



Minor Variance Rationale

To: Diana Keay, MCIP RPP, D.M. Wills Associates Limited, Manager,
Planning Services (Municipal Planning Consultant)

From: RFA Planning Consultant Inc. (Agent)

Cc: 1972890 Ontario Inc. o/a PTF Holdings (Owner)

Date: February 27, 2025

Re: Application for a Minor Variance – Peterborough Truss and Floor Ltd.
– 2809 Television Road – Part of Lot 2, Concession 11, Geographic
Township of Douro, Township of Douro-Dummer, County of
Peterborough

This memo is to summarize our planning opinion in support of the Application for a Minor Variance for the Subject Property located on Part of Lot 2, Concession 11, Geographic Township of Douro, Now in the Township of Douro-Dummer, County of Peterborough. We have assessed the applicable policies of the *Planning Act* and policies of the County of Peterborough Official Plan and *Township of Douro Zoning By-law No. 2000-21*, as amended, and offer the following planning opinion in support of the application.

BACKGROUND

The Subject Property is currently part of one land parcel with Property Identification Number (PIN) 28479-0065. The land is legally described as Part of Lot 2, Concession 11, Geographic Township of Douro, Now in the Township of Douro-Dummer, County of Peterborough. It is important to note, the current registered owner, 1972890 Ontario Inc. o/a PTF Holdings was created by the previous owners, Alfred Herbert Curtis and June Doris Curtis, who originally purchased the land on July 10, 2002 and developed the site to its current use as described further below.

The Subject Property is currently designated “Rural Industrial – Site-Specific Special Policy Area ” on Schedule ‘A4-4’ Land Use Young’s Point, Donwood and Warsaw of the County of Peterborough Official Plan, and is within the “Residential (R) Zone”, “Special District 137 (S.D. 137) Zone” and “Rural (RU) Zone” on “Schedule B1” of *Township of Douro Zoning By-law No. 2000-21*. Amongst various site-specific performance standard provisions, use of the Site-Specific Special Policy Area and S.D. 137 Zone is limited to the production of wood building truss and floor components, along with accessory retail outlet, wholesale outlet, office and open storage. Surrounding land uses are Rural and Restricted Industrial to the north, Rural to the south and east, and Residential to the west.

The subject property consists of 64.4 hectares (159.1 acres) and 92.2 metres (302.49 feet) of frontage on Television Road. The site is relatively flat and consists of a 1,923.1-square-metre manufacturing facility and office serviced by individual on-site well and sewage. A dry storm water management facility exists in the central-west area of the site between the manufacturing facility and Residential area, along with drainage ditches along its west, north and east perimeter.

It is important to note that the site is the subject of a Zoning By-law Amendment (By-law No. 2004-44), which was passed by Council on June 1, 2004 and included a holding (H) provision to place a portion of the property in a Special District 143 (S.D. 143) Zone. The site is also the subject of Ontario Municipal Board (now the Ontario Land Tribunal) decisions between September, 2004 and January 2006 – File No. PL31271, which upheld the 2004 Zoning By-law Amendment approval by Council. On October 17, 2005 removal of the holding provision (H) was granted by Council (By-law No. 2005-84). Just prior to the holding provision removal, the owners entered into a Site Plan Agreement with the Corporation of the Township of Douro-Dummer on September 22, 2005 (registered on October 06, 2005). A Township lead Zoning By-law update in 2010 changed the site’s Special District number to 137 in through By-Law No. 2010-55.

APPLICATION FOR A MINOR VARIANCE

The nature of the subject Application for a Minor Variance is to request relief from various site-specific and general Zoning By-law provisions to permit the expansion of the existing on-site manufacturing facility and to recognize minor adjustments based on as-built conditions, some of which are already deemed to comply with the Zoning By-law by the approved 2005 Site Plan. The extent of subject Minor Variance

is the current Special District 137 (S.D. 137) Zone. More specifically, in addition to removing the provision **Accessory structures must be attached or touch the principal use building, and have a minimum separation distance of 30.0 metres to any western, southern, or northern Lot Line(s)**, the requested relief is as follows:

