

Planning Justification Report

52 Hawkesville Road and 110 & 118 Northside Drive, St. Jacobs, Township of Woolwich

Schlegel Urban Developments Corp.

Official Plan Amendment, Zoning By-law Amendment & Draft Plan of Subdivision

May 2025



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Township of Woolwich
Region of Waterloo

April 2025

Prepared for:

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1. Introduction

1.1 Background

GSP Group has been retained by Schlegel Urban Development Corp. (the “Owner”) to prepare a Planning Justification Report in support of applications for Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision for the property in north-west St. Jacobs municipally addressed as 52 Hawkesville Road and 110 & 118 Northside Drive (the “Subject Property”).

The Proposed Development includes 18 residential lotless blocks containing a range and mix of housing typologies including single and semi-detached, on-street townhouses, stacked townhouses, and the potential for apartment residential uses. A total of 186-409 residential units are proposed. Two parks are proposed, as well as stormwater management facilities. Two future development blocks provide access opportunities for adjacent lands. A residential reserve block is proposed for future consolidation and development of adjacent lands. Public roads are proposed to provide for adequate circulation. An Open Space Block captures the protected natural area and required buffer on the northern portion of the Subject Property. The proposal discussed above is detailed further throughout this report and is collectively described at the “Proposed Development” (see Figure 2)

The Subject Property was recently included within the Settlement Area Boundary as part of the Regional Official Plan Amendment No. 6 (“ROPA 6”). However, this change in the St. Jacobs Settlement Area is not yet reflected in the Township of Woolwich Official Plan or Zoning By-law. Since the passing of Bill 23, the Regional Official Plan is considered part of the in force Official Plan for the Township of Woolwich.

The proposed applications for Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision discussed in this report are necessary to facilitate the proposed development and to bring the Subject Property into conformity with the Provincial and Regional policies.

The following reports are provided in support of the proposed applications for Official Plan and Zoning By-law Amendment, and Draft Plan of Subdivision:

- Urban Design Brief;
- Environmental Impact Study;
- Phase 1 Environmental Site Assessment;
- Land Use Compatibility Study (Noise and Vibration Assessment);
- Functional Servicing and Stormwater Management Report, including Salt Impact Assessment;

- Geotechnical Report;
- Hydrogeological Report;
- Water Balance Assessment;
- Traffic Impact Study; and
- Archaeological Assessment.

Key findings and recommendations of these reports are discussed in Section 5 of this report but should be read in full in conjunction with this report.

Other materials provided in support of the proposed applications include:

- Draft Plan of Subdivision;
- Draft Phasing Plan;
- Consolidated Property Areas Sketch;
- Rail Safety Memo;
- Conceptual Landscape Plan for the Parks and Stormwater Management Facility; and,
- Grading, Drainage, Servicing, and Stormwater Management Plans;

1.2 Purpose and Scope

This report has been prepared in support of the proposed Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision applications. The objectives of this report are as follows:

- To provide a description of the Subject Property existing conditions and its context within Township of Woolwich and the immediate surroundings (Section 2),
- To outline the Proposed Development (Section 3),
- To provide an overview and analysis of the relevant Provincial, Regional, and Township of Woolwich planning policy and regulatory context relevant to the proposed applications, as well as to demonstrate consistency with or conformity to such policies and provisions (Section 4),
- To provide an overview of the studies prepared in support of the proposed application, including a description of their scope and summary of their conclusions (Section 5),
- To describe the proposed Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision applications (Section 6), and
- To provide an overview of the conclusions of supporting plans and studies for the proposed development (Section 7).

2. Site Information

2.1 Site Location and Existing Conditions

The Subject Property is located on the northern edge of the St. Jacobs Urban Settlement Area. The Subject Property is an urban parcel located along the north side of Hawkesville Road (Figure 1). The Subject Property is a large irregularly shaped block generally bounded by King Street North to the north, Northside Drive to the east, Hawkesville Road to the south, and existing rail line to the west. The Subject Property is approximately 28.98 hectares in size with a frontage of approximately 110 metres along Hawkesville Road and 64.9 metres along Northside Drive.

The Subject Property is a large, vacant, and underutilized parcel of land within St. Jacobs Urban Settlement Area. The Subject Property currently contains actively farmed agricultural land on the southern portion of the site and a significant woodland and wetland characterized by a mix of upland and wetland communities on the northern portion of the property. The natural features is discussed further in Section 6 of this report and in detail in the Environmental Impact Study (EIS) provided as part of the application submission.

Trees of various ages and types exist along the lot lines of the Subject Property, as discussed in the EIS. No street trees exist along Hawkesville Road. The existing topography of the Subject Property has a drainage pattern that conveys runoff from south to north to the existing woodland and ultimately rains to the Municipal Drain 11.

Soils on the Subject Property include a combination of topsoil, sandy silt, sand, and clayey silt, and glacial till.

2.2 Surrounding Context

The Subject Property is generally surrounded by agricultural, institutional and residential uses. Immediately north of the Subject Property is a woodlot and wetland. Further north are agricultural operations including Valley Springs Farm.

Several existing single detached residential dwellings abut the eastern boundary of the Subject Property. Frey's Hatchery, a chicken hatchery, and Calvary United Church and associated cemetery are directly east of the Subject Property. Further east of Northside Drive are commercial uses.

South of the Subject Property are two existing single detached residential dwellings. Hawkesville Road is also immediately adjacent to the site to the south. South of Hawkesville Road is TAS Trucking, an existing business employment. An unevaluated wetland and woodlot are located between the rail line and TAS Trucking. Conestogo River is located to further to the south.

Directly west of the Subject Property is a rail line, which also represents the northwest boundary of the St. Jacobs Urban Settlement Area. Further west are agricultural lands.

A short walk or drive from the Subject Property (approximately 900 metres), is the St. Jacobs Village which has a broad range of commercial retail, community, and institutional uses. The St. Jacobs Farmer's Market is about a 6 minute drive or 20 minutes by public transit (see figure 1). The St. Jacobs Market is the largest year-round indoor/outdoor farmer's market in Canada and attracts visitors from near and far and is an excellent commercial asset to the St. Jacobs community.

The Subject Property has frontage along Hawkesville Road, which currently has a municipal right-of-way (ROW) width of 30.7 meters as indicated through aerial imagery of the Subject Property. The designated road allowance in Schedule A of the Region of Waterloo Official Plan for Hawkesville Road from its intersection with "West end of [Calvary United Church] cemetery" and Knarr Street (Linwood) is 30.48 metres. Further road allowances are not required.

The Subject Property is within the vicinity of public transportation services, as a bus stop servicing route 21 is located at the intersection of Sawmill Road and Parkside Drive, an approximately 9-minute (650 metre) walk from the Subject Property. Route 21 provides connections to Conestoga Station and St. Jacobs Market. Existing public sidewalks are located east of Hawkesville Road from Calvary United Church eastwards, and along Northside Drive.

3. Proposed Development

3.1 Proposed Draft Plan

In designing the Proposed Development, consideration was given to the Provincial, regional, and municipal planning frameworks for managing and directing growth. The Proposed Development also considers the existing built environment and character of the St. Jacobs area. The Proposed Development is intended to optimize a vacant parcel of land recently added to the St. Jacobs Urban Area while respecting the existing and planned rural character of the Township.

The Proposed Development features a range of low and medium density residential uses accessed by a grid-like street network with appropriate connections to Northside Drive and Hawkesville Road. The streets within the Proposed Development are all 20m wide and feature sidewalks on both sides, boulevard trees and street lighting on both sides, and asphalt roads as per the Township's standard Right-of-way standard cross-section referenced in the Engineering Development and Infrastructure Manual (EDIM).

Two park blocks (Blocks 19 and 20 on the Draft Plan) are provided centrally within the subdivision and are sized to meet the passive and active park needs of the future residents of the subdivision. Parkland makes up a total of 4% of the developable area of the Subject Property. Cash-in-lieu of parkland will be provided for the balance of the parkland dedication requirements under Section 41 of the Planning Act. The Proposed Development contains a large Open Space block which will not be developed. This area contains a wooded area and Non-Provincially Significant Wetland. A stormwater management block provides for adequate facilities to manage the stormwater within the Proposed Development.

The Proposed Development includes a mix of lotless blocks containing a range of unit types. Blocks 1-6 are proposed to contain single detached or semi-detached homes yielding approximately 45-78 residential units. Lots 6-16 are proposed to contain an expanded range of residential unit types including single detached homes, semi-detached homes, and townhouses yielding approximately 101-236 units. Block 17 is proposed to contain on-street townhouses and/or multiple residential dwellings yielding between 20-38 units. Block 18 is proposed to contain multiple residential units which will yield approximately 20-57 units. Future development block 24 will provide for access to the rear of the Calvary Unity Church property which may be partially redeveloped in the future. Future development block 23 provides as an optional future access should the properties fronting onto Hawkesville Road redevelop and require additional access to their site. A residential reserve block is proposed between Street A and Northside Drive which may be redeveloped in the future should it be consolidated with properties north of it along Northside Drive (see Figure 2).

Table 1 – Land Uses in Proposed Draft Plan

Land Use	Lot/ Block	Official Plan Designation	Proposed Zoning	Units (min.)	Units (max.)	Area [ha]
Single/Semi Detached Residential	1–5	Residential and Ancillary	R.5	45	78	2.46
Single/Semi/Townhouse Residential	6-16	Residential and Ancillary	R.5 (16.xxa)	101	236	5.07
Street Townhouse Residential	17	Residential and Ancillary	R.6	20	38	0.54
Multiple Residential	18	Residential and Ancillary	R.6	20	57	0.60
Parks	19-20	Open Space	Open Space (OS)	---	---	0.62
Open Space	21	Open Space	Open Space (OS)	---	---	13.79
Stormwater Management	22	Open Space	Open Space (OS)	---	---	1.54
Future Development	23	Residential and Ancillary	R.6 (16.xxa)	---	---	0.05
Future Development	24	Residential and Ancillary	R.5 (16.xxb)	---	---	0.05
Residential Reserve	25	Residential and Ancillary	R.5 (H)	---	---	0.12
Roads	---	---	---	---	---	4.14
Total Developable Area (Excludes Natural Heritage and Required Buffer)	---	---	---	---	---	15.24
Total	---	---	---	186	409	28.98

3.2 Development Density Projections

Table 2 includes a break-down of estimated residents by dwelling type withing the Proposed Development. The number of persons per dwelling type has been taken from the Region of Waterloo's 2024 Water and Wastewater Monitoring Report. Table 2 demonstrates that the proposed residential units in the range of 186-409 provided in the Proposed Development are expected to accommodate approximately 702-1528 people and jobs per hectare. With a net developable area of 15.24 hectares (i.e. the area of the Proposed Development, excluding any non-developable lands such as the Protected Natural Heritage Area and required buffer captured within Open Space block 21), the Proposed Development provides for an overall density of approximately 46-100 persons and jobs per hectare.

