



Zelinka Priamo Ltd.

LAND USE PLANNERS

October 24, 2025

submitted electronically

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Dear Ms. Polselli:

**Re: Planning Justification Letter for Zoning By-law Amendment
Southbridge Healthcare LP
Additional Permitted Uses - Clinic
Exeter, ON**
Our File: SBG/EXE/22-01

INTRODUCTION

On behalf of CVH (No.8) LP. (Southbridge Healthcare), Zelinka Priamo Ltd. is pleased to submit materials in support of a Zoning By-law Amendment application for the above-noted lands (the “subject lands”) to permit a physiotherapy “Clinic” on the first floor of the Long-Term Care (LTC) home currently under construction.

The purpose of the following Planning Justification Letter is to evaluate the proposed Zoning By-Law Amendment application within the context of applicable land use policies and regulations, including:

- The 2024 Provincial Planning Statement (PPS);
- The County of Huron Official Plan;
- The Municipality of South Huron Official Plan; and,
- The Municipality of South Huron Zoning By-law.

This letter concludes that the proposed Zoning By-Law Amendment application to permit the proposed “*Clinic*” use within the LTC home is appropriate and desirable for the following reasons:

- The proposed Zoning By-Law Amendment is generally consistent with the policies of the 2024 Provincial Planning Statement, County of Huron Official Plan and South Huron Official Plan;
- The proposed Zoning By-Law Amendment provides an appropriate zone to implement the proposed use while maintaining all other regulations of the South Huron Zoning By-Law;
- The proposed Zoning By-law Amendment will support the continued development of a valuable and desirable LTC home by permitting a complementary clinic use that benefits both residents and the broader community;
- The proposed use will make efficient use of the subject lands which are within an identified settlement area; and,
- The physiotherapy clinic, as a small-scale, low-intensity use, will have no additional impacts to area properties beyond those from the LTC home, and is considered a complementary, compatible, and appropriate use.

THE SUBJECT LANDS

The subject lands consist of a single, rectangular-shaped parcel of land located approximately 184m north of Huron Road West, directly to the north of the Exeter Christian Reformed Church in the Municipality of South Huron (Figure 1). The subject lands have a lot area of approximately 1.74ha (4.29ac), a lot depth of approximately 218m (715ft), and are currently occupied by a 3-storey Long-Term Care (LTC) home currently under construction. The home has a gross floor area of approximately 10,187m² (109,565 ft²) and 105 surface parking spaces.

Figure 1 - Subject Lands



Figure 2 – Aerial Imagery of Subject Lands



Surrounding land uses are comprised of the following:

North and West: Cultivated fields and a municipal drain;

East: Low-density residential subdivision; and,

South: Exeter Christian Reformed Church

As part of the previously approved consent process, a 20-metre-wide block was established along the southerly edge of the subject lands to accommodate a future right-of-way extension. This block has since been developed as a private road, providing functional vehicular access to the subject property and ensuring connectivity to adjacent lands. Although the roadway has not yet been assumed as a public street, it currently serves as the primary access for the site, supporting ongoing construction activities associated with the new building. The subject lands contain two registered easements, to accommodate municipal servicing and access.

The subject lands are within the “Settlement Area” land use designation under the Huron County Official Plan; are within the “Residential” land use designation as per ‘Schedule ‘C’- Land Use Plan Exeter Ward’ in the Municipality of South Huron; and are zoned “Residential 3 (R3-18)” Zone under the Municipality of South Huron Zoning By-law 69-2018.

PROPOSED ADDITIONAL USE - CLINIC

Southbridge intends to provide a small, 104m² physiotherapy clinic within the first floor of the LTC home (Figures 3 - 4). The site layout situates the physiotherapy practice along the west side of the building, with a dedicated entrance and no internal connection to the long-term care facility.

