

Technical Memorandum #8

Industrial Zones

Zoning By-law Review

Town of St. Marys

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1. Introduction

This Technical Memorandum forms part of the overall background review for the Town of St. Marys Zoning By-law Review.

The Town of St. Marys (“The Town”) adopted a new Official Plan on April 12, 2022, and it was approved by the Ministry of Municipal Affairs and Housing (MMAH) on October 9, 2024. The purpose of the Zoning By-law Review is to implement policy direction provided by the recently approved Official Plan. This Zoning By-law Review will introduce regulations that are concise, easy to understand, and provide clear direction on land use and built form while also providing flexible implementation where appropriate.

As part of this process, the Town of St. Marys is seeking to determine an appropriate approach to the use permissions and regulations for its Industrial Zones to ensure that it addresses the needs of the Town.

The purpose of this Technical Memorandum is to provide direction on updates to the Zoning By-law regarding Industrial uses, and zoning permissions and standards in the Industrial Zone categories.

This report will evaluate the existing Industrial Zones for conformity with the existing policy framework found in the proposed Town Official Plan, to identify gaps and challenges and determine how to address those gaps.

2. Overview

What are the Industrial Zone Categories?

The Town Zoning By-law identifies three (3) Industrial Zones. Two (2) of the three (3) Industrial Zones permit industrial, commercial and business-related uses, along with commercial and office accessory uses. The remaining zone permits extractive, recreational and existing agricultural uses, along with accessory uses, buildings and/or structures. These zones are intended to apply the industrial-related designations of the Official Plan.

The Town Zoning By-law describes these zones as follows:

Table 1 – Industrial Zone Categories

Zone Symbol	Description of Zone	Associated Official Plan Designation
Light Industrial (M1)	The Light Industrial Zone primarily permits industrial uses that have a low probability of producing air pollutants, noise, dust or odours, among others.	General Industrial

Zone Symbol	Description of Zone	Associated Official Plan Designation
General Industrial (M2)	The General Industrial Zone permits a wider range of industrial uses than is permitted in the Light Industrial Zone, including a greater variety of commercial and industrial uses, such as those associated with farming.	General Industrial
Extractive Industrial Zone (M3)	The Extractive Industrial Zone permits uses associated with the extraction and processing of mineral aggregate resources, such as pits, quarries, resource extraction operations and cement plants. Some passive recreational uses are also permitted, including golf courses and hiking trails.	Extractive Industrial

3. Analysis and Proposed Changes

The following are recommended changes based on legislative and policy requirements, a review of trends pertaining to Zoning By-law Amendment Applications and Minor Variance trends, and technical issues identified by Town Staff.

3.1 Planning Act and Provincial Planning Statement

Table 2 - Recommended Updates to Zoning By-law for Compliance with the Planning Act and Provincial Planning Statement

Section No.	Proposed Zoning By-law Change	Rationale
10.1 and 10.2	No change is proposed to these sections of the Zoning By-law to implement the new definition of area of employment under the <i>Planning Act</i> . Through a future Official Plan conformity exercise, the Town should consider whether lands should be designated to meet the definition of Area of Employment under the <i>Planning Act</i> and 2024 Provincial Planning Statement.	Bill 97 updated the <i>Planning Act</i> to include a strict definition of area of employment. The 2024 Provincial Planning Statement also included an updated definition of Employment Area. The Town Official Plan does not have areas of employment as per the definition under the <i>Planning Act</i> . The closest designation in the Town Official Plan is its General Industrial designation. However, as business and professional

Section No.	Proposed Zoning By-law Change	Rationale
		offices and commercial uses are permitted within the designation, the General Industrial designation is not considered to be an area of employment.

3.2 Official Plan – Permitted Uses

Table 3 – Recommended Updates to Zoning By-law for Conformity with Official Plan Permitted Uses

Section No.	Proposed Zoning By-law Change	Rationale
10.1	Add “Manufacturing and Assembly Industry”, “Transportation Terminal” “Business or Professional Office”, “Hotel”, “Conference or Banquet Facility”, “Service Trade”, “Production Studio”, “Data processing facility”, and “Place of Entertainment”, “Recreational Use, Commercial” as permitted uses in the M1 Zone.	Policy 3.4.2 of the Town Official Plan lists permitted uses within the General Industrial designation, including “manufacturing, assembling, fabricating, processing, service trades and construction, transportation terminals... business and professional offices...data processing and communication facility...film or recording studios... hotels... conference or convention centres... commercial recreational uses...”. These uses are permitted in the General Industrial Designation.
10.2	Modify Section 10.2.14 to not permit outdoor storage of goods or materials within the M1 Zone. Lands currently zoned M1 with existing outdoor storage would become legal non conforming uses.	Policy 3.4.3.2.1 of the Town Official Plan describes light industry and states that “This type of industry normally operates during daytime hours and has no outside storage of materials or products.” Outdoor storage would still be permitted in the M2 Zone.