Table 2 – Summary of Total Estimated Persons and Jobs

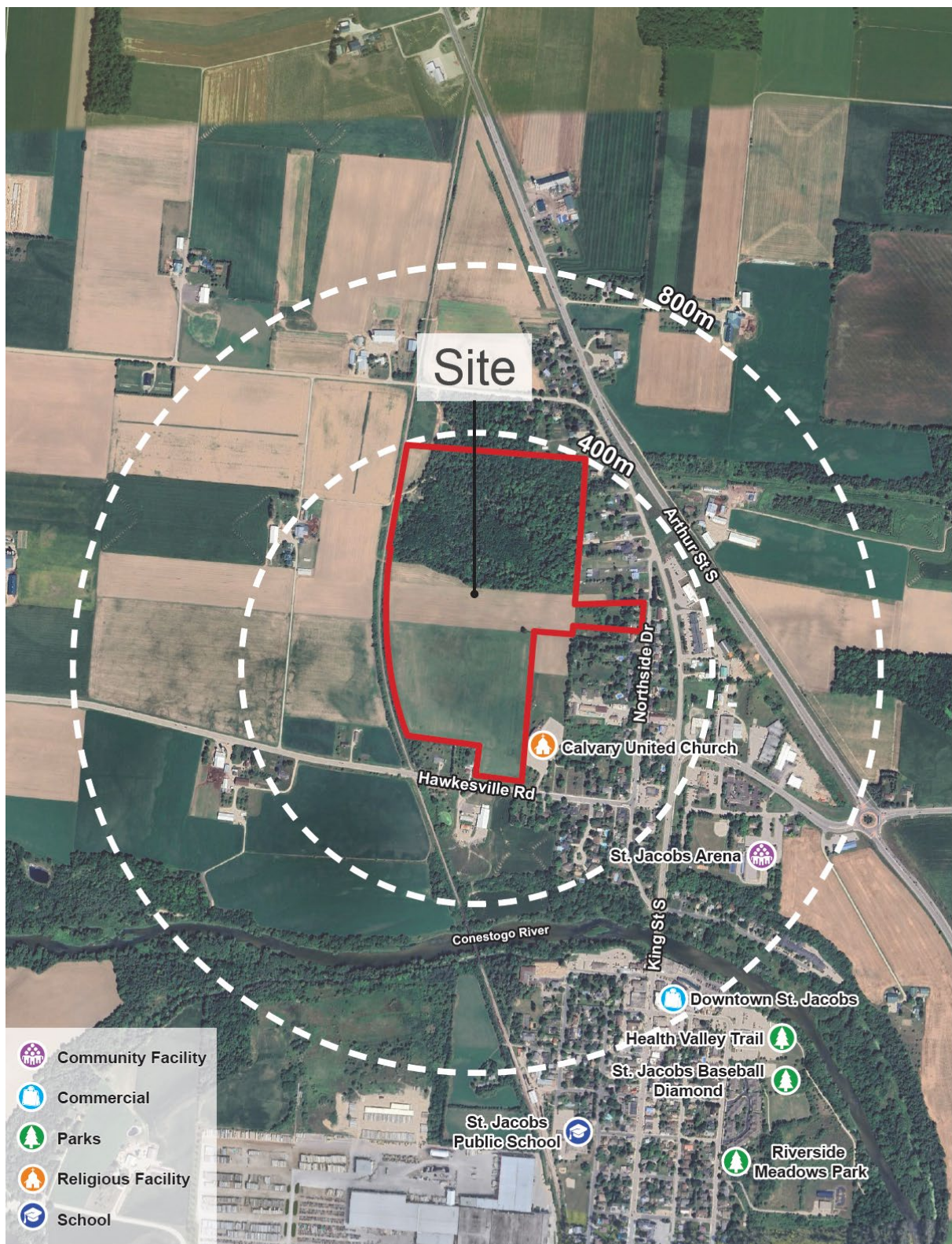
	Units		Persons per dwelling*	Population		Work-At-Home Jobs (28.8%)**		TOTAL RESIDENTS AND JOBS	
	Min.	Max.		Min.	Max.	Min	Max	Min	Max
Single Detached/ Semi	45	78	3.25	146.25	253.5	42.12	73.01	188.37	326.51
Single Detached/ Semi/ Street Townhomes	101	236	3.05	308.05	719.8	88.72	207.3	396.77	927.1
Street Townhomes	20	38	2.44	48.8	92.72	14.05	26.7	62.85	119.42
Multiple Residential	20	57	2.11	42.2	120.27	12.15	34.64	54.35	154.91
Totals	186	409		545	1186	155	342	702	1538
Developable Area (ha)***								15.24	
TOTAL RESIDENTS AND JOBS PER HECTARE PROVIDED								Min	Max
								46	100
*Average persons per dwelling values from 2024 Water and Wastewater Monitoring Report (Region of Waterloo) **Work-At-Home rate from 2021 Census (employed labour force by place of work status) *** PPS 2020 Directed that the minimum density target be measured over the entire designated greenfield area excluding natural heritage features and area, natural heritage systems and floodplains, provided development is prohibited in these areas; This total is total land area minus defined natural heritage feature and required buffer.									

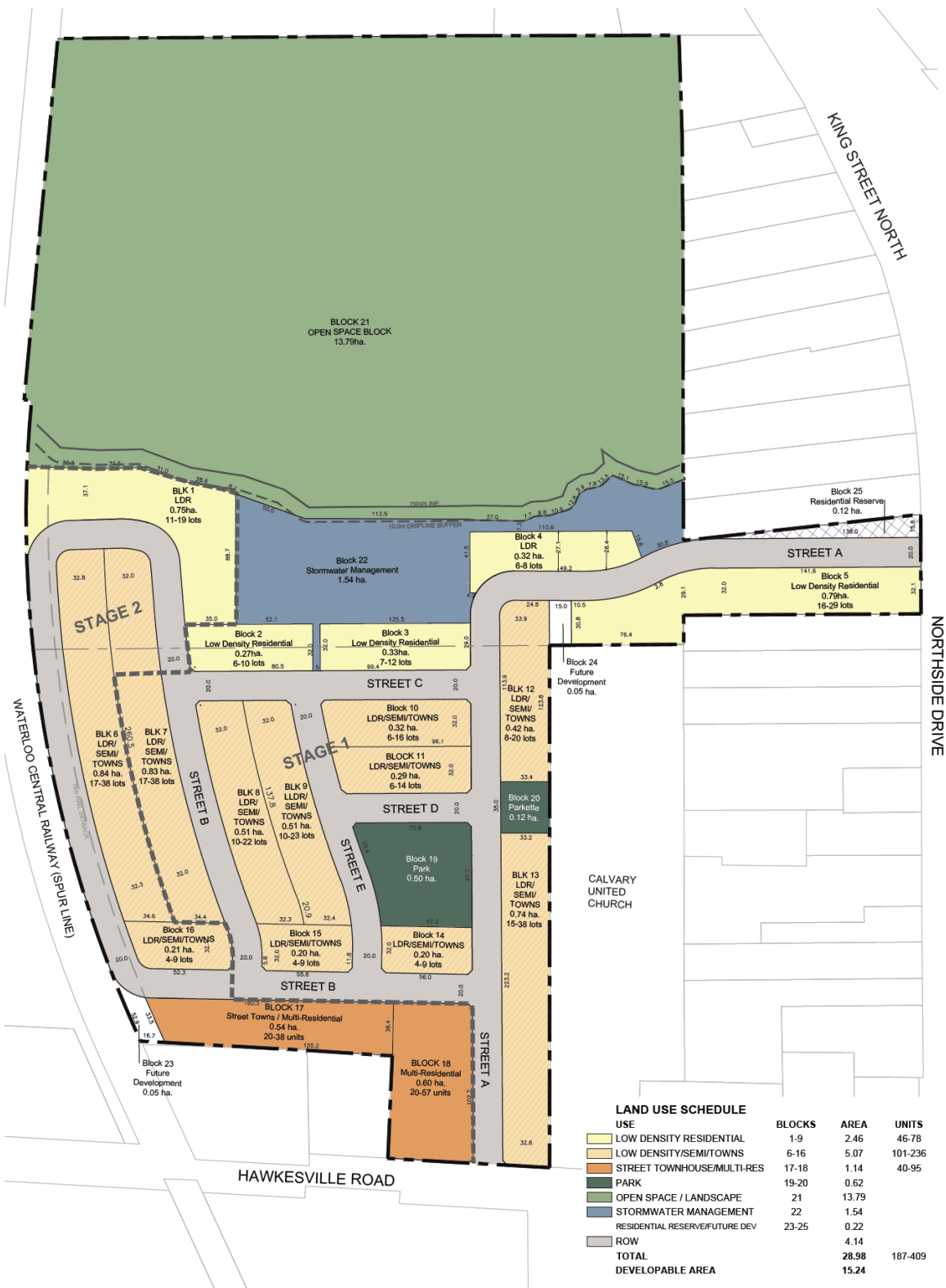
3.3 Urban Design

An Urban Design Brief, prepared by GSP Group provides details on the overall design of the Proposed Development and how it meets the Urban Design policies in the Township Official Plan.

3.4 Planning Applications

Official Plan and Zoning By-law Amendments as well as a Draft Plan of Subdivision are required to facilitate the Proposed Development in conformity with the Official Plan policies of the Region of Waterloo and Township of Woolwich. Details of the proposed Official Plan and Zoning By-law Amendments are presented in in Section 6 of this Report.





Development Concept
Source: GSP Group Inc (2025)

Figure
2

4. Policy Review

4.1 Planning Act

The *Ontario Planning Act*, R.S.O 1990, c. P.13, (the “*Planning Act*”) consolidated October 20, 2024, serves as an overarching piece of legislation that guides land use planning in Ontario. The *Planning Act* sets out regulatory procedures and processes associated with planning applications. The *Planning Act* further establishes land use controls, delegated authorities, and ensures appeal rights and public notice requirements. The *Planning Act* also seeks to integrate matters of provincial interest by requiring all decisions to be consistent with the Provincial Planning Statement.

