PLANNING JUSTIFICATION REPORT

REV. 2 [03-31-2026]

51-55 HAWKESVILLE ROAD & 9 CHRIS COURT, ST. JACOBS

up consulting

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1. INTRODUCTION

This Planning Justification Report ("Report") has been prepared as part of the resubmission ("Resubmission No. 2") of the development applications proposed to facilitate the residential development of the properties municipally known as 51-55 Hawkesville Road and 9 Chris Court, St. Jacobs, Township of Woolwich ("subject lands", "subject property", or "site").

As discussed in this Report, the applicant is proposing to redevelop the site to consist of a range of low-rise residential uses, containing a total of 112-141 units, of which 18 are single-detached units, 44-58 are street townhouse units, and 50-65 are medium density units.

On January 25, 2025, an Official Plan Amendment, Zoning By-Law Amendment and corresponding Draft Plan of Condominium applications, were submitted regarding the subject property. Following preliminary comments on the application received from the Township, the applicant has revised the overall development concept which is now predicated on a proposed Draft Plan of Subdivision along with updated Official Plan Amendments and Zoning By-Law Amendments proposed to facilitate the concept.

The purpose of the updated proposed Official Plan Amendment is to establish appropriate land use planning designations. Likewise, the purpose of the updated Zoning By-Law Amendment is to establish appropriate zoning and site-specific regulations to facilitate the anticipated development.

As noted, a Draft Plan of Condominium had previously been submitted showing the proposed unit breakdown and lotting for the site. In response to comments received to date, the applicant is now considering a revised development concept predicated on a Draft Plan of Subdivision, including a new municipal road, proposed lot boundaries, as well as multiple blocks which will be subject to future Site Plan approvals. While the applicant is advancing the Draft Plan of Subdivision as the preferred development framework, the previously submitted Draft Plan of Condominium application remains active. Should the Draft Plan of Subdivision not be approved, the applicant reserves the right to proceed with the Draft Plan of Condominium.

To permit the revised development proposal, an Official Plan Amendment is required to expand the Settlement Area boundary to be consistent with the Regional Official Plan which is largely a technical exercise. A concurrent Zoning By-Law Amendment is required to allow for the proposed use of the property for multiple dwellings and to establish site specific regulations to recognize zoning deficiencies within the development. This Report discusses the original proposal as well as updates to both the concept and required development approvals now proposed.

This Report was prepared by Up Consulting Ltd., who have been retained as the consulting land use planner and urban design consultant for the revised development proposal to provide independent land use planning analysis and opinion. This Report, including the opinions and recommendations set out herein, has been prepared by a member in good standing with the Ontario Professional Planners Institute and the Canadian Institute of Planners.

2. SITE DESCRIPTION

The Subject Lands are municipally addressed as 51-55 Hawkesville Road and 9 Chris Court, Township of Woolwich, and known legally as Woolwich Tract German Company Part Lot 37; and PLAN1346 Lot 9. The location of the Subject Lands are shown on Figure 1, outlined in red.

Figure 1: *Location of Subject Lands (Source: Region of Waterloo GIS Portal)*

It should be noted that the applicant has a conditional agreement to purchase the property municipally addressed as 9 Chris Court. Ownership between the 51-55 Hawkesville Road lands and 9 Chris Court will remain separate; however, 9 Chris Court is included as part of the subject lands for the purposes of the proposed development applications in order to facilitate the creation of a servicing easement across the property. As 9 Chris Court forms part of an existing registered plan of subdivision, the legal boundary of the parcel is not proposed to change through this application. The property will therefore retain its existing legal description as Lot 9 on Plan M-1346. A revised servicing strategy has been adopted as of January 27, 2026, which will extend the services from Chris Court to the broader consolidation.

The Subject Lands are located on the western edge of the St. Jacobs Settlement Area, on the south side of Hawkesville Road, west of Northside Drive, and east of a CN railway, and north of the Conestogo River.

The Subject Lands have an approximate area of 6.958 ha, with approximately 221.9 m of frontage onto Hawkesville Road and 24 m along Chris Court. The southern portion of the Subject Lands (~1.99 ha) includes an area comprised of several environmental features as identified by the Grand River Conservation Authority (GRCA), including a portion of the Conestogo River, the associated floodplain (associated with the Conestogo River), tributary (watercourse) to the River, slope valleys and erosions, and wetlands. These environmental features are planned to be protected via a 10 m buffer from the dripline. As a result, the remaining developable area within the site is approximately 4.78 ha.

The subject lands generally slope away from Hawkesville Road toward the Conestogo River. An approximately 8 to 13 m slope is located near the south side of the subject lands, roughly 200 m south of Hawkesville Road, and extends from roughly 50 m east of the railway line to the east property line adjacent to the Conestogo River.

51-55 Hawkesville Road has historically been used for agricultural purposes and is currently occupied by a multi-tenanted storage building, a shed, a barn, and a silo. These structures will be demolished to accommodate the revised development proposal. 9 Chris Court currently consists of a single-detached dwelling, which will be retained as part of the proposed development applications. Further, it should be noted that an existing 3 m wide servicing easement abuts the northern property line of the adjacent property known as 8 Chris Court. This existing easement would remain on 8 Chris Court.

Streetview images of the subject lands, existing buildings, and structures are shown on Figures 2 to 4 below.

Figure 2: *Existing Buildings and Accessories on 51-55 Hawkesville Road (Source: Google Maps)*

Figure 3: *Existing Agricultural Lands on 51-55 Hawkesville Road (Source: Google Maps)*

Figure 4: *Existing Single-detached Dwelling on 9 Chris Court (Source: Google Maps)*

3. CONTEXT ANALYSIS

This section provides an overview of the surrounding context, as well as the site's connection to existing roads and public transit.

a) Surrounding Area

The broader neighbourhood contains a mix of residential, commercial, retail, institutional, and industrial uses. Directly west of the site is the CN Rail corridor with agricultural lands further west. Generally, the railway aligns with the western edge of the St. Jacobs settlement boundary. The lands to the north consist of two (2) single detached dwellings and mostly agricultural lands beyond. These lands are also within the St. Jacobs Settlement Area boundary which can be anticipated for development in the near future.

Of note, the subject lands are located south of lands subject to active development applications on the lands municipally known as 52 Hawkesville Road, 110 and 118 Northside Drive, St. Jacobs, proposed by Schlegel Urban Development Corp. The owner has submitted an Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Subdivision application for the subject lands which proposes:

- 5 Low Density Blocks (Single Detached Dwellings) – 46-78 units
- 10 Low/Medium Density Blocks (Single Detached, Semi-Detached and/or Townhouses) – 101-236 units
- 2 Medium/High Density Blocks (Street Townhouses and/or Multi-Residential) – 40-95 units
- 2 Parks - 0.62 hectares total area
- Open Space Block (woodlot) – 13.79 hectares
- 1 Stormwater Management Facility – 1.54 hectares
- Residential Reserve – 0.12 hectares
- 2 Future Development Blocks - 0.10 hectares
- An internal public road system with one (1) access onto Hawkesville Road and one (1) access onto Northside Drive

These applications remain with the municipality for review and consideration of approval. Directly to the east of the subject lands is a neighbourhood consisting of single-detached dwellings. Further east and northeast of the subject lands are a range of uses, including residential, commercial, institutional, and light industrial uses, as described below.

Along Northside Drive are single-detached dwellings with some neighbourhood-scale commercial uses. A variety of commercial uses, including a multi-unit plaza, can be found toward the north portion of King Street North. Several light industrial uses are located north of Sawmill Road with a sports complex consisting of a sports arena, a baseball diamond, a tennis court south of Sawmill Road.

Directly south of the subject lands is the Conestogo River. Further south of the Subject Lands across Conestogo River is the St. Jacobs Downtown with surrounding neighbourhoods 800 m east of the site. The Downtown consists of a much denser development along King Street North providing a range of commercial and retail uses, with some institutional uses (i.e. churches). Adjacent to these uses along the periphery of the settlement boundary are primarily single-detached dwellings.

Several medium density residential developments are found within the broader neighbourhood, including a Townhouse complex at 29 Water Street, a retirement home at 10 Water Street, and an apartment for seniors. Additionally, institutional and light industrial uses are found within this area. A local public school is located on 72 Queensway Drive, while the Home Hardware distribution centre is located on 34 Henry Street further southwest of the Downtown.

b) Transit & Connectivity

The subject lands have limited public transit options, as there is one (1) Grand River Transit route (Number 21: Elmira) that passes through St. Jacobs, with an origin from Conestoga Station and a destination to Elmira. The closest bus stop is located at the intersection of King Street and Cedar Street, which is approximately 1 km east of the site.

The subject lands are well-connected to local roads and highways with good connections to other municipalities in the Waterloo Region. It is located approximately 8 km north of Conestoga Mall, Waterloo, which is within a 10-minute drive via Highway 85. It is also approximately 8 km south of Elmira (via Highway 85) and 4.5 km west of Conestogo.

The aerial imagery on Figure 5 shows existing buildings and key points of interest that are within proximity to the site.

Figure 5: *Context Map (Source: Region of Waterloo GIS Portal)*

Identifier	Description
A	Single-Detached Dwellings
B	Cavalry United Church
C	Cavalry United Church Cemetery
D	Single-Detached Neighbourhood
E	Chicken Hatchery (Frey's Hatchery)
F	Single-detached Neighbourhood along Northside Drive
G	Medical Supply & Manufacturing Stores
H	Multi-Unit Commercial Plaza
I	Art School (Arts Abound)

J	Spa and Salon (True Reflections Day Spa & Elite Hair Studio)
K	Steel Fabricator (W.K. Dahms Manufacturing Ltd.)
L	Light Industrial Uses (Manufacturing, Supplier, Wholesaler)
M	Health Facilities
N	Restaurant
O	Sports Complex
P	Confectionary Store (Picard Food Ltd.)
Q	Nursing Home (Heritage House)
R	Downtown St. Jacobs
S	St. Jacobs Place Retirement Home (10 Water St)
T	Townhouse Neighbourhood (29 Water St)
U	St. Jacobs Elementary School (72 Queensway Dr)
V	Sprucelawn Apartments for Seniors
W	Home Hardware Stores Ltd. Distribution Service
X	St. Jacobs Water and Wastewater Treatment Plant
Y	Conestogo River

4. OVERVIEW OF PROPOSED DEVELOPMENT

a) Original Proposal

As shown on Figure 6, the residential development of the lands was initially proposed as a Draft Plan of Condominium, which was included as part of the complete applications showing the contemplated development of the lands. The applicant proposed to develop the subject lands for residential purposes with the Draft Plan proposing a total of 151 residential units with the following unit breakdown:

- 17 single-detached units (Units 20 to 36),
- 55 townhouse units (Units 1 to 19, 37 to 72),
- 45 triple stacked townhouse units (Units 74 to 117),
- 34 double stacked townhouse units (Units 118 to 151)

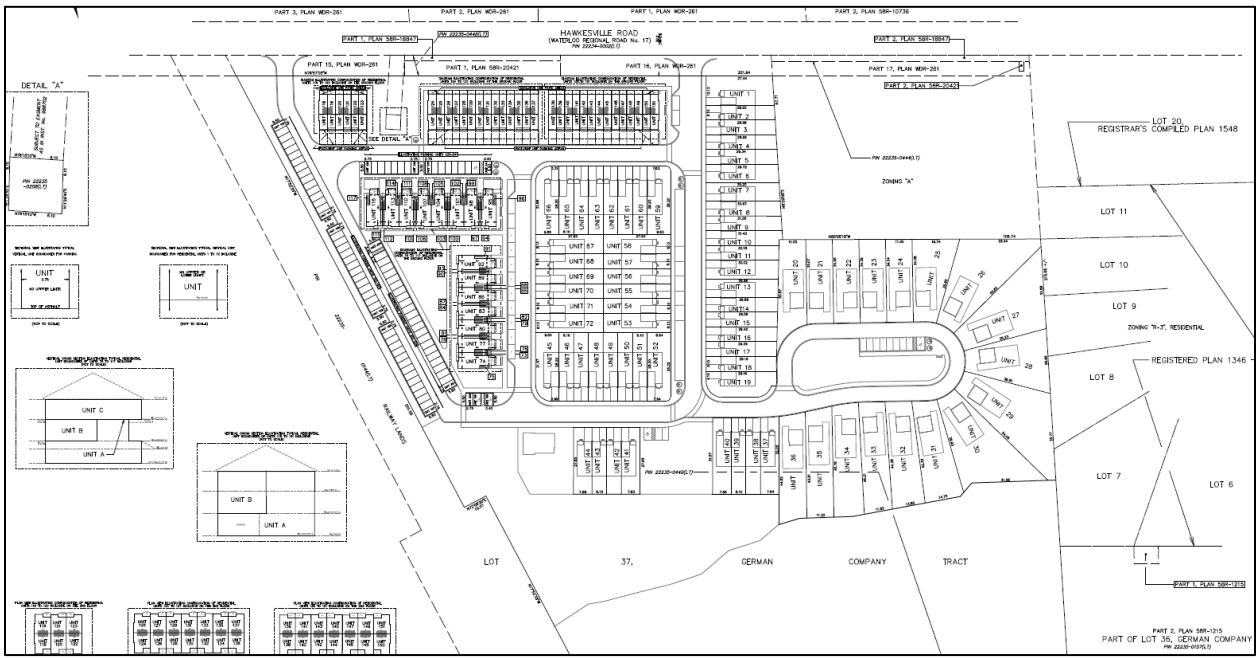

Figure 6: *Previously Proposed Draft Plan of Condominium (Source: JD Barnes Ltd.)*

The single-detached units were proposed to be positioned toward the eastern portion of the site, which are adjacent to existing single-detached dwellings east of the subject lands. The double stacked townhouses were oriented toward Hawkesville Road, with driveway aprons facing the interior portion of the site. The triple stacked townhouses were proposed to be positioned towards the western portion of the site, adjacent to the rail corridor, while non-stacked traditional townhouses were located towards the centre and southern portions of the site.

The proposed development contemplated a net residential density of approximately 32 units per hectare (uph) at a density of about 80 people and jobs per hectare (pph).

Notable buffers and setbacks are also planned within the proposed development to mitigate adverse impacts to the health and safety of future residents. First, a 15m setback from the western

lot line along the Waterloo Spur Line Rail Corridor/CN Rail lands is proposed which provides parking and a roadway. Second, a 10m buffer to the dripline is planned to protect the environmental features located within the southern portion of the site.

Other amenities within the site included a sewage pumping station to be installed within the southwest corner of the site's developable area, adjacent to the private SWM facility. An existing gas regulation station was also planned to be retained adjacent to the double stacked townhouses, oriented towards Hawkesville Road.

At the time of the initial application, the applicant proposed a pumping station as part of the servicing strategy for the lands in order to avoid more intensive changes to the existing servicing network in the area. This approach, while still viable, was determined to be not preferred by the municipality, with the Township opining that a preferred option would be to tie into existing services along Chris Court.

b) Public, Agency and Council Feedback on Original Development Concept

Following an initial review of the applications noted above and the applications being deemed complete for the purposes of the Planning Act, the applications were circulated to internal Township departments, commenting bodies (including the GRCA and CN Rail), and the public for initial review and comment. A statutory public meeting of Council was held by the Township in May 2025, where the applications were introduced to Township Council formally and where numerous local residents provided comments and concerns with regards to the proposal.

Several comments were raised through the public and agency review process to date, which included:

1. Concern with the proposed Condominium tenure and associated servicing strategy, specifically related to the reliance on privately owned pumping stations and the possibility that such pumping stations could fail and/or require future municipal ownership. Please note while the Condo Act has more stringent rules guiding the maintenance of features in the condominium, the Township has indicated concern for this approach, due in part to a concern that the municipality may have to assume the pumping station in the event of a failure;
2. Preference for an alternate servicing approach which would be mutually beneficial to the residential development proposed north of the subject lands as described above (Schlegel development);
3. Some concerns related to the overall density of the proposed development with several members of the public opining that the original development concept was too intensive;
4. Some concern related to the type of housing proposed, with a preference raised by the public for fewer stacked townhouses and more traditional low rise forms of housing (such as single detached, street-facing townhomes and semi-detached dwellings.
5. Concerns about how the condominium will integrate into the general neighbourhood.
6. Some concerns raised by the general public related to the impact of the development on overall servicing in St. Jacobs and the potential for the development to exacerbate matters related to sewage backups.

In addition to the above, the following table provides a chronology of events and key milestones for the project to date.

Date	Description
April 11, 2023	Subject lands were included within the Settlement Area boundary of St. Jacob's by ROPA 6 as part of the Province's decision on the Region's Official Plan.
June–July 2023	Applicant met with the Township and key agency staff for a formal Pre-Submission Consultation Meeting to discuss the development of the subject lands and to obtain a list of 'complete' application materials required for future planning applications.
October 2023	Subject lands were removed from the urban boundary following the Province's reversal of ROPA 6.
October–November 2023	The Province requested that individual municipalities confirm whether they wished to modify the Province's decision regarding ROPA
December 2023	The Township of Woolwich (and other municipalities) advised the Province that they wished to maintain ROPA 6 with only minor modifications, reaffirming support for the inclusion of the subject lands within the St. Jacobs urban area.
October 2023 – December 2024	Various multi-party discussions relating to a servicing strategy for the St. Jacobs area, involving Township staff, consultants, Schlegel, and Polocorp. These discussions included discussion related to servicing options including gravity-based solutions, pumping station options, and the alignment of servicing across multiple landowners.
February 2024	On behalf of the applicant Ms. Angela Kroetsch of GEI Engineering provided four potential servicing strategies to the Township, with pros/cons and cost estimates. This report included the gravity-feed servicing strategy through Chris Court.
May 2024	Following discussions between Township staff and GEI engineering, a revised servicing strategy materials were submitted.
May 2024	ROPA 6 was formally approved, which reinstated the subject lands into the urban boundary.
May 2024	At a Township stakeholder meeting, a draft schedule / map was presented indicating "Developer-Led Sanitary Pumping Station" as the preferred servicing mechanism at the time.