Figure 3 –Site Plan (excerpt, north at left)

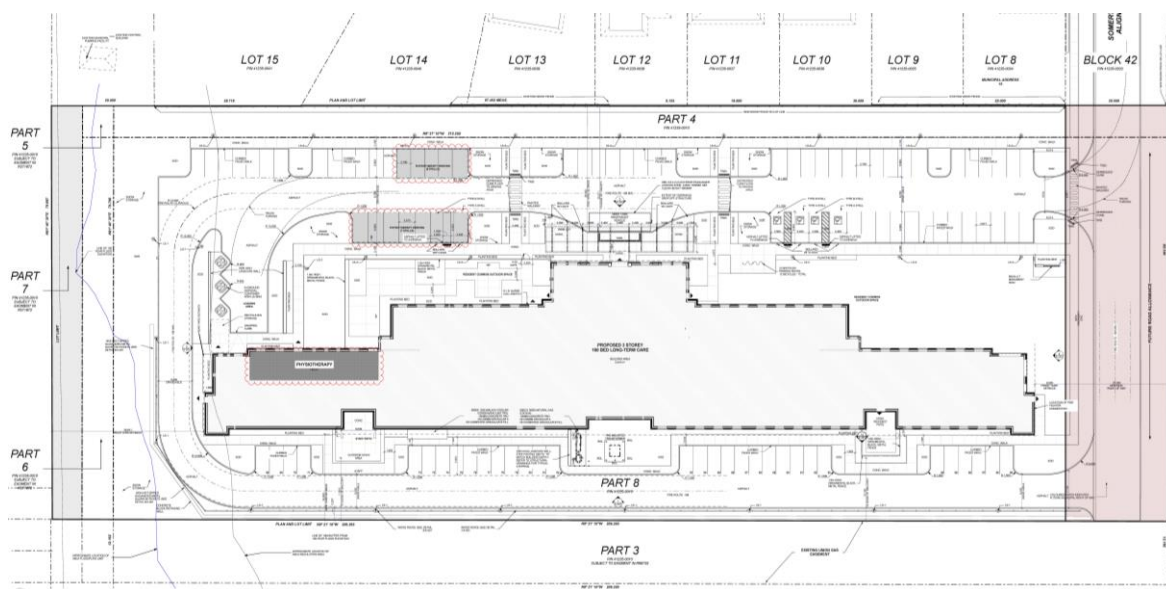
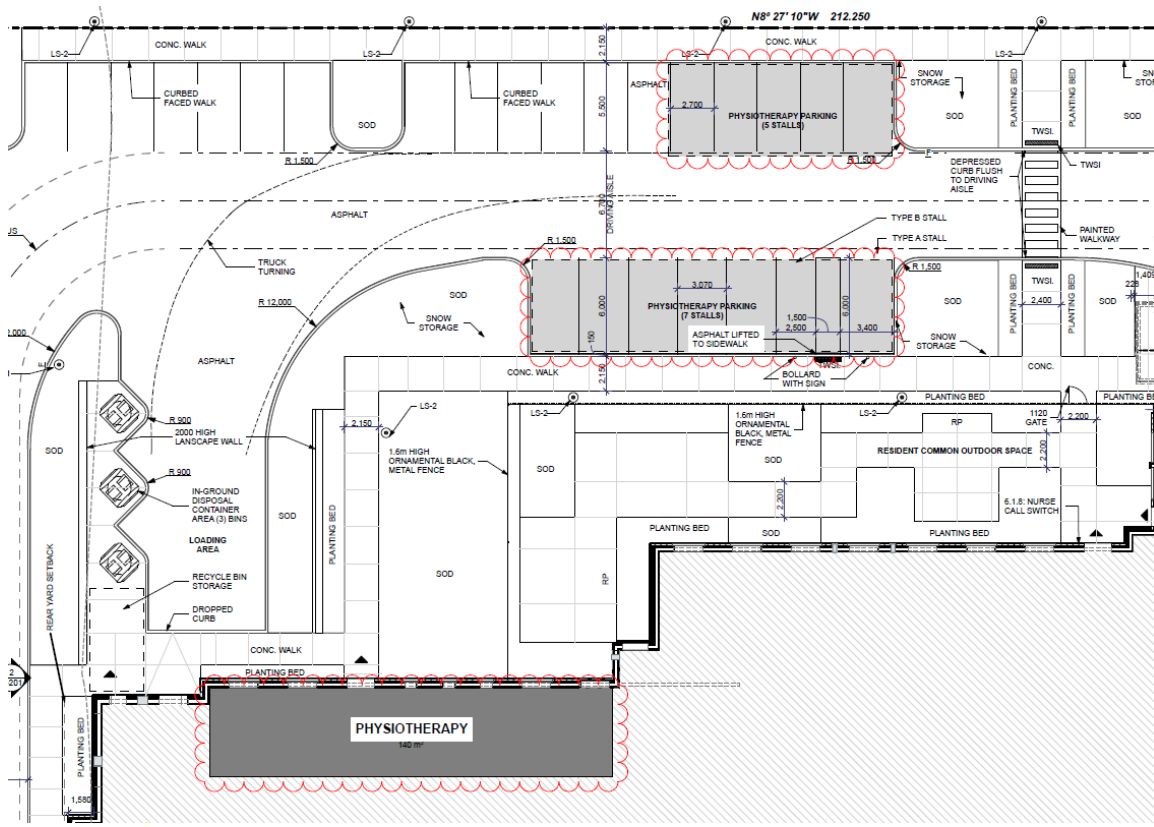