4.1.1 Matters of Provincial Interest

Section 2 of the *Planning Act* provides that when municipal councils, planning boards, the Tribunal, and the Minister carry out their responsibility under the *Planning Act*, they shall have regard for matters of provincial interest. The provincial interests applicable to the proposed development and requested planning applications are assessed in the table below:

Planning Act – Assessment of Matters of Provincial Interest		
Section 2 Matters of Provincial Interest		
#	Criteria	Assessment
(a)	the protection of ecological systems, including natural areas, features and functions;	The Subject Property is located adjacent to a large woodlot containing a Non-Provincially Significant Wetland. An Environmental Impact Study was prepared by NRSI, April 2025 in support of the proposed development and recommends implementing a number of mitigation measures to reduce potential adverse impacts. These are discussed further in Section 6.
(d)	the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	An Archeological Assessment was prepared by Parslow Heritage Consultancy, dated Nov 1, 2023 and concluded that the Stage 2 survey did not result in the identification of archaeological materials and no further archaeological assessment is recommended.
(e)	the supply, efficient use and conservation of energy and water;	The Proposed Development optimizes energy and water conservation by connecting to existing and available municipal servicing infrastructure.
(f)	the adequate provision and efficient use of communication, transportation,	The Proposed Development makes efficient use of existing municipal services, road

	sewage and water services and waste management systems;	network, telecommunications infrastructure and public service facilities.
(h)	the orderly development of safe and healthy communities;	The Proposed Development is located within the St Jacobs Urban Area and is adjacent to existing, established residential uses. The Proposed Development supports the orderly development of safe and healthy communities.
(h.1)	the accessibility for persons with disabilities to all facilities, services and matters to which this Act applies;	The Proposed Development will adhere to all requirements set out in the Accessibility for Ontarians with Disabilities Act and the Ontario Building Code.
(i)	the adequate provision and distribution of educational, health, social, cultural and recreational facilities;	The Proposed Development is located in close proximity to several community amenities and services. It is located a short distance to St. Jacobs Village which has a wide range of commercial, retail, community, and institutional uses. The St. Jacobs Farmer's Market is located less than 5km away from the Subject Property and is an excellent commercial and retail asset for the community.
(j)	the adequate provision of a full range of housing, including affordable housing;	The Proposed Development introduces 186-409 residential units of various types and sizes to accommodate for the diverse needs of future residents.
(l)	the protection of the financial and economic well-being of the Province and its municipalities;	The Proposed Development will optimize existing municipal servicing infrastructure, thereby reducing additional costs associated with the expansion of such infrastructure.
(p)	the appropriate location of growth and development;	The Proposed Development is located within the St. Jacobs Urban Area and is within proximity to residential uses, community services and facilities. The Proposed Development represents the logical and orderly expansion of the existing urban uses in St. Jacobs. As such, the Subject Lands are an appropriate location for residential growth and development.
(q)	the promotion of development that is designed to be sustainable, to support public transit and to be oriented to pedestrians;	The Proposed Development introduces a total of 545-1186 new residents to the area that will support the transit infrastructure of St. Jacobs in addition to pedestrian oriented infrastructure

		including sidewalks on both sides of the road to support active and public transit.
(r)	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 Proposed Development incorporates a well-designed built form through a street pattern that is integrated and connected with the surrounding area. The proposal encourages a sense of place through consistent lot sizes and a consistent streetscape. The proposal will also provide for high quality, safe, accessible and vibrant public spaces through the provision of barrier-free and pedestrian oriented infrastructure.
(s)	the mitigation of greenhouse gas emissions and adaptation to a changing climate.	The Proposed Development supports the mitigation of greenhouse gases generated through personal vehicles through the provision of pedestrian-oriented infrastructure including sidewalks and walkways.

4.1.2 Draft Plan of Subdivision

Section 51(24) of the *Planning Act* sets out requirements for the subdivision of land. In consideration of draft plans of subdivision, regard shall be given to “health, safety, convenience, accessibility for persons with disabilities and welfare of the present and future inhabitants of the municipality.” The applicable criteria are evaluated in the table below:

Planning Act – Assessment of Criteria		
Section 51(24) Draft Plan of Subdivision Requirements		
#	Criteria	Assessment
(a)	the effect of development of the proposed subdivision on matters of provincial interest as referred to in section 2;	The Proposed Development has regard for the applicable matters of provincial interest per Section 2 of the Act as discussed above.
(b)	whether the proposed subdivision is premature or in the public interest;	The Proposed Development introduces 186-409 residential units that address the demand for new housing stock in the region while optimizing existing infrastructure. The Proposed Development is within the Urban Settlement Area and can be serviced by existing municipal services and infrastructure. As such, the Proposed Development is not premature and is in the public interest.

(c)	whether the plan conforms to the official plan and adjacent plans of subdivision, if any;	The Proposed Development generally conforms to the policies contained in the Official Plan, as discussed in Section 4.4 of this Report.
(d)	the suitability of the land for the purposes for which it is to be subdivided;	The Subject Property is suitable for residential development as they can be adequately serviced and are not located within any identified hazard lands. The Proposed Development includes the extension of existing municipal infrastructure that is currently available through Northside Drive. The Proposed Development therefore represents the logical expansion of existing municipal infrastructure and development within the existing settlement area.
(d.1)	if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;	Affordable housing units will be considered throughout the development process.
(e)	the number, width, location and proposed grades and elevations of highways, and the adequacy of them, and the highways linking the highways in the proposed subdivision with the established highway system in the vicinity and the adequacy of them;	The Proposed Development includes several internal streets that intend to connect to the existing road network including Hawkesville Road and Northside Drive. Direct linkages to highways are not proposed.
(f)	the dimensions and shapes of the proposed lots;	The proposed configurations and dimensions of the lots are generally rectangular in shape with sizes ranging from 192m ² - 676m ² and are consistent with the prevailing lotting pattern of the surrounding community.
(g)	the restrictions or proposed restrictions, if any, on the land proposed to be subdivided or the buildings and structures proposed to be erected on it and the restrictions, if any, on adjoining land;	The lands south of the Subject Property are bound by the railway, the subject property, and Hawkesville Rd. The Proposed Development includes the provision of two potential access points including from Street B, adjacent to townhouse block 17, as well as through Multi-Residential Block 18. The two access points to Hawkesville Road ensures the developability of adjacent lands is not impacts by the Proposed Development.

		Block 25 is proposed as “Residential Reserve” to allow for future development of the land should it be consolidated with adjacent land to the North. We propose an “H” be included in the zoning provisions for the block to restrict the development of this block unless it is consolidated with adjacent property to the north along Northside Drive to ensure a coherent development pattern and efficient use of land should this area be redeveloped in the future.
(h)	conservation of natural resources and flood control;	The developable portion of the Proposed Development is located outside of any natural resource areas or watercourses. Growth outside of natural heritage areas is encouraged and aides in the conservation of such areas.
(i)	the adequacy of utilities and municipal services;	The Proposed Development intends to connect to existing and available municipal servicing infrastructure which will have sufficient capacity to accommodate for residential growth associated with the proposed development as demonstrated in the Functional Servicing Report prepared by Walter Fedy, dated April 30, 2025 which is discussed in further detail in Section 6 of this report.
(j)	the adequacy of school sites;	The Proposed Development is located in proximity to Park Manor Senior Public School. The Waterloo Region District School Board and Waterloo Catholic District School Board will both be circulated with the full submission and will be given opportunity to comment on the Proposed Development regarding school adequacy concerns if there are any.
(k)	the area of land, if any, within the proposed subdivision that, exclusive of highways, is to be conveyed or dedicated for public purposes;	The Proposed Development includes the conveyance of a 0.5 hectare park block as well as a 0.12 hectare parkette which are intended to meet the recreation needs of the residents of the subdivision.

(l)	the extent to which the plan’s design optimizes the available supply, means of supplying, efficient use and conservation of energy; and	The Proposed Development aspires to create a sustainable and environmentally friendly community that optimizes energy conservation through operating on full municipal services and the use of high-performance energy efficiency measures. Further details on the sustainability measures proposed for the Development are discussed in the Urban Design Brief.
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51.1 Parkland

Section 51.1 of the Planning Act sets out the requirements for parkland dedication which enables municipalities to fund the costs for parks and ensures that residents continue to have access to parks and greenspace. Section 51.1(1) requires that 5% of land is conveyed to the local municipality for residential purposes. Operating under this calculation, a total of park space of 0.76 hectares is required. The *Planning Act* also allows for the provision of cash in lieu of parkland, or a combination of land and cash. A total of 0.62 hectares of parkland including a 0.5ha park (Block 19) and 0.16 ha parkette (Block 20) are proposed representing 4.07% of the land. It is GSP’s opinion that the proposed 0.5 hectare park and 0.12 hectare parkette provided as part of the draft plan of subdivision will adequately serve the community’s parkland needs. Therefore, cash in lieu of parkland will be provided for the balance of the Planning Act’s parkland dedication requirements.

In summary, the Subject Property is located within the St Jacobs Urban Area and is adjacent to establishes commercial, institutional and residential uses and represents an ideal location for introducing 186-409 residential units of various types and sizes. The proposed development precludes the environmental features to the north, thereby protecting ecological function and biodiversity. The proposed development optimizes existing infrastructure and facilities including municipal services, road network, and telecommunications infrastructure. The proposed Draft Plan of Subdivision includes several internal streets that are well-connected to the surrounding, established road network, and introduces a 0.5-hectare park block and a 0.16-hectare parkette in addition to cash in lieu for the balance of the parkland dedication requirements under the Planning Act. Overall, the proposed development has regard for the applicable matters of provincial interest and conforms to the Draft Plan of Subdivision criteria.

4.2 Provincial Planning Statement (2024) (“PPS”)

The Provincial Planning Statement (“PPS”), issued under the *Planning Act* came into effect October 20, 2024. It replaces the PPS that came into effect on May 1, 2020. The PPS provides policy

direction on matters of provincial interest related to land use planning and development. The PPS sets the policy foundation for regulating the development and use of land province-wide.

Chapter 2: Building Homes, Sustaining Strong and Competitive Communities

Housing

Section 2.2 of the PPS outlines requirements for planning authorities to provide for an appropriate range and mix of housing options and densities to meet projected needs of current and future residents of the regional market area by:

- a. *“establishing and implementing minimum targets for the provision of housing that is affordable to low and moderate income households, and coordinating land use planning and planning for housing with Service Managers to address the full range of housing options including affordable housing needs;*
- b. *permitting and facilitating:*
 - 1. *all housing options required to meet the social, health, economic and wellbeing requirements of current and future residents, including additional needs housing and needs arising from demographic changes and employment opportunities; and*
 - 2. *all types of residential intensification, including the development and redevelopment of underutilized commercial and institutional sites (e.g., shopping malls and plazas) for residential use, development and introduction of new housing options within previously developed areas, and redevelopment, which results in a net increase in residential units in accordance with policy 2.3.1.3;*
- c. *promoting densities for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and*
- d. *requiring transit-supportive development and prioritizing intensification, including potential air rights development, in proximity to transit, including corridors and stations.”*

Response: The Proposed Development includes a variety of housing types and options, which broadens housing options for future residents. The Proposed Development provides for a moderate expansion to an existing settlement area that is well serviced by existing community and commercial amenities, and results increased residential density ranges that will make efficient use of land, resource and infrastructure. Finally, the Proposed Development will result in additional residential population close to existing transit services at Sawmill Road and Parkside Drive and has been designed to include an active, accessible and well-connected pedestrian network.

Settlement Areas

Section 2.3 of the PPS establishes policies related to settlement areas.

Policy 2.3.1.1 states that settlement areas shall be focus of growth and development. Policy 2.3.1.2 states that land use patters 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.”*

Response: The Proposed Development is located within an existing settlement area, which are areas intended to be the focus of future growth and development. The Proposed Development will result in a range and mix of residential uses that are supportive by a well-designed, interconnected active pedestrian network that provides access to existing off-site transit uses.