- **Total Maximum Ground Floor Area of all Principal and Accessory Buildings and Structures.....4,270 m²**
- **Minimum Yard Requirements**
 - **Westerly.....69 m**
 - **Northerly.....45 m**
- **Maximum height of accessory buildings or structures.....5 m**
- **Parking Area Requirements for Industrial Establishment.....**
 - 1 parking space per 72 m² of manufacturing floor area or per 90 m² of warehousing**
- **In all zones, except residential, no driveway shall be permitted within 4 metres of the boundary of a Residential Zone.**
- **Access to and from the required parking spaces and areas may be provided by means of unobstructed driveways or passageways at least 3 m but not more than 10 m in width**
- **The maximum width of any combined ingress and egress driveway measured along the street line may be 10 metres.**
- **Where a planting strip is required by this By-law it shall consist of an unpierced and unbroken hedgerow of evergreen or perennial shrubs, or a storm water management facility where an unbroken hedgerow is not achievable.**
- **Where a driveway or walk extends through a planting strip, it shall be permissible to interrupt the planting strip within 4.4 metres of the edge of such driveway or within 1.5 metres of the edge of such walk.**

The reason why the proposed expansion cannot comply with the **Total Maximum Ground Floor Area** and **Northerly Minimum Yard Requirement** is that the Special District 137 (S.D. 137) Zone represents the building plans at the time exception 137 was created. With this, a Planning Act application is required in order to permit any amendments to those provisions. This said, the subject Minor Variance maintains the general intent and purpose of the Zoning By-law by continuing to restrict total ground floor area and northerly yard requirement, maintaining existing planting strip

and that the expansion is farther from the existing facility to sensitive Residential uses.

PLANNING ACT §45

Subsection 45(1) of the *Planning Act*, R.S.O. 1990, c. P.13 outlines the powers of the Committee of Adjustment to grant a minor variance and the criteria pertaining thereto:

The committee of adjustment, upon the application of the owner of any land, building or structure affected by any by-law that is passed under section 34 or 38, or a predecessor of such sections, or any person authorized in writing by the owner, may, despite any other Act, authorize such minor variance from the provisions of the by-law, in respect of the land, building or structure or the use thereof, as in its opinion is desirable for the appropriate development or use of the land, building or structure, if in the opinion of the committee the general intent and purpose of the by-law and of the official plan, if any, are maintained. R.S.O. 1990, c. P.13, s. 45 (1); 2006, c. 23, s. 18 (1); 2009, c. 33, Sched. 21, s. 10 (11).

Subsection 45(1.0.1) further elaborates on the criteria for a minor variance, which states:

The committee of adjustment shall authorize a minor variance under subsection (1) only if, in addition to satisfying the requirements of that subsection, the minor variance conforms with,

- a) the prescribed criteria, if any; and*
- b) The criteria established by the local municipality by by-law, if any. 2015, c. 26, s. 29 (1);*

The following is our analyses of Subsections 45(1) and 45(1.0.1) of the *Planning Act* under the following headings: “Prescribed Criteria”, “General Intent and Purpose of the Official Plan”, “General Intent and Purpose of the Zoning By-law” and “Desirability for Appropriate Development of the Land”, which are commonly known as the “Four Tests of a Minor Variance”.

PREScribed CRITERIA

Our analysis of the County of Peterborough Official Plan and *Township of Douro Zoning By-law No. 2000-21* indicates no local prescribed criteria for Minor Variance applications. In the absence of local prescribed criteria, the subject Application for a Minor Variance is submitted in accordance with *Ontario Regulation (O. Reg.) 200/96*, which sets out the information and material to be provided in an application under Section 45 of the *Planning Act*.