Figure 4 –Site Plan (excerpt, zoomed in)



In the original iteration of the LTC design and operations, a small, accessory physiotherapy space was identified to provide services for only LTC residents. Despite Southbridge's efforts, it has been challenging attracting physiotherapists to work part-time in that space. Therefore, to ensure care and services for residents, the physiotherapy space is to be open to the public (normal business hours), in addition to LTC home residents, allowing for a more stable and permanent situation for practitioners. As the space will no longer be considered accessory to the LTC, a Zoning By-Law Amendment is required. However, as noted in this report, it is anticipated that the primary use of physiotherapy services will be from LTC residents and not the general public. In essence, providing services to the public will fill up a full schedule for physiotherapy practitioners to work full-time roles.

A total of 12 surface parking spaces will be provided exclusively for the clinic, including 3 Type B and 3 Type A accessible spaces, located immediately adjacent to the clinic space (Figure 4).

As a minimum of two physiotherapists will be on-site at any given time, with up to five employees in total, 12 parking spaces will be provided to ensure adequate parking availability for both patients and staff. The subject lands currently provide 105 parking spaces, which, together with the spaces required for the LTC home, exceeds the minimum requirements of the Zoning By-law.

Due to the nature of the proposed use, it is not anticipated that there will be any additional impacts arising from the proposed use beyond those already occurring with the LTC home. Traffic generation is minimal and there is no additional noise generated from the use.

PROPOSED ZONING BY-LAW AMENDMENT

As only a Long-Term Care Facility is permitted in the current zoning, a Zoning By-law Amendment is required to add “Clinic” to the range of permitted uses in the “Residential 3 (R3-18)” zone. No other special regulations are proposed.

For reference, “Clinic” in the Municipality of South Huron Zoning By-law is defined as:

a building or part thereof, used exclusively by physicians, dentists, drugless practitioners, licensed medical practitioners, their staff and their patients for the purpose of consultation, diagnosis and office treatment. A clinic may also include administrative offices, waiting rooms, treatment rooms, laboratories, pharmacies and dispensaries directly associated with the clinic, but shall not include accommodation for in-patient care.

PLANNING ANALYSIS

2024 Provincial Planning Statement

The 2024 Provincial Planning Statement (PPS), issued under the authority of Section 3 of the *Planning Act* “provides policy direction on matters of provincial interest related to land use planning and development”. The proposed Zoning By-law Amendment application to permit a clinic is consistent with the PPS as follows:

- The proposed clinic supports the achievement of complete communities by accommodating an appropriate mix of complementary uses within the existing LTC home. The integration of a clinic within the LTC home enhances social and functional inclusivity by improving accessibility to healthcare services for both residents and the broader community and contributes to community well-being and universal accessibility (2.1.6 a,b,c).
- The proposed clinic promotes efficient land use patterns and optimizes existing infrastructure and public service facilities by locating new services within an already serviced and constructed building. This ensures the efficient use of land and municipal resources while supporting the Municipality’s objectives for sustainable growth within a designated settlement area (2.3.1.2 a,b).
- The proposed clinic contributes to general intensification within an existing serviced area, reinforcing compact and efficient growth. By making use of floor space within an existing building, the proposal supports the achievement of

complete communities and aligns with the PPS direction to prioritize investment within established urban areas (2.3.1.3).