Energy Conservation, Air Quality and Climate Change

Section 2.9 of the PPS directs planning authorities to *“plan to reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that:*

- a. *support the achievement of compact, transit-supportive, and complete communities;*
- b. *incorporate climate change considerations in planning for and the development of infrastructure, including stormwater management systems, and public service facilities;*
- c. *support energy conservation and efficiency;*
- d. *promote green infrastructure, low impact development, and active transportation, protect the environment and improve air quality; and*
- e. *take into consideration any additional approaches that help reduce greenhouse gas emissions and build community resilience to the impacts of a changing climate.*

Response: The Proposed Development is within the St. Jacobs Settlement Area and will make makes efficient use of the land and existing and planned infrastructure for the Township. The Proposed Development reflects the existing built form of the area and builds upon its suburban character through consistent lot pattern, while providing a range and mix of housing options appropriate for the area. The Proposed Development optimizes energy conservations by making efficient use of existing and available municipal water and sanitary infrastructure. The Proposed Development aspires to create a sustainable and environmentally responsible community by incorporating net-zero ready homes, green infrastructure, water-efficiency strategies, and emission-conscious design. The sustainability measures are outlined in more detail in the Urban Design Brief which forms a part of the complete submission materials.

Chapter 3: Infrastructure and Facilities

Chapter 3 of the PPS discusses policies related to infrastructure and public service facilities.

Land Use Compatibility

Section 3.5.1 of the PPS requires that *“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 viability of major facilities in accordance with provincial guidelines, standards and procedures.”*

Sewage, Water and Stormwater

Section 3.6.2, 3.6.3 and 3.6.4 outlines the hierarchy of preferred servicing options for new developments. Municipal sewage services and municipal water services are the preferred form of servicing for settlement areas.

Section 3.6.8 states that stormwater management shall:

- a. *“be integrated with planning for sewage and water services and ensure that systems are optimized, retrofitted as appropriate, feasible and financially viable over their full life cycle;*
- b. *minimize, or, where possible, prevent or reduce increases in stormwater volumes and contaminant loads;*
- c. *minimize erosion and changes in water balance including through the use of green infrastructure;*
- d. *mitigate risks to human health, safety, property and the environment;*
- e. *maximize the extent and function of vegetative and pervious surfaces;*
- f. *promote best practices, including stormwater attenuation and re-use, water conservation and efficiency, and low impact development; and*
- g. *align with any comprehensive municipal plans for stormwater management that consider cumulative impacts of stormwater from development on a watershed scale.”*

Public Spaces, Recreation, Parks, Trails and Open Space

Section 3.9 a) requires that healthy, active, and include communities are promoted by:

- a. *“planning public streets, spaces and facilities to be safe, meet the needs of persons of all ages and abilities, including pedestrians, foster social interaction and facilitate active transportation and community connectivity;*
- b. *planning and providing for the needs of persons of all ages and abilities in the distribution of a full range of publicly-accessible built and natural settings for recreation, including facilities, parklands, public spaces, open space areas, trails and linkages, and, where practical, water-based resources;*
- c. *providing opportunities for public access to shorelines; and*

- d. recognizing provincial parks, conservation reserves, and other protected areas, and minimizing negative impacts on these areas.”*

Response: Residential land uses are considered a sensitive land use. A Noise Impact Study was conducted by HGC, dated April 30, 2025 and indicated that traffic and stationary noise can be mitigated through the implementation of the recommendations outlined in the report, including construction materials and techniques, ventilation (i.e. provisions for central air conditioning), and warning clauses in agreements of purchase and sale.

The Proposed Development is planned to be integrated into the existing municipal water and wastewater systems. The Functional Servicing and Stormwater Management Report, prepared by Walter Fedy, dated April 30, 2025 demonstrates how the Proposed Development is integrated to ensure the system is optimized, minimizes contaminant loads, mitigates risks to human health, safety, and the environment, maximizes the extent and function of vegetative and previous surfaces. It also aims to promote best practices in stormwater management and aligns with municipal plans for stormwater management. Each of these items are discussed in detail in the Functional Servicing and Stormwater Management

Both the Noise Impact Study and Stormwater Management Report are summarized in Section 6 of this report.

The street network of the Proposed Development is planned to meet the needs of the community by providing transportation options to residents and visitors through the provision of sidewalks on both sides of every street. A 0.5 hectare park (Block 19) is proposed within the development to serve the subdivision and community at-large. A 0.12 hectare (Block 20) parkette will further contribute to the access and availability of open space for residents. Cash-in-lieu of parkland will be provided for the balance of the parkland dedication requirements.

Chapter 4: Wise Use and Management of Resources

Natural Heritage

Section 4.1 of the PPS requires that natural features be protected for the long term.

Section 4.1.2 states that *“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, improved, recognizing linkages between and among natural heritage features and areas, surface water features and ground water features.”*

Section 4.1.3 requires that municipality identify the natural heritage systems. According to Section 4.1.4 and 4.1.5, development and site alterations shall not be permitted in significant wetlands, woodlands, valleylands, significant wildlife habitat, significant area of natural and scientific interest, and coastal wetlands unless it has been demonstrated that there will be no negative impacts on the natural features or their ecological functions. Furthermore, Development and site alteration shall not be permitted on adjacent lands to the natural heritage features and areas identified in policies 4.1.4 and 4.1.5 unless the ecological function of the adjacent lands has been evaluated and it has been demonstrated that there will be no negative impacts on the natural features or on their ecological functions.

Water

Section 4.2 outlines policies for planning authorities and developments as they relate to water protection and improvement.

Section 4.2.2 states that *“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.”*

Cultural Heritage and Archaeology

Section 4.6.2 states that *“Planning authorities shall not permit development and site alteration on lands containing archaeological resources or areas of archaeological potential unless the significant archaeological resources have been conserved.”*

Section 4.6.3 states that *“Planning authorities shall not permit development and site alteration on adjacent lands to protected heritage property unless the heritage attributes of the protected heritage property will be conserved.”*

Response: An Environmental Impact Statement has been prepared by NRSI, dated April 2025 which details the ecological features of the Subject Property and also identifies any relevant Natural Heritage Features on, or adjacent to the Subject Property. The mitigation measures recommended in the EIS have been incorporated into the design of the Proposed Development, including a 10-metre development setback from the dripline of the significant woodland to ensure no significant adverse impacts on the adjacent natural heritage features or their functions. The wetland feature and existing plant and animal species are adequately protected through the designation of the open space block which extends to the extent of the natural feature in addition to a 10-metre buffer along the edge of the feature. The findings and recommendations of EIS are discussed further in Section 6 of this report.

The Hydrogeological Assessment prepared by HGC, dated April 30, 2025 outlines the existing condition of the hydrogeological function of this area and provides recommendations for the protection and improvement of water resources in the area which will be implemented as part of the development. The Hydrogeological Assessment is summarized in Section 6 of this report.

The Subject Property is located within the settlement boundary of St. Jacobs which is identified as a “Urban Settlement Area”. The PPS directs growth and development towards settlement areas to promote efficient development patterns that preserve significant resources including natural heritage features, water, and archaeological resources and is thus consistent with the overall direction provided in the PPS.

Conclusion

The Subject Applications are consistent with the policies of the PPS as they relate to the Subject Property and the Proposed Development. The Proposed Development will provide for the efficient development of the Subject Property, which is located within the St. Jacobs Settlement Area, and represents a logical extension of the existing built-up area.

The Proposed Development is compatible with surrounding land uses and makes efficient use of available municipal services. The proposed range and mix of residential units are compatible with the existing community and the proposed new streets and sidewalks are well integrated into the existing and future surrounding network.

In summary, the Subject Applications and Proposed Development are consistent with the PPS 2024.

4.3 Region of Waterloo Official Plan (“ROP”)

The Region of Waterloo’s Official Plan (ROP) was approved by the Ministry of Municipal Affairs and Housing, with modifications, on December 22, 2010 and approved with amendments by Oral Decision of the Ontario Municipal Board on June 18, 2015.

Regional Official Plan Amendment 6 (ROPA 6), which establishes the planning framework for accommodating forecasted population and employment growth within the Region to 2051, was approved by the Minister of Municipal Affairs and Housing on April 11, 2023. ROPA 6 established a new policy framework with the implementation of Chapter 2 – Where and How to Grow as well as new housing policies in Section 3.A, among other policy matters.

4.3.1 Chapter 2 – Where and How to Grow

Chapter 2 of the ROP establishes an urban system that serves as a framework for guiding new growth. A key objective of Chapter 2 is to accommodate forecasted growth through the creation of 15-minute neighbourhoods which refer to compact, highly connected places that support daily needs including access to goods, services, and employment within a 15-minute trip from home by walking, cycling, and rolling.

2.E Township Urban Area

The policies contained in 2.E encourage directing most of population and employment growth to the Township Urban Area. Policy 2.E.1.1 states that *“Township Urban Areas are designated as shown on Map 1. This designation contains the central urban areas of the Townships of North Dumfries, Wellesley, Wilmot and Woolwich that are not part of the city Urban Area. The lands included within this designation are intended to serve as the focus for growth outside of the Urban Area within the planning horizon of this Plan.”*

Response: The Subject Property is located within the urban area in St Jacobs as shown on Map 1 (See figure 3). As such, the site represents an ideal location for residential growth.

2.G Designated Greenfield Area

The policies contained in 2.G encourage compact greenfield communities to reduce the rate at which land is being consumed and design designated greenfield areas to function as 15-minute neighbourhoods. Policy 2.G.1.1 states that *“Designated greenfield areas are designated as shown on Map 2. This designation identifies lands within the Urban Area and Township Urban Areas, but outside the delineated built-up area, that are required to accommodate a portion of the Region’s forecasted population and employment growth to 2051.”*

Response: The Subject Property is located within a Designated Greenfield Area on *Map 2 Urban System* of the ROP (See figure 4). As such, the Subject Property is intended for growth and development, in accordance with regional and provincial direction.

Policy 2.G.1.2 states that *“designated greenfield areas 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 set out in Table 4;*

- (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) *within the Township Urban Areas, 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.”*

With regard to phasing, Policy 2.G.1.4 states that “*Area municipalities will establish policies in their official plans, or other planning documents, to ensure that new development within designated greenfield areas 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;”*

Policy 2.G.1.5 provides that “*Area municipalities will establish policies in their official plans, or other planning documents, to support the gradual transition of existing designated greenfield areas to become vibrant 15-minute neighbourhoods through gentle density in the form of infill, missing middle housing, and additional residential units.”*

Table 4 of the ROP sets out minimum density targets for designated greenfield areas by area municipality. The Township of Woolwich establishes a minimum density target of 53 residents and jobs combined per gross hectare of land. Policy 2.G.1.3 further provides that *“The minimum density targets set out in Table 4 will be calculated over the entire designated greenfield area of the region and each respective area municipality”*.