July 2024	The Township Woolwich Development Charges By-law was passed, including background study assumptions for a developer-initiated pumping station and Hawkesville Road improvements.
December 2024	Servicing strategy discussions continued as the Township sought consensus between affected developers (Polocorp & Schlegel) and their respective consultants (GEI Engineering and WalterFedy)
January 2025	Applicant submitted complete applications for a proposed Official Plan Amendment, Zoning By-Law Amendment and Draft Plan of Condominium for the subject lands (as previously described).
March 2025	Notice of complete applications for the proposed Official Plan Amendment and Zoning By-Law Amendment issued by the Township.
May 2025	A Public Information Meeting (PIM) was held with regards to the proposed development applications.
June 2025	A joint meeting between Schlegel, the Township, and Polocorp took place to evaluate alternate servicing options and potential cost-sharing responsibilities.
August 2025	The Township issued a formal letter to Schlegel and Polocorp outlining the preferred servicing strategy, giving clearer direction on the gravity-feed approach via Chris Court.
November 2025	Polocorp pursued and acquired the option of 9 Chris Court.
December 2025	A meeting by the Township was arranged where the Township reiterated their position that the option to service the lands through gravity feed via Chris Court was the preferred option. Both Schlegel and Polocorp presented their revised development concepts, where a revised Official Plan and Zoning By-Law Amendment application was submitted by the applicant.
January 2026	A Council meeting regarding the Hawkesville Road Servicing Strategy occurred, where the option to service the lands through gravity feed via Chris Court was adopted. The corresponding Council resolution from the January 27, 2026, minutes are noted as follows: *That the Council of the Township of Woolwich, considering Report DS01-2026 respecting Hawkesville Road Servicing Strategy:* *1. Approve in principle the Chris Court servicing solution with a reduced easement through 9 Chris Court for the Polocorp lands (51 and 55 Hawkesville Road) and allow the Schlegel lands (52*

	Hawkesville Road) to determine a servicing strategy that works for their lands and provides a suitable servicing option for 56 and 60 for the Hawkesville Road development area; and *2. Direct Polocorp to ensure a house remains at 9 Chris Court*

c) Revised Development Proposal

As a result of preliminary comments received and ongoing discussions with Township staff on the initial development applications, the applicant and their consulting team have contemplated several changes to the originally proposed development, which have included:

- Redesigning the site as a Draft Plan of Subdivision and converting the previously proposed drive aisles to municipal streets;
- The option to acquire the property known as 9 Chris Court to tie into existing municipal infrastructure and avoid the reliance on a pumping station;
- A servicing easement of 9 metres (size subject to change) is proposed along the shared property line between 8 and 9 Chris Court, correspondingly between proposed Lots 9 and 10 on the Draft Plan, thereby eliminating the need for a separate dedicated servicing block;
- The southern limit of Block 21 has been shifted north by 3.0 metres to provide additional space for the SWM facility, reduce retaining walls, increase storage capacity, lower the road corner invert elevation, and improve the relative elevation of the sanitary connection at 9 Chris Court. A reduction in the overall unit count / density of the proposed development;
- The inclusion of a 0.3 metre reserve within the road right-of-way along the western boundary of 47 Hawkesville Road, as requested by Township staff, to ensure that appropriate cost-sharing arrangements are secured should the adjacent lands be developed in the future;
- A reduction in the potential number of stacked townhouses; and
- The alignment with the Schlegel development on at least one opening, per the iteration described on December 4, 2025.

i. Residential Lots / Blocks

As shown on Figure 7, the applicant is proposing the development of the lands through a Draft Plan of Subdivision. The applicant is proposing to develop the subject lands for a total of 112-141 residential units with the following unit type breakdown:

- 17 single-detached units (Lots 1-17)
- 44-58 street townhouse units (Blocks 18-21)
- 50-65 medium density units (Block 22)
- 1 existing single-detached unit on 9 Chris Court (Lot 23)

Lots 1-17 consist of the single-detached units, which are positioned towards the eastern portion of the site, which are adjacent to existing single-detached dwellings located on Chris Court. The intent of providing the single-detached units adjacent to the existing development along Chris Court is to provide an appropriate transition or buffer between the existing and proposed low-rise

residential uses and the proposed townhouses and medium density uses. These lots will front proposed Street 'A' and 'B'.

Blocks 18-21 consist of the street townhouse units, which are located central to the subject lands. These blocks will have frontage along the proposed Streets 'A' and 'B'.

Block 22 consists of the medium density units, which is positioned towards the north and western portion of the site, adjacent to the rail corridor. This block will have frontage along the proposed Street 'A', as well as Hawkesville Road. An existing gas regulation station is also planned to be retained within this block. As previously noted, the intent is to ensure that the medium density block is located appropriately away from the existing and proposed low-rise residential uses, as it transitions from medium density to street townhouses to single-detached units as you move west to east.

Lot 23 consist of one (1) existing single-detached dwelling to remain on 9 Chris Court. As previously mentioned, this portion of the subject lands will facilitate the Council adopted servicing strategy.

The revised development proposal contemplates a net residential density of approximately 24.4 – 30.7 units per hectare (uph), as well as a net 41.4 - 51.5 people and jobs per hectare (pph). Please refer to Section 11 of this Report for a detailed breakdown and density calculations.

An integrated private road network connecting the residential units is proposed within the development. Access to the development is proposed through two (2) entrances along Hawkesville Road, Street 'A' and 'B'. Street 'A' will end as cul-de-sac for the single-detached lots.

ii. Common Element Amenity Spaces

Additionally, the revised development proposal contemplates the following common element amenity spaces:

- Block 24: A private SWM facility, with an approximate area of 0.53 ha. to the west.
- Block 25: A passive amenity area contemplated to be located towards the south of the site adjacent to the Conestogo River, which has an approximate area of 2.371 ha.

iii. 0.3 M Reserve

Per the direction of Township Staff, the Draft Plan of Subdivision includes Block 26, which is proposed as a 0.3 metre reserve located within the road right-of-way along the western boundary of 47 Hawkesville Road. The purpose of this reserve is to control access and servicing connections from the adjacent lands to the east and to ensure that appropriate cost-sharing arrangements are secured should future development occur on the 47 Hawkesville Road property.

iv. Buffers and Setbacks

Notable buffers and setbacks are also planned within the revised development proposal to mitigate adverse impacts to the health and safety of future residents. First, a 15 metre setback from the western lot line along the Waterloo Spur Line Rail Corridor/CN Rail lands is proposed which provides parking and a roadway. Second, a 10 metre buffer to the dripline is planned to protect the environmental features located within the southern portion of the site.

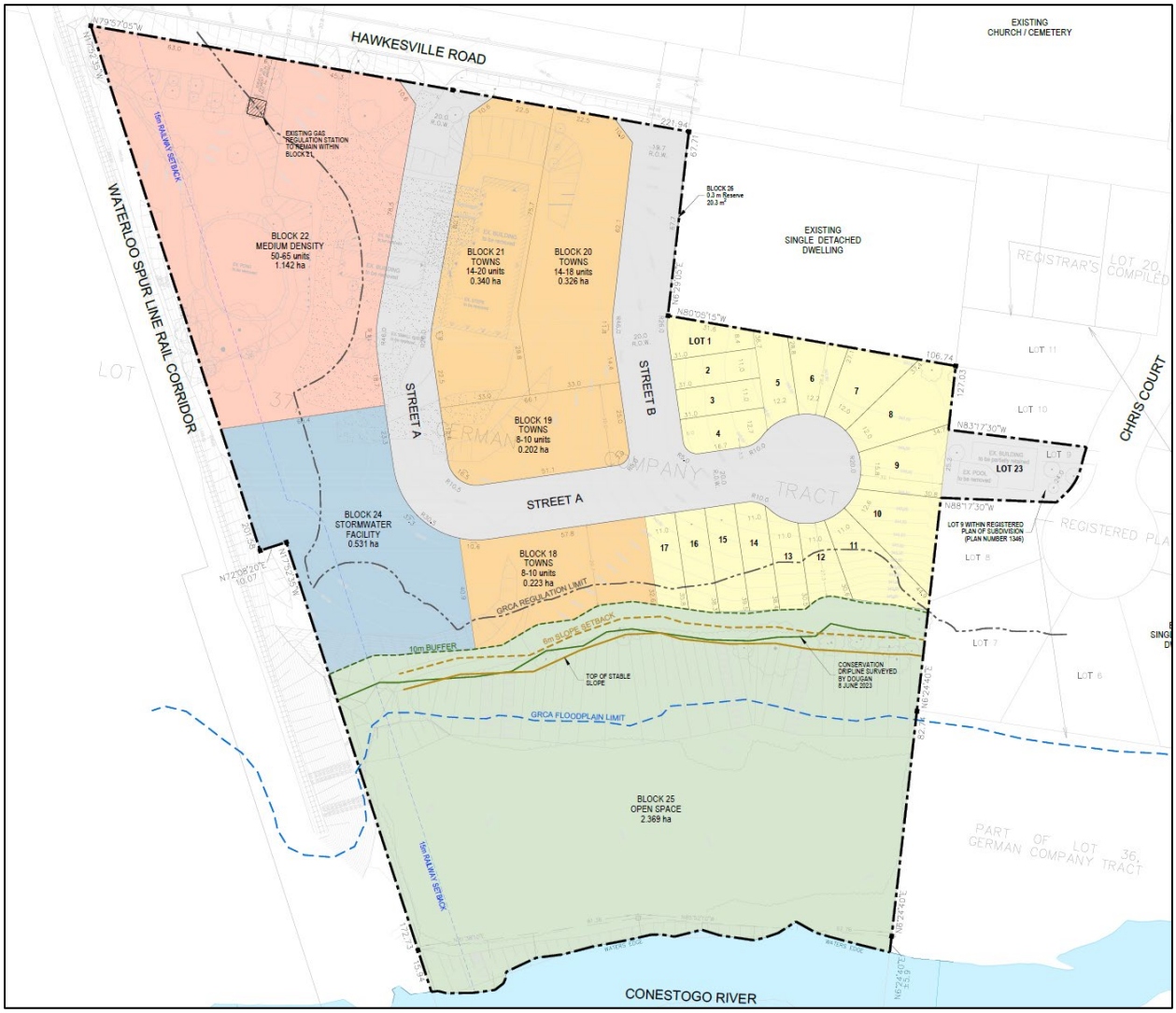

Figure 7: *Revised Draft Plan of Subdivision (Source: Polocorp)*

d) Phasing / Staging of Development

At the current time, it is anticipated that the single detached lots (Lots 1-17) and street townhouse units (Blocks 18-21) will proceed as the initial phase of the residential development of the lands, followed by the development of Block 22 which is the medium density block. It is anticipated that development of the initial phase will begin in 2027, with the medium density block being advanced following and no earlier than 2029.

This proposed staging approach aligns with the St. Jacob's Population and Staging Projections outlined in Staff Report DS10-2025 and included in Appendix A which identifies existing / planned capacity to accommodate 267 residents on the subject land by 2029, with further capacity available in subsequent years.

As detailed in Section 11 of this Report and as shown in the following Table, the single detached (identified as 'Phase 1 a') and street townhouse (identified as 'Phase 1 b') portions of the

development will result in a population of between 165 to 200 residents, whereas the population and staging projections of the municipality contemplate up to 267 residents by the end of 2029 on the Subject Lands. The Phase 2 portion of the overall development, being the development of the medium density block, will result in a population of between 122 and 158 additional residents following 2029.

Phase	Lots / Blocks	No. Units	Anticipated Population / Required Allocation	Timing	Assigned/ Available Allocation
Phase 1 a)	Lots 1-17 (Single Detached)	18	58.5	2027-2029	**212 (Ex. + 2027) – 267 (2029)**
Phase 1 b)	Blocks 18-21 (Street Townhouses)	44-58	107.3-141.5	2027-2029	
Total Phase 1		**62-76**	**165.8 - 200**	**2027-2029**	
Phase 2	Block 22 (Medium Density)	50-65	122.0-158.6	Post 2029	**212 (Ex. + 2027) - 357 (2033)**
Total Phase 2		**50 – 65**	**122.0 – 158.6**	**Post 2029**	

It is our opinion that the proposed staging approach for the proposed development is aligned with the municipality's population and staging projections for the subject land. Notwithstanding the above, depending on market conditions, the applicant may alter their approach to the phasing of development for the overall project, provided the density of the advanced phases is aligned with the Township's staging direction.

5. REQUESTED LAND USE PLANNING APPROVALS

In order to permit the revised development proposal, revised site-specific amendments to the Township of Woolwich Official Plan Amendment and corresponding Zoning By-Law Amendment application are proposed. A Draft Plan of Subdivision application have also now been proposed in order to facilitate the revised development concept. Details of the now proposed planning applications are provided as follows:

Township of Woolwich Official Plan Amendment:

1. To incorporate the entirety of the subject lands to be within the Settlement Area Boundary in Schedule A – Township of Woolwich Urban Settlement Plan St Jacobs Land Use to be consistent with the Regional Official Plan (ROPA 6).
2. To redesignate the "Northern Portion" of the subject lands, as shown on Figure 8 below, to 'Residential and Ancillary' in Schedule A – Township of Woolwich Urban Settlement Plan: St Jacobs Land Use.

Township of Woolwich Zoning By-Law Amendment:

1. To rezone the portion of the subject lands containing natural heritage features (Block 25) and the stormwater management facility (Block 24) from A (Agriculture) to O-2 (Open Space Two).
2. To rezone Blocks 1-17 to the R-5 Zone.
3. To rezone Blocks 18-22 to the R-7 Zone.

Township of Woolwich Draft Plan of Subdivision (Standard):

The applicant intends to advance a Standard Draft Plan of Subdivision for the subject lands, which proposes 26 lots/blocks where:

a) 17 single-detached units are located on Lots 1-17, 44-58 street townhouse units located on Blocks 18-21, 50-65 medium density units located on Block 22.
b) A private SWM facility is located on Block 24, and the passive amenity area/natural heritage features on Block 25.
c) A 0.3 m reserve is located on Block 26 within the road right-of-way along the western boundary of 47 Hawkesville Road to ensure that appropriate cost-sharing arrangements are secured should the adjacent lands be developed in the future.

Notwithstanding the revised development concept now proposed, the applicant is not currently withdrawing the originally proposed Draft Plan of Condominium. It is anticipated that this application will be withdrawn following the ultimate consideration of the revised applications by Township Council.

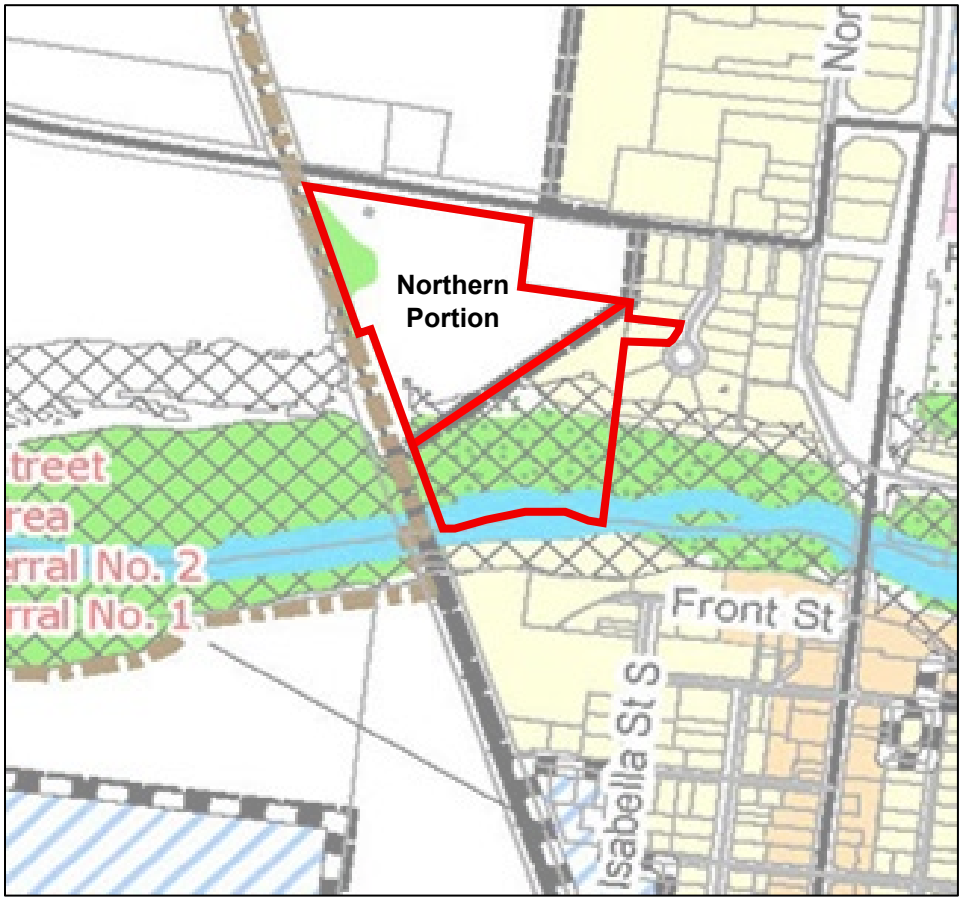

Figure 8: *Land Use Map of Subject Lands (Source: Township of Woolwich Official Plan)*

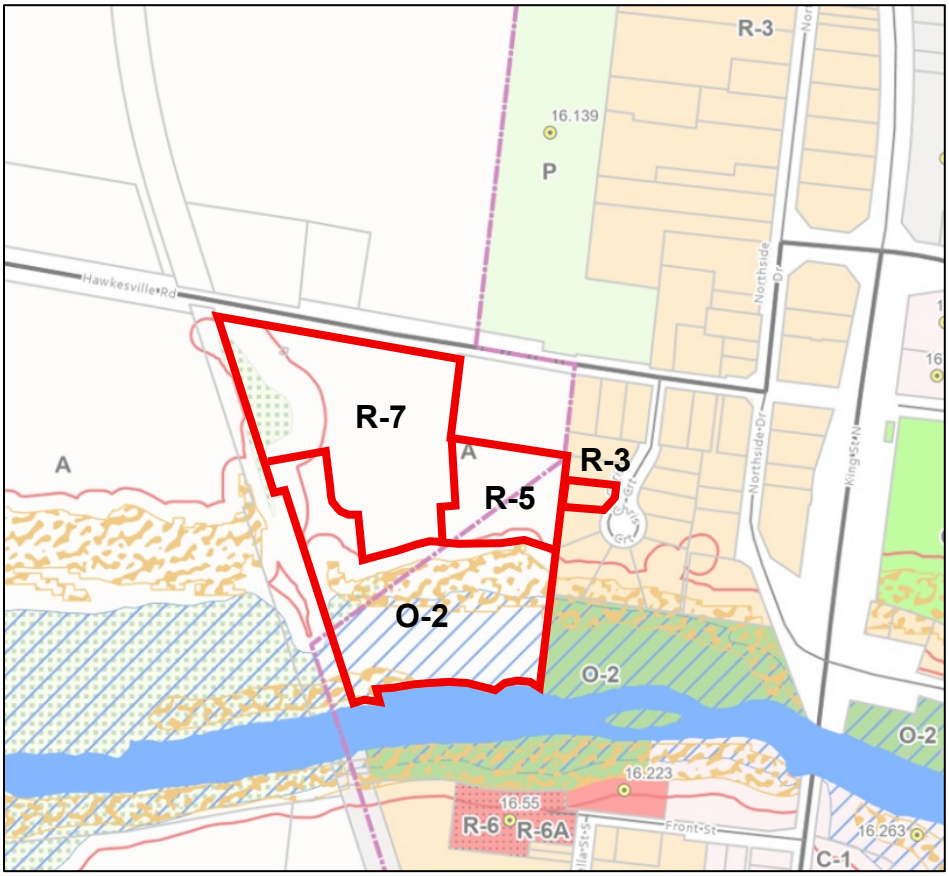

Figure 9: *Proposed Zone Change of Subject Lands (Source: Township of Woolwich Zoning By-Law)*

6. LAND USE PLANNING FRAMEWORK

Land use planning and decision-making related to the same is guided by a range of legislation, policies, and plans set out at the Provincial, Regional, Municipal/City and neighbourhood levels. The following subsections of this Report discuss the land use planning policy framework applicable to the subject lands and how they have been considered in the proposed development applications.

a) Planning Act

The *Planning Act, R.S.O. 1990* establishes the legal framework for land use planning in Ontario, and includes legislative direction with regards to Official Plans, Zoning By-Laws and Site Plan Approvals among other planning tools. The Planning Act also provides the Minister of Municipal Affairs and Housing with policy making authority to issue policy statements and plans to guide land use planning and development in the province, which is the basis for the Provincial Planning Statement, 2024.