- The proposed clinic assists the Municipality of South Huron in achieving its goals for complete communities by providing additional employment opportunities and supporting complimentary uses on the subject lands. The clinic component contributes to a more diverse and resilient local economy while supporting the long-term function of the LTC Facility as a focal point for community health and care services (2.4.1.2 a,b).
- The proposed clinic promotes economic development and competitiveness by integrating a compatible commercial/institutional use that generates employment and expands local access to specialized healthcare services. This aligns with the PPS direction to support a mix of employment and institutional uses in growing settlement areas (2.8.1.1 a).

County of Huron Official Plan

The subject lands are identified as being within a “*Primary Settlement Area*” as per the *Settlement Areas Map* in the County of Huron Official Plan. The intent of the “*Primary Settlement Area*” designation is to direct and accommodate growth within the County in a manner that supports community health, efficient development, and long-term sustainability.

The proposed physiotherapy “*Clinic*”, is consistent with the policies and objectives of the County of Huron Official Plan as follows:

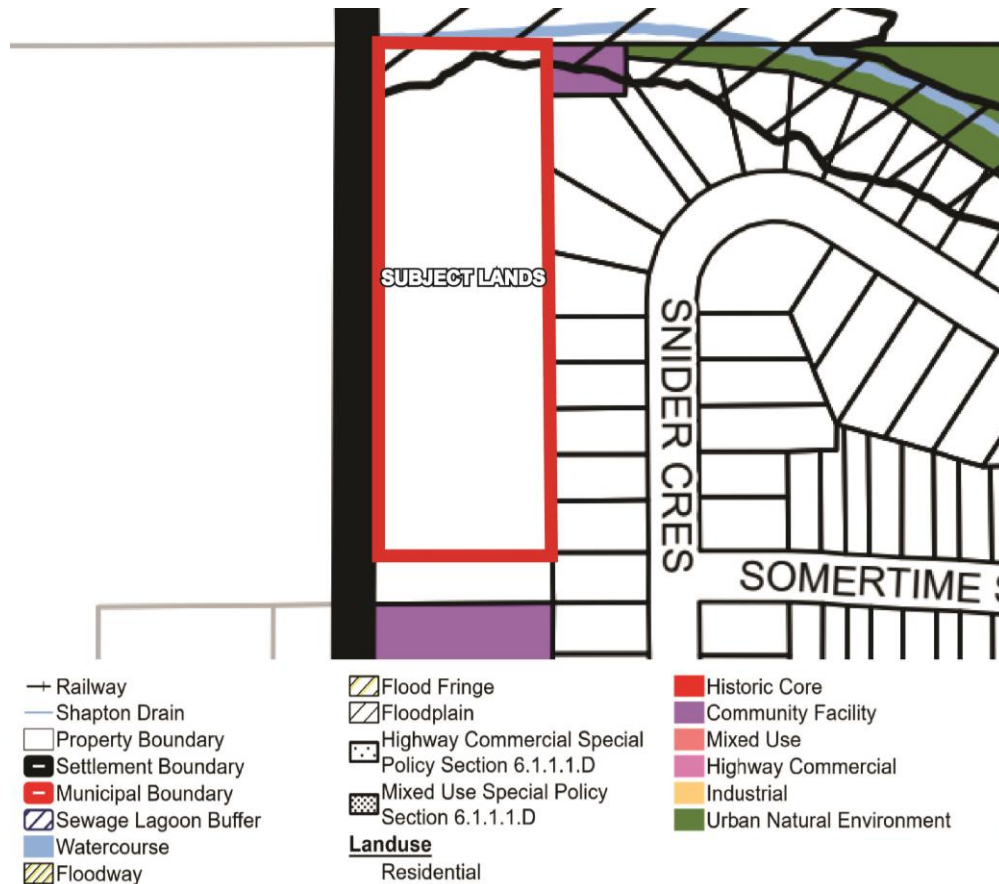
The proposed use supports growth and intensification within a Primary Settlement Area by introducing a complementary community service use within an existing institutional building. This aligns with Section 7.3.1.1, which directs growth through intensification, redevelopment, and expansion in appropriate locations within settlement boundaries. In keeping with Section 7.3.1.4(c), the proposed clinic is appropriately located within a Primary Settlement Area, where existing infrastructure, services, and employment opportunities are available to support the use.