Response: The Proposed Development supports the creation of 15-minute neighbourhoods through the establishment of a continuous network of sidewalks and trails that support connectivity within the surrounding community and access to goods, services, and employment. The Proposed Development promotes compact built form through the provision of a range of residential uses resulting in approximately of 186-409 residential units and a projected density of approximately 46-100 residents and jobs per hectare. The Proposed Development meets the policy objectives of the ROP with respect to creating a compact, complete community and will contribute to the Region’s density target of 53 people and jobs per gross hectare.

The Proposed Development promotes energy efficiency through the efficient use of existing municipal servicing infrastructure and the provision of high-performance energy standards. The sustainability measures that will promote energy efficiency are detailed further in the Urban Design Brief, prepared by GSP Group dated May 2025.

The Proposed Development provides for public sidewalks, parkland, and trails, thereby ensuring access to greenspace and supporting active transportation and recreation. The Proposed Development includes internal streets that are well-connected to existing and established surrounding road network, therefore supporting the integration of future transit services.

The Proposed Development will be developed across 2 phases, to align with the delivery of infrastructure required for the proposed development such as roads, stormwater management facilities and open space. Phase 1 will provide access for the future redevelopment of the rear of the Calvary United Church property, which is intended to be developed as a long-term care facility. Future phases will continue south and west in a logical manor as the development is built out. The Proposed Development represents the orderly progression of development.

2.I General Urban Development Policies

2.I.1.1 Land Use Compatibility

Policy 2.I.1.1 regarding land use compatibility 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 accordance with Provincial guidelines, standards and procedures.”

Response: The Subject Lands are within proximity to a rail line and an existing industrial use northeast of the site. A Noise Study was completed by GHD and provides recommendations for noise and vibration mitigation. The layout of Street B allows for adequate buffering from the rail line to residential land uses while providing for circulation around the subdivision. Recommendations related to building material selections, ventilation, and warning clauses meant to address the Noise and Vibration effects are discussed in detail in their report, and are summarized in Section 5.6 of this report.

4.3.2 Chapter 3 – Housing

3.A Range and Mix of Housing

The policies contained in this section encourage the provision of a diverse range and mix of housing types to address missing middle housing and support a wide range of housing options that are affordable. Policy 3.A.2 provides that *“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 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 states that *“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.”*

Response: The Proposed Development provides for a range of housing typologies intended to accommodate diverse household needs. The Proposed Development provides for a mix of single detached, semi-detached, townhouse and multi-unit-residential dwellings, providing a broad range of housing options in terms of size, tenure and affordability. The provision of dedicated affordable and/or attainable housing will also be considered through the development process. Should the multiple residential blocks be built to maximum their density as proposed, 30% of the residential units will be in forms other than single detached, semi-detached or street facing townhouses.

4.3.3 Chapter 5 – Infrastructure

The policies within this chapter set out requirements regarding the review of development applications relating to the assessment of the potential impacts the development can have on existing or planned infrastructure.

Policy 5.A.17 requires that wherever feasible, sidewalks will be provided on both sides of streets where transit service currently exists or is planned, and on a minimum of one side of all other through-streets or streets that interconnect with the walking network.

Generally, the priority for wastewater servicing options is to extend servicing from a municipal wastewater system as well as municipal drinking water system.

Response: The Proposed Development includes 20-metres right-of-ways which includes sidewalks on both sides of the street, except where the road abuts the rail line. Where the road abuts the rail line, sidewalk is provided on the side of the street farther from the rail line along the front property lines of the residential lots.

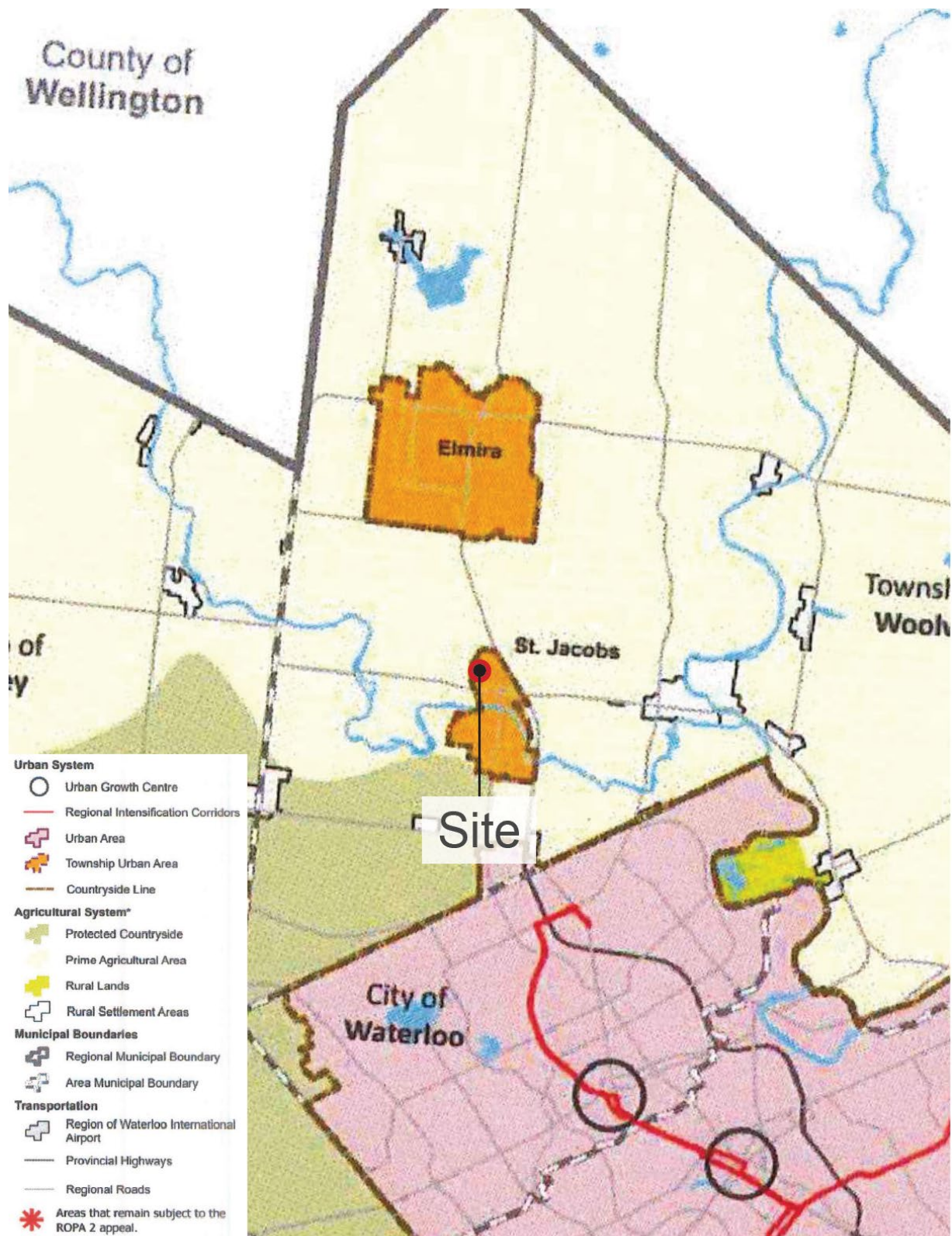
The Proposed Development will extend existing municipal servicing infrastructure to service the new residential lots.

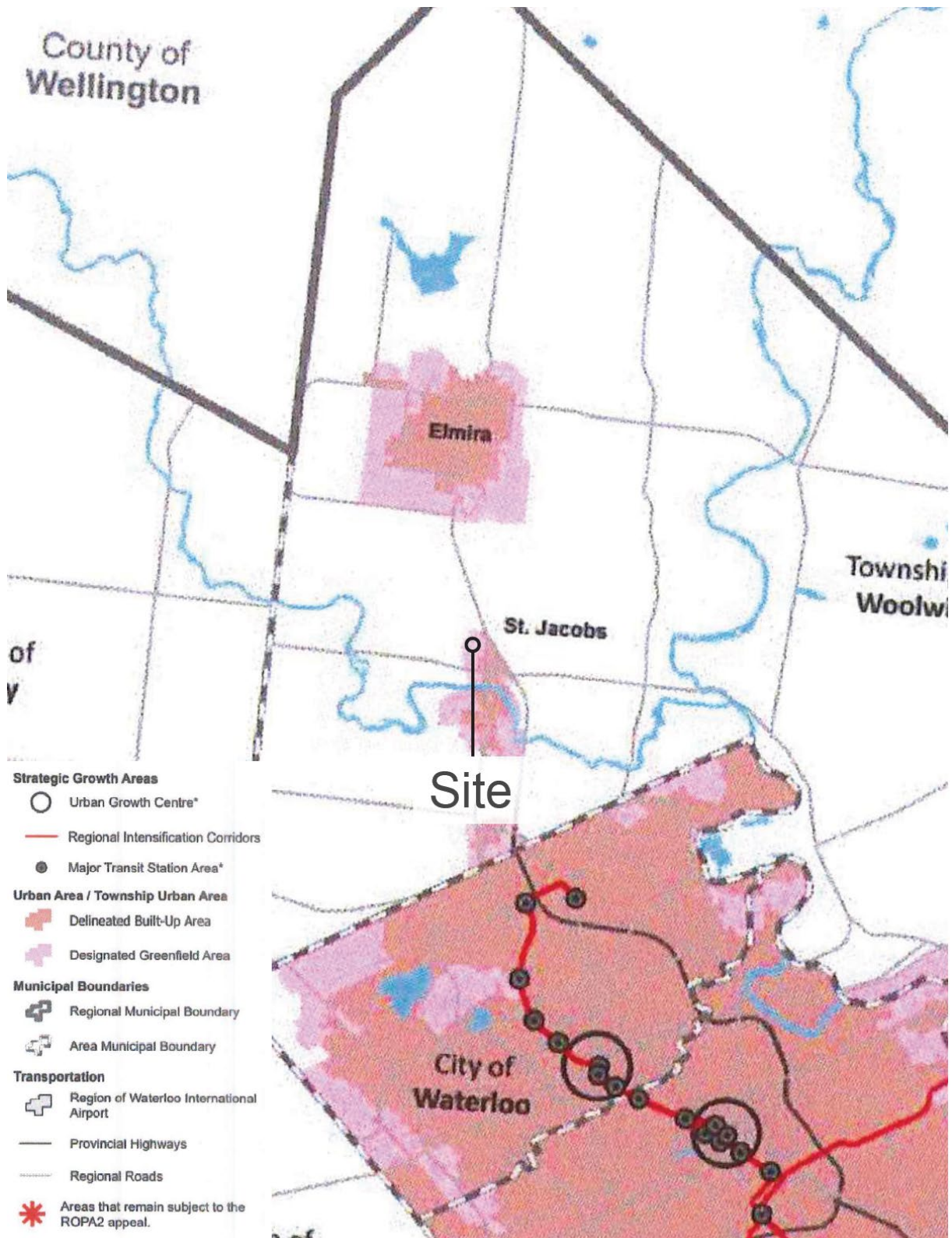
4.3.4 Chapter 7 – Greenlands Network

The Greenlands Network is defined as environmental features and the linkages among them. The northern portion of the Subject Property is identified as a Core Environmental Feature. Policy 7.C.1 of the ROP describes these features as the most significant elements of the regional landscape in terms of maintaining, protecting and enhancing biodiversity and important ecological functions.