The following subsection of this Report provides an overview of the Planning Act as it applies to the revised development proposal and commentary relating to how the revised development adheres to the direction set out therein.

i. Matters of Provincial Interest

Section 2 of the Planning Act sets out various 'Matters of Provincial Interest'. In carrying out their responsibilities under the Planning Act, decision-makers must have regard to these Matters of Provincial Interest.

The table below outlines the Matters of Provincial Interest set out in Section 2 of the Planning Act and commentary regarding how each matter has been considered, where applicable.

Provincial Interest	Demonstration of Regard
a) The protection of ecological systems, including natural areas, features, and functions;	The revised development proposal demonstrates regard for the protection of ecological systems by conserving the environmental features located within the southern portion of the site. A 10 m buffer to the dripline is proposed along the south to minimize disruption to the surrounding natural heritage features. It is noted that there are wetland and watercourse features located at the northwest corner of the site to be confirmed by the EIS.
b) The protection of agricultural resources of the Province;	While the subject lands are currently partially in agricultural use, the lands themselves have been contemplated for urban development as a result of

	Regional planning approvals which now include the lands within the urban area. As the subject lands are within the urban area and contemplated for such uses, regard for this matter is maintained.
c) The conservation / management of natural resources and the mineral resource base;	Not Applicable. The subject lands do not contain natural resources or a mineral resource base.
d) The conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	An Archaeological Assessment was prepared by AMICK Consultants Inc. and was accepted by the Ministry, as part of the complete application to identify and conserve any features.
e) The supply, efficient use, and conservation of energy and water;	The revised development proposal considers preliminary sustainable elements, as detailed in Section 12 of this Report.
f) The adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The revised development proposal is designed to integrate with existing municipal infrastructure, supporting efficient service provision, which are detailed in the Functional Servicing and Stormwater Management Report prepared by GEI Consultants Canada Inc.
g) The minimization of waste;	The revised development proposal incorporates several sustainable elements, as detailed in Section 12 of this Report.
h) The orderly development of safe and healthy communities;	The revised development proposal will align with CPTED principles. It also supports healthy living by providing trails and common amenities, including a private swim facility.
i) The accessibility for persons with disabilities to all facilities, services, and matters to which this Act applies;	The revised development proposal will meet or exceed the standards in the AODA and the Ontario Building Code.

j) The adequate provision and distribution of educational, health, and recreation;	The revised development proposal has regard for the adequate provision and distribution of recreational facilities by proposing common amenity spaces, including a trail network.
k) The adequate provision of a full range of housing, including affordable housing;	The development includes a range of low and medium density residential development, including single-detached, townhouses, and medium density units.
l) The adequate provision of employment opportunities;	Not Applicable.
m) The protection of the financial and economic well-being of the Province and its municipalities;	A Fiscal Impact Assessment has been prepared by urbanMetrics which was included as part of the initial complete applications. The development will be subject to municipal fees including development charges, planning/building/engineering fees and parkland contributions.
n) The co-ordination of planning activities of public bodies;	The Township will circulate the application for comments from relevant public bodies to obtain feedback on the application(s).
o) The resolution of planning conflicts involving public and private interests;	The applicant is committed to working with relevant agencies to resolve comments / concerns received through the consultation process.
p) The protection of public health and safety;	The revised development proposal is not anticipated to have adverse negative impacts to public health and safety. The development intends to be fully AODA compliant with amenity areas facilitating outdoor activities and supporting public health.
q) The appropriate location of growth and development;	A significant portion of the subject lands is located within the Township Designated Greenfield Areas, which are areas designated to meet planned density targets by the Regional and Township Official Plans. The Official Plan amendment is being advanced to align the Township's Official Plan with the settlement area boundaries set out in the ROP.
r) The promotion of development that is designed to be sustainable, to support	The revised development proposal contemplates sustainable elements, which are detailed in Section 12 of this Report.

public transit and to be oriented to pedestrians;	The development is designed with a pedestrian-friendly focus, featuring a connected road network, common amenity areas, and dedicated recreational spaces. It also supports transit supportive densities, creating opportunities for the expansion of public transit services within the Township.
s) The promotion of built form that, i) is well-designed, ii) encourages a sense of place, and iii) provides for public spaces that are of high quality, safe, accessible, attractive, and vibrant.	The revised development proposal responds to the Township's Landscape and Design Guidelines, as detailed in Section 9 of this Report.

Based on the foregoing, it is our opinion that the revised development proposal has regard for the matters of Provincial interest as set out in the *Planning Act*.

b) Provincial Planning Statement (2024)

The Provincial Planning Statement (PPS), 2024 is issued under Section 3 of the Planning Act and came into effect on October 20, 2024, replacing the *Provincial Policy Statement (2020)* and *the A Place to Grow: Growth Plan for the Greater Golden Horseshoe*. Approval authorities, including Council of the Township of Woolwich, in carrying out their responsibilities under the Planning Act, are to ensure that their decisions "are consistent with" the PPS.

The PPS builds upon the policy direction expressed in the Planning Act ("Matters of Provincial Interest") related to land use planning, which supports the Provincial goal of enhancing the quality of life for all citizens of Ontario. The focus of the PPS is on supporting a strong and competitive economy by increasing the supply and variety of housing options, by prioritizing compact and transit-supportive design, by optimizing investments in infrastructure and public service facilities, by recognizing the unique role of Indigenous communities, and by directing growth and development within existing urban and rural settlements to protect natural resources for the long-term, including natural areas, water, aggregates and agricultural lands.

The PPS is to be read in its entirety, and applicable policies are to be applied to specific situations/applications. The following table provides a summary of relevant policies of the PPS and describes how the revised development proposal is consistent with this policy direction.

Section	Policy	Discussion of Consistency
Planning for People and Homes		
2.1.4	Providing an appropriate range and mix of housing options and densities by:	The revised development proposal will contribute to a range and mix of

	a) Maintaining at all times the ability to accommodate residential growth for a minimum of 15 years through lands which are designated and available for residential development; and b) Maintaining at all times where new development is to occur, land with servicing capacity sufficient to provide at least a three-year supply of residential units available through lands suitably zoned, including units in draft approved or registered plans.	housing options which supports residential growth. a) The revised development proposal consists of a total of 112-141 residential units, including single-detached, townhouses, and medium density units. The subject lands are located within the Township Designated Greenfield Areas, which are designated for intensification. b) The development will connect with existing municipal services and infrastructure via Chris Court, which are detailed within the Functional Servicing and Stormwater Management Report prepared by GEI Consultants Canada Inc.
1.1.3.1	Achieving complete communities by: a) 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; b) improving accessibility for people of all ages and abilities by addressing land use barriers which restrict their full participation in society; and c) improving social equity and overall quality of life for people of all ages, abilities, and incomes, including equity-deserving groups.	a) The revised development proposal includes a range of housing types within a broader neighbourhood containing a mix of uses. It integrates a recreational facility and common amenity spaces, which support the creation of complete communities. b) The revised development proposal will be designed to meet or exceed the requirements set out in AODA. c) The mix of housing types ensures affordability and diversity, benefiting a broad range of income levels. The inclusion of common amenity area enhances the community's quality of life, promoting social well-being.

Housing		
2.2.1	Providing for an appropriate range and mix of housing options and densities required to meet projected needs of current and future residents of the regional market area	The development contemplates a mix of housing types, including single-detached, townhouses, and medium density units. The development addresses the diverse housing needs of the region's current and future residents by providing a range of housing typologies and levels of affordability.
Settlement Areas		
2.3.1.1	Settlement areas shall be the focus of growth and development. Within settlement areas, growth should be focused in, where applicable, strategic growth areas, including major transit station areas.	The subject lands are located within the St. Jacobs Settlement Area boundary, and identified within the Designated Greenfield Areas, where growth and intensification are allocated within the Region's OP. This proposed Township Official Plan Amendment intends to bring the property into conformity with ROPA 6.
2.3.1.2	Land use patterns within settlement areas should be based on densities and a mix of land uses which: a) efficiently use land and resources; b) optimize existing and planned infrastructure and public service facilities; c) support active transportation; d) are transit-supportive, as appropriate; and e) are freight-supportive	The revised development proposal demonstrates consistency with this policy as follows: a) The development promotes efficient use of land that is located adjacent to urbanized land containing a mix of uses. b) It is located within a well-serviced area, and is planned to connect to existing municipal infrastructure. c) Pedestrian connections will be determined through the Site Plan Application stage. This network would connect

		residential dwellings to common amenities. d) The development supports transit supportive densities for future transit expansions. Its location is adjacent to a main arterial road, which enhances accessibility to the existing bus route in St. Jacobs. e) Not Applicable.
2.3.1.3	Planning authorities shall support general intensification and redevelopment to support the achievement of complete communities, including by planning for a range and mix of housing options and prioritizing planning and investment in the necessary infrastructure and public service facilities.	The development supports intensification in a designated growth area and supports the achievement of complete communities by providing a range of housing options and common amenities, such as a trail network, and SWM facility.
2.3.1.5	Planning authorities are encouraged to establish density targets for designated growth areas, based on local conditions. Large and fast-growing municipalities are encouraged to plan for a target of 50 residents and jobs per gross hectare in designated growth areas.	The planned development identifies a gross People and Jobs Density of approximately 62.7 - 78.1 persons and jobs per hectare, which exceeds the encouraged target of 50 residents and jobs her gross hectare for large and fast-growing municipalities. This level of density is achieved through a planned mix of unit typologies.
Land Use Compatibility		
3.5.1	Major facilities and sensitive land uses shall be planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic	The revised development proposal is primarily residential, and no major facilities are planned on the subject lands. Existing and potential industrial operations in the surrounding area have been identified and assessed in accordance with the D-Series

	viability of major facilities in accordance with provincial guidelines, standards and procedures.	Guidelines and ROPA 6 policies, which are detailed in Section 10 of this Report. It is noted that the development is located adjacent to the Waterloo Spur Line Rail Corridor to the west. A Noise and Vibration Feasibility Study was prepared by HGC Engineering and made noise and vibration recommendations for the dwellings closest to the railway, as detailed in Section 13.
3.5.2	Where avoidance is not possible in accordance with policy 3.5.1, planning authorities shall protect the long-term viability of existing or planned industrial, manufacturing or other major facilities that are vulnerable to encroachment by ensuring that the planning and development of proposed adjacent sensitive land uses is only permitted if potential adverse affects to the proposed sensitive land use are minimized and mitigated, and potential impacts to industrial, manufacturing or other major facilities are minimized and mitigated in accordance with provincial guidelines, standards and procedures.	It is noted that the closest existing industrial uses are located approximately 80 m (55 Spring Street) and 100 m (34 Henry Street) southwest of the subject lands. As such, the revised development proposal has been assessed for compliance with the D-Series Guidelines, which are detailed in Section 9 of this Report. In summary, the revised development proposal complies with the recommended minimum separation distances of the D-6 Guidelines and no land use compatibility issues are anticipated. A Noise and Vibration Feasibility Study was prepared by HGC Engineering, which made noise and vibration recommendations for the dwellings closest to the railway, as detailed in Section 13.
Waste Management		
3.7.1 4.1 and 4.2	Waste management systems need to be planned for and provided that are of an appropriate size, type, and location to accommodate present and future	Waste management systems to be determined at the detailed design stages.

	requirements, and facilitate integrated waste management.	
Natural Heritage		
4.1.1	Natural features and areas shall be protected for the long-term.	The proposed development protects natural features for the long-term by delineating the GRCA floodplain, watercourse, and dripline limits as non-developable lands. These areas are consolidated into designated Open Space and Stormwater blocks, ensuring permanent removal from development pressure and a maintained natural state.
4.1.2	The diversity and connectivity of natural features in an area, and the long-term ecological function and biodiversity of natural heritage systems, should be maintained, restored, or where possible, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.	The development maintains and reinforces the diversity and connectivity of natural features by aligning open space lands along the Conestogo River corridor and integrates stormwater management areas that function as part of the broader natural heritage and water resource system. This approach preserves ecological linkages between surface water features, riparian areas, and adjacent natural lands, supporting long-term ecological function and biodiversity.
4.1.8	Development and site alteration shall not be permitted on adjacent lands to the natural heritage features [...] unless the ecological function of the adjacent lands have been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions.	The development is setback from natural heritage features through the application of GRCA floodplain limits, driplines, and defined buffers.

4.1.9	Nothing in policy 4.1 is intended to limit the ability of agricultural uses to continue.	The proposed development respects the continued operation of surrounding agricultural uses by maintaining clear boundaries between the development area and adjacent agricultural lands to avoid constraining ongoing agricultural activities.
Water		
4.2.1	Planning authorities shall protect, improve or restore the quality and quantity of water by: a) Using the watershed as the ecologically meaningful scale for integrated and long-term planning, which can be a foundation for considering cumulative impacts of development; b) Minimizing potential negative impacts, including cross-jurisdictional and cross-watershed impacts; c) Identifying water resource systems; d) Maintaining linkages and functions of water resource systems; e) Implementing necessary restrictions on development and site alteration to: 1. Protect all municipal drinking water supplies and designated vulnerable areas; and 2. Protect, improve or restore vulnerable surface and ground water, and their hydrologic functions; f) Planning for efficient and sustainable use of water	The development maintains appropriate setbacks for identified natural heritage features, including the Conestogo River.

	resources, through practices for water conservation and sustaining water quality	
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.	Development and site alteration is restricted in proximity to sensitive water features through defined floodplain limits, buffers, and stormwater controls. In accordance with the findings of the Environmental Impact Study, appropriate buffers have been established to identifies natural heritage features.
Natural and Human-Made Hazards		
5.1.1	Development shall be directed away from areas of natural or human-made hazards where there is an unacceptable risk to public health or safety or of property damage, and not create new or aggravate existing hazards.	The development accounts for the presence of the floodplain and slope erosion area located within the southern portion of the site. The development ensures that a buffer of 10 m to the dripline is established in order to minimize potential safety risks to public health and of property damage.
5.3.2	Sites with contaminants in land or water shall be assessed and remediated as necessary prior to any activity on the site associated with the proposed use such that there will be no adverse effects.	Given the property's location to the railway and existing uses, the Township may apply a Holding provision to the site to require a Record of Site Condition prior to site plan and/or building permit stage.

Based on the foregoing, it is our opinion that the revised development proposal is consistent with the PPS 2024.

c) Region of Waterloo Official Plan

The Regional Official Plan sets out policy direction to guide land use planning in the Region of Waterloo over a 20-year planning horizon. The ROP determines areas for growth and development, sets out population and employment forecasts and density targets, establishes an

Urban Boundary, promotes multi-modal transportation options, and sets out policies to protect the Region's valuable environmental and agricultural resources.

On August 18, 2022, Council for the Regional Municipality of Waterloo adopted Regional Official Plan Amendment No. 6 ("ROPA 6"), which was the result of the Region's municipal comprehensive review to bring the Regional Official Plan into conformity with the PPS and the Growth Plan. On April 11, 2023, the Minister of Municipal Affairs and Housing approved ROPA 6, subject to various modifications.

As set out in the preamble for the Amendment, "this amendment establishes the planning framework in the Regional Official Plan (ROP) to accommodate Waterloo Region's forecasted population and employment growth to 2051, in conformity with Schedule 3 of the Growth Plan for the Greater Golden Horseshoe, 2019 (Growth Plan). It will help guide strategic decisions regarding land use planning and a range of Regional services, including transportation, public transit, water and wastewater supply and services, public health, economic development, affordable housing and others. The amendment also updates several other planning policies, objectives, and mapping in the ROP to ensure they conform to the Growth Plan and the Greenbelt Plan, 2017, or do not conflict with them, and are consistent with the Provincial Policy Statement, 2020. The overall effect of this amendment is to support Waterloo Region's long-term growth and development in a way that achieves an equitable, thriving and sustainable regional community for all residents."

Key changes brought about by ROPA 6 include policy changes to support an intensification-first approach to accommodating growth; extending the planning horizon to the year 2051; providing affordable and 'missing middle' housing; and planning in a manner that improves social equity, overall quality of life, and accessibility.

Section 1.1 of the ROP provides that by 2051, the Region of Waterloo is anticipated to grow to accommodate a population of 923,000 people from its current population of approximately 600,000. In particular, the Township of Woolwich is projected to have a population of approximately 51,200 by 2051, where it has a population of 28,700 in 2021. Section 1.3 of ROPA 6 sets out the purpose of the plan, which is to establish a framework for growth and development to the year 2051.

As stated in Section 5c of this Report, the subject lands are identified to be within the Township Urban Area boundary and the Township Designated Greenfield Areas.

Section 2.C.2 provide policy direction on Urban Areas in a manner that (a) implements the Regional urban system, (b) advances the community's transition into an energy efficient, resilient and low-carbon community. The development shall (d) protect the natural environment and (e) provide a diverse range and mix of housing options to accommodate the needs of all household sizes and incomes.

Policies 2.D.5.1 and 2.D.5.2 of ROPA 6 encourage the building of missing middle housing within Township Urban Areas, as well as opportunities for intensification. The revised development proposal conforms to these policies by proposing to build townhouses and medium density units within a Township Urban Area.

i. Where and How to Grow

Section 2.E of the ROPA sets out policy direction as to where and how to grow within Township Urban Areas, and establishes several objectives in that regard:

a) Support the development of thriving, livable, vibrant, and productive Township Urban Areas that foster community health and individual well-being;

b) Strengthen the economic vitality of the Region's four Townships by directing most of their population and employment growth to the Township Urban Areas; and

c) Promote gentle density and other context sensitive intensification to facilitate the transition of existing communities into vibrant 15-minute neighbourhoods.

It is our opinion that the revised development proposal is aligned with these policy directions as it contemplates residential growth, adjacent to existing urbanized areas with a mix of uses, in a Designated Greenfield Area. The development promotes gentle density by providing housing forms that are slightly more compact than single-detached dwellings in order to support the achievement of transit supportive densities. The development fosters the development of 15-minute neighbourhoods through the provision of a range of housing options and common amenity spaces.

ii. Township Urban Area & Township Designated Greenfield Area

The subject lands are identified to be within the Township Urban Area boundary and the Township Designated Greenfield Areas. One of the goals of the ROP is to designate lands within the Township Designated Greenfield Areas for the creation of complete communities and for growth and intensification. The ROP establishes a minimum density target of 45 residents and jobs combined per hectare within Designated Greenfield Areas. Development within the Township Designated Greenfield Areas is subject to Policy 2.E.6. of the ROP, where development will be planned to:

a) Conform to Policy 2.D.17 (a), (c), (d), and (g);

Policy 2.D.17 (a) – Conform to the general development provisions described in Policy 2.D.1.

Policy 2.D.17 (c) – Establish a network of continuous sidewalks, community trails and bicycle pathways that provide direct, safe, comfortable and convenient linkages within the neighbourhood and externally to other neighbourhoods, including linkages to transit stops, employment areas, school sites, food destinations and community facilities.