The proposed use contributes to the delivery of high-quality community services, consistent with Section 3.2, which encourages the provision of facilities that enhance overall community health and well-being. The integration of physiotherapy and rehabilitation services within the LTC home provides coordinated, preventative care that benefits both residents and the wider public.

Municipality of South Huron Official Plan

The subject lands are designated “Residential” as per “Schedule ‘C’ – Land Use Plan Exeter Ward” in the Municipality of South Huron Official Plan (Figure 6).

Figure 6 – Municipality of South Huron Land Use Plan (Schedule C, excerpt)



“Residential” areas contemplate and permit a range of residential forms including low-density to high-density; special residential uses including long-term care homes; communal housing and mobile home parks; and, group homes. Importantly, a limited range of secondary uses, “*which form an integral part of the residential structure and play a supportive role*”, are contemplated in residential areas, subject to the following criteria (Section 6.1.1.2.20):

- “a) Secondary uses are located and designed so that the primary residential character, function and atmosphere is maintained;*
- b) Necessary site planning measures are taken to maximize compatibility with surrounding residential uses and mitigate nuisances arising from traffic flow, lighting, signage, and assemblages of people;*
- c) That the establishment of secondary uses is preceded by an amendment to the zoning by-law”*

The proposed clinic is consistent with the above criteria as follows:

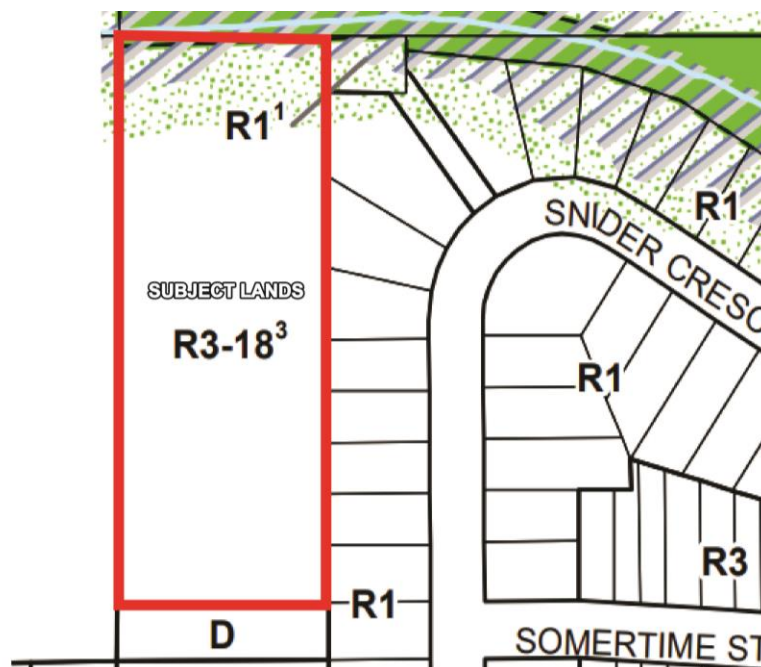
- The small-scale, complementary use is integrated into the LTC home, meaning the primary residential character, function, and atmosphere of the subject lands as a specialized residential use is maintained;
- As outlined in this report, there are no anticipated impacts on abutting or adjacent properties that will arise out of the clinic beyond those generated from the LTC home. For clarity, through the previous planning approvals it was determined that the LTC home is a compatible use with abutting single-detached dwellings, and the clinic would have no further compatibility issues beyond this given its small scale and low-intensity nature of use;
- The present Zoning By-Law Amendment application seeks to permit the use through the appropriate mechanism under the Planning Act; and,
- The subject lands are already subject to a Development Agreement under Section 41 of the Planning Act.