Response: The Core Environmental Feature was examined by a natural heritage consultant (NRSI) and an Environmental Impact Study (EIS) was completed to identify the boundaries of the protected natural feature and required buffers to ensure that the Proposed Development does not impact the feature. The findings and recommendations of the EIS are discussed in Section 6 of this report.

Overall, the requested Official Plan Amendment, Zoning By-law amendment, and Draft Plan of Subdivision applications conform to the policies of the Region of Waterloo Official Plan.





4.4 Township of Woolwich Official Plan (2015) (“OP”)

The purpose of the Township’s Official Plan (“OP”) is to guide the Township's future development in conformity with the broader framework established by the Regional Official Plan, and the Provincial Planning Statement, 2024.

The Township has not yet updated their OP to conform with the recent Ministry approved ROPA 6. As such, an Official Plan Amendment is proposed to bring the OP mapping in conformity with ROPA 6.

4.4.1 Chapter 5 – Planned Township Structure

Chapter 5 of the OP identifies the Planned Community Structure for the Township in accordance with corresponding policy direction of the Regional Official Plan.

The Subject Property is currently located outside the Township Urban Area on Map 5.1 – Township of Woolwich Planned Township Structure of the OP (See figure 5). The Proposed Official Plan Amendment would see the Subject Property located within the Township Urban Area.

The Subject Property is located outside of a Designated Greenfield Area on Map 5.4 – Township of Woolwich Urban Areas of the Township of Woolwich Official Plan (See figure 6). The Proposed Official Plan Amendment would see the Subject Property located within a Designated Greenfield Area on Map 5.4.

Section 5.1.2 of the OP states that lands within the Township Urban Area will be planned to accommodate a broad range and mix of land uses and, together with the Urban Areas, will serve as the focus for population and employment growth in the Township to 2031.

Response: The Proposed Development is located within the newly expanded urban area for St. Jacobs and will provide for a broad range and mix of residential uses.

Section 5.5 outlines the general policies for the Elmira and St. Jacobs Township Urban Areas.

Policy 5.5.1 requires that development occurring in Elmira and St. Jacobs will be planned and developed in conformity with sections (a) to (h) of Policy 5.4.1.

Policy 5.4.1 requires that *“In preparing or reviewing planning studies, or in reviewing development applications or site plans, the Township will ensure that development will be planned and developed in a manner that:*

- a. Supports the Planned Township Structure defined in this Plan;*
- b. Uses municipal water and wastewater systems unless otherwise identified in this Plan;*

- 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 in addition to motor vehicles;*
- d. *Protects the natural environment, surface water and ground water resources;*
- e. *Conserves the 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 into neighbourhoods; and*
- h. *Promotes building designs and orientations that incorporate energy conservation features and use of alternative and/or renewable energy systems."*

Policy 5.5.2 states that *"Residential growth within the Elmira and St. Jacobs Township Urban Areas will be staged so that development will not exceed the capacity of municipal water and wastewater services at any given time."*

Response: The Proposed Development provides for the logical and orderly expansion of the existing built-up area for St. Jacobs and will make efficient use of existing municipal water and wastewater services available to the site, in accordance with defined servicing capacity and allocation. The Proposed Development has been designed to provide for accessible transportation network that provides opportunities for walking and cycling internal to the community as well as appropriate connections to the surrounding transportation network that includes existing walking, cycling and transit facilities. The Proposed Development provides for the long-term protection of the existing natural heritage feature and intends to incorporate principles of sustainable development and energy conservation as part of future development and build-out.

Section 5.7 of the OP outlines policies related to Designated Greenfield Areas.

Policy 5.7.3 requires that *"development occurring in the designated greenfield area of the Elmira and St. Jacobs Township Urban Area 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.”*

Policy 5.7.4 (a) defines the region-wide minimum density targets measured over the entire designated greenfield areas identified in the ROP. Within Elmira and St. Jacobs Urban Areas servicing a residential function, a minimum average density of 45 people and jobs per hectare is required.

Response: The Proposed Development provides a broad range and mix of housing units while respecting the scale, physical character, and context of the surrounding neighbourhood.

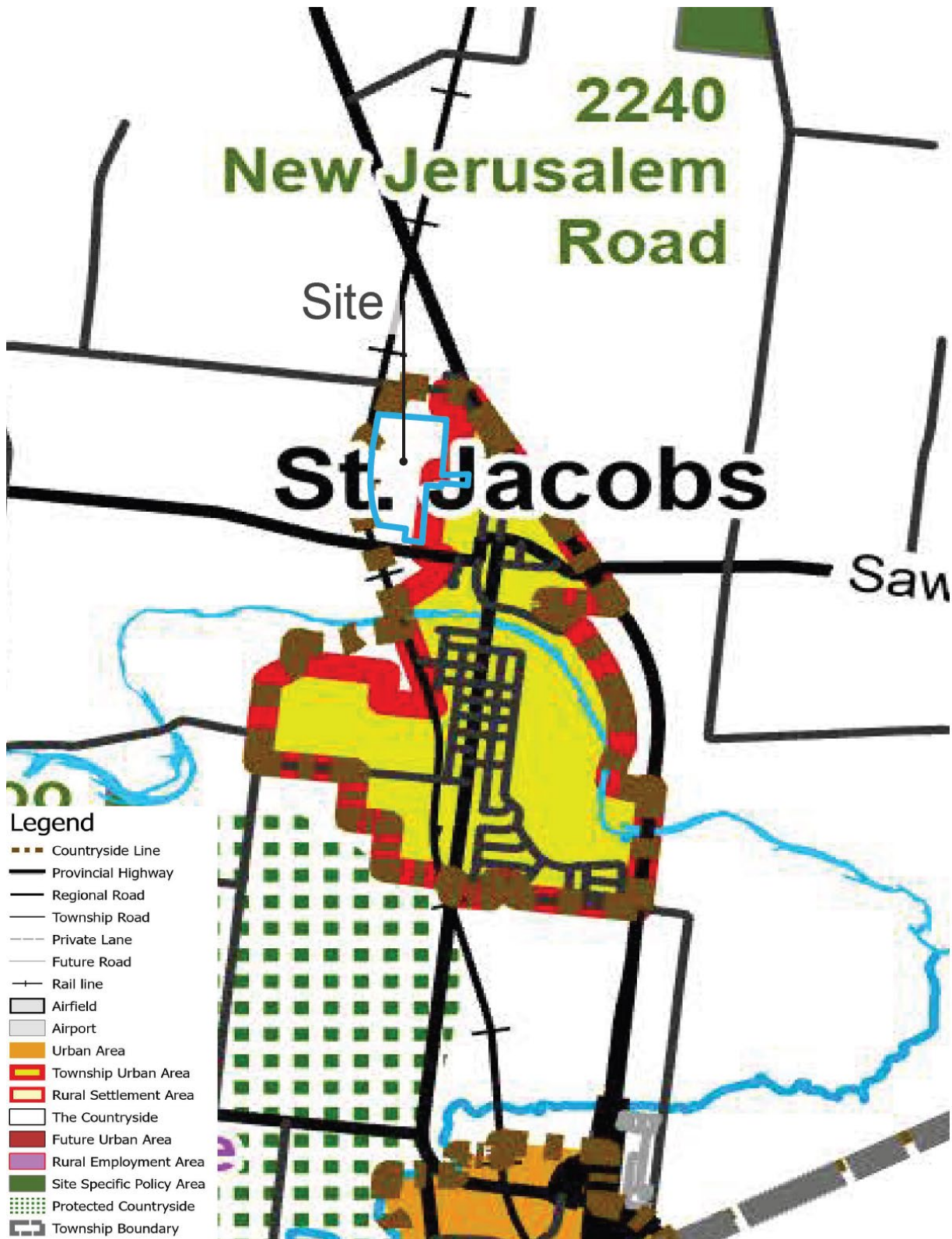
The population density anticipated within the Proposed Development is approximately 46-100 people and jobs per hectare. The Region of Waterloo calculates people and jobs per hectare by applying an assumption of the average number of people per residential unit type based on the following assumptions as identified in the Region of Waterloo’s Water and Wastewater Monitoring Report (2024).

- 3.25 people for single detached dwellings
- 3.05 people for unspecified unit types (i.e. mix of single detached, semi-detached, and townhouses)
- 2.44 people for townhouse dwellings
- 2.11 people for multi-unit dwellings (assumes a combination of stacked townhouses and apartment buildings)

The Proposed Development will house a population in the range of 545-1186 people. Therefore, a total of 157-342 jobs are expected within the Proposed Development. With a residential population range of 539-1174, and a range of 157-342 jobs, the Proposed Development is expected to host a total of 702-1528 people and jobs with a density of 46-100 people and jobs per net hectare. Overall, the Proposed Development will contribute to the Township achieving their density targets for greenfield areas.

The Proposed Development includes a future municipal park as well as a parkette providing options for active and passive recreational uses. Providing a range of residential uses, publicly accessible parkland and passive recreation opportunities contributes to the creation of a complete community.

The Proposed Development will be serviced via municipal water and wastewater services. It also provides a coherent grid network of roads and sidewalks which will support the future integration of transit services.