Section No.	Proposed Zoning By-law Change	Rationale
10.1 and 11.1	Revise Sections 10.1 (z) and 11.1 (hh) to read: “accessory uses, buildings, and structures, including accessory office uses, restaurants, and retail store, but excluding any accessory residential uses.”	Policy 3.4.2 of the Town Official Plan states that “Ancillary uses such as restaurants, and small scale retail and commercial uses may be permitted provided they are directed related to the principal use”.
11.1	Add “Service Trade” as a permitted use in the M2 Zone.	Policy 3.4.2 permits a broad range of uses in the General Industrial designation. Certain uses such as hotels, commercial recreational facilities, production facilities, offices, etc. have not been added. Although these uses do not meet the definition of sensitive land uses under Provincial D-series Guidelines, these uses are more appropriate outside M2 zone due to potential land use conflicts. The General Industrial designation does not require that each property be zoned to include all permitted uses within the designation.
11.1	Remove “Salvage or wrecking yard” as a permitted use in the M2 Zone.	Policy 3.4.3 of the Town Official Plan states that “Automobile wrecking yards, salvage yards... are not permitted in the “General Industrial” designation.” It was determined that the use should not be included in any zone, but be considered on a site-specific basis. Section 7.8 of the Town Official Plan states that “Council shall review existing legislation pursuant to the Municipal Act, RSO 2001, governing such uses as automobile wrecking/salvage yards, solid waste disposal areas, gravel pits, and trailers

Section No.	Proposed Zoning By-law Change	Rationale
		and where necessary, amend existing by-laws or pass such new by-laws as may be required to ensure that such uses are properly regulated and controlled...”
12.1	Add “Office, Support” as a permitted use in the M3 Zone.	Policy 3.5.2 of the Town Official Plan permits activities normally associated with extraction such as “office facilities” within the Extractive Industrial designation.
12.1	Add “Park, Public” as a permitted use in the M3 Zone.	Policy 3.5.2 of the Town Official Plan permits “Parks, Open Space, Recreational, and Passive Agricultural activities” in the Extractive Industrial designation.

3.3 Official Plan – Lot and Building Requirements

No changes are required to the Zoning By-law to implement the Town Official Plan policies.

3.4 Zoning and Minor Variance Trends

There are no changes recommended based on a review of Zoning By-law amendments and minor variance decisions between 2020 and 2025.

3.5 Technical Issues

Table 4 – Recommended Updates to Zoning By-law based on Issues Raised by Staff

Section No.	Comment	Rationale
10.1	Modify “convenience business services establishment” to “ Convenience business services establishment ”.	“Convenience business services establishment” is a permitted use in the M1 zone, but “Convenience business service establishment” is the defined term.

Section No.	Comment	Rationale
10.1 and 11.1	Modify “an office support” to “Office, Support”.	“an office support” is a permitted use in the M1 and M2 zones, but “Office, Support” is the defined term.
12.3	Replace “a cement plant” and “a concrete plant or an asphalt plant” with “Batching Plant, Asphalt or Cement”	Aligns with revised definitions.

4.0 Conclusion and Recommendations

This Technical Memorandum reviewed the existing Industrial zones within the Town of St. Marys. It is recommended that the changes outlined in Section 3 be incorporated into the updated Zoning By-law to ensure consistency with the 2024 Provincial Planning Statement and conformity with the updated Town Official Plan, while also maintaining appropriate consideration of the local context, recent planning trends, and technical issues identified by Staff.

Appendix A - Correspondence of Industrial Zones with Official Plan Designations and Use Permissions

Table 5- Correspondence of Industrial Zones with Official Plan Designations and Use Permissions

Official Plan Designations	Official Plan Industrial-related Permitted Uses	Industrial Zones
General Industrial	- Manufacturing - Assembling - Fabricating - Processing - Warehousing - Distribution - Wholesaling - Repair activities - Service trades and construction - Transportation terminals - Business and professional offices - Data processing and communication establishments - Research and development facilities and incubators - Public storage facilities - Film or recording studios - Recycling centres - Service commercial uses - Hotels - Public halls - Conference and convention centres - Commercial recreational uses - Utilities - Ancillary uses such as restaurants and small-scale retail and commercial uses	M1, M2
Extractive Industrial	- Activities normally associated with extraction such as crushing, screening, washing, stockpiling, outdoor storage, transport, aggregate recycling and office facilities are permitted. - Associated facilities for the production or derived products such as asphalt and concrete or	M3

Official Plan Designations	Official Plan Industrial-related Permitted Uses	Industrial Zones
	the production of secondary related products - Parks, Open Space, Recreational, and Passive Agricultural activities.	