Given the analysis above, the proposed physiotherapy “Clinic” is an appropriate use to be added to range of uses permitted on the subject lands and is consistent with the policies of the South Huron Official Plan.

Municipality of South Huron Zoning By-law

The subject lands are zoned “*Residential 3 (R3-18) Zone*” under the Municipality of South Huron Zoning By-law No. 69-2018 (Figure 7).

Figure 7 – Municipality of South Huron Land Use Plan



The current “R3-18” zone was applied to the subject lands to permit a “Long-term Care Home” which is currently under construction and will be fully operational and occupied shortly. Several site-specific regulations are also present in this zone to reflect the unique lot configuration. No site-specific regulations were deemed required to address compatibility with abutting uses.

The proposal seeks simply to add a “Clinic” to the permitted uses in the “R3-18” zone. Specifically, the zone regulations are proposed to read as follows:

“32.7.18 R3-18 (as per By-law 31-2023)

Notwithstanding the provisions to the contrary, in the R3-18 zone the following special provisions apply:

- a) The only permitted main uses are a Long-term Care Home and Clinic.***
- b) The front property line is the southern property line of the property zoned R3-18.*
- c) The property shall abut a street or have an agreement with the Municipality for access.*
- d) Front yard (minimum): 6m*
- e) A minimum of 1.8m high solid fence is required along the east property line abutting the R1 zone.”*

The only amended section of the “R3-18” zone regulations is therefore subsection a) above, which is bolded for emphasis.

While the proposed use is planned to occupy only 140m², it is possible that this floor area may be changed over time to respond to the specific needs of residents of the LTC home and those from the public using the clinic, though it is highly unlikely that the clinic would occupy significantly more area than currently planned. To provide flexibility for the clinic over time, a specific floor area cap for the use is not proposed.

Given the Development Agreement that is current entered into permits the physical development off the lands, and that this agreement does not require amendment for the “Clinic”, no additional zoning regulations are required.

Considering the proposed use is a use contemplated in the “Residential” land use designation in the South Huron Official Plan, the proposed amendment to add a clinic to the subject lands, as denoted in the specific regulation above, is appropriate.

OTHER CONSIDERATIONS

Traffic

The proposed physiotherapy clinic will be open to both LTC home residents and the general public. The intent, however, is that the majority of patients that attend the clinic are LTC home residents. Given this intended patient split, it is unlikely that the clinic will create any meaningful increase in traffic beyond which will already be generated by the LTC home, and therefore no impacts are anticipated. Furthermore, the clinic does not

generate any specialized vehicle movements, such as loading spaces, deliveries, or truck reversing movements.

CONCLUSION

The proposed Zoning By-law Amendment seeks to permit a physiotherapy clinic within the existing LTC home. The proposed clinic will serve and support the residents of the LTC facility, while also providing services accessible to the broader community.

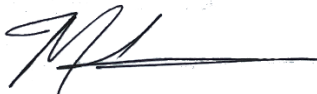
The proposed Zoning By-law Amendment represents an efficient use of land and infrastructure, utilizing existing municipal servicing without negatively impacting servicing capacity. The development will enhance community accessibility to specialized health services while maintaining compatibility with surrounding residential and institutional land uses.

Based on the above, and as detailed throughout this Planning Justification Letter, the proposed Zoning By-law Amendment is consistent with the intent and policies of the Provincial Planning Statement, County of Huron Official Plan, and the Municipality of South Huron Official Plan. As such, the proposed Zoning By-Law Amendment represents good land use planning, is compatible with the surrounding area, and is in the public interest.

We trust that the enclosed information is complete and satisfactory and we look forward to working with Municipal and County staff on this application. Please contact our office should you have any questions or require additional information.

Yours very truly,

ZELINKA PRIAMO LTD.



Matt Litwinchuk, BEDP, CPT
Planner

cc. Alex da Costa, Southbridge Healthcare, CVH (No.8) LP