Policy 2.D.17 (d) – Provide any required easements, land dedications and pedestrian amenities in accordance with Policy 5.A.3 to support walking, cycling and existing or planned transit services for everyday activities.

Policy 2.D.17 (g) - Discourage the use of noise attenuation walls and berms through the use of passive noise attenuation measures in accordance with Policy 2.G.15.

b) Achieve the following density target:

Areas serving primarily a residential function will meet or exceed a minimum density of 45 residents and jobs combined per hectare.

c) Provide a development pattern and road network that supports the integration of transit services, where planned to be available in the future

d) Require development to be serviced by a municipal drinking-water supply system and a municipal wastewater system

It is our opinion that the revised development proposal conforms to this policy direction. With regards to matters 'a' and 'c', it is noted that the revised development proposal is contemplated to include an internal road network that can be accessed off of Hawkesville Road, which is a key regional road in St. Jacobs that would have public transit connections should it be planned in the future. The development proposes to have an integrated sidewalk network dispersed throughout the development. The development will also utilize passive noise attenuation measures, as recommended in the Noise and Vibration Feasibility Study including brick or masonry equivalent to the exterior of the dwelling walls closest to the railway.

With regards to matters 'b' and 'd', it is noted that the revised development proposal would support the achievement of the residential density target set out within the ROP. The development is also proposed to connect to existing municipal water and wastewater systems, which are detailed within the Functional Servicing and Stormwater Management Report prepared by GEI Consultants Canada Inc. to support the efficient use of public infrastructure.

Furthermore, development within the Township Designated Greenfield Areas is subject to general development policies (Policy 2.D.1) of the ROP, where development will be planned and developed in a manner that:

a) supports the Planned Community Structure described in this Plan;

b) is serviced by a municipal drinking-water supply system and a municipal wastewater system;

c) contributes to the creation of complete communities with development patterns, densities and an appropriate mix of land uses that supports walking, cycling and the use of transit;

d) protects the natural environment, and surface water and groundwater resources;

e) conserves cultural heritage resources and supports the adaptive reuse of historic buildings;

f) respects the scale, physical character and context of established neighbourhoods in areas where reurbanization is planned to occur;

g) facilitates residents' access to locally grown and other healthy foods in neighbourhoods; and

h) promotes building designs and orientations that incorporate energy conservation features and the use of alternative and/or renewable energy systems.

With regards to matter ‘a’, the revised development proposal supports the planned community structure, as the subject lands are located within the Region’s Township Designated Greenfield Area, which is to accommodate residential and employment growth.

With regards to matters ‘b’ and ‘c’, as previously noted, the revised development proposal is planned to connect to existing municipal water and wastewater services through the property acquisition of 9 Chris Court to allow for connection to existing services. It also supports the creation of complete communities by providing a range of housing options within a broader neighbourhood containing a mix of uses.

With regards to matter ‘d’, the revised development proposal demonstrates regard for the protection of ecological systems by conserving the environmental features located in the southern portion of the subject lands with an appropriate buffer. Although, as previously mentioned in Section 5a, some existing vegetation will be removed as part of the overall development, site planning considerations have been taken to preserve most of the environmental features. An Environmental Impact Study was conducted by Dougan Ecology which ensures any potential negative impacts are properly mitigated and the natural features protected, and where possible, enhanced as detailed in Section 13.

It is noted that matter ‘e’ is not relevant to the revised development proposal, as there is no cultural heritage resource within the subject lands.

With regards to matters ‘f’ and ‘h’, the revised development proposal will respect the character of the broader neighbourhood and will incorporate sustainable design elements, which are described in Section 11 of this Report.

With regards to matter ‘g’, future residents will have good access to locally grown and healthy foods, as the subject lands are located within a broader area with primary agricultural uses.

Section 2.G of the ROP provides policy directions with regards to Designated Greenfield Areas. Policy 2.G.1.2 provides guidance for new developments, which will be planned, designated, zoned and designed to:

a) Function as 15-minute neighbourhoods with a broad mix of land uses where people can meet their daily needs for goods, services and employment within a 15-minute trip by walking, cycling and rolling, and where other needs can be met by using direct, frequent and convenient transit;

b) Promote a more compact built form by meeting or exceeding the minimum density targets (Township of Woolwich: 53 residents and jobs per hectare);

c) Prioritize walking, cycling, and rolling, and taking transit over automobile trips by establishing a network of continuous sidewalks, trails and bicycle lanes that provide direct, safe, comfortable and well-maintained access to a variety of destinations for people of all ages and abilities and at all times of the year;

d) Establish a street network with frequent connections and pathways to surrounding areas, a high degree of internal connectivity, and adopt a complete streets approach that ensures the needs and safety of all road users are considered and appropriately accommodated;

e) Implement land use patterns, building orientations to maximize solar gain, and urban design standards that support net-zero operational carbon buildings, including those related to energy efficiency and demand reductions, and enable community energy planning, renewable energy system and alternative energy systems, including district energy systems, in appropriate locations;

f) Incorporate appropriate green infrastructure, low impact development, and urban heat island mitigation measures to adapt to the impacts of a changing climate;

g) Provide access to high-quality parks, greenspaces, and public service facilities to all members of the community in an inclusive and equitable way in accordance with the policies in Chapter 3;

h) Provide a development pattern and road network that supports the integration of transit services, where planned to be available in the future; and

i) Are serviced by a municipal water and wastewater system.

It is our opinion, the revised development proposal conforms to all of these policy directions. With regard to matters ‘a’, ‘c’, ‘g’, and ‘h’, the development supports the achievement of a 15-minute neighbourhood through the provision of a range of housing types and amenity spaces. The development will also establish a network of continuous sidewalks to access the residential units, amenity spaces and parking spaces. The development is ideally located, as it fronts onto a major arterial road, which will potentially be serviced by public transit through future transit expansions. As described in Section 3 of this Report, the subject lands are in close proximity to a mix of uses, including institutional, commercial, and retail uses.

With regards to matter ‘b’, the development promotes a compact form of development that is anticipated to result in a gross density of 62.7 - 78.1 people and jobs per hectare (or net 41.4 - 51.5 people and jobs per hectare), exceeding the minimum density target set out by the Region.

With regard to matters ‘d’ and ‘h’, the revised development proposal incorporates an integrated street network with a high degree internal connectivity and the incorporation of complete streets principles, and providing clear physical separation between pedestrians and motorists. The road and pedestrian networks can be accessed off of Hawkesville Road, which is identified as a Regional Road and will potentially be serviced by public transit in the future should transit expansions be planned within the Township.

With regard to matters ‘e’ and ‘f’, the revised development proposal is planned to incorporate several sustainable elements in its pre- and post-construction phase, which are detailed in Section 11 of this Report.

With regards to matter ‘i’, the revised development proposal will be serviced through the municipal water and wastewater systems, which is detailed within the Functional Servicing and Stormwater Management Report prepared by GEI Consultants Canada Inc.

Furthermore, Policy 2.G.1.4 provides that new development is phased in a manner that:

a) Provides for the logical and orderly progression of development;

b) Achieves the delivery of 15-minute neighbourhoods in accordance with the policies of this Plan;

c) Ensures that the pace, scale and phasing of development is aligned with the delivery of infrastructure and public service facilities in a financially sustainable manner at the Regional and/or area municipal level; and

d) Will not adversely affect the achievement of the minimum intensification and density targets in this Plan, as well as the other policies of this Plan.

It is our opinion that though a locational perspective, the revised development proposal provides for the logical progression of development that is in close proximity to an existing urbanized land, preventing the fragmentation of prime agricultural lands. The broader neighbourhood is currently serviced by existing municipal water and wastewater infrastructure, which are planned to service the proposed residential development. As previously mentioned, the development supports the creation of 15-minute neighbourhoods and the achievement of the Region's density target.

Within the Designated Greenfield Area, Policy 2.G.1.5 establishes several objectives for growth, including supporting the gradual transition of becoming vibrant *15-minute neighbourhoods* through *gentle density* in the form of infill, *missing middle housing*, and *additional residential units*. It is noted that the terms "*15-minute neighbourhood*", "*gentle density*", "*missing middle*", and "*additional residential units*" are defined by ROPA 6 as follows:

15-Min. Neighbourhood:	Compact, well-connected places such as mixed-use neighbourhoods or other areas within the Urban Area and Township Urban Areas. They are places that offer support and opportunities for people of all ages and abilities and at all times of year to conveniently access the necessities for daily living with a 15-minute trip by walking, cycling, and rolling, and where other needs can be met by taking direct, frequent, and convenient transit, wherever possible. 15-minute neighbourhoods include an appropriate mix of jobs, local stores, and services, a full range of housing, transportation options and public service facilities. They are also age-friendly places and may take different shapes and forms appropriate to their contexts.
Gentle Density:	Development or redevelopment in Urban Areas or Township Urban Areas with a slightly higher density than adjacent single-detached (or lower density) neighbourhood.
Missing Middle:	Multiple unit housing including, but not limited to multiplexes, stacked townhouses, apartments, and other low-rise housing options.
Add. Residential Units:	Two residential units in a detached house, semi-detached house or row house; or one residential unit in a building or structure ancillary (e.g., garage, or a separate building referred to as "coach house") to a detached house, semi-detached house or row house.

> Additional residential units may also be referred to as additional dwelling units, secondary dwelling units, accessory dwelling units, second residential unit, secondary suites, laneway houses, garden suites, accessory apartments, or basement apartments.

Section 3.A provided objectives to provide a Range and Mix of Housing. Policy 3.A.6 states, "where a development application proposing residential uses is submitted for a site containing one hectare or more of developable land, the Region and the area municipalities will require, a minimum of 30 percent of new residential units to be planned in forms other than single-detached, semi-detached, and street fronting and single unit condominium townhouse units. Examples of other potential housing forms may include, but are not limited to: duplexes; tri-plexes; four-plexes; multi-plexes; stacked and back-to-back townhouses; and apartments."

It is our opinion, the revised development proposal is aligned with this direction as it provides a mix of housing options including missing middle form of housing that will provide a gentle density increase compatible with the surrounding neighbourhood. The development incorporates a range and mix of housing options with 50-65 medium density units proposed, thus accounting for, at a minimum, 36% of the unit makeup.

The development supports the creation of a 15-minute neighbourhood through the provision of a range of housing options and common amenity spaces, such as a trail and a private swim facility, promoting active living. The subject lands are ideally located fronting onto a major arterial road in St. Jacobs, whereby public transit expansions in the Township would potentially serve future residents on the site.

Based on the foregoing, it is our opinion that the revised development proposal conforms to the policy direction set out in the ROP for Designated Greenfield Areas.

iii. Significant Valleys

Chapter 7 of the ROP establishes a policy framework for the Greenlands Network within the Region. It is noted that the subject lands contain natural heritage features, which are identified as 'Significant Valleys' in Map 4 (Greenlands Network) of the ROP. More specifically, as shown on Figure 10 below, the Grand River Conservation Authority identifies the following natural features to be present within the subject lands: (a) Floodplain; (b) Slope Erosion; (c) Slope Valley; (d) Regulated Watercourse; and (e) Regulated Waterbody (Conestogo River).

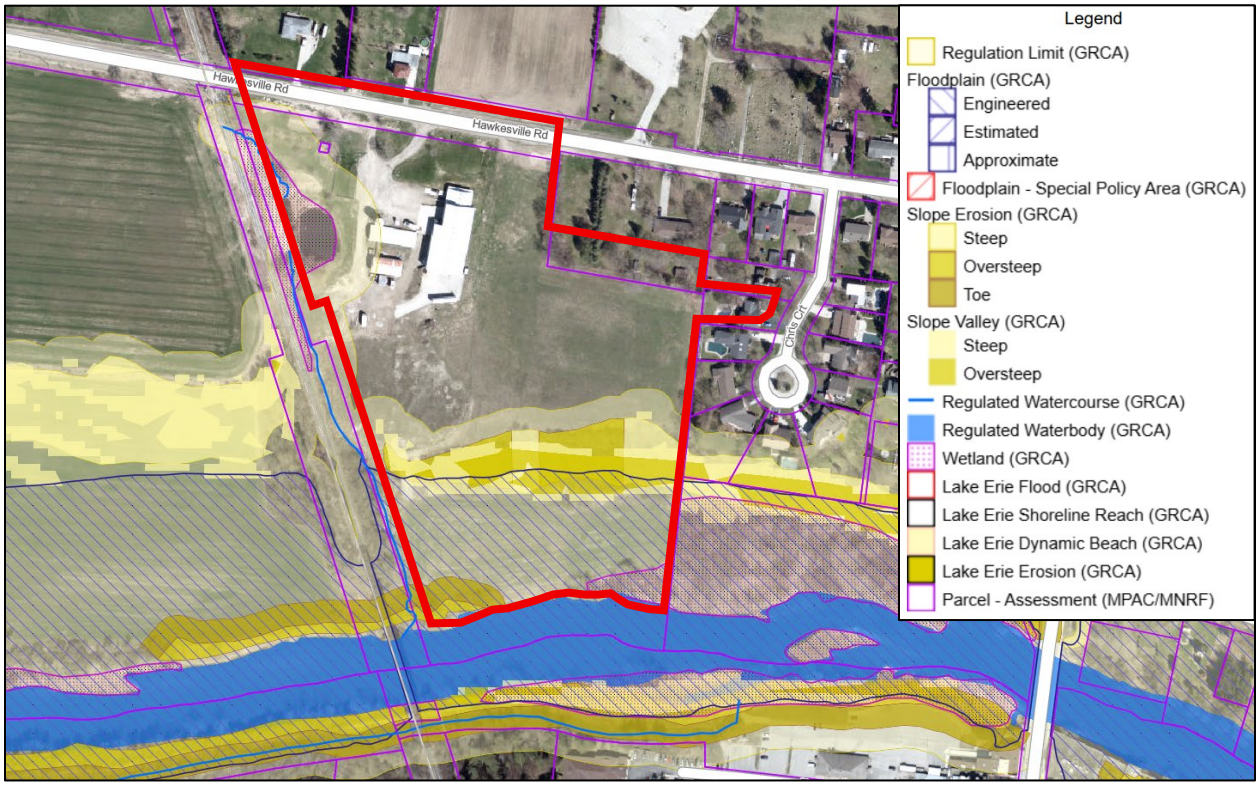

***Figure 10**: Natural Features within the Subject Lands (Source: GRCA)*

Section 7.B.20 identifies Significant Valleys as valleys of the Grand River, Conestogo River, Nith River and Speed River, which are together nationally recognized as a Canadian Heritage River. As such, the Region and Area Municipalities, in collaboration with the Grand River Conservation Authority, will seek to maintain the character of Significant Valleys by identifying, conserving, interpreting and enhancing cultural heritage resources of recreational and scenic value within Significant Valleys.

No development is proposed within lands identified as 'Significant Valleys' in order to preserve the natural heritage features. A natural buffer of 10 m is also proposed from the dripline for further mitigation of adverse impacts of the revised development proposal to the natural features. Likewise, these areas are proposed to be zoned open space to ensure their permanent protection.

Based on the foregoing, it is our opinion that the revised development proposal conforms to the ROP.

d) Township of Woolwich Official Plan

The Township of Woolwich Official Plan ('OP') is the principal land use planning document guiding the long-term growth and development of the Township. The Township Official Plan was adopted on June 22, 2022.The following subsections provide assessments of the revised development proposal in the context of the Township Official Plan.

i. Designated Greenfield Areas

Chapter 5 of the OP identifies the Planned Community Structure for the Township in accordance with the Regional Official Plan. The subject lands are identified to be partially within the Township Urban Area boundary and the Township Designated Greenfield Areas, as shown on Figure 11, with the remainder of the site being currently identified as outside the settlement area. As previously noted, ROPA 6 has now included the entirety of the site within the settlement area boundary and the purpose of the proposed OPA is to mirror this within the Township Official Plan.

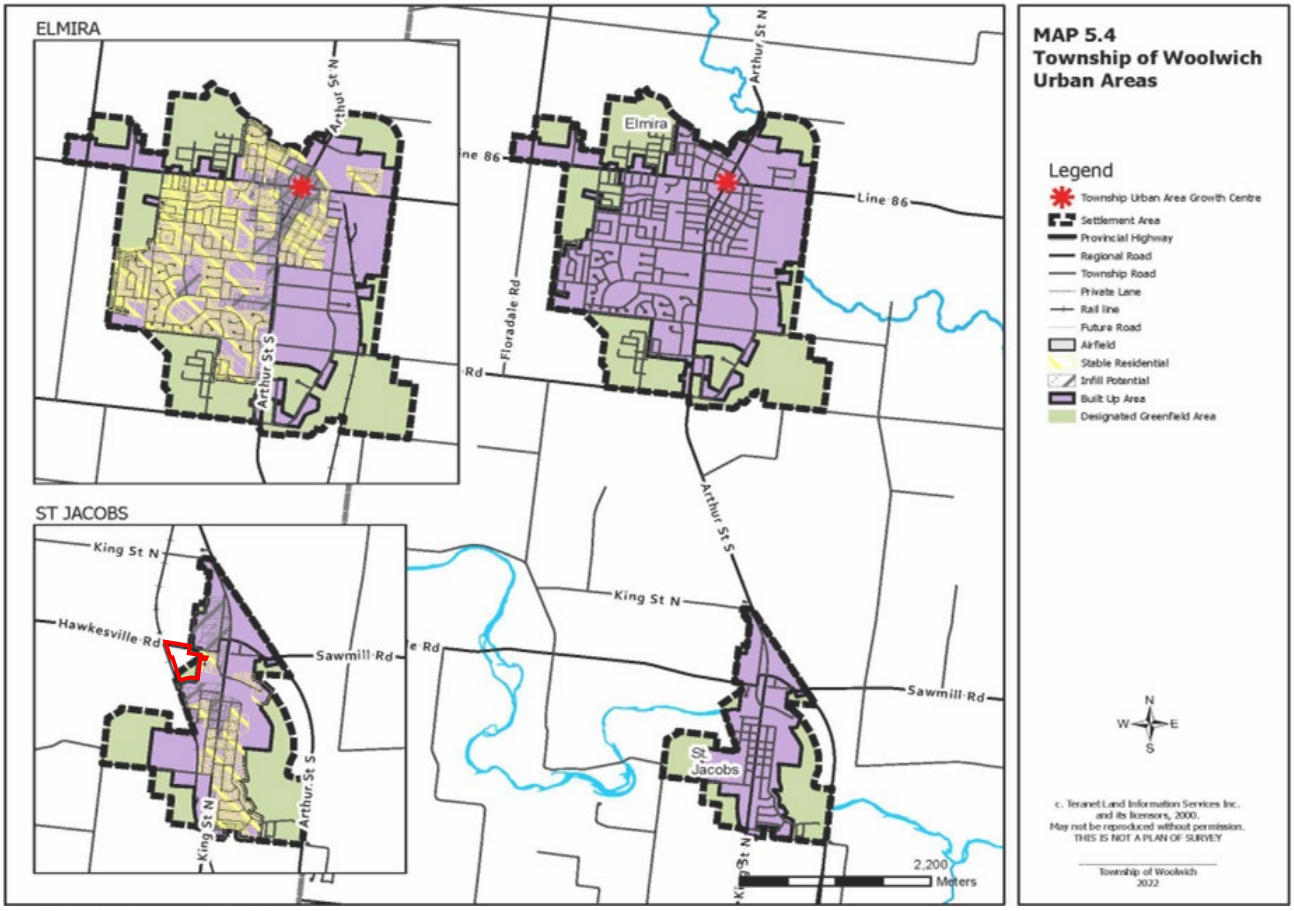

Figure 11: *Township of Woolwich Urban Areas (Source: Township of Woolwich Official Plan)*

The OP provides policy directions with regards to development within the Designated Greenfield Areas. Policy 5.7.3 states that development will be planned and developed to:

a) Conform to the general development policies set out in Section 5.5;
b) Establish a network of continuous sidewalks, community trails and bicycle pathways that provide direct, safe, comfortable, and convenient linkages within the neighbourhood and externally to other neighbourhoods, including linkages to transit stops, employment areas, school sites, food destinations and community facilities;
c) Provide a development pattern and road network that supports the integration of transit services, where planned to be available in the future;

d) Provide any required easements, land dedications and pedestrian amenities to support walking, cycling and existing or planned transit services for everyday activities;
e) Discourage the use of noise attenuation walls and berms, where appropriate, through the use of passive noise attenuation measures; and
f) Support development on municipal water and wastewater services.

