

January 28th, 2026

File No.: 2026-01

Mike Rolph, CBCO
Director of Building and Planning
Chief Building Official
Municipality of South Huron
322 Main Street South
P.O. Box 759
Exeter, ON NoM 1S6

**RE: Minor Variance Application
Lot 1320 Plan 376 Exeter, Secondly Pt. Lot 15, Parts 1, 2, and 3, Plan 2NDLY: PART LOT 15
22R3785
1343877 Ontario Ltd. and Pol Quality Homes**

On behalf of 1343877 Ontario Ltd. ("Owner") and Pol Quality Homes ("Applicant"), we are pleased to submit a Minor Variance Application for land known legally as Lot 1320 Plan 376 Exeter, Secondly Pt. Lot 15, Parts 1, 2, and 3, Plan 2NDLY: PART LOT 15 22R3785, Municipality of South Huron, Huron County ("Site"). The Site forms a remanent block from the adjacent Plan of Subdivision for Pinnacle Quality Homes.

The Site is irregularly shaped, with a land area of 6,664.6 square metres and a frontage of 15.1 metres on Simcoe Street. The Site is currently vacant, with no buildings or structures. The Site grade runs from the northwest corner to the southwest corner.

The area surrounding the Site includes a mix of land uses, summarized as follows:

North: Low Density Residential
East: Stormwater Management Pond
West: Low Density Residential/Main Street
South: Commercial

The surrounding road network connects within and external to the settlement area of Exeter. There are sidewalks on both sides of Simcoe Street, an arterial road. The Site is within walking distance of the various amenities in downtown Exeter, as well as the hospital.

The Site is designated as "Residential" in the South Huron Official Plan, 2025 and zoned "Residential High Density (R3-9)" in the South Huron Zoning By-law (through By-law No.55-2019). The OP and By-law permit the construction of stacked townhouse dwelling units on the Site.

The Owner and the Applicant are proposing a residential development on the Site, consistent with the use permitted in the site-specific zoning. The attached Conceptual Site Plan shows 34 stacked townhouse units and 62 off-street parking spaces. The concept includes three (3) new residential buildings, each 2 storeys to 2.5 storeys in height. The proposed dwelling units will be one (1) floor, with options for accessible units on the first level. Generally, the dwelling units will include two (2) bedrooms) and a balcony.

Access to the Proposed Development is proposed via a new private entrance from Simcoe Street that is 20 metres wide. Supporting site features include a private amenity area, mailboxes, and a centralized screened molok system. The Owner and Applicant are proposing a solid wood fence along the property lines and an enhanced landscaped screening area on the northern portion of the property, adjacent to existing low-density residential uses.

A new pedestrian connection is proposed from Albert Street to Simcoe Street, along with a centralized common amenity area. The northerly, easterly, and southerly yard areas will not be utilized for private amenity area(s), and will form part of the common elements to the proposed condominium. Each unit will have a private balcony.

Sample building elevations are provided below for illustrative purposes. The Applicant has completed four (4) similar developments in Perth County.

Sample Elevations



BUILDING A - NORTH BUILDING
REAR WALL FACADE
NORTH ELEVATION



BUILDING A - NORTH BUILDING
STREET FACADE
WEST ELEVATION

Source: Pol Quality Homes, 2025

Minor Variance Application

The purpose of the Minor Variance Application is to seek relief from the required yard setbacks set-out in the site-specific zoning on the Site. By way of history, the site-specific zoning applied at the time of the subdivision approval was based on a highly conceptual concept and not specific building designs and floor plans. The unique shape of the Site and the market need for slightly larger dwelling units require minor reductions to the setbacks to facilitate the Conceptual Site Plan. The reductions are as follows:

1. North Property Line – 6.0 metres (rear yard), whereas the By-law requires a minimum of 6.8 metres;
2. South Property Line – 4.0 metres (rear yard), whereas the By-law requires a minimum of 6.5 metres;
3. East Property Line – 4.0 metres (interior side yard), whereas the By-law requires a minimum of 6.9 metres;
4. To permit off-street parking spaces in the front yard setback; and,
5. To permit covered patios and balconies to project 1.6 metres into any required yard.

In consideration of the above-noted variances, the Owner and Applicant sent notices to the abutting residential property owners to the north of the Site and held an information session on January 27th, 2026. The purpose of the information session was to present the requested variances and to discuss mitigation opportunities along the northern property line, including fencing and landscaping. While none of the abutting property owners attended, the Owner and Applicant are proposing enhanced landscaping and fencing along the mutual property line and have relocated two (2) of the balconies to the eastern and western building elevations to further minimize concerns of privacy and overlook.