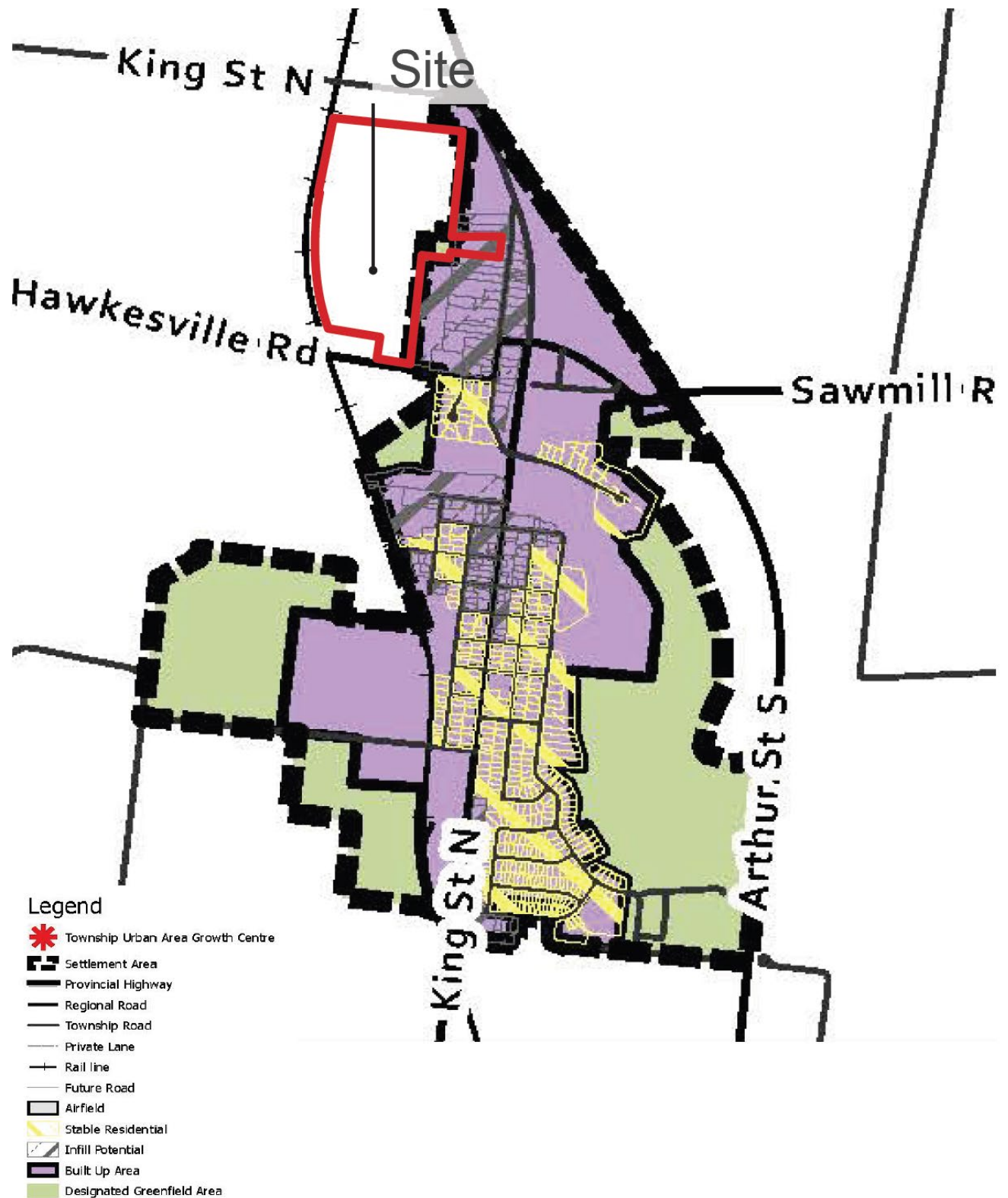


Township of Woolwich Planned Township Structure

Source: Township of Woolwich Official Plan, Map 5.1 (2022)

Figure

5



4.4.2 Chapter 7 – Settlement Patterns

Chapter 7 further supports and implements the broad planning framework with general policies and guidelines that are applied to Settlement Areas.

The Subject Property is located outside the Settlement Area Boundary on *Schedule A – Township of Woolwich Urban Area Settlement Plan Elmira Land Use* of the Township of Woolwich Official Plan (See Figure 7). The Official Plan Amendment proposed to amend this schedule and designate the Subject Property “Residential and Ancillary” consistent with the other residential lands within the St. Jacobs Urban Settlement Area. This 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 (Section 7.4.1.2).

Section 7.6

Section 7.6 of the OP outlines the general settlement policies.

Policy 7.6.2 of the OP states that *“Future development shall take place within the limits of the Settlement Area Boundary as established by the specific Settlement Plan.”*

Policy 7.6.3 of the OP states that *“Future development in any Settlement Area shall only be considered if it conforms to the definition for the Settlement Classification contained in Section 7.1”*

Policy 7.6.4 of the OP states that *“Future development in any Settlement Area shall only be considered if the proposed development conforms to the land use designation as set out in the Settlement Plan and is in accordance with the requirements of the Zoning Bylaw”*.

Policy 7.6.5 states that *“Future development may be staged and shall develop in accordance with the staging policies for the respective Settlement Plan.”*

Policy 7.6.20 of the OP states that *“Future development shall be compatible with existing and approved land uses. The establishment of new sensitive land uses, or new commercial/employment uses shall be in accordance with the Ministry of Environment, Conservation and Parks’ Land Use Compatibility Guidelines. The establishment of new urban land use designations and Settlement Plan limits shall be in accordance with the minimum distance separation formula”*.

Response: The Subject Property is located within the St. Jacobs Settlement Area which is classified General Urban Settlement. As previously discussed, the Subject Property was recently brought into the St. Jacobs Settlement Area Boundary through the Ministry’s approval of ROPA 6 with modifications. An Official Plan Amendment is required to bring the Subject Property in conformity with the ROP. The land use designation for the surrounding residential uses in the St. Jacobs

Settlement Area is 'Residential and Ancillary'. The Subject Application requests that the same land use designation be applied to the Subject Property, in keeping with the existing and approved residential land uses of St. Jacobs. The Proposed Development will be built out in phases, starting with Phase 1 which represents the largest phase and includes:

- Street A access through the Subject Property from Northside Drive to Hawksville Road and well as part of Street B, Street C, Street D, and Street E which complete a logical and functional interim street network for the subdivision.
- The Stormwater Management facilities meant to service the entire subdivision.
- Blocks 19 and 20 park blocks.
- Future Development Block 24 which will provide access for the future development of the Calvary United Church property for an intensified institutional use such as a long-term care facility.
- Residential Reserve Block 25 which is reserved for future development only if/when it is consolidated with the property north of it to ensure a logical and efficient use of land.
- Twelve (12) residential blocks consisting of Blocks 2-5, part of Block 7, and 8-14.
- Open Space Block which will not be developed.

A second phase includes the balance of the subdivision and includes:

- Six (6) residential blocks consisting of Blocks 1, 6, part of Block 7, 16, 17, and 18.
- Future Development Block 23 which provides the opportunity for site access for the properties located on Hawksville Road should it be required for future development of those properties.

The Proposed Development balances the current and future residential and parkland needs of the community while respecting the existing character of the St. Jacobs community in terms of density and built forms. Overall, the Proposed Development represents a logical and efficient use of land within a Settlement Boundary and is in accordance with the policies within Section 7.6 of the OP.

Section 7.9

Section 7.9 of the OP outlines sustainability and design policies for development within the Township Urban Settlement Areas.

The policies generally put an emphasis on energy and water use efficiency, high quality public realm, efficient use of land, enhancing the natural environment, and public safety. An urban design brief, prepared by GSP Group outlines how the Proposed Development addresses the Township's urban design policies. This was also discussed in Section 3.3 of this report.

Section 7.28

Section 7.28 of the OP applies to the St. Jacobs Township Urban Area.

Section 7.28.5.2 outlines the general residential policies and states:

- a) *“The St. Jacobs Settlement Area shall have a planned future population of approximately 2,675 people within the planning period to 2031.*
- b) *The gross residential density for the St. Jacobs Settlement Area will be a minimum of 45 people and jobs per hectare and may allow up to 60 people and jobs per hectare in and around the core area provided sufficient services are available, the development is compatible with proposed or existing surrounding land uses and is consistent with the objectives and policies of this Plan.*
- c) *The net residential density on a particular site may be permitted to a maximum of 120 units per net residential hectares (48.6 units per net residential acre) provided sufficient services are available, the development is compatible with proposed or existing surrounding land uses and is consistent with the objectives and policies of this Plan.*
- d) *A range and variety of dwelling unit types and densities shall be required to accommodate the various household structures and income groups expected in the St. Jacobs Settlement Area.*
- e) *Innovative housing types and subdivision design incorporating traditional small-town land use principles shall be encouraged, where appropriate, in accordance with good planning, engineering and environmental principles.*
- f) *It shall be the policy of this Plan to require the integration of a range and variety of housing types and densities within residential developments.*
- g) *Residential development shall not be permitted without full municipal sanitary sewer, water, storm sewer and electrical services.”*

Response: The Proposed Development provides up to 409 units ranging in size and typology and includes a mix of single detached homes, street townhouses, and multiple residential blocks. The overall residential density for the subdivision is in the range of 46-100 people and jobs per hectare, contributing to the Township’s density targets for the St. Jacobs Settlement Area and contributing to the planned population growth.

The provision of lotless blocks allows the subdivision to remain flexible to the housing needs of the community and react to changes in desired density, built form, and planned population and the Proposed Development is built out over time. The intention with the planning permissions sought through the Zoning By-law Amendment is to provide for a greater range and variety of dwelling unit types within a block, in alignment with Policy 7.28 d).

The Proposed Development aims to achieve the density requirements set out in the Section 7.28 policies, provide for a broad range of residential unit types, while remaining consistent with the surrounding neighbourhood context. The Proposed Development will be serviced via full municipal services.

Section 7.28.9.3 of the OP provides policies for parks, stating:

- a) *“The location and size of required parks will be established through submission and review of draft plan of subdivision or other development applications.*
- b) *Draft plan of subdivision or other development applications will provide for pedestrian linkages and/or bicycle paths connecting open space areas where appropriate.*
- c) *For the purpose of determining parkland dedication requirements, pursuant to the Planning Act, parkland shall not include flood plain, valley lands, open space areas for stormwater management facilities, unless acceptable to the Township, but may include wooded areas.*
- d) *Passive use parkland, in the form of lands designated as Environmental Features, is located throughout the Settlement Plan Area and may be utilized for pedestrian and bicycle paths where appropriate.”*

Response: A 0.5 hectare park (Block 19) and 0.12 hectare parkette (Block 20) located centrally within the subdivision is proposed. The size and location of the park has been established to meet the needs of the current and future surrounding residents. Cash-in-lieu of parkland will be provided for the balance of the parkland requirements under the Planning Act.

Transportation policies are outlined in Section 7.28.11.