It is our opinion, the revised development proposal conforms to this policy direction. With regards to matter 'a', the general development policies set out in Policy 5.5.1 are the same as the general development policies set out in Policy 2.D.1 of the ROP, which is been addressed in the previous subsection of this Report. The revised development proposal also conforms with Policy 5.5.2, as the revised development proposal does not exceed the capacity of municipal water and wastewater services, which is detailed in the Functional Servicing and Stormwater Management Report prepared by GEI Consultants Canada Inc.

With regard to matters 'b', 'c', and 'd', the revised development proposal contemplates a network of continuous sidewalks throughout the development. The sidewalk network would connect to Hawkesville Road, which is a Regional Road, and provides connections to other neighbourhoods and key points of interest within the Township and broader regional transit networks, where planned in the future. Furthermore, the inclusion of public amenities such as parks, benches, bike racks, and shelters enhance the functionality and comfort of walking and cycling, which will all be determined at the Site Plan Application stage.

With regards to matter 'e', as previously mentioned, the development anticipates the use of passive noise attenuation measures, including brick or masonry equivalent dwelling facades as recommended within the Noise and Vibration Feasibility Study prepared by HGC Engineering detailed in Section 13.

With regards to matter 'f', as previously mentioned, the development is proposed to connect to existing municipal water and wastewater systems, which are detailed within the Functional Servicing and Stormwater Management Report prepared by GEI Consultants Canda Inc.

Policy 5.7.4 of the OP provides that areas primarily serving a residential function within a Designated Greenfield Area will meet or exceed a minimum, average density of 45 people and jobs combined per hectare. As detailed in Section 11 of this Report, the revised development proposal is planned to achieve a gross density of 62.7 - 78.1 people and jobs per hectare (or net density of 41.4 - 51.5 people and jobs per hectare), which exceeds the policy's minimum target.

Policy 5.7.5 encourages a logical and orderly progression of development. The development is proposed to be located at the edge of the Settlement Area boundary that is adjacent to urbanized lands and is planned to connect to existing municipal water and wastewater systems, ensuring that growth is planned in an efficient manner.

ii. Prime Agricultural Areas

Chapter 6 of the OP provides policy directions with regards to the Township's Countryside, which are comprised of agricultural lands and other valuable natural resources, including woodlands, mineral aggregate resources and groundwater recharge areas. As shown on Figure 11 above, the northern portion of the subject lands is currently outside of the St. Jacobs Settlement Area

Boundary. Map 6.1 of the OP identifies the northern portion of the subject lands to be a Prime Agricultural Area and outside of the Settlement Area Boundary but within the Countryside Line.

Section 6.1 of the OP states that land uses permitted within Prime Agricultural Areas include agricultural uses, agricultural-related uses and on-farm diversified uses. Mineral aggregate operations (as an interim use), as well as small scale schools, places of worship and associated cemeteries may also be permitted.

It is noted that the revised development proposal is currently not permitted within Prime Agricultural Areas, and as such, an Official Plan Amendment is advanced with this application to remove the Prime Agricultural Areas designation from the northern portion of the subject lands and to include the lands within the St. Jacobs Settlement Area Boundary, as detailed in Sections 5 and 7 of this Report.

iii. Residential and Environmental Protection Designation

Chapter 7 of the OP provides maps, land uses, and policies within the St. Jacobs Township Urban Area. As shown on Figure 12, the southern portion of the lot addressed 51-55 Hawkesville Road fall within two land use designations. The northeast portion (shaded in yellow on Figure 12) of the same lot is designated as Residential and Ancillary, while the southern portion (shaded in green) containing the natural heritage features is designated as Environmental Protection. Additionally, the lot addressed 9 Chris Court is designated as Residential and Ancillary.

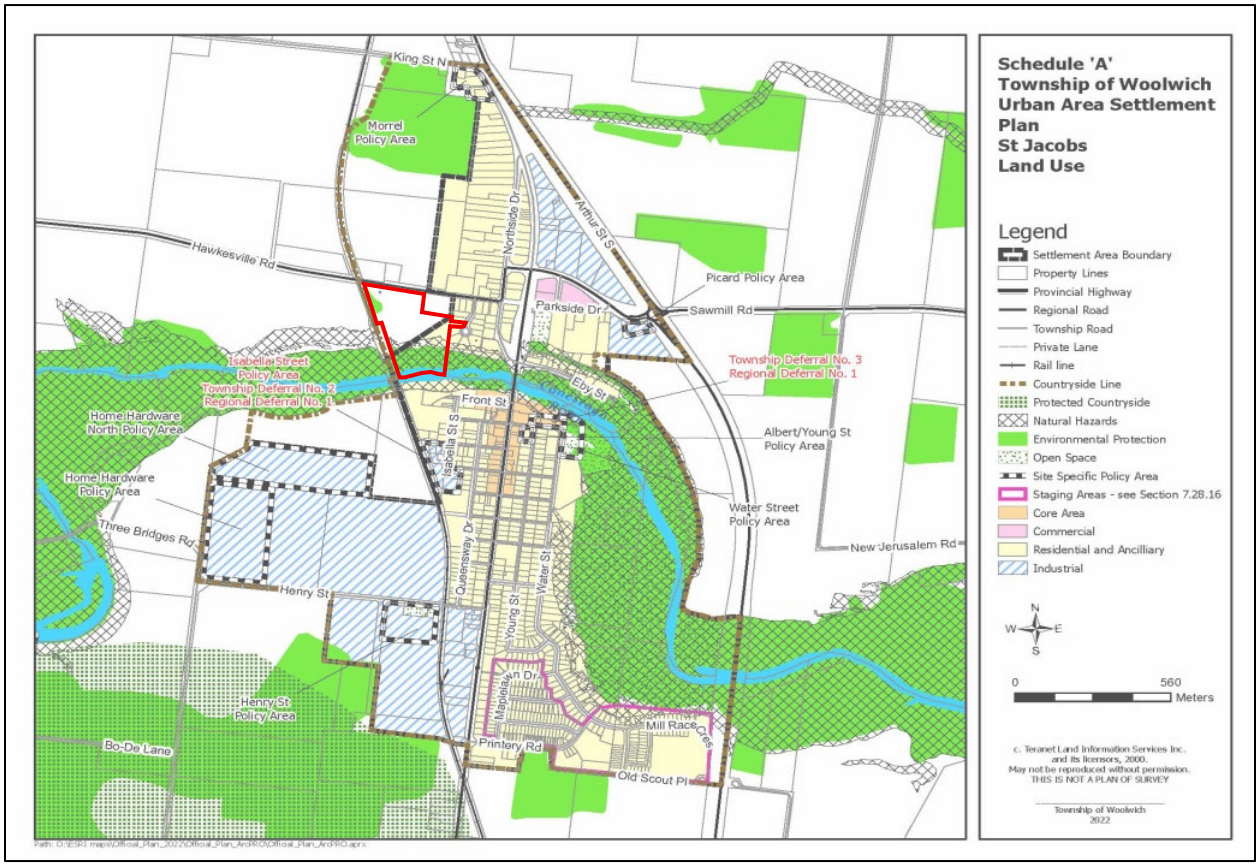

Figure 12: *Settlement Plan St. Jacobs Land Use (Source: Township of Woolwich Official Plan)*

The 'Residential and Ancillary Use' designation is intended to indicate areas within which consideration may be given to the provision of living accommodations of all kinds and uses ancillary to a residential area. Ancillary uses may include uses such as home occupations, schools, churches, parks and neighbourhood commercial uses.

The 'Environmental Protection' designation comprises of the components of the Greenlands Network described in Chapter 13 of the OP, including lands identified as Significant Valleys. The permitted uses within these lands include:

- Forest, fish and wildlife management
- Stewardship, conservation, restoration and remediation undertakings
- Flood and erosion control projects
- Public infrastructure and roads
- Low intensity recreational uses that require very little terrain or vegetation modification
- Within the defined ecological buffer element of the Environmental Protection Designation, compatible land uses may be permitted, including limited portions of stormwater management facilities, trails, passive/active parks, school grounds, common element open spaces related to a condominium development and landscaped boulevards associated with public roads if supported by an approved Environmental Impact Statement.
    - Minor transitional grading within the outer portion of the buffer to transition natural topography to required development grades may be permitted where the alteration does not negatively affect the intended ecological functions of the buffer and the alteration provides a benefit to the community.

In order to advance the revised development proposal, a revised Official Amendment application proposes to designate the northern portion of the subject lands as 'Residential and Ancillary', identical to the designation of the southern portion of the subject lands (shaded in yellow on Figure 12 above). A detailed description and planning justification for the designation is included in Sections 5 and 7 of this Report.

Furthermore, no development within the portion of the subject lands designated as Environmental Protection is being contemplated.

Section 7.28.5.2 of the Official Plan provides policies specific to the St. Jacobs Township Urban Area. More specifically, Section 7.28.5.2.b) states that the gross residential density will be a minimum of 45 people and jobs per hectare. The updated development proposal is aligned with this policy direction, as it is planned to achieve a gross residential density of 62.7 - 78.1 people and jobs per hectare. Further, Section 7.28.5.2.c) of the Official Plan states that the net residential density on a particular site may be permitted to a maximum of 120 units per net residential hectares. The revised proposal would achieve a net residential density of 24.4 - 30.7 units per hectare, and is therefore aligned with this policy. Please see Section 11 of this Report for the density calculations.

iv. Regional Road Designation

The OP provides policy directions with regards to the Road Hierarchy within the Township. Hawkesville Road is identified to be a Regional Road. The OP defines 'Regional Roads" as the following:

> **Regional Roads:** *The Regional Road system is intended provide safe, direct, accessible and multi-modal transportation links for moving people and goods throughout Waterloo Region and to adjacent municipalities. All development applications that potentially impacting an existing or proposed Regional Road will be subject to the policies of the Regional Official Plan and appropriate Regional Implementation Guidelines;*

Based on the foregoing, the subject lands are strategically located. As a Regional Road, Hawkesville Road provides connections to key destinations and points of interest throughout the Township. Furthermore, in the event public transit expansion is planned within the Township, it is likely that transit will be provided along this road, creating opportunities for residents to have transit-oriented lifestyles.

v. Housing Policies

The OP provides policy directions with regards to the provision of housing within the Township. The Township's anticipated population growth will be accommodated in Designated Greenfield Areas. Policy 9.2.1 provides that the Township will provide for a diverse range and mix of housing options, including additional/accessory residential units and affordable housing. The following table lists the criteria that are applicable to the revised development proposal and discusses how the development conforms.

Criteria	Discussion of Conformity
a) Requiring, wherever appropriate, development applications proposing residential uses on sites containing two hectares or more of developable lands, to include a minimum of 30 percent of the dwelling units to be planned in forms other than single detached and semi-detached dwellings, such as townhomes and multi-unit residential units.	The revised development proposal contemplates a total of 94-123 townhouse and medium density units, which at a minimum provide 68% of the total number of units, exceeding the minimum requirement set out within the policy.
b) Encouraging innovative lot configurations, housing designs and construction techniques.	A Draft Plan of Subdivision application has been included as part of the Resubmission #2 which demonstrates the innovative lot fabric, housing design and construction.

c) Providing opportunities for mixed-use developments in new and redeveloping residential areas.	The subject lands are located at the edge of the St. Jacobs Settlement Area boundary, where mixed-use development is less appropriate.
d) Encouraging the construction of assisted housing, not-for-profit and affordable housing that is accessible/barrier free. For the purpose of providing affordable housing such factors to be considered are housing types (e.g., apartments, stacked townhouses, plexes), tenure (ownership and rental), size of units and number of bedrooms.	As previously mentioned, the revised development proposal contemplates on a range of housing types, including medium density units to ensure a variety of housing options. Affordable housing units are not planned within the preliminary concept design currently proposed as part of this application.
e) Encouraging housing intensification in appropriate areas.	The subject lands are located within the Township's Designated Greenfield Areas, which are planned to accommodate residential growth.

Based on the foregoing, the revised development proposal conforms to the Official Plan's housing policies.

vi. Open Space Policies

The Township OP provides policy directions with regards to parks, open space, and recreational facilities. Policy 10.1.1 emphasizes the provision of a balanced system of recreational and leisure opportunities through the development of parks, open spaces, and recreational facilities. Policy 10.1.5 encourages the development of a system of linked green space, open space and trails throughout the Township.

The revised development proposal contemplates common amenity spaces.

e) Township of Woolwich Zoning By-Law

The subject lands are governed by the Township of Woolwich Zoning By-Law 26-2024. The subject lands are zoned within two (2) categories. As shown on Figure 13 below, the lot on 51-55 Hawkesville Road is zoned as Agriculture (A), while the lot on 9 Chris Court is zoned as Residential Three (R-3).

Per Section 6.1 of the Zoning By-law, the Agriculture Zone permits a range of farming uses, such as livestock barn, drive shed, storage for farm equipment, sale of products, research farming, on-farm diversified uses (e.g. agri-tourism), and more. The Zone also permits a range of low-rise residential units, including single-detached dwellings (with accessory uses such as private home day care, home occupation, bed and breakfast, home tradesperson), doddy house, farm labour residence, mobile home dwelling, short term rental, and group home.

The Residential Three Zone permits a range of residential uses, including single-detached, semi-detached, twin-link home, duplex, triplex, fourplex, dwelling conversion, group home, and bed and

breakfast. The permitted accessory uses within the Zone include accessory dwelling units, short term rental, accessory buildings or structures, accessory buildings for horse transportation, home occupation, and private home day care.

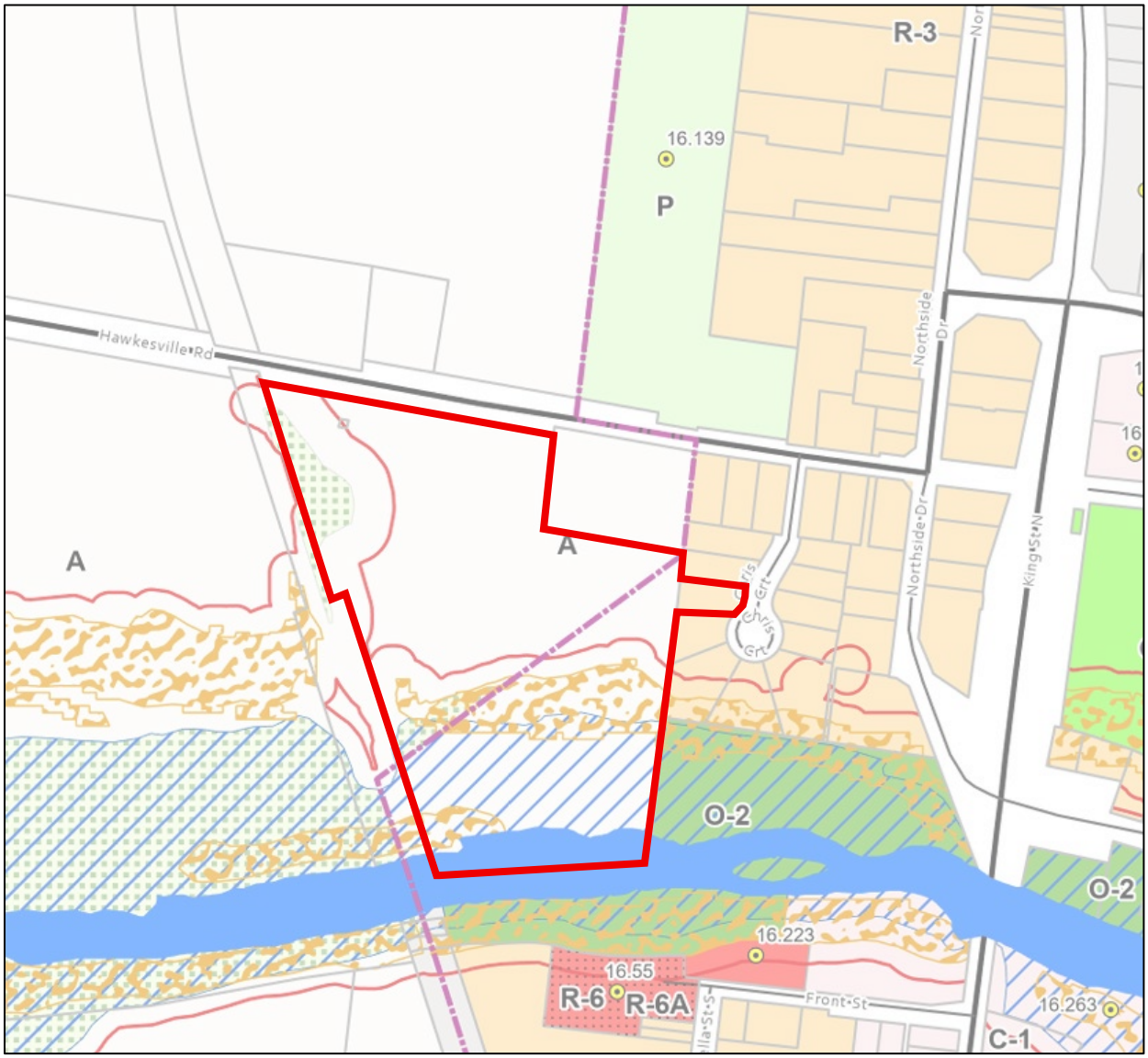

Figure 13: *Township of Woolwich Zoning Map*

The range of residential units contemplated by the revised development proposal are not permitted within the Agriculture Zone portion of the subject lands, and as such, a Zoning By-Law Amendment is proposed to allow for the development.

More specifically, the applicant is proposing to change the zone from Agriculture (A) to Residential Five (R-5) for the proposed single detached lots and Residential Seven (R-7) for the townhouse / multiple blocks, as shown on the proposed Draft Plan of Subdivision, as well as from Agriculture (A) to Open Space Two (O-2) for the SWM facility (Block 24) and the lands containing protected natural heritage features, as shown on Figure 9 of this Report.