Planning Policy Framework

Provincial Planning Statement, 2024

The Provincial Planning Statement (“PPS”), 2024, is a province-wide policy document that sets the foundation for regulating development and land use. The PPS is issued under Section 3 of the Planning Act. The PPS “sets the policy foundation for regulating the development and use of land province-wide, helping achieve the provincial goal of meeting the needs of a fast-growing province while enhancing the quality of life for all Ontarians.” The document is to be read in its entirety, and all relevant policies must be considered. Municipal official plans are the most important vehicle for implementing the PPS and achieving comprehensive, integrated, and long-term planning.

The PPS, in Section 2.1.6 a) states that planning authorities should support the achievement of complete communities by accommodating an appropriate range and mix of land uses and housing options. Section 2.3.3 of the PPS supports general intensification and redevelopment, including planning for a range and mix of housing options.

Section 2.2 of the PPS speaks explicitly to considerations for housing, including intensification, redevelopment and the provision of an appropriate range and mix of housing types and densities. Section

1.4.3 states that planning authorities shall provide for a mix of housing types and densities by, amongst others:

- b) 2. Permitting....all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- c) promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*

It is our professional opinion that the Proposed Development and the requested variances are consistent with the PPS, as they address existing housing needs in South Huron, including a greater range of unit types, sizes, and affordability. It leverages the locational benefits of a property within the settlement area that has access to municipal infrastructure and is within walking distance of downtown.

The Proposed Development addresses matters related to climate change and agricultural protection by providing new housing within the built boundary that alleviates long-term pressure to expand the settlement area.

County of Huron Official Plan, 2025

The purpose of the Huron County Official Plan ("County OP"), is outlined in Section 1.2, stating that:

The County Official Plan is a statement of the community and is presented in the words of the community. It is a record and guide. Not only does it provide direction for the activities of individuals and community organizations, the County Official Plan provides guidance to local municipalities for the development of local official plans. The policies and actions are general policies and are provided as guidance.

The County OP includes five (5) resource maps, provided as reference, not land use designations. Detailed mapping and land use designations are to be provided in the local official plans. The Site is identified as "Settlement Area" and specifically Exeter is a "Primary Settlement Area (P1)". Section 7.2 of the County OP states that:

Primary Settlement Areas are Huron's largest urban centres, and have full, municipal water and sewer services. These areas are intended to be the primary location for growth and development in the County and offer a full range of amenities and employment options.

Of the total growth in Huron County, 75% is directed to Primary Settlement Areas, and of that, 30% will be for high-density development.

Policies for housing and intensification are set out in Section 7.2.2 of the OP, which states that the required variety and mix of housing to meet needs have shifted. In this regard, the County OP promotes a mix of land uses with an overall increase in density as well as an emphasis on infilling and intensification.

The County has developed Residential Intensification Guidelines, 2020, as a reference document to inform increased densities, while maintaining land use compatibility. Section 1.1 of the Guidelines states that intensification is required “to promote a diverse community and accommodate a variety of households (i.e. young adults, families with children, single parents, seniors, people with special needs, etc.), the County encourages the provision of a full range of housing types through residential intensification projects.”

In consideration of the Guidelines, the Conceptual Site Plan has included the following:

- Locates the proposed buildings, parking and amenities on the Site to complement the existing land uses. Reduced setbacks are proposed where the Site abuts open space or undeveloped lands, and increased the building setbacks where adjacent to commercial uses.
- Maintains the general building heights in the immediate area, being two-storeys.
- Provides vertical and horizontal building articulation through building materials, balconies, and roof lines.
- Provides for an integrated pedestrian network that connects to Simcoe Street.
- Parking is visually screened from adjacent land uses by the proposed residential buildings.
- Screening is proposed through a combination of fencing and landscaping.
- Provides the opportunity for barrier-free dwelling units and barrier-free off-street parking.
- Included bicycle parking.

Based on the foregoing, it is our professional opinion that the Application conforms to the County OP and has regard for the Guidelines. The Applications will facilitate an infill opportunity in a Primary Settlement Area with access to municipal infrastructure and community amenities. The Conceptual Site Plan and Building Elevations demonstrate a clear intent to provide a compatible transition in use, density and building height from the adjacent low-density residential uses and consideration of enhanced screening to minimize overlook and maintain privacy.