SCHEDULE

INFORMATION AND MATERIAL TO BE PROVIDED IN AN APPLICATION UNDER SECTION 45 OF THE ACT

1. *The name, address and telephone number of the owner of the subject land and of the agent if the applicant is an agent authorized by the owner.*
2. *The current designation of the subject land in any applicable official plan.*
3. *The current zoning of the subject land.*
4. *The nature and extent of the relief from the zoning by-law.*
5. *The reason why the proposed use cannot comply with the provisions of the zoning by-law.*
6. *The description of the subject land, such as the municipality, concession and lot numbers, registered plan and lot numbers, reference plan and part numbers and name of street and number.*
7. *The frontage, depth and area of the subject land.*
8. *Whether access to the subject land is by a provincial highway, a municipal road that is maintained all year or seasonally, another public road or a right of way or by water.*
9. *If access to the subject land is by water only, the parking and docking facilities used or to be used and the approximate distance of these facilities from the subject land and the nearest public road.*
10. *The existing uses of the subject land.*
11. *Whether there are any buildings or structures on the subject land.*
12. *If the answer to item 11 is yes, for each building or structure the type of building or structure, the setback from the front lot line, rear lot line and side lot lines, the height in metres of the building or structure and the dimensions or floor area of the building or structure.*

13. *The proposed uses of the subject land.*
14. *Whether any buildings or structures are proposed to be built on the subject land.*
15. *If the answer to item 14 is yes, for each building or structure the type of building or structure, the setback from the front lot line, rear lot line, and side lot lines, the height in metres of the building or structure and the dimensions or floor area of the building or structure.*
16. *The date the subject land was acquired by the current owner.*
17. *The date the existing buildings or structures on the subject land were constructed.*
18. *The length of time that the existing uses of the subject land have continued.*
19. *Whether water is provided to the subject land by a publicly owned and operated piped water system, a privately owned and operated individual or communal well, a lake or other water body or other means.*
20. *Whether sewage disposal is provided to the subject land by a publicly owned and operated sanitary sewage system, a privately owned and operated individual or communal septic system, a privy or other means.*
21. *Whether storm drainage is provided by sewers, ditches, swales or other means.*
22. *If known, whether the subject land is the subject of an application under the Act for approval of a plan of subdivision or a consent.*
23. *If the answer to item 22 is yes, and if known, the file number of the application and the status of the application.*
24. *If known, whether the subject land has ever been the subject of an application under section 45 of the Act.*
25. *A sketch showing the following:*
 - i. *The boundaries and dimensions of the subject land.*
 - ii. *The location, size and type of all existing and proposed buildings and structures on the subject land, indicating the distance of the buildings or structures from the front yard lot line, rear yard lot line and the side yard lot lines.*
 - iii. *The approximate location of all natural and artificial features on the subject land and on land that is adjacent to the subject land that, in the opinion of the applicant, may affect the application. Examples include buildings, railways, roads, watercourses, drainage ditches, river or stream banks, wetlands, wooded areas, wells and septic tanks.*

- iv. The current uses on land that is adjacent to the subject land.*
 - v. The location, width and name of any roads within or abutting the subject land, indicating whether it is an unopened road allowance, a public travelled road, a private road or a right of way.*
 - vi. If access to the subject land is by water only, the location of the parking and docking facilities to be used.*
 - vii. the location and nature of any easement affecting the subject land.*
- 26. An affidavit or sworn declaration by the applicant that the information required under this Schedule and provided by the applicant is true.*

All of the required information and materials are provided in the Application for Minor Variance, Site Plan, Property Index Map, Parcel Register and reference Plan 45R-12418, and this Minor Variance Rationale.

On this basis, it is our professional planning opinion that the subject Minor Variance conforms with prescribed *Planning Act* criteria for minor variances.

GENERAL INTENT AND PURPOSE OF THE OFFICIAL PLAN

The Subject Land is designated “Rural Industrial – Site-Specific Special Policy Area” of the County of Peterborough Official Plan, approved in November, 1994. The requested Minor Variance will permit a proposed 2,288.1-square metre expansion of the existing manufacturing facility that produces wood building truss and floor components, which is permitted within the Rural Industrial – Site-Specific Special Policy Area of the site. It is understood the existing manufacturing facility and its proposed expansion are, and will continue to be, considered a “dry” industrial use.

The proposed expansion considers Subsection 6.2.12.3 d) and is located further away from sensitive residential uses than the existing facility and will use an approved / permitted site access that has existed for nearly 20 years, which will minimize potential conflicts with surrounding land uses.