The proposed R-5 zone would permit detached dwellings, the R-7 Zone would permit the development of townhouses and medium density units, while the O-2 Zone is designated for the conservation of natural heritage features, in which the erection of buildings and structures are prohibited unless such structures are related only to public infrastructure or passive trails. A detailed proposal and rationale of the Zone change is provided in Sections 5 and 7 of this Report. Zoning Provision details of the proposed single-detached, street townhouses, and medium density uses will be later determined at Site Plan Approval.

It is assumed that the proposed building/structures on the subject lands will meet all zoning regulations as listed above. Should the structures when constructed not meet the applicable provisions and regulations above, a separate planning application will be required to bring the property into conformity with the Zoning By-Law.

It should also be noted that the existing R-3 Zone on the 9 Chris Court portion of the subject lands permits the existing single-detached dwelling to remain. Therefore, the R-3 Zone will remain on this portion of the subject lands.

7. LAND USE PLANNING RATIONALE

This section of the Report builds off the previous sections and provides land use planning opinion with regards to the site-specific planning regulations proposed to accommodate the contemplated development.

a) Incorporate Lands within Settlement Area Boundary

As noted previously, the northern portion of the subject lands are located outside of the St. Jacobs Settlement Area Boundary within the Township of Woolwich Official Plan although these lands have previously been brought into the urban area by the Region. By way of the Official Plan Amendment, the applicant is proposing to incorporate the entirety of the subject lands to be within the St. Jacobs Settlement Area Boundary in Schedule A.

In our opinion, the proposed Official Plan Amendment is technical and administrative in nature as the lands have already been brought into the Settlement Area by ROPA 6. The application will, in essence, mirror the delineation of the settlement area from ROPA 6 in the Township Official Plan. It is noted that pursuant to the *Planning Act*, municipalities are required to ensure that local planning documents are aligned with upper-tier plans. In this regard, it is noted that the Township would be required to eventually update its plan to align with ROPA 6 and show the subject lands within the settlement boundary of St. Jacobs.

From a locational perspective, the subject lands are situated adjacent to existing urbanized areas containing a mix of uses and represents the logical next step for development in this area. The proposed inclusion would support the Township's vision for residential growth and in reaching its growth and housing targets, as well as the creation of complete communities. It would also represent an efficient form of land use planning by connecting to existing municipal public infrastructures.

Based on the foregoing, it is our opinion that the proposed inclusion of the northern portion of the subject lands within the St. Jacobs Settlement Area boundary, and the removal of Prime Agricultural Areas designation within the same portion of land is appropriate and represents good land use planning.

b) Redesignation of Lands to Residential and Ancillary

As noted in Section 4, the applicant is proposing to redesignate the northern portion of subject lands to Residential and Ancillary in Schedule A Land Use Map of the Township's Official Plan. It is noted that several properties to the east and south are designated as Residential and Ancillary. The proposed redesignation would form a continuation of similar uses within the broader neighbourhood. Furthermore, the revised development proposal is located in close proximity to areas with Core Area designation with a mix of uses, and thus, the revised development proposal would support the creation of a complete community.

It is also noted that the natural heritage features located on the subject lands would remain designated as Environmental Protection, with the exception of the natural heritage feature located at the northwest edge of the site, which currently consists of a woodlot and a pond. A portion of this natural heritage feature would be removed to allow for the proposed parking lot along the

western lot line. However, the location of the natural heritage feature coincides with a proposed outdoor amenity space, and thus, the majority of the natural feature will be preserved.

c) Application of R-5, R-7 and O-2 Zoning

As discussed in Section 4, the lot addressed 51-55 Hawkesville Road is currently zoned as A (Agriculture). By way of a Zoning By-Law Amendment, the applicant is proposing to rezone the northern developable portion of the lot as R-5 (Residential Five), R-7 (Residential Seven), and the SWM facility and southern portion containing natural heritage features as O-2 (Open Space Two).

In consideration of the appropriateness of R-5, R-7 and O-2 zoning for the site, we have undertaken a review of the zoning of adjacent and nearby properties in the general area. As shown on Figure 14 below, properties to the east and south of the subject lands are zoned as Residential Three (R-3), and specifically R-6 with regards to the properties across Conestogo River. Moreover, the property north of the subject lands is zoned as P (Institutional), while several properties located at the southeast corner of the King Street North and Sawmill Road intersection are zoned as C-1 (Commercial One). Thus, the proposed R-7 Zone for the northern portion of the subject lands conforms with the zoning of the general area, while creating a mix of uses within the broader neighbourhood.

Similarly, the proposed O-2 Zone for SWM facility (Block 24) and the southern portion of the subject lands is appropriate given the context of the natural feature and the continuity of the Zone category of the same features to the east and west of the subject lands.

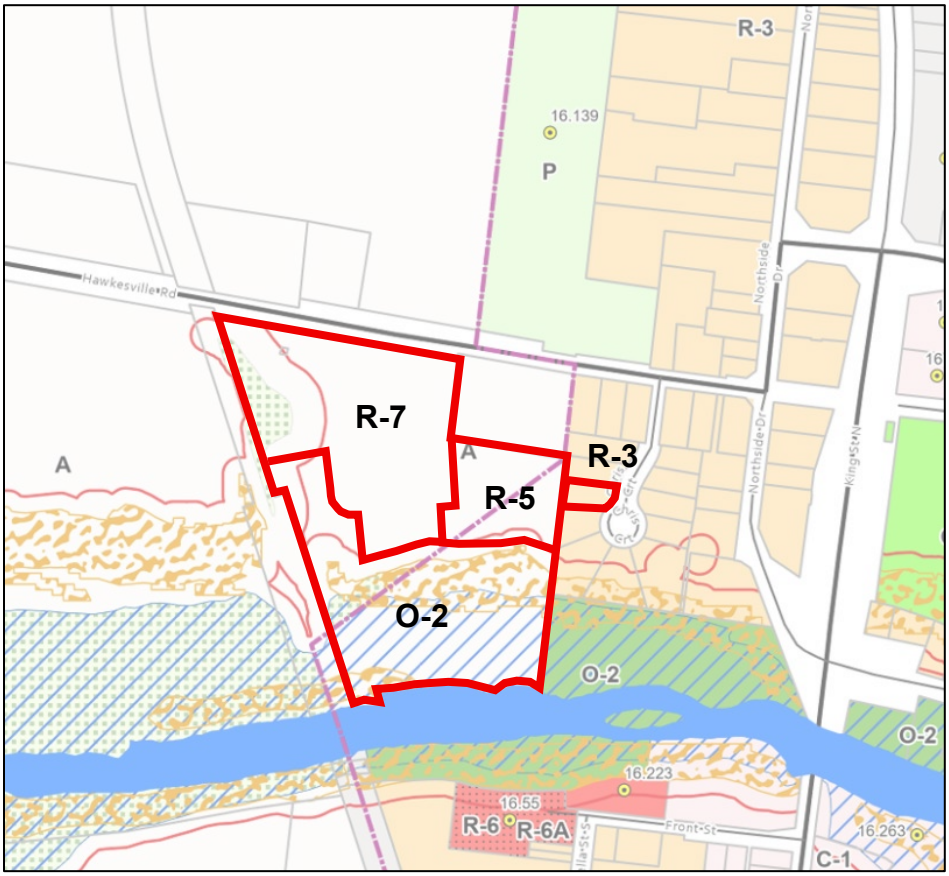

Figure 14: *Zoning Context (Source: Township of Woolwich Zoning By-Law)*

d) Service Connection to Chris Court

As previously discussed, a revised servicing strategy has been adopted by Council as of January 27, 2026. The Draft Plan of Subdivision includes 9 Chris Court to facilitate a direct municipal services connection into the adjacent, established neighbourhood. The inclusion of this parcel facilitates the ability to extend sanitary and water services through a conventional frontage connection, eliminating the need for the previously contemplated pumping station. The existing servicing easement is being utilized and expanded to establish a total easement width of 9 metres, consisting of the existing 3 metre easement on 8 Chris Court and a proposed 6 metre easement on 9 Chris Court, thereby eliminating the need for a separate dedicated servicing block.

It should also be noted that the previous subdivision design contemplated a similar servicing approach through the establishment of a 3.0 metre easement on 8 Chris Court, consistent with the servicing easement located between 4 and 5 Chris Court. While current engineering standards require a wider easement to accommodate the proposed infrastructure, the existing easement framework provides the basis for the revised servicing strategy. Accordingly, the proposed servicing easement is being expanded to meet current standards and will extend across both 8 and 9 Chris Court.

By securing this property, the subdivision can be tied into existing infrastructure and would no longer necessitate a pumping station. The revised approach also improves integration with the

adjacent community by providing seamless connection to existing infrastructure, which reduces operational complexity. It also mitigates potential issues related to pumping equipment, easements and long-term homeowner responsibilities.

e) Proposed Density

The Region of Waterloo Official Plan states that areas serving primarily a residential function will meet or exceed a minimum density of 45 residents and jobs per hectare (2.E.6.b). While ROPA 6 further specifies that the Township of Woolwich should have a 53 residents and jobs per hectare (6 2.G.1.2.b). Similarly, the Township of Woolwich Official Plan requires an average density of 45 people and jobs combined per hectare within the Designated Greenfield Area (5.7.4). The revised development proposal meets and exceeds these density targets as it provides a gross density of approximately 62.7 - 78.1 residents and jobs per hectare, and a net density of 41.4 - 51.5 residents and jobs per hectare.

Further, the Township of Woolwich Zoning By-law Section 7.1 outlines the Purpose of the R-6 and R-7 zones by stating, these are “High density zones with a broad range of multiple residential housing types with increased height permissions for lands on full services. These zones shall generally maintain a density of 50 units per net residential hectare or greater recognizing that certain housing types (e.g., townhouses) may be less.” The revised development proposal is aligned with this target.

Additionally, a 15 m setback from the western lot line along the Waterloo Spur Line Rail Corridor/CN Rail lands is required for noise and vibration mitigation which further reduces the proposed density to an appropriate level. Other areas within the site include a service connection to the east via Chris Court, the private SWM facility, and an existing gas regulation station along Hawkesville Road which all contribute to achieving a less dense and balanced development.

For the reasons listed above, it is our opinion that the proposed reduced net density of 24.4 - 31.7 units per developable hectare is appropriate for the site given the railway setback, the property’s location on the edge of the St. Jacobs settlement area, and the range of housing options being provided and likewise responds to comments raised by the public and Council at the informal meeting of council. Please refer to Section 11 of this report for a detailed breakdown and density calculations for the site.

8. AFFORDABLE HOUSING

This section of the Report identifies affordable housing policies within the Region of Waterloo Official Plan (ROP) and ROPA 6, and describes how the revised development proposal responds to the policies. The following policy direction within ROP is applicable to the revised development proposal.

Policy 3.A.5: Where a development application proposing residential uses is submitted for a site containing two hectares or more of developable land, the Region and Area Municipalities will require, wherever appropriate, a minimum of 30 per cent of new residential units to be planned in forms other than single-detached and semi-detached units, such as town homes and multi-unit residential buildings.

While it is noted that the development does not contemplate any affordable housing units, it is noted that the revised development proposal will include a range of housing options suitable to various needs and affordability levels. This includes a total of 94-123 townhouse and medium density units, which would account for a minimum of 68% of the total number of units, exceeding the minimum requirement set out within the policy.

Moreover, ROPA 6 provides several policy directions with regards to affordable housing:

> *Policy 3.A.2: Area municipalities, in collaboration with the Region, will plan to provide a diverse range and mix of housing options with an overall target of a minimum of 30 percent of new ownership and rental housing being affordable to low and moderate income households. The range and mix of housing options provided will vary in terms of form, tenure, density, and number of bedrooms to accommodate the needs of all sizes, incomes, and ages of households.*
>
> *Policy 3.A.6: Where a development application proposing residential uses is submitted for a site containing one hectare or more of developable land, the Region and the area municipalities will require, a minimum of 30 percent of new residential units to be planned in forms other than single-detached, semi-detached, and street fronting and single unit condominium townhouse units. Examples of other potential housing forms may include, but are not limited to: duplexes; tri-plexes; four-plexes; multi-plexes; stacked and back-to-back townhouses; and apartments.*

It is our opinion that the development conforms to Policy 3.A.6, as 50-65 medium density units are proposed, which would be at a minimum 36% of the total number of units, exceeding the amount set out within the policy.

It is noted above that the revised development proposal currently does not include an affordable housing component (i.e. ownership or rental), as it is geared towards subdivision market sales. However, the revised development proposal, including the types of units and the purchase price of units, are preliminary in nature, as this Report is for the purposes of establishing Official Plan and Zoning By-Law amendments.

9. URBAN DESIGN BRIEF

This section of the Report provides a preliminary assessment of the proposed design within the context of the Township of Woolwich's urban design framework, as established within the Township's Official Plan and the Township's Landscape and Design Guidelines. Given the submitted concept plan is subject to change it is recommended that as part of the future site plan and/or condominium applications that this brief be updated based on the ultimate development concept.

a) Township of Woolwich Official Plan

Section 7.9 of the Township Official Plan provides an urban design framework for future developments. The Urban Design Principals within the Township are the following:

- an emphasis on a high-quality public realm, including, but not necessarily limited to, streets, parks and play areas which provide a streetscape and building form that promotes community interaction;
- an integration of uses and housing types within communities and neighbourhoods;
- efficiency of land use;
- minimizing reliance on motor vehicles;
- support for the natural environment;
- having regard to those design elements that minimize the impact of climate change;
- achieving sustainable design; and
- the use of urban design to address public safety and crime prevention issues.

It is our opinion that the revised development proposal adheres to these objectives, as it contemplates a compact form of development containing a range of housing options and amenity spaces such as parks, while promoting gentle density within the edge of the St. Jacobs Settlement Area boundary.

The proposed buildings will be designed with well-articulated architectural expressions that respects the character of the broader neighbourhood, while having distinct features. The revised development proposal contemplates ~~on~~ incorporating several sustainable elements within its design, including water saving technologies, the provision of natural species and drought resistant plantings, the diversion of construction waste from the landfill, as well as efforts to reduce resource consumption. The design will comply with CPTED principles, as well as conform and/or exceed the standards within the AODA and Ontario Building Code to ensure the public safety of residents.

b) Township of Woolwich Landscape and Design Guidelines

The Township's Landscape and Design Guidelines provide design principles and specific guidelines for the public and private realm. The design objectives are the following:

- A standardized and highly interconnected pattern of lotting for development blocks
- Consistent built form and pleasing streetscapes
- Safety, accessibility and comfort in the pedestrian environment
- Promotion of development that is compatible with the existing community and respectful of its heritage context

- Achievement of an overall density that is appropriate for the surrounding context, considerate of Provincial and Regional requirements, and consistent with the overall growth management strategy of the Township of Woolwich

It is our opinion that the revised development proposal adheres to these objectives, as the development:

- Contemplates a highly interconnected pattern and road network within the development blocks, which includes the provision of sidewalks on all streets.
- Fosters interaction with the streetscape, by orienting a row of medium density units towards Hawkesville Road and orienting driveway aprons towards the interior portion of the site, away from public streets.
- Considers CPTED principles towards the site design, by limiting entrapment areas and providing 'eyes on the street' over the public realm and common areas of the development.
- Conforms to the standards of the AODA and Ontario Building Code.
- Is of a similar scale and density as other buildings in the vicinity of the development and will have compatible height and density of these existing developments.
- The existing single-detached dwelling located at 9 Chris Court will remain and continues to be consistent in scale and design with other dwellings along Chris Court. In the event that any portion of the dwelling requires reconstruction in the future, the design will be undertaken with consideration for the established character and built form along Chris Court, in accordance with the Township's Landscape and Design Guidelines.
- Represents context appropriate intensification, supporting gentle density and efficient use of municipal physical infrastructure.

The following table identifies the applicable Urban Design Policies pertaining to the Private Realm and discusses how the revised development proposal conforms to these policies.

Standard Policy	Guideline	Discussion
Development Blocks and Lots		
Division of Blocks	Developable lands should be subdivided into a series of development blocks, defined by a highly interconnected grid, or modified, system of public roads and lanes.	The revised development proposal consists of a series of development blocks containing a variety of housing types. The development blocks are divided by a system of public roads in an interconnected grid.

Size of Blocks	The size and configuration of each development block will: (a) be appropriate to its intended use; (b) facilitate and promote pedestrian movement; and, (c) provide a sufficient number and, where appropriate, range of building lots to achieve cost effective and efficient development.	The revised development proposal blocks are designed of human-scale with an appropriate size. All of the streets include a sidewalk to facilitate pedestrian movement. The blocks range ~~is~~ in the number of units and housing types.
Frontage and Size of Lots	Each development lot in a block will: (a) have frontage on a public road or private road within an approved plan of condominium; and, (b) be of sufficient size and appropriate configuration to accommodate development.	All of the revised development proposal lots have frontage over a road, and are sufficient, but range in size according to the proposed housing type on the lot.
Built Form		
Housing Form	A full range of housing types and tenures should be provided to make a variety of housing options available to the community.	The revised development proposal consists of a range of housing types, including single-detached, medium density units, and townhouses. The existing single-detached dwelling at 9 Chris Court will remain as part of the development framework and reflects the established single-detached character of the surrounding Chris Court neighbourhood.
Sustainability	The design of built form shall incorporate principles of sustainable development, energy and resource efficiency.	Preliminary design elements are detailed in Section 12 of this Report.
Architectural Elements	Architectural styles of individual units and blocks should be sensitive to and complement each other.	The revised development proposal will include a high standard of architectural expression that conform to the character of adjacent lots.

	A variety of architectural elements such as entry porches, dormers, material detailing should be employed to create a distinctive character for each block.	The existing dwelling at 9 Chris Court currently reflects the architectural character of other homes along Chris Court and will continue to do so. Should modifications or reconstruction be required in the future, the architectural treatment would be designed to remain compatible with the established character of the street. A detailed design will be included as part of the Site Plan Approval process.
Massing Compatibility	New development will be compatible with adjacent and neighbouring development by ensuring that the sighting and massing of new buildings does not result in undue adverse impacts on adjacent properties.	The revised development proposal will respect the scale, physical character and context of the broader neighbourhood. No adverse impacts are anticipated on adjacent properties, as the proposed low-rise residential uses are proposed adjacent to the existing single-detached dwellings along Chris Court. The retention of the single-detached dwelling at 9 Chris Court further reinforces the continuity of the existing streetscape and built form along Chris Court.
Safety and accessibility	Primary building entrances to principle buildings shall be clearly visible and located on a public road or onto public open spaces. Access from sidewalks and public open space areas to primary building entrances shall be convenient and direct, with minimum changes in grade	All of the building entrances will be oriented towards a road, and are designed to comply with CPTED principles. The revised development proposal will conform and/or exceed the standards within the AODA and Ontario Building Code.