Municipality of South Huron Official Plan, 2025

The Site is designated as “Residential” in the Municipality of South Huron Official Plan (“OP”), 2025 and is located within a defined settlement area. The Principles for settlement areas include, but are not limited to (Section 2.6):

1. *Recognize Exeter as the major urban center in South Huron.*
2. *Promote the development of settlement areas based on their level of servicing.*
3. *Build vibrant neighbourhoods within complete communities which provide a healthy lifestyle for the residents of South Huron.*
4. *Encourage infill and re-development within existing settlement areas.*

Section 6.0 D.2 provides the policies for intensification and infilling, noting that the efficient use of land and services is encouraged through increased intensification within the existing boundaries of settlement

areas. The OP considers townhouses as medium-density housing forms for the Exeter settlement area and specific development policies are provided in Section 6.1.1.2, including:

1. *New residential development will be allowed in all residential neighbourhoods as infilling, expansion or intensification.*
2. *Infilling and residential intensification will occur primarily in established residential neighbourhoods.*
3. *The design of residential development, including infill and intensification, within established neighbourhoods shall demonstrate compliance with the County's Residential Intensification Guidelines.*
5. *New residential developments shall provide a mix of dwelling types and includes a range of affordable housing for current and future residents of South Huron. All new residential developments should have consideration for the need for housing options for all income types and household sizes. A mix of housing tenures and forms is recognized for its benefits to the entire community.*
6. *Residential development shall proceed with concern for compatibility of surrounding land uses. Residential development in proximity to Industrial uses shall proceed according to Ministry of Environment Guideline D-6 'Compatibility between Industrial Facilities and Sensitive Land Uses' as updated.*
7. *New residential development will be directed to locations where adequate services including water supply, sanitary waste disposal, storm and surface drainage, roads, sidewalks, street lighting and facilities (e.g. schools, parks and open spaces) are available or can be made available. Active modes of transportation, such as walking trails and bike paths, shall be incorporated into the design of new development, and create and improve linkages between existing trail systems, commercial areas, and community facilities. The active transportation network will be designed to be inclusive of all community members. New development may require enhanced tree planting to promote shade and heat mitigation over the long term.*
11. *A variety and mix of housing will facilitate the provision of a full range of housing options including building type, size, tenure (e.g., rental, ownership, life lease, etc.) affordability, housing which contains supports and location.*
12. *New residential development, including infill and intensification, shall occur at a density which efficiently uses land, resources, infrastructure, public lands and facilities. Intensification and the development of currently designated lands will form the primary method of meeting new housing need and demand which supports the preservation of farmland and natural areas, promotes energy efficiency and maximizes community investments in infrastructure.*
13. *New residential development will be directed to locations where adequate services are available. Services to be considered include but are not limited to water supply, wastewater disposal, stormwater management, roads, sidewalks, and public facilities (e.g., schools, parks and open spaces). Where appropriate, new or improved active transportation infrastructure such as walking trails and/or bike paths should be incorporated into the design of new developments.*

In our professional opinion, the Proposed Development and the implementing Application conforms to the OP by providing a medium-density housing option within the built-up area with access to service and amenities.

The specific variances relate to yard setbacks to adjacent properties. As noted in Section 6.1.1.2.6, new development shall be compatible with surrounding land uses. In our professional opinion, the reduced easterly and southerly side yards about a stormwater management pond and a commercial use. In this regard, there is minimal impact on privacy and/or overlook. The reduced northerly yard setback is proposed only in the context of enhanced landscaping and buffering being provided to ensure that matters of privacy and overlook are addressed and has been limited to a requested reduction of 0.6 metres.

The northerly property line, where a reduction is requested, abut four (4) existing residential properties. Each of these properties contains a single detached dwelling, with frontage on Simcoe Street. On average, these four (4) properties have a rear yard depth (from dwelling to rear lot line) of 44 metres, which exceeds the zoning requirements. The spacing between the Proposed Development and the adjacent residential dwellings is approximately 49 metres (160 feet), providing significant spacing for privacy. The Owner and Applicant are also proposing enhanced buffering along this property line to minimize any overlook to the existing rear yard amenity areas. The proposed balconies have also been adjusted to minimize overlook.

The proposed parking in the front yard setback is limited to five (5) visitor parking spaces and are being provided to minimize any potential for on-street parking. The parking spaces will be screened by a solid wood fence.

