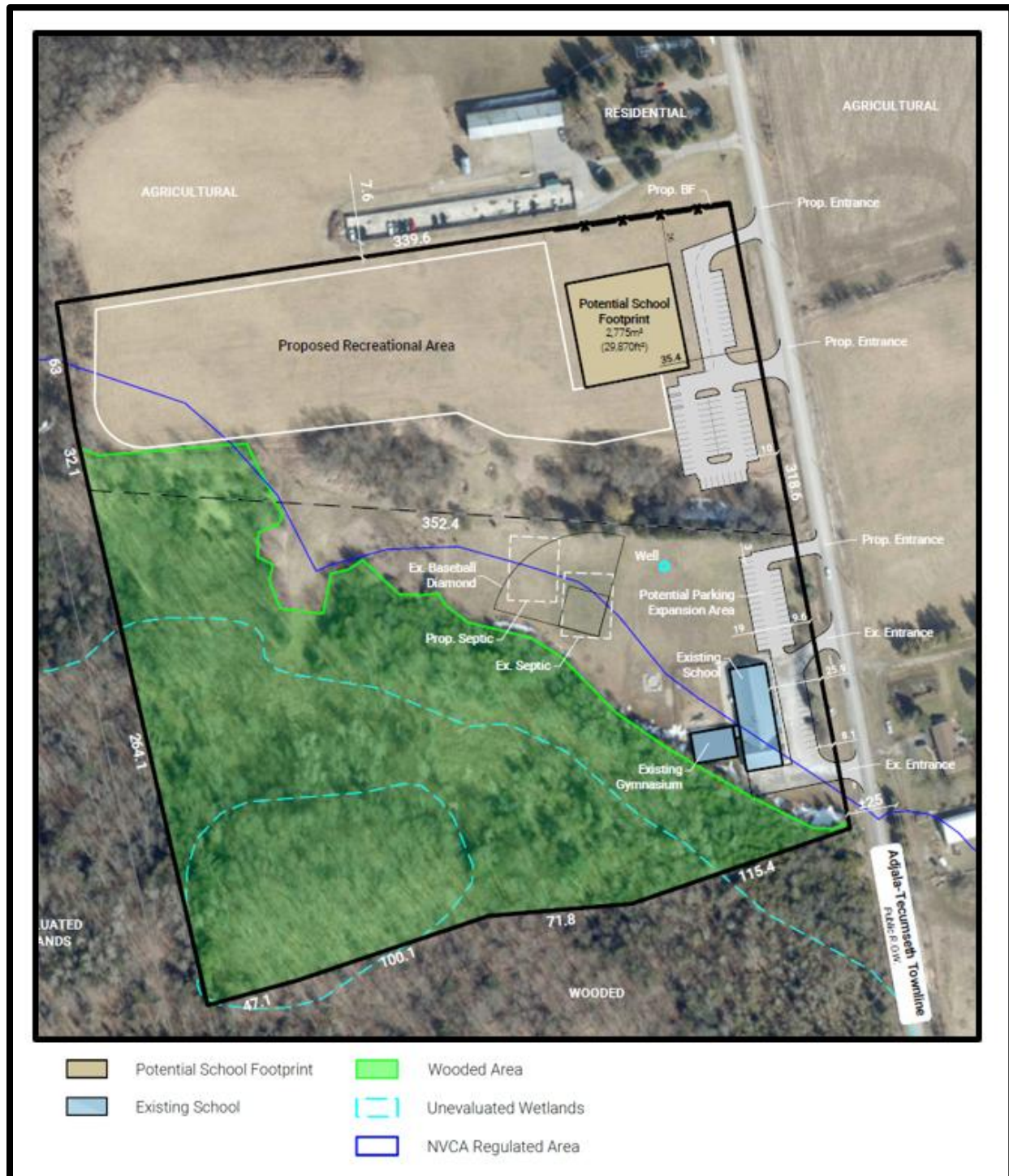
James Hunter, BURPL.
Senior Planner



Joshua Morgan, MCIP, RPP
Principal Planner

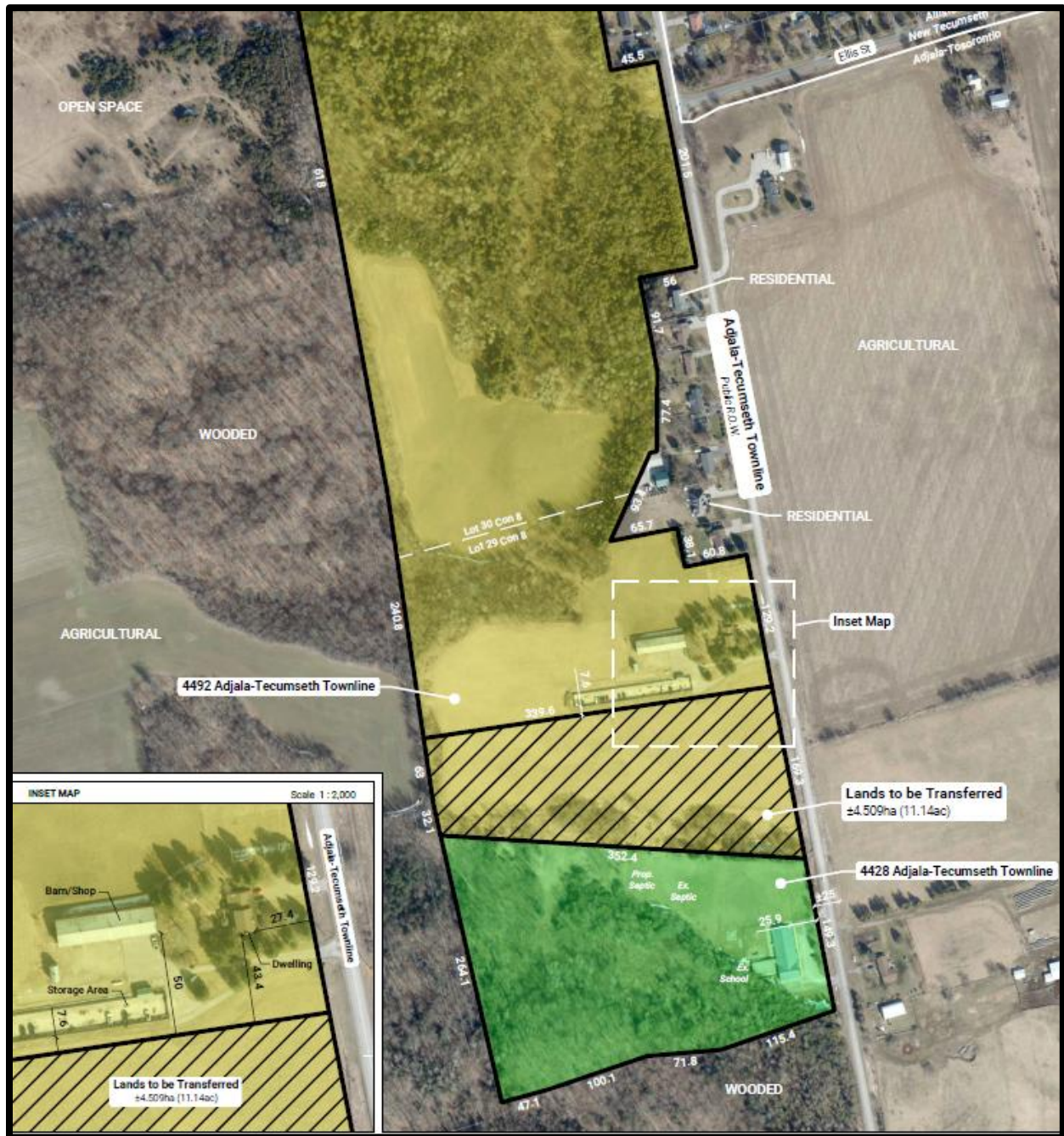
APPENDICES

Appendix A – Concept Plan



Source: MP & D

Appendix B – Boundary Adjustment Plan (Consent Plan)



Source: MP & D

Appendix C – Draft Zoning By-law Amendment & Schedule

THE TOWNSHIP OF ADJALA-TOSORONTIO BY-LAW NO. _____ - 2025

Being a By-law to amend By-law No. 03-57, as amended, the Zoning By-law for the Township of Adjala-Tosorontio for lands as municipally know as 4492 Adjala-Tecumseth Townline and 4428 Adjala-Tecumseth Townline.

WHEREAS the Council of the Corporation of the Township of Adjala-Tosorontio is empowered to pass By-laws to regulate the use of land pursuant to Section 34 of the Planning Act, R.S.O 1990;

AND WHEREAS a Zoning By-law Amendment application has been submitted to rezone lands municipally know as 4492 Adjala-Tecumseth Townline and 4428 Adjala-Tecumseth Townline.

AND WHEREAS the Council of the Corporation of the Township deems it advisable to amend By-law 03-57, as amended;

NOW THEREFORE the Council of the Township of Adjala-Tosorontio enacts as follows:

- Schedule 'A-4' to Zoning By-law No. 03-57 is amended as follows:
 - Rezoning part of 4492 Adjala-Tecumseth Townline from the '**Rural (R)**' zone to the '**Institutional – Exception (I-X)**' zone.
 - Reduced setback of minimum 200 metres to the Minimum Distance Separation (MDS) criteria for an institution use in proximity to an existing agricultural use.
 - Rezoning part of 4492 Adjala-Tecumseth Townline from the '**Rural (R)**' zone to the '**Open Space Conservation (OSC)**' zone.
 - Rezoning lands known as 4492 Adjala-Tecumseth Townline from the '**Rural (R)**' zone to the '**Rural – Exception (R-X)**' zone.
 - Permitted Uses: Open storage for non-agricultural uses.
 - Lot Area of 26 hectares.
 - Rear Yard Setback of 7.0 metres.
 - Front lot line setback of 73 metres to an agricultural building.
 - That Adjala-Tecumseth Townline be recognized as the applicable street for the purposes of determining lot frontage and corresponding lot lines.
 - Rezoning part of 4428 Adjala-Tecumseth Townline from the '**Institutional (I)**' zone to the '**Open Space Conservation (OSC)**' zone.