Parking	The construction of parking lots/structures which occupy significant proportions of the at-grade frontage of public roads shall not be permitted.	Parking spaces, notably for the Medium Density Block 21, will be determined at the Site Plan Application stage and will be oriented in a manner that does not occupy significant proportions of the at-grade frontage of public roads.
Location of Buildings with Respect to Roads and Open Space		
Orientation and Positioning of Buildings	All buildings will be aligned parallel to a public road. Buildings will be located in proximity to the property line adjoining the public road. Siting and massing of buildings will provide a consistent relationship, continuity and enclosure to the public roads.	All of the proposed buildings will be aligned to an internal road network within the development. To the extent possible, parking will be located outside of public view.
Single-Detached Building		
Orientation and Positioning of Building	Buildings must have front and exterior side façades parallel to the road with front doors, windows and entry features facing the road to create a consistent street wall.	All of the single-detached dwellings have front facades parallel to a road. The existing dwelling at 9 Chris Court also maintains this orientation and contributes to the consistent street wall and residential character along Chris Court.
Setbacks to Road	The setback to the main building face should be from 4.5 to 7.5 m from the edge of the right-of-way. In the case of houses with a double car garage and double-wide driveway, the garage doors facing a public road, shall be set back a minimum of 6 m from the road right-of-way	A detailed design of the single-detached dwellings will be confirmed through the Site Plan Approval process. The existing dwelling at 9 Chris Court currently reflects a setback condition consistent with the established pattern along Chris Court. Should any reconstruction

		occur in the future, setbacks and building placement will be reviewed to ensure conformity with the Township's design guidelines and the existing streetscape character.
Architectural Elements	Porches, stairs, canopies and other entrance features can encroach into the required setbacks. Entry features and other architectural elements shall be incorporated into the front elevation of the house to reduce the visual dominance of the garage and the front drive. Windows should vary in design to distinguish individual units within a block while creating a uniform image.	Detailed design will be established through the Site Plan Approval process.
Townhouses		
Massing and Façade Design	The siting, massing, and façade design of Townhouse units shall be coordinated on a block-by-block basis. The elevation of the Townhouse block shall be articulated in a manner that provides variation between units and reinforces common characteristics that visually unites the block. Variety in the design of roofs is required to break up the massing of Townhouse blocks. The massing and built form of Townhouse units adjacent to single/ semi-detached dwellings shall be broken down with architectural elements to promote visual integration.	The townhouse units are coordinated in a block-by-block basis. The design of each block will respect the character of other blocks, but will contain distinct features. The townhouse units that are adjacent to single-detached dwellings are designed to promote visual integration, while having a distinct character.

Garages	Garages may be accessed from a rear public Lane. Where they are not, garages should be paired to allow for more substantial front yard green space.	Detailed design of garages will be confirmed through the Site Plan Approval process.
Number of units	Townhouse built form will be limited to a maximum of 8 units, with 6 units preferred. Where 8 units are proposed, individual unit widths should not exceed 6.5 m.	The maximum number of units within a row of townhouses will be confirmed through Site Plan Approval.
Positioning	Townhouses should be dispersed and integrated throughout new developments rather than being concentrated in one location within a subdivision.	The townhouses are contemplated to be dispersed throughout the site and provide an appropriate transition between the single-detached lots to the east, and the medium density Block 21 to the west.
Residential Buildings – Architectural Features and Details		
Porches and Entry Features	Porches on detached units shall be deep enough to allow a seating area. The porch width is encouraged to encompass the entry door and windows on the front façade of the unit. Where railings are used, they should be consistent with the character of the house. Entry features shall be articulated through detailing and/or a variation of materials.	The detailed design of the residential units will be confirmed through the Site Plan Approval process.
Utilities and Mechanical Equipment	On interior lots, utility meters are encouraged to be limited to the side elevation of dwellings and coordinated between units to generate consistency.	The detailed design of the residential units will be confirmed through the Site Plan Approval process.

	Landscaping as a means of screening meters is encouraged. Air conditioning units, vents for dryers, exhaust fans, etc., shall not be located on any elevation facing the street.	
Garages	The design and material of attached garages should complement, not dominate, the main dwelling to create a cohesive streetscape. Provide a variety of garage types.	Garages will be designed to complement the main dwelling. A detailed design will be included through the Site Plan Approval process.
Front Garages	Attached garages must be a natural extension of the design, massing, and materials of the main dwelling.	Garages will be designed to complement the massing and materials of the main dwelling.

Based on the foregoing, it is our opinion that the proposed design adheres to the Township of Woolwich's urban design framework as set out in the Township's Landscape and Design Guidelines

10. LAND USE COMPATIBILITY ASSESSMENT

This section of the Report provides an assessment of how the subjects lands are compatible with the broader context of the neighbourhood, including existing land uses, as well as potential concerns due to dust, odour, or other emissions from adjacent facilities. More specifically, the following subsections provide an assessment of land use compatibility of major facilities and sensitive land uses highlighted within ROPA 6 and the D-Series Guidelines provided by the Ministry of Environment, Conservation and Parks.

a) Review of Nearby Employment Area and Industrial Uses

ROPA 6 provides several policy directions with regards to land use compatibility for urban development. Policy 2.I.1.1 provides that the Region and the area municipalities will ensure that major facilities and sensitive land uses are planned and developed to avoid, or if avoidance is not possible, minimize and mitigate any potential adverse effects from odour, noise and other contaminants, minimize risk to public health and safety, and to ensure the long-term operational and economic viability of major facilities.

In response to the policy, the revised development proposal is primarily residential, and no major facilities are anticipated within the subject lands. However, it is noted that two (2) lands municipally addressed as 55 Spring Street and 34 Henry Street located approximately 80m and 100m from the property lines, respectively, southwest of the subject lands are designated as Regional Employment Areas on Map 3 of ROPA 6. Employment Areas are areas intended to be protected for business and economic activities, including, but not limited to, manufacturing, warehouses, offices, research and development, and associated retail and ancillary facilities.

The lands at 55 Spring Street contains an existing single-detached dwelling and is currently designated as Agricultural in the Township Official Plan. However, the land is anticipated to be re-designated to align with the employment designation within ROPA 6, which could include the potential for Industrial Class I, II or III facilities. The land on 34 Henry Street is currently used as a Home Hardware distribution facility. It is designated as Industrial and zoned as M-1 (General Industrial – Dry), which permits a wide range of industrial uses. Given the nature of the potential and current industrial uses at 55 Spring Street and 34 Henry Street, the revised development proposal is subject to compliance of the D-Series Guidelines provided by the Ministry of Environment, Conservation and Parks.

The D-6 Guideline is specifically focussed on providing compatibility direction with respect to the location of sensitive uses in proximity to industrial uses with the goal to “prevent or minimize the encroachment of sensitive land use upon industrial land use and vice versa, as these two types of land uses are normally incompatible, due to possible adverse effects on sensitive land use created by industrial operations.” This Guideline establishes recommended separation distances between residential and Class 1, 2 and 3 industrial uses.

According to the D-6 Guideline, the existing uses at 34 Henry Street, as a distribution centre, could be classified as a Class I industry as the building is self-contained, and the uses do not generate offsite vibration, odour/dust, or noise. The Noise and Vibration Feasibility Study

prepared by HGC Engineering have made recommendations to mitigate the noise and vibration to potentially affected dwellings including facade treatments, window glazing and HVAC systems.

As a Class I industry for the purposes of the D-6 Guidelines, the guidelines identify a 70 m influence zone. As noted, the subject lands and revised development proposal are proposed to be situated greater than 70 m from these existing uses. No Class 2 or 3 industries were identified in proximity to the site.

The D-6 Guideline establishes recommended minimum separation distances between existing Class I industries and potentially incompatible uses, including residential uses. Specifically, the Guideline provides that "no incompatible development other than identified in Section 4.10, 'Redevelopment, infilling and Mixed Use Areas', should occur" within 20m of a Class 1 industry. The proposed buildings are to be situated approximately 160m from the existing industry property line.

The revised development proposal complies with the recommended minimum separation distances of the D-6 Guidelines.

b) Review of Nearby Railway Corridor

It is noted that the subject lands are located adjacent to the Waterloo Spur Line Rail Corridor to the west. As such, the revised development proposal is subject to policy directions in Section 2.I.2 (Noise from Stationary and Transportation Sources) of ROPA 6. As a preliminary approach, the revised development proposal contemplates a 15 m railway setback to minimize adverse noise and vibration impacts from the rail corridor.

Policy 2.I.2.2 of ROPA 6 provides that "where a development application for a sensitive land use is submitted in the vicinity of … railways, a noise study may be required". In response to the policy direction, a Noise and Vibration Feasibility Study has been prepared by HGC Engineering to assess the impact of the rail corridor on the proposed sensitive uses. The Study made recommendations to mitigate the noise and vibration to potentially affected dwellings through including facade treatments (i.e. brick or masonry equivalent), double-glazed windows and HVAC systems.

Policy 2.I.2.3. states that "where projected noise levels exceed the noise criteria shown in Table 5, appropriate noise warning and/or noise attenuation measures will be required prior to, or as a condition of approval of the development application.

Table 5:
Noise Criteria for Noise Sensitive Land Uses

Receiver Category	Time Period	Road Traffic	Rail Traffic
Outdoor Living area	0700 - 2300	Leq = 55 dBA	Leq = 55 dBA
Indoor Living area	0700 - 2300	Leq = 45 dBA	Leq = 40 dBA
Indoor Living area (Sleeping Quarters)	2300 - 0700	Leq = 40 dBA	Leq = 35 dBA

Leq means average sound level
dBA is a unit of measurement for sound levels

Additionally, the Report also required warning clauses to be included in the development agreements, purchase and tenancy agreements and offers of the purchase and sale for the dwelling units.

11. DENSITY CALCULATIONS

This section of the Report contains information about the residential density calculations resulting from the revised development proposal. In summary, the revised proposal results in a net density of 41.4 - 51.5 people and jobs per hectare, or a gross density of 62.7 - 78.1 people and jobs per hectare. A detailed calculation is provided in the table below.

Average PPU, Region of Waterloo, Water and Wastewater Monitoring Report, 2024			
Typology		Persons per unit (PPU)	
Single Detached		3.25	
Townhouse		2.44	
Medium Density		2.44	
Number of Residents			
Typology	PPU (Regional avg.)	Number of Units	Residents
Single Detached	3.25	18	58.5
Townhouse	2.44	44-58	107.3 – 141.5
Medium Density	2.44	50-65	122 - 158.6
Total		112-141	287.8 – 358.6
Number of Jobs			
Job Type	Number of Residents	Work from Home Percentage	Number of Jobs
Work at Home	287.8 – 358.6	2.8%	8.05 – 10.0
Residents and Jobs per Hectare			
Number of Residents		287.8 – 358.6	
Number of Jobs		8.0 – 10.0	
Total Number of Residents and Jobs		295.8 – 368.6	
Gross Area (hectare)		6.958	
Net Area (hectare)		4.589*	
Gross Residential Density (people and jobs / hectare)		62.7 - 78.1	
Net Residential Density (people and jobs / hectare)		41.4 - 51.5	
Net Density (units / hectare)		24.4 - 30.7	
*Net Area excludes floodplain lands and forested slope			

12. SUSTAINABLE DESIGN & GREEN BUILDING REPORT

This section of the Report identifies sustainable design policies within the Township of Woolwich Official Plan (OP) and how the revised development proposal responds to the policies. Section 7.9.1 of the OP provides the following General Sustainable Design Principles:

- An emphasis on a high-quality public realm, including, but not necessarily limited to, streets, parks and play areas which provide a streetscape and building form that promotes community interaction;
- An integration of uses and housing types within communities and neighbourhoods;
- Efficiency of land use;
- Minimizing reliance on motor vehicles;
- Support for the natural environment; having regard to those design elements that minimize the impact of climate change;
- Achieving sustainable design, and
- The use of urban design to address public safety and crime prevention issues.

It is our opinion that the revised development proposal aligns with these sustainable design principles, as the revised proposal:

- Provides a range of low and medium density residential development within a mixed-use community.
- Promotes gentle density through more compact housing form, making efficient use of existing public infrastructure.
- Supports the achievement of transit supportive densities for future public transit expansions within the Township.
- Incorporates walkways along all streets, including extensions of the sidewalk towards the west, along the northern boundary of the subject lands.
- Incorporates common amenity areas in the form of trails and SMW ponds that encourage recreational activities and active transportation.
- Preserves natural heritage features within the subject lands with an appropriate buffer.
- Directs the stormwater flow away from Conestogo River and into the SWM pond to minimize any negative impacts on fish habitat.
- Aligns with CPTED principles towards the site design.
- Incorporates a variety of sustainable design elements within its preliminary design, which are further discussed below.

Section 7.9.2 of the Township OP provides Sustainable Design and Green Building policies that are applicable to new developments, including green building technologies, renewable and alternative energy options and other sustainable design options. The following table outlines the policies and the preliminary measures that are being considered within the design of the revised development proposal.

Sustainable Design and Green Building Policies	Potential Sustainability Measures
The Township shall encourage all new buildings to be designed and constructed to achieve the most current Ontario Building Code, Energy Star, or R-2000 requirements.	The buildings will be constructed to Ontario Building Code efficiency standards including insulation, heating, cooling and water flow requirements. Opportunities to exceed OBC minimum requirements will be explored through detailed design within the Site Plan Approval process.
The Township shall encourage all new buildings to achieve 10 percent greater water efficiency than the Ontario Building Code Act.	Use of water saving technologies such as low flow fixtures, low water consuming appliances and fixtures will be contemplated at the time of Building Permit. At minimum, the revised development proposal will meet contemporary Ontario Building Code requirements for water efficiency.
The Township shall encourage the use of water efficient, drought resistant landscaping.	Through the Site Plan Approval process, a landscape plan will be prepared for the development which will include the provision of natural species and drought resistant plantings.
The Township shall encourage that all new development reduces construction waste and diverts construction waste from landfills.	Diversion of construction waste from the landfill will be contemplated whenever feasible through sorting and waste management either on-site or off-site.
All new residential development shall be designed to provide barrier-free access through accessible features that are well integrated with the function and design of the sites and consistent with the applicable standards and regulations of the AODA and the OBC.	The revised development proposal conforms with AODA principles, which includes the provision of barrier-free parking spaces. As stated previously, the buildings will be constructed to ~~will~~ meet or exceed the minimum standard of OBC.
All new development shall have regard for the Township's Tree Canopy Policy and Topsoil Policy, where applicable.	A landscape plan will be prepared as part of the Site Plan Approval process.

Water Conservation

A Functional Servicing and Stormwater Management Report has been prepared outlining how the site will be serviced and how stormwater may potentially be managed on the site.

The applicant will explore the implementation of water conservation measures through detailed design of the project which is contemplated to include low flow fixtures, and low water consuming appliances and fixtures.

The site will also be subject to a detailed landscape plan which will incorporate local species and drought resistant plantings.

Energy Conservation and Generation

The applicant will consider efforts to reduce resource consumption, where feasible. The new building will be constructed to OBC efficiency standards, which may include insulation, heating, and cooling requirements.

The revised development proposal will explore opportunities for energy efficiency through its final detailed design within the Site Plan Approval process. The features being contemplated include:

- High performance, energy efficient building components including insulation, windows, wall and roof construction
- High efficiency HVAC infrastructure
- Energy efficient light fixtures and the provision of EnergyStar appliances

Air Quality

The applicant is committed to preparing a sustainable landscape design which will be prepared as part of the Site Plan Approval process. This may include perimeter tree plantings and street tree plantings to the extent possible and the use of native and drought resistant plantings.

Waste Reduction and Management

Through the Site Plan Approval process, the applicant will explore on-site waste management facilities, including compositing and recycling, and the installment of Moloks dispersed throughout the site. The applicant will consider ways to reuse building materials as viable for this project or others in the community.

13. SUPPORTING STUDIES

This section of the Report provides summaries of the supporting studies with regards to the Official Plan and Zoning By-Law Amendment Applications.

a) Archaeological Assessment

A Stage 1 and 2 Archaeological Assessment was prepared by AMICK Consultants Ltd. dated July 16, 2024. The Report was a submitted to the Ontario Ministry of Citizenship and Multiculturalism (MCM) and entered into the register on November 20, 2024.

The entirety of the study area was subject to property inspection and photographic documentation concurrently with the Stage 2 Property Assessment which consisted of high intensity test pit methodology at a five-metre interval between individual test pits, test pit survey at a ten-metre interval to confirm disturbance and high intensity pedestrian survey at an interval of 2.5 metres between individual transects due to new growth plants.

As a result of the property assessment of the study area, four isolated artifacts were documented and one scatter of pre-contact artifacts. The isolated archaeological finds on site were completely documented and the artifacts have been removed from the study area as a result of standard Stage 2 Property Assessment procedure.

The subject lands are clear of any archaeological concern and no further archaeological assessment of the study area is warranted.

b) Functional Servicing and Stormwater Management Report (Revised)

A revised Functional Servicing and Stormwater Management Report was prepared by GEI Consultants Canada Ltd., dated December 17, 2025, and further amended March 9, 2026. The Report documents the proposed site grading, servicing, and stormwater management design for the revised development concept and reflects Township Council's January 27, 2026, direction regarding the preferred sanitary servicing strategy.

Per the Report, water servicing is proposed via extension of the existing 150 mm diameter watermain along Hawkesville Road, which currently terminates east of the site. The watermain will be extended approximately 100 metres west and looped through the development to provide domestic supply and fire protection, with confirmed fire flow capacity based on hydrant testing.

With respect to sanitary servicing, the amended Report now advances the servicing connection through Chris Court as the proposed servicing strategy. This strategy consists of installing a deep 200 mm diameter gravity sanitary sewer from the eastern limit of 51-55 Hawkesville Road to the existing 200 mm sanitary sewer on Chris Court, via a sanitary sewer easement through 9 Chris Court. Sewer depths are anticipated to range from approximately 2.8 metres to 7.3 metres below proposed ground surface. The proposed sanitary sewer within the Polocorp lands will be designed at a minimum slope of 0.50% (or as required to achieve appropriate cover), ensuring adequate hydraulic performance and servicing flexibility. Capacity analysis confirms that the existing 200 mm diameter sanitary sewer on Chris Court has sufficient available capacity to accommodate cumulative future flows, operating at approximately 72% of full capacity under projected build-out conditions.

In accordance with Township Council's direction, the Polocorp lands and any future development at 47 Hawkesville Road are proposed to connect via Chris Court. Should it be determined that lands north of Hawkesville Road (including 52, 56, or 60 Hawkesville Road) cannot be serviced via Hawkesville Road, the proposed sanitary sewer within the Polocorp lands can be lowered and extended to facilitate servicing of these properties, thereby providing broader municipal servicing integration.

As previously demonstrated through earlier submissions, a public sanitary pumping station connection to Hawkesville Road remains technically feasible. However, in response to Council's direction and ongoing coordination with the Township, the current Functional Servicing strategy exclusively advances the Chris Court gravity connection as the proposed servicing approach.

Per the Report, stormwater management is designed to attenuate post-development peak flows to pre-development levels for storm events up to the 100-year and Regional storm, while achieving enhanced water quality control (80% TSS removal) through a treatment-train approach including lot-level controls, oil/grit separators, and a wetland-type end-of-pipe stormwater management facility discharging to the Conestogo River. The amendment further acknowledges that additional external flows from lands north of Hawkesville Road may be directed to the Polocorp stormwater management facility, subject to attenuation to existing condition levels and appropriate quality control prior to discharge. The storm sewer system is designed to convey the 5-year event, with major overland flow routes safely directed to the stormwater management facility.

c) Geotechnical Report

A preliminary Geotechnical Investigation, prepared by GEI Consulting Engineers and Scientists and dated January 23rd, 2025, was conducted for the subject lands. The purpose of the geotechnical investigation is to assess the subsurface soil conditions at the site, and provide recommendations for the construction of the proposed development.