In accordance with Subsections 6.2.12.3 g) and h) of the County of Peterborough Official Plan, sufficient off-street parking and loading facilities shall be provided to accommodate employees, visitors and customers, and to minimize traffic congestion. The site currently operates, and will continue to operate on a single-shift basis. The proposed parking area will continue to provide designated “Type A” and

two “Type B” accessible parking spaces in accordance with Section 80.36 of *O. Reg. 191/11: Integrated Accessibility Standards* under the *Accessibility for Ontarians with Disabilities Act*. The site will continue to use the single access driveway that has been approved and permitted for nearly 20 years.

In accordance with Subsection 6.2.12.3 i) and j) of the County of Peterborough Official Plan, adequate land area shall be preserved for buffer strips between Rural Industrial and outdoor storage areas and any adjacent residential, commercial and open space areas. There is no change proposed to the existing planting strips that have generally been established in accordance with the approved 2005 Site Plan as a result of the subject Minor Variance.

With respect to Subsection 6.2.12.3 k) of the County of Peterborough Official Plan, “all Rural Industrial development shall be adequately regulated by suitable provisions in the Zoning By-law including adequate setbacks from property lines, appropriate off-street parking and loading requirements, landscaped area or buffering requirements in certain cases, prohibition of nuisances, and control over outside storage.” The current S.D. 137 Zone on the subject lands contains provisions for property line setbacks, buffering and outside storage requirements. The Zoning By-law contains general provisions for off-street parking and loading requirements. As part of the subject Minor Variance, some site-specific parking regulations are requested to recognize minor adjustments based on as-built conditions and that the manufacturing facility operates on a single-shift basis. The subject Minor Variance also requests some minor adjustments to some general Zoning By-law planting strip buffer provisions to recognize contents and interruption for driveway that were not addressed by the approved 2005 Site Plan, but that were deemed to comply with the Zoning By-law at that time. This said, it is our professional planning opinion that there are, and will be, suitable provisions to adequately regulate the existing and proposed development within the S.D. 137 Zone as a result of the subject Minor Variance.

With respect to Subsection 6.2.12.3 p), the subject property consists of a Site Plan Agreement registered on title and previously completed a comprehensive planning approval process, where suitability of access, compatibility, impact on surrounding septic systems, groundwater and natural habitat were addressed at that time. If the subject Minor Variance request is approved, a formal amendment will subsequently be required to the Site Plan Agreement. It is our professional planning opinion that

that amended Site Plan will continue to address the above-noted matters of Site Plan Control.

On such bases, it is our professional planning opinion that the subject Minor Variance maintains the general intent and purpose of the Official Plan.

GENERAL INTENT AND PURPOSE OF THE ZONING BY-LAW

The subject Minor Variance will permit the expansion of the existing manufacturing facility that produces wood building truss and floor components, which is a Permitted Use in the current Special District 137 (S.D. 137) Zone on the subject lands, along with accessory retail outlet, wholesale outlet, office and open storage.

The requested relief from **Total Maximum Ground Floor Area of all Principal and Accessory Buildings and Structures** from 2,000 square metres to 4,270 square metres and **Minimum Yard Requirement – Northerly** from 115 metres to 45 metres is to accommodate the footprint of the proposed manufacturing facility expansion. The proposed expansion will result in a Maximum Lot Coverage of all principal and accessory buildings and structures of 12.4 %, less than half of the Restricted Industrial (M1) Zone requirement, the most comparable zone that permit similar uses. The total ground floor area of the principal and accessory buildings and structures will continue to be regulated. With respect to the requested Northerly Minimum Yard Requirement, there is no change proposed to the 9-metre wide planting strip established during the site's original development and that there are no sensitive land uses to necessitate a setback greater than 9 metres for interior side yard. Existing uses to the north are Restricted Industrial and a driveway to a Rural use. For clarity, the northerly yard is defined as an interior side yard in accordance with the Zoning By-law, of which the M1 Zone prescribes a 9-metre building setback. This said, it is our professional planning opinion that the requested Northerly Minimum Yard Requirement will continue to meet the general intent and purpose of the Zoning By-law. Additional development control through Site Plan Control will remain in effect as a result of the subject Minor Variance to continue to enforce such matters as planting strip treatment. The requested relief from **Minimum Yard Requirement – Westerly** from 70 metres to 69 metres considers a 0.6-metre deficiency from the Zoning By-law requirement inadvertently created during construction of the existing manufacturing facility and is not a result of the proposed expansion, which is located 91 metres to the nearest Residential Zone. Similar to the request for the northerly yard setback, there is no change proposed to the

19.5-metre-wide westerly planting strip established during the site's original development. On these bases, it is our professional opinion that the requested relief to **Minimum Yard Requirements** is appropriate.