Municipality of South Huron Zoning By-law 69-2018

The Site is zoned as "Residential High Density (R3-9)" in the Municipality of South Huron Zoning By-law 69-2018. The R3-9 zoning permits stacked townhouses. Site-specific zoning provisions are as follows:

- b) The property fronts onto Simcoe Street and has a minimum frontage requirement of 15.10 metres. There is no lot frontage requirement for each dwelling unit. The units are provided access to a public road (Simcoe Street) via a privately owned, internal road.
- c) The whole of the lands zoned R3-9 shall be a lot for the purposes of the Bylaw.
- d) The setbacks to property lines for proposed buildings are as follows:
 - o North Property Line – 6.8 metres (front yard /interior side yard)
 - o South Property Line – 6.5 metres (rear yard)
 - o East Property Line – 6.9 metres (interior side yard)
 - o West Property Line – 3.1 metres (interior side yard)
- e) One accessory building or structure may be permitted to serve the overall site in accordance with the requirements of Section 3.2.
- f) A minimum of 1.5 parking spaces per dwelling unit are required permitting a maximum unit count to 34, and a total of 50 parking spaces in accordance with Section 3.26. Section 3.26.12 does not apply.
- g) A planting strip is required in accordance with Section 3.28. along the north, west and south property lines.
- h) The 18-metre minimum required separation distance between buildings does not apply on lands zoned R3-9
- i) Minimum amenity area for the lands zoned R3-9 shall be 355 square metres
- j) Landscaped Open Space (minimum) – 30%

- k) Lot Coverage (maximum) – 40%
- l) Building Height (maximum) – 12 metres
- m) All other applicable provisions of this By-law, as amended, shall apply.

The Conceptual Site Plan complies with all zoning provisions, except for the northerly, easterly, and southern side yard setbacks for building and patio/balcony locations.

Tests of Minor Variance

Per Section 45(1) of the Planning Act, R.S.O. 1990, c. P.13, there are four (4) tests to be evaluated when considering a Minor Variance Application. The following section outlines the four (4) tests and provides an analysis of the variance sought by the Owner and Applicant.

1. Is the application minor?

In our professional opinion, the proposed variances to reduce the required yard setbacks are minor in nature. As noted, the proposed land use, density, lot coverage, landscaped open space, and off-street parking comply with the R3-9 Zone. The setback relief provides for a well-designed multi-unit development and viable building footprints, while addressing matters related to privacy and overlook to the adjacent properties. Enhanced screening and landscaping are proposed to mitigate overlook, and the setback between existing dwellings and the proposed dwellings is approximately 49 metres.

2. Is the application desirable for the appropriate development of the lands in question?

In our professional opinion, the Application is desirable for the appropriate development of the Site. The Site is located within the defined settlement area and is designated and zoned for residential uses. The variances will provide for a greater range and mix of housing types in the community to meet market demand, and will also efficiently utilize existing municipal infrastructure.

3. Does the application conform to the general intent of the Zoning By-law?

In our professional opinion, the Minor Variance Application conforms to the general intent of the R3-9 Zone. The intent of yard setbacks is to provide for, amongst others:

- Maintenance of privacy and minimizing overlook;
- Meeting fire separation requirements in the Ontario Building Code;
- Providing sufficient land area for private amenity area(s);
- Providing sufficient land area to address stormwater management requirements;
- Providing for a consistent streetwall along municipal roads.

In our professional opinion, the Proposed Development and variances continue to meet the intent of yard setbacks:

- As noted in this letter, privacy and overlook have been with enhanced screening and landscaping and limiting the number of balconies.
- There is approximately 49 metres between existing and proposed buildings, providing compliance with the Ontario Building Code.
- The area of the Site proposed for reduced yard areas is not intended for private amenity areas.
- Through the required Site Plan, the Owner and Applicant will provide a stormwater management plan to demonstrate engineering objectives.
- There are no buildings proposed along the Simcoe Street lot line, given the Site's shape and as such, there is no change to the streetwall along the municipal street.

4. Does the application conform to the general intent of the Official Plan?

In our professional opinion, the Minor Variance Application conforms to the general intent of the OP, which encourages residential development and infilling within settlement areas that have access to a full range of services and amenities.

Summary

In support of the Minor Variance Application, please find enclosed the Conceptual Site Plan, prepared by Ritz Architects.

The Minor Variance Application fee will be paid electronically by the Owner through CloudPermit.

We trust the submission can be accepted and circulated for review.

Kind regards,



Caroline Baker, MCIP, RPP
Principal

c.c. Owner
Applicant