On April 23, 2024, six (6) boreholes were drilled throughout the site, and six (6) monitoring wells were installed to measure groundwater levels. The borehole locations are shown on the Borehole Locations Plans in Figure 2A and 2B in the Geotechnical Report.

Based on the fieldwork, the following observations of the subsurface conditions were made:

- Topsoil was encountered at the ground surface in all boreholes.
- Fill was encountered in Borehole 24-01, which comprised of sand with varying amounts of silt, gravel, and cobbles, as well as some traces of organics and/or rootlets. The sand condition varied from very loose to very dense.
- A deposit of (loose) silty sand was encountered in Borehole 24-02, which contained trace amount of clay and gravel.
- A layer of silty clay was encountered in Boreholes 24-03 and 24-05, which contained some sand and trace gravel. The silty clay was moist to dry in Borehole 23-03, and wet in Borehole 24-05. The silty clay contains high plasticity (CH).
- A deposit of sandy silt to silty sand glacial till was encountered underlying the fill in Borehole 24-01, underlying the silty sand in Borehole 24-02, below the silty clay in Borehole 24-03 and Borehole 24-05, and below the topsoil in Boreholes 24-04 and 24-06.

The glacial till generally contained trace to some gravel and trace amounts of clay, although some plastic zones were encountered locally within the till. Glacial till contains cobbles and boulders, which have slight to low plasticity (ML to CL-ML).

The existing topsoil, fill, loose silty sand, and soft to firm silty clay are not suitable to support the foundations. These materials are to be removed and replaced with engineered fill. Footings could then be placed at nominal depth and be founded on engineered fill or native soil at depth and the floor slab could be supported by engineered fill.

Soil samples from Boreholes 24-02, 24-03, and 24-04 were submitted for testing of corrosivity, which indicated a low potential for soil corrosivity to affect cast iron alloys. Thus, corrosion protection measures are not recommended. The samples were also tested for water-soluble sulphate content, which indicated negligible exposure to sulphate attack, and therefore no additives are required.

The Report provides the following recommendations with regards to foundations, basements, site servicing, pavement design, as well as considerations with respect to construction:

- Foundation footings stepped from one level to another must be at a slope not exceeding 7 vertical to 10 horizontal.
- All footings exposed to ambient air temperature throughout the year must be provided with a minimum of 1.2 m of earth cover or equivalent insulation for frost protection.
- All building floor slabs must be provided with a capillary moisture barrier and drainage layer.
- For buildings with basements, a perimeter drainage system must be installed that will remove any water that infiltrates into the building backfill.
- Basements should be established a minimum of 1 m above the seasonal high groundwater table.
- Following subexcavations to the piping subgrade level, any topsoil/organics, loose/soft or wet, and disturbed materials should be subexcavated and replaced with engineered fill.
- Continuous pavement subdrains should be provided along the edges of the pavement and drained into respective catch basins. The subdrain invert should be maintained at least 0.3 m below subgrade level.
- Consideration should be given to raising the grades at the site.
- It is recommended to carry out the work during the dry time of the year when the ground water table is lowest.
- The SWM facility (pond) coincides with a thick later, which will need to be removed.

d) Hydrogeological Study

A Hydrogeological Study, prepared by GEI Consultants Canada Ltd. and dated January 20th, 2025, was conducted for the subject lands. The purpose of the Study is to identify key hydrogeological characteristics and to assess the potential impact that the proposed development may have on the local hydrogeological system, groundwater, and groundwater-interactions with nearby surface water features. Based on the investigation and assessment of the Study, the proposed residential subdivision is not anticipated to cause hydrogeological impacts. The

assessment has identified no significant obstacles that would preclude the proposed development.

A field investigation was conducted as part of the Study. A subsurface (i.e., drilling) investigation was conducted with the concurrent geotechnical investigation. On April 23, 2024, six (6) boreholes were drilled, and a monitoring well was installed in each of the six (6) boreholes to permit long-term groundwater monitoring and hydrogeological testing. On May 3, May 13, and September 3, 2024, groundwater level measurements were collected from the six (6) monitoring wells and from the shallow piezometer. Groundwater samples were also collected from monitoring wells 24-01, 24-03, and 24-05 on May 13, 2024. On May 3, 2024, single-well response tests from monitoring wells 24-01, 24-02, and 24-06 were conducted.

Generally, the reported results indicate that the shallow groundwater on-site is moderately mineralized. Sodium and chloride concentrations from the groundwater samples indicate some slight influence from road salting activities. An exceedance of the PWQO value was reported for the metal parameter cobalt at monitoring well 24-01, which is expected to be due to natural occurrence. The elevated concentration of cobalt is unlikely to cause deleterious impacts to the environment during construction dewatering. The significance of the site as a source of groundwater recharge is considered to be minimal. The development of the site is not expected to cause a decrease in the quantity of water available to private wells. The development is also not expected to cause natural hazards, adverse impacts to watercourses or negative impacts related to sediment transport and erosion.

The following conclusions and recommendations are made:

1. That groundwater levels continue to be monitored at the monitoring wells on-site until final approval is issued and that monitoring include the following:
    - Annual sampling and analysis for groundwater quality
    - Quarterly groundwater level monitoring, augmented by dataloggers installed in each monitoring well and set to record water levels at least once a day.
2. That, per prior correspondence with the Township, the Township consider approving draft plan of condominium on the basis of one year of groundwater monitoring data and issuing final approval based on a total of two years of groundwater monitoring data.
    - It is noted that this report provides data for a period of less than one year. Additional monitoring data would be submitted in an updated hydrogeological study report or in a hydrogeological study addendum letter, as appropriate.
3. That additional investigation be undertaken in the vicinity of monitoring well 24-01 to confirm soil and groundwater conditions (i.e., extent, hydraulic conductivity, groundwater quality) in the fill soils identified in that area.
    - As these investigations are intended to determine practical matters with respect to details for construction dewatering, it is considered that these investigations may be deferred until after draft plan approval is issued.
4. That a detailed construction dewatering assessment be prepared, including recommendations for construction dewatering monitoring and mitigation (e.g., discharge management), following the completion of the groundwater level monitoring and additional investigation recommended in item 3 above.

5. That, especially during construction dewatering, suitable erosion and sediment controls be implemented by the contractor to protect the receiving drainage feature(s) from potential impacts (e.g., sediment accumulation, turbidity).
6. That if, during construction dewatering, the outlet of the dewatering discharge line is less than 30 m from a municipal drain or watercourse, then daily monitoring of turbidity be undertaken according to Section 6 of this report.
7. That the stormwater management plan ensures that the development of the existing pond and select parts of the GRCA regulated area on-Site will not result in negative impacts such as flooding or erosion.
8. That the geotechnical report for the project provide appropriate plans (e.g., engineered fill, compaction procedures) to address potential for unstable soils where development is proposed at the existing pond.
9. That all proposed dwellings with basements be constructed with foundation drains according to the Ontario Building Code.
10. That, noting the prevalence of fine-textured soils on-site and the expected effectiveness of foundation drains in protecting basements against basement seepage,
    - where feasible, basements shall be constructed meeting the required clearance between seasonal high groundwater levels and underside of footing, which (as specified in the Township Engineering Development and Infrastructure Manual) is 0.8 m for walk-out basements and 0.6 m for other basements; or
    - for any basement not meeting the specified clearance, a geotechnical or groundwater engineer (licensed by Professional Engineers Ontario) conduct an inspection of the excavation and confirm the absence of coarse, permeable soil layers. In the event that a coarse, permeable soil layer is identified during the inspection, that basement shall be “waterproofed” in accordance with the requirements of the Ontario Building Code.
11. That all subsurface linear infrastructure (e.g., storm sewers, sanitary sewers, watermains) be constructed with trench plugs to minimize the potential for development of preferential groundwater flow pathways and minimize induced groundwater drainage.
12. That, when no longer required for the purpose of monitoring to satisfy municipal approval requirements, wells on-site be decommissioned by a licensed water well driller as per Ontario Regulation 903.
13. That a well monitoring program be developed and conducted during construction dewatering and for an appropriate period (e.g., 3 years) following 95% build-out of the subdivision, to monitor water quality at overburden wells within 100 m of the proposed SWM pond.
14. That the stormwater management facility be constructed with an appropriate impermeable liner.(e.g. geomembrane, geosynthetic-clay, or compacted clay).

e) Slope Stability Report

A Slope Stability Report has been prepared by GEI Consultants Canada Ltd. on January 23rd, 2025. The purpose of the report is to provide visual slope inspection and slope stability analysis in order to identify erosion hazards, as well as provide the recommended setback for the proposed development.

The slope is located near the south side of the site approximately 200 m south of Hawkesville Road and extends from roughly 50 m east of the railway line to the east property line. The slope is approximately 8 to 13 m in height with an overall inclination of about 3.0H:1V to 2.4H:1V. The slope is heavily forested with trees.

During the visual slope inspection, no signs of concentrated runoff or seepage were observed, nor were signs of slope instability (e.g. tension cracks, toe bulging, etc.). The Rating Value obtained from the MNR Slope Rating Form was 38, which indicates a moderate potential for slope instability. Similarly, an analysis of existing conditions based on the computer program Slide2 provided by RocScience Inc. identified that the computed factor of safety (FOS) for the existing slope was 1.71, which indicates that the slope is stable.

Based on the analysis, all new building lots should be setback a minimum distance of 6 m from the existing top of slope. The following recommendations during construction are provided:

- Construction and restoration activities should be conducted in a manner which does not result in surface erosion of the slope.
- Site grading and drainage should be designed to prevent direct concentrated or channelized surface runoff from flowing directly over the slope.
- Water drainage (i.e. from rood down-spouts, sumps, road drainage, etc.) should not be permitted to flow over the slope crest, but be directed into stormwater management infrastructure or to the bottom of the slope to areas where the erosive energy can be dissipated (e.g. rip-rap splash pads).
- A healthy vegetative cover should be maintained on the slope, and disturbance to the slope and vegetation on the slope should not occur. Any slope areas disturbed by construction should be restored with suitable native vegetation as soon as possible.
- The slope should not be steepened and fill materials (including landscape debris) should not be placed on the slope or within 3 m of the slope crest.
- A sedimentation control fence (silt fence) should be erected around work areas prior to the commencement of site works.

f) Environmental Impact Study

An Environmental Impact Study was conducted by Dougan Ecology Ecological Consulting & Design dated January 21, 2025. The proposed development would result in the permanent removal of the 0.2 ha unevaluated wetland including the man-made pond and adjacent meadow marsh. GRCA policy makes allowances for removal of anthropogenic wetlands under certain conditions all of which are met in this instance. Additionally, no negative hydrologic impacts are anticipated with respect to the removal of the wetland.

A total of 53 trees are proposed for removal to facilitate the proposed development. An additional 10 are proposed to be injured/impacted due to excavation work occurring within treed driplines. Tree removals, avoidance and mitigation strategies to minimize impacts to trees are outlined are addressed in the Arborist Report & Tree Preservation Plan.

A total of 0.18 ha of confirmed Significant Wildlife Habitat (SWH) and 0.87 ha of candidate SWH are proposed for removal, totaling 1.05 ha of candidate or confirmed SWH. Impacts to candidate and confirmed Significant Wildlife Habitat.

The conversion of agricultural land to residential will inevitably result in land use changes that may affect the adjacent valleylands. Normal use of the dwellings and yards introduce a large and uncertain number of practices which may result in a number of potential secondary effects on the natural features. However, strategies to address potential encroachment issues can largely addressed through the establishment of ecological buffers, as shown on the Buffer Planting Plan prepared by Dougan Ecology.

Several mitigation strategies are recommended in Section 8 of the Report including best practices during and post-construction, tree preservation and replacement, ecological buffering and post-development fencing, post-development run-off volumes and water balance protection, erosion and sediment control, and wildlife rescues and habitat enhancement.

g) Arborist Report & Tree Preservation Plan

An Arborist Report & Tree Preservation Plan was prepared by Dougan Ecology Ecological Consulting & Design dated January 21, 2025. A total of 103 trees of 10cm DBH or larger were inventoried and assessed within the subject lands including trees within forested slopes, hedgerows, and cultural communities. To facilitate the proposed development, a total of 53 trees are proposed to be removed and 10 additional trees may be injured. An additional 40 trees will be retained on site. Trees proposed for removal are proposed to be replaced on site at a ratio of 2:1 (a total of 106 replacement trees), consisting of native species appropriate to the planting location.

Tree preservation and mitigation recommendations for trees marked as preserve or injure include:

- Installing Tree Protection Fencing (TPF) surrounding the trees prior to and shall be maintained during construction
- Where excavation is proposed within the dripline and/or tree protection zones, root pruning may be required and shall be preformed by a qualified arborist
- Trenching should be avoided within the Tree Protection Zone (TPZ) of trees to be preserved. Where this is not feasible, dig the trench by hand and either prune roots or bridge roots.
- Ensure TPF is installed around trees to keep traffic and storage out of root area. Where access within the TPZ is required, adjust the TPZ and protect soils with at least 15cm of mulch.
- If injury should occur to any tree during construction, it should be evaluated as soon as possible (no more than 6 hours) by a certified arborist so that appropriate treatments can be applied.
- Bark that is damaged shall be neatly trimmed back to uninjured bark without causing further injury to the tree.

If the recommendations herein are followed, the project will be conducted in compliance with provincial and local regulations.

h) Transportation Impact Study

A Traffic Impact Study (TIS) was prepared by Paradigm Transportation Solutions Limited, dated January 2025. The purpose of the TIS is to analyze existing traffic conditions and traffic forecasts

for a five-year horizon from the study commissioned date (2029), as well as to provide recommendations to improve future traffic conditions. The TIS concludes that based on the findings of this study, it is recommended that the development be considered for approval with no conditions related to off-site transportation improvements.

Based on the assessments carried out, it is concluded that the study area intersections are currently operating within acceptable levels of service and no critical movements during the AM and PM peak hours. The proposed development is forecasted to generate approximately 85 new trips in the AM peak hours and 103 new trips in the PM peak hours, which is deemed minor and manageable within the current traffic network's capacity.

Moreover, the study area intersections are forecasted to operate at acceptable levels of service similar to existing traffic conditions without any critical movements noted during the AM and PM peak hours. The intersections within the study area will continue to operate at acceptable levels of service as these additions are considered to have a minor impact on the overall flow within the intersections. Therefore, the existing capacity is sufficient to accommodate the new trips generated by the development without requiring significant changes or upgrades to the road infrastructure.

The study also considered potential remedial measures, specifically the need for additional left-turn lanes at key intersections. The analysis concluded that a westbound left-turn lane is not warranted along Hawkesville Road at the Primary Site Access based on the projected traffic volumes and patterns. The traffic flows, including turning movements, are manageable within the current roadway configurations, and no modifications are necessary to maintain efficient traffic operations.

i) Noise and Vibration Feasibility Study

A Noise and Vibration Feasibility Study was prepared by HGC Engineering dated January 22, 2025. The primary sources of noise are road traffic on Hawkesville Road to the north and rail traffic on the Waterloo Central Railway to the west.

Forecasted traffic data for the Hawkesville Road was obtained from the RMOW while rail traffic data was obtained via unattended vibration measurements and HGC Engineering past project files in the area. Traffic data was used to predict future traffic sound levels at the proposed development. The predicted sound levels were evaluated with respect to the guidelines of the RMOW and the Ministry of the Environment, Conservation and Parks (MECP).

The study concludes that the traffic noise exceeds the MECP sound level criteria during daytime and nighttime hours at the proposed residential development. A brick or masonry equivalent home facades, air conditioning, and upgraded window glazing are required for dwellings closest to the railway. Exterior building constructions meeting the minimum requirements of the Ontario Building Code will provide sufficient acoustical insulation for the interior spaces of the buildings further from the railway.

Warning clauses are also required in the property and tenancy agreements and offers of purchase and sale of all the residential units in order to inform future owners/tenants of the sound level excesses and proximity to industrial/commercial uses.

j) Fiscal Impact Assessment

A Fiscal Impact Assessment was prepared by urbanMetrics dated January 16th, 2025, to review the financial impact of the proposed development. The assessment concluded that the proposed development would have a positive fiscal impact for both the Township and the Region. It would generate an estimated $2.5 million in development charge revenues for the Township and $5.6 million for the Region, as well as $562,000 in building permit fees for the Township. In terms of ongoing impacts, the report estimates that the proposed development would generate approximately $306,000 in annual net revenues at full build-out for the Town and $54,000 for the Region assuming that the on-site infrastructure would be owned and operated by the developer.

14. CONCLUSION

This Report provides an assessment of the revised development proposal and development applications for the property known municipally as 51-55 Hawkesville Road and 9 Chris Court, which includes a discussion on the existing conditions of the site, the history of applications and correspondence, its context, the land use planning policy framework applicable to it and land use planning rationale for the development proposed.

Based on our assessment of the applications, it is our opinion that the proposed Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision applications are justified as it has regard to the "Matters of Provincial Interest" set out in the *Planning Act*, is consistent with the PPS (2024), and conforms with the Region of Waterloo Official Plan / ROPA 6.

Moreover, it is our opinion that the development provides for context appropriate intensification, supports the orderly redevelopment of the site, and supports the wise use of existing infrastructure. It is our opinion that the applications serve the public interest and represent sound land use planning.

Based on the above and the conclusions of this Report, it is our recommendation that the Township of Woolwich continue to process the development applications and re-circulate the updated materials to internal departments, technical review agencies, and the community in accordance with Township procedures and the *Planning Act*.

Respectfully submitted,

up consulting

David Galbraith, MCIP RPP
President, UP Consulting

Christian Tsimenidis MCIP RPP
Senior Planner, UP Consulting

APPENDIX A: ST. JACOB'S POPULATION AND STAGING PROJECTIONS (WOOLWICH STAFF REPORT DS10-2025)

ST. JACOBS A-1b - POPULATION AND STAGING PROJECTIONS

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039
ST. JACOBS																				
Population																				
Projection	2,185	2,254	2,324	2,392	2,477	2,571	2,635	2,699	2,763	2,827	2,891	2,955	3,019	3,083	3,147	3,211	3,275	3,339	3,403	3,467
StatsCan																				
Staging																				
Total	**55**	**69**	**70**	**68**	**85**	**94**	**64**	**64**	**64**	**64**	**64**	**64**	**64**	**64**	**64**	**64**	**64**	**64**	**64**	**64**
Targeted Infill*	16	16	16	16	16	39	9	9	9	9	9	9	9	9	9	9	9	9	9	9
Total	0	14	15	13	30															
Remaining	16	2	1	3	-14	39	9	9	9	9	9	9	9	9	9	9	9	9	9	9
Targeted Greenfield*	39	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55
Polocorp	19	28	27	28	27	28	27	28	27	28	27	28	27	8						
357																				
N/S Hawksville	20	27	28	27	28	27	28	27	28	27	28	27	28	47	55	55	55	55	55	3
966																				
Valeyview Heights	16																			
Total	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	55	3
Remaining	-16	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	52
Sewage Capacity	1230	1161	1091	1023	938	844	780	716	652	588	524	460	396	332	268	204	140	76	12	0
Assuming Improvements Are Made																				