- The amendments are precisely shown on Schedule 'A' attached hereto, which forms part of By-Law 03-57 as amended.
- In all other respects, the provision of By-law 03-57, as amended shall apply.

This By-law shall come into effect upon the date of the passage hereof, subject to the provisions of Section 34 (30) and (31) of the Planning Act (Ontario).

READ and PASSED this _____ day of _____ 2025.

The Township of Adjala-Tosorontio

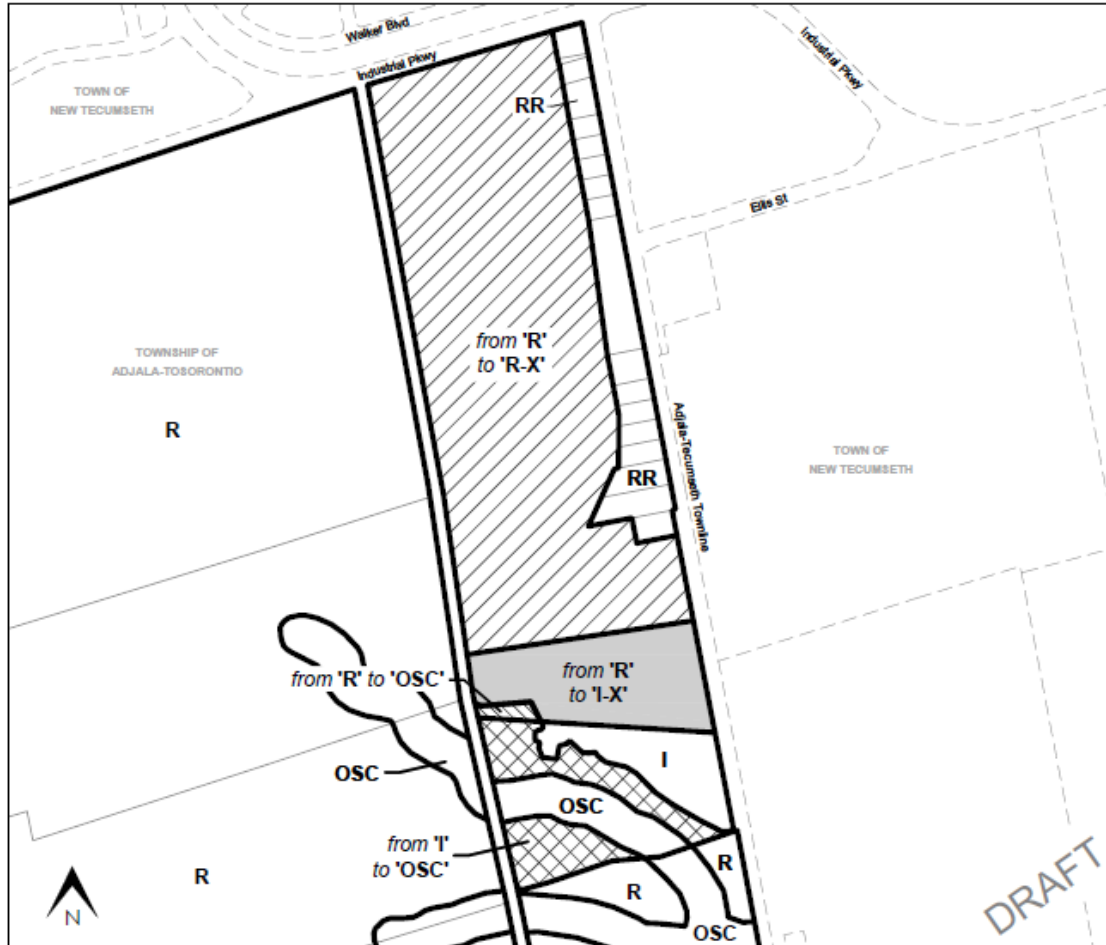
_____ Mayor

_____ Clerk

SCHEDULE 'A' TO Z.B.A. NO. _____

CORPORATION OF THE TOWNSHIP OF ADJALA-TOSORONTIO

ZONING BY-LAW 03-57 - SCHEDULE A-4



LANDS TO BE REZONED FROM THE 'RURAL (R)' ZONE TO THE 'RURAL - EXCEPTION X (R-X)' ZONE.



LANDS TO BE REZONED FROM THE 'RURAL (R)' ZONE TO THE 'INSTITUTIONAL - EXCEPTION X (I-X)' ZONE.



LANDS TO BE REZONED FROM THE 'RURAL (R)' ZONE TO THE 'OPEN SPACE CONSERVATION (OSC)' ZONE.



LANDS TO BE REZONED FROM THE 'INSTITUTIONAL (I)' ZONE TO THE 'OPEN SPACE CONSERVATION (OSC)' ZONE.

DATE

MAYOR

DATE

CLERK

Source: MP & D

Appendix D – Site Photos of Subject Lands



Source: MP & D