With respect to the requested removal of the requirement that **accessory structures** be attached to the principal use building, there is no general provision in the Zoning By-law for such a performance standard, nor is there any general provision for their 30-metre separation from lot lines. The most comparable performance standard is to require **accessory structures** be located a minimum 15 metres from a public or private road. The Zoning By-law otherwise allows for **accessory buildings and structures**, such as garages, to be as close as 1.5 metres to rear and side lot lines. It also allows for detached garages. The built form of the existing on-site **accessory building** in question appears as a 2-bay garage as seen in the provided site photos, and functions as a garage to secure garbage prior to collection and for general storage. The 2005-approved Site Plan illustrates an open-air fenced garbage enclosure, which was originally built as approved. Over time, the owner encountered animal mischief from the open-air garbage enclosure and constructed an **accessory building** to secure garbage prior to collection and for added general storage. A minor increase to the **maximum height of accessory buildings** is also requested from 4.5 metres to 5 metres to accommodate the as-built height from grade at the front of the building or structure and the average height between the eaves and ridge. The existing accessory garbage building is setback 6 metres from the nearest property line, being the east, which exceeds the accessory building requirement by 4 times. There are no sensitive uses within a reasonable distance to the accessory garbage building, which is generally Rural. On these bases, the requested removal of the requirement for an attached location of **accessory** structures in our professional planning opinion will bring the S.D. 137 Zone into better conformity with the general intent and purpose of the Zoning By-law and is appropriate.

The requested relief from **Parking Area Requirements** for “**Industrial Establishment**” from 1 parking space per 36 square metres of manufacturing floor area to 1 parking space per 72 square metres considers a total of 59 vehicular parking spaces are to be provided for the single-shift operation of the Peterborough Truss and Floor facility. It is understood that the current Industrial Establishment parking requirement is intended for multi-shift operations, which requires double the amount of parking to accommodate overlapping shift changes. In addition, the proposed manufacturing facility expansion will require a negligible increase in the

number of employees due to the level of automation afforded by the new Manufacturing equipment intended to be used. The one Type A and two Type B accessible spaces provided represent 5 % of the total number of parking spaces, which exceeds the requirement under Section 80.36 of *O. Reg. 191/11: Integrated Accessibility Standards* under the *Accessibility for Ontarians with Disabilities Act*. As the Official Plan requires sufficient off-street parking to accommodate employees, visitors and customers, that the Peterborough Truss and Wall facility operates on a single-shift basis, that off-street parking will be provided and that the Zoning By-law implements the Official Plan, the requested parking requirement is considered appropriate to meet the general intent and purpose of the Zoning By-law.

The requested relief for **driveway location from Residential Zone** and **maximum width of combined ingress and egress driveway measured along the street line and access to / from parking spaces / areas** recognizes as-built conditions of the driveway that have existed for nearly 20 years. The general intent and purpose of the **driveway location** general provision is to ensure separation from residential uses and non-residential vehicular traffic. Further, the requested relief of **driveway location from a Residential Zone** from 9 metres to 4 metres appears to be an oversight of the original zoning approval, presumed to be inadvertently omitted. This said, the S.D. 137 Zone requires a minimum 5-metre-wide Southerly Planting Strip, which was implemented by the approved 2005 Site Plan. A 12-metre Southerly Planting Strip is currently provided abutting the developed Residential Zone south of the existing driveway, exceeding the minimum southerly planting strip by nearly 2.5 times, where a 4.4-metre separation exists between abutting Residential Zone north of the driveway (which is vacant, owned by the applicant and forms part of the subject lands) as an existing condition. Because the separation of driveways and Residential Zones has already been deemed appropriate by the previous planning approvals through the current S.D. 137 Zone, that the existing combined ingress and egress driveway measured along the street line was established under permit, that the approved Site Plan is deemed to comply with the Zoning By-law, and that the Residential Zone abutting to the north of the driveway, is vacant, owned by the applicant and forms part of the subject lands, the requested **driveway location** relief is considered appropriate.

With respect to **Planting Strip Contents** and **Interruption for Driveway or Walk**, it is requested to add a storm water management facility as permitted **Planting Strip Contents**. It is also requested to increase **Planting Strip Interruption for Driveway**

or Walk from 3 metres to 4.4 metres. Both Planting Strip Minor Variance requests are to recognize as-built conditions that have existed for nearly 20 years, already deemed appropriate by the previous planning approvals through the current S.D. 137 Zone and that the approved Site Plan is deemed to comply with the Zoning By-law, but that are presumed to have been inadvertently omitted at that time.

On such bases, it is our professional planning opinion that the subject Minor Variance maintains the general intent and purpose of the Zoning By-law.

DESIRABILITY FOR APPROPRIATE DEVELOPMENT OF THE LAND

The requested relief for **Westerly Minimum Yard Requirement, Accessory Structures, Driveway Location, Access to / from Parking Spaces / Areas, Driveway Measured Along the Street Line** and **Planting Strip** provisions are as-built conditions that have existed for nearly 20 years, some of which appear to be general Zoning By-law provisions inadvertently omitted from the original planning approvals, but that have already been deemed appropriate or to comply by virtue of the 2005 Site Plan Agreement. On these bases, and that there will be no additional impact as a result of the subject minor variance, it is considered desirable to address the existing conditions deficiencies through a Minor Variance.

The requested **Maximum Ground Floor Area** provision and corresponding **Northerly Minimum Yard Requirement** represent an expansion of an established business and permitted use that has existed on-site for nearly 20 years. Because the proposed manufacturing facility expansion will not entail a corresponding increase in employees due to the level of automation afforded by the new manufacturing equipment intended to be used, it is considered desirable and appropriate as potential impacts from additional employees can be mitigated such as for parking and servicing requirements. It is important to note that outdoor storage management of the site has already undergone changes, where product will remain on-site for a shorter period of time so as to not require the outdoor storage area that will be used by the proposed expansion. The Northerly Yard reduction will not affect the Northerly Planting Strip, which is considered desirable. Uses to the north are Restricted Industrial and Rural not requiring the same protection as the sensitive Residential uses to the west. The requested 45-metre **Northerly Minimum Yard Requirement** is considered appropriate as it exceeds the Easterly Minimum Yard Requirement of 30 metres, where similar uses abut, and is considered the most desirable of areas for the proposed expansion when compared to expanding to the

east, west or south, where there is either insufficient space, would require relocation of parking and a sewage system or would impact a sensitive Residential area.

Operating on a single-shift basis affords a reduced parking demand half of what would otherwise be required for other multi-shift Industrial Establishments. A reduced parking requirement will allow for a more desirable use of the S.D. 137 Zone area for the proposed expansion and for maximizing site functionality for items such as planting strips, outdoor storage and vehicle circulation.

On such bases, it is our professional planning opinion that the subject Minor Variance is desirable for the appropriate development of the land.

PLANNING OPINION AND CONCLUSION

The subject Application for a Minor Variance requests relief from Zoning By-law Subsections **21.137.2, 3.31.1, 3.31.2 (a), 3.31.3 (a) and (b), 3.32.2 and 3.32.5**, and to recognize the existing detached accessory building. Only the requested **Total Maximum Ground Floor Area of all Principal and Accessory Buildings and Structure, Minimum Yard Requirements – Northerly and Industrial Establishment Parking Requirements** are as a result of the proposed manufacturing facility expansion. All other Minor Variance requests are as-built conditions that have existed for nearly 20 years.

All of the prescribed *Planning Act* criteria are provided in the Application for Minor Variance, Site Plan, Property Index Map, Parcel Register and reference Plan 45R-12418, and this Minor Variance Rationale.

The proposed 2,288.1-square metre expansion of the existing manufacturing facility that produces wood building truss and floor components, which is permitted within the Rural Industrial – Site-Specific Special Policy Area of the site. It is understood the existing manufacturing facility and its proposed expansion are, and will continue to be, considered a “dry” industrial use. The proposed expansion will be farther from sensitive Residential uses than the existing manufacturing facility, which will continue to provide sufficient off-street parking and loading facilities to accommodate employees, visitors and customers, and to minimize traffic congestion. Suitable provisions in the Zoning By-law including adequate setbacks from property lines, appropriate off-street parking and loading requirements, landscaped area or buffering requirements will continue to be regulated as a result of the subject Minor

Variance. The Site Plan Agreement registered on title previously completed a comprehensive planning approval process, where suitability of access, compatibility, impact on surround septic system, groundwater and natural habitat were addressed at that time.

The proposed expansion will result in a Maximum Lot Coverage of all principal and accessory buildings and structures of 12.4 %, less than half of the M1 Zone requirement, and the total area of the principal and accessory buildings and structures will continue to be regulated by the Zoning By-law. The requested yard reductions will not affect the established planting strips and will not result in additional impacts to sensitive land uses. The requested removal of the requirement for attached accessory structures in our professional planning opinion will bring the S.D. 137 Zone into better conformity with the general intent and purpose of the Zoning By-law, and there are no sensitive uses within a reasonable distance to the accessory garbage building that will be affected by its height or location in the site's rear yard. As the Official Plan requires sufficient off-street parking to accommodate employees, visitors and customers, that the Peterborough Truss and Wall facility operates on a single-shift basis, that off-street parking will be provided and that the Zoning By-law implements the Official Plan, the requested parking requirement is considered appropriate to meet the general intent and purpose of the Zoning By-law. The separation of driveways and Residential Zones has already been deemed appropriate by the previous planning approvals and 2005 Site Plan, which was deemed to comply with the Zoning By-law at that time. The existing combined ingress and egress driveway measured along the street line was established under permit. The Residential Zone abutting to the north of the driveway, is vacant, owned by the applicant and forms part of the subject lands. Both Planting Strip Minor Variance requests are to recognize as-built conditions that have existed for nearly 20 years, already deemed appropriate by the previous planning approvals through the current S.D. 137 Zone and that the approved Site Plan is deemed to comply with the Zoning By-law, but that are presumed to have been inadvertently omitted at that time.

The requested relief for Westerly Minimum Yard Requirement, Accessory Structures, Driveway Location, Access to / from Parking Spaces / Areas, Driveway Measured Along the Street Line and Planting Strip provisions are as-built conditions that have existed for nearly 20 years, some of which appear to be general Zoning By-law provisions inadvertently omitted from the original planning approvals, but that have already been deemed appropriate or to comply by virtue of the approved 2005

Site Plan. The proposed manufacturing facility expansion will not entail a corresponding increase in employees due to the level of automation afforded by the new manufacturing equipment intended to be used, it is considered desirable and appropriate as potential impacts from additional employees can be mitigated such as for parking and servicing requirements. The requested 45-metre Northerly Minimum Yard Requirement is considered appropriate as it exceeds the Easterly Minimum Yard Requirement of 30 metres, where similar uses abut, and is considered the most desirable of areas for the proposed expansion when compared to expanding to the east, west or south, where there is either insufficient space, would require relocation of parking and a sewage system or would impact a sensitive Residential area. A reduced parking requirement will allow for a more desirable use of the S.D. 137 Zone area for the proposed expansion and for maximizing site functionality for items such as planting strips, outdoor storage and vehicle circulation.

On such bases, it is our professional planning opinion that the subject Minor Variance conforms with the prescribed criteria of *O. Reg. 200/96* for minor variances, maintains the general intent and purpose of the County of Peterborough Official Plan and *Township of Douro Zoning By-Law No. 2000-21* and is desirable for the appropriate development of the Subject Land.

If you have any questions about this information, please do not hesitate to contact us.

Yours truly,



Shawn Legere, MCIP, RPP
Vice President / Senior Planner
RFA Planning Consultant Inc.