Policy 7.28.11.1 requires that:

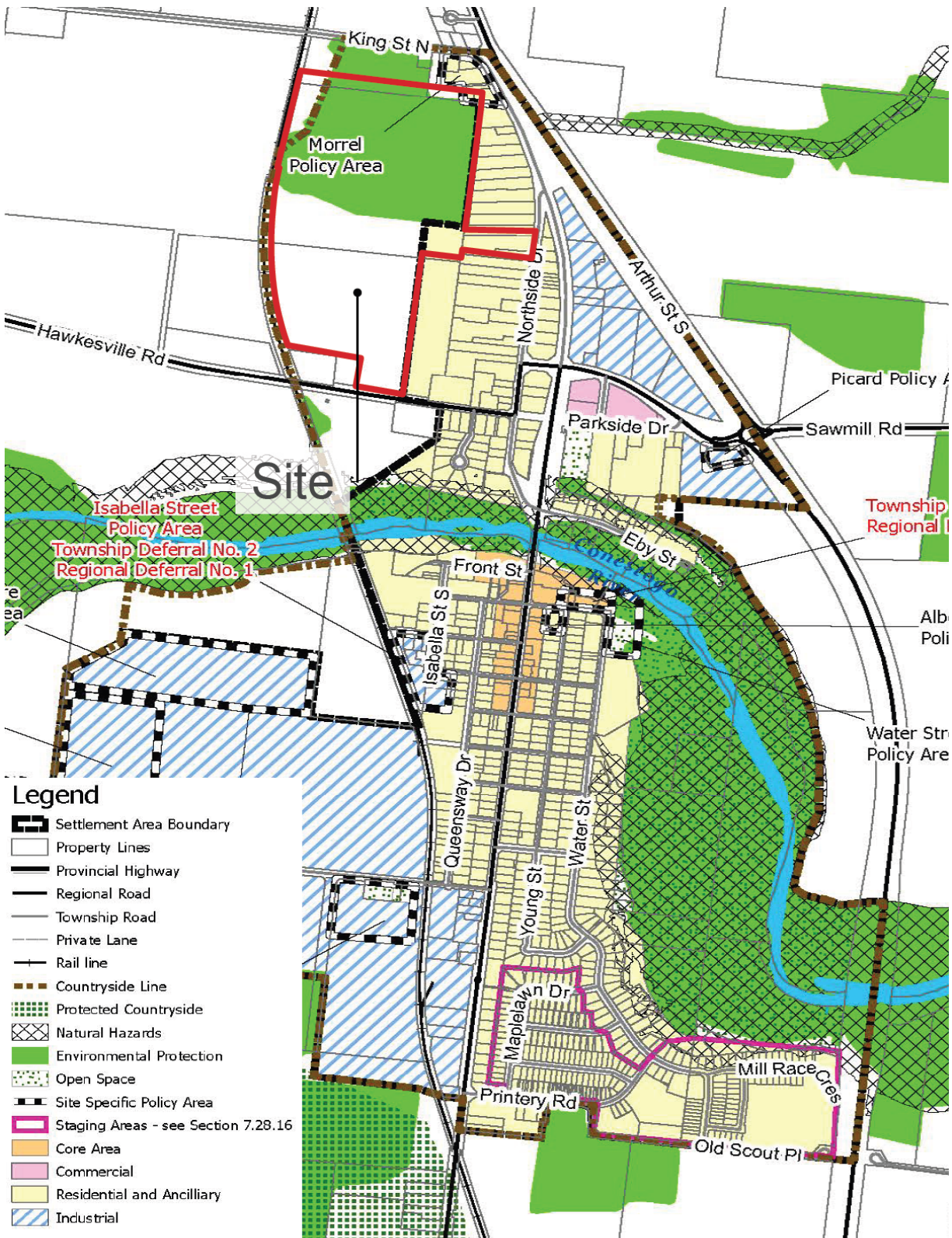
- b) *“The road system shall generally be designed to reflect a modified grid pattern consistent with the residential form contemplated by the Settlement Plan.*
- c) *Road widenings and daylighting triangles shall be provided in accordance with Township and Regional requirements.”*

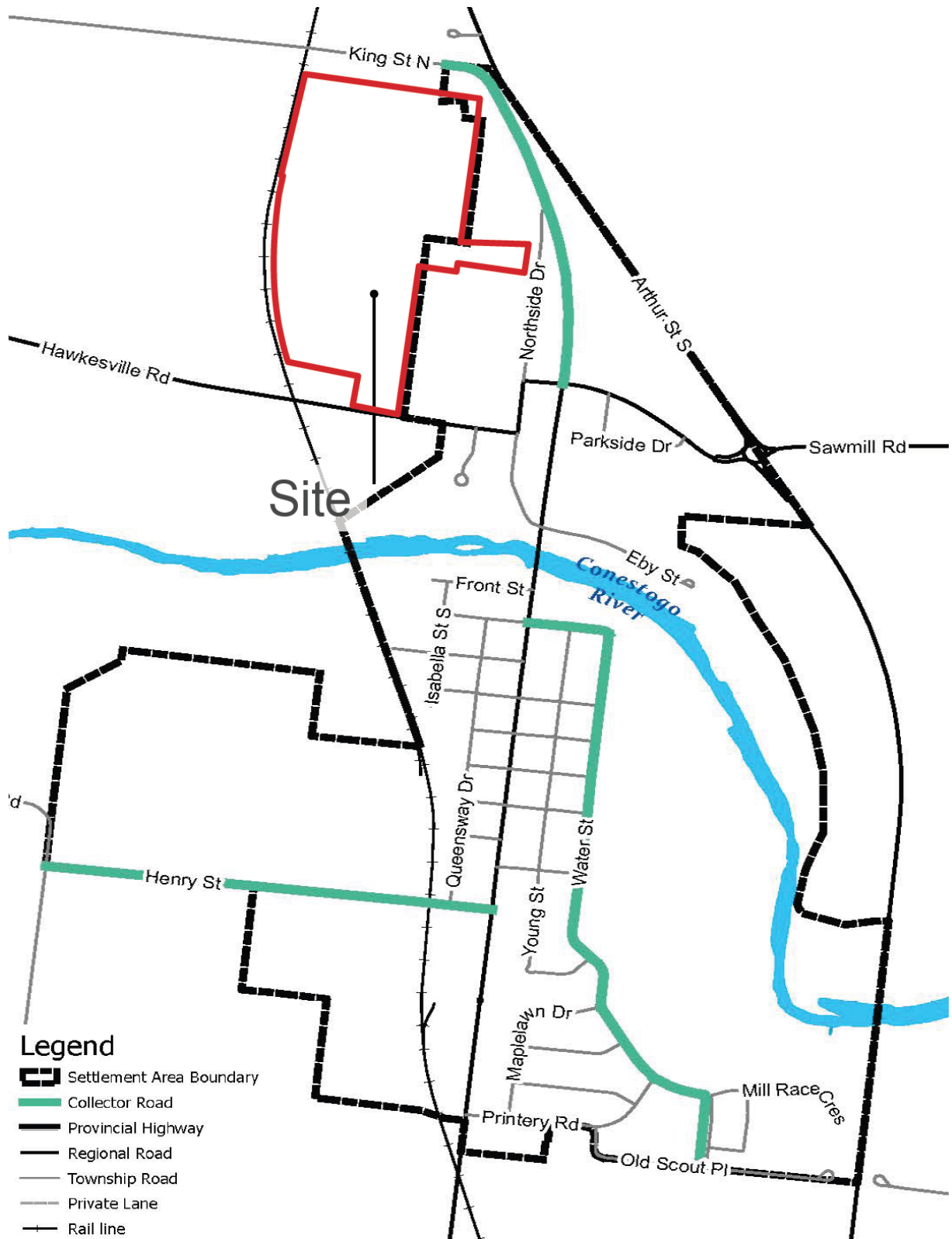
Section 7.28.11.4 requires a right-of-width width of up to 20 metres. Reduced right-of-way widths may be considered by the Township where consistent with the residential form contemplated by the Settlement Plan.

Section 7.28.12.1 requires that new development shall be developed on the basis of full municipal services including roads with curbs and gutters, sidewalks, piped water, sanitary sewers, storm drainage facilities, streetlights, and electrical distribution systems.

Response: The proposed street pattern reflects a modified grid pattern and allows for safe and efficient flow through the subdivision. A 20-metre rights-of-way is proposed which include sidewalks on both sides of the road, curbs and gutters.

The Proposed Development will make efficient use of municipal services by connecting to the available water and wastewater systems. The Proposed Development will adequately manage stormwater through the provision of two stormwater management blocks. Sidewalks are provided throughout the subdivision on both sides of the street and streetlights are provided to adequately illuminate the right-of-way.





4.4.3 Chapter 9 – Housing Policies

Section 9.2.1 requires that the Township provide a diverse range and mix of housing options including additional/accessory residential units and affordable housing to serve all sizes, incomes, and age of households in the community by:

- 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;*
- b) *Encouraging innovative lot configurations, housing designs and construction techniques;*
- c) *Providing opportunities for mixed-use developments in new and redeveloping residential areas;*
- 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; and*
- e) *Encouraging housing intensification in appropriate areas;*
- f) *Modifying existing zoning and servicing standards, to facilitate the provision of the affordable housing in new residential developments, where such modifications are consistent with the intent of this Plan and are in accordance with good planning, environmental and engineering practices;*
- g) *Subject to the staging policies of this Plan, fast-tracking the processing of development applications containing affordable housing;*
- h) *Encourage, where appropriate, density bonuses, property tax exemptions, and other incentives to support the creation of affordable housing and special needs housing;*
- i) *Requiring new residential plans of subdivision to include housing designs to include, or provide for the future installation of additional residential units;”*

Response: The Proposed Development aims to provide a broad range and mix of residential dwelling types while respecting the existing scale, character and surrounding context of St. Jacobs. The distribution of housing types includes a mix of single detached homes, semi-detached homes, townhouses, and multiple residential units which is similar to the existing distribution of housing typologies in St. Jacobs. This allows the Proposed Development to maintain the existing character of the broader St. Jacobs context.

4.4.4 Chapter 10 – Open Space

Section 10.1 provides policies for open space in the Township of Woolwich. Section 10.1.1 states that *“The Township will actively seek to provide a balanced system of recreational and leisure opportunities through the development of parks, open space and recreational facilities that provide opportunities for physical recreation, socialization, cultural pursuits, community identification, nature appreciation and education”*.

Section 10.1.7 of the OP states that *“The Township will encourage the development of a system of bicycle routes, sidewalks, and pedestrian paths to link residential areas, employment areas, major public open spaces, schools and activity centres, and to provide for recreational needs of Township residents, as well as those visitors of the community”*.

Response: Two publicly accessible parks are proposed within the subdivision that are planned to adequately serve the local community. A concept plan of park space illustrates the opportunities for the parks to meet the passive and active recreation needs of residents of the new subdivision. The Proposed Development provides for a maximum approximate population of to 1186 people. The proposed 0.5 hectare park and 0.12 hectare parkette is anticipated to meet the needs of the residents of the new subdivision and the great St. Jacobs community. Cash-in-lieu of parkland will be provided for the balance of the parkland dedication requirements set out in the Planning Act which requires that 5% of the developable land within a new residential subdivision be dedicated parkland.

4.4.5 Chapter 13 – Environmental Protection and Stewardship

The portion of the Subject Property within Open Space Block 21 is identified as a Core Environmental Feature in the OP. Policy Section 13.7 outlines the policies related to Core Environmental Features. These policies require that development or site alternation will not be permitted except for:

- a) Forest, fish, or wildlife management and conservation;
- b) Flood or erosion control projects demonstrated to be in the public interest and for which no other alternative is feasible;
- c) Minor alterations to legal non-conforming land uses within Core Environmental Features;
- d) Infrastructure projects in accordance with the policies of the Regional Official Plan; or
- e) New mineral aggregate operations in accordance with the policies of the Regional Official Plan.

Response: No development is proposed within the Core Environmental Feature. The feature is being adequately buffered as outlined in the EIS prepared by NRSI. Recommendations for protection and stewardship are discussed in Section 6 of this report and in detail in the EIS.

4.4.6 Chapter 15 – Transportation

Section 15.7.4 outlined the road width requirements for developments. It states that on all other Township Roads other than collector or sub-collector roads, right-of-way widths are generally 20 metres but may be less only where functions and conditions justify the same to the satisfaction of the Township.

Response: The Proposed Development provides for 20-metre road widths throughout the entire subdivision, conforming to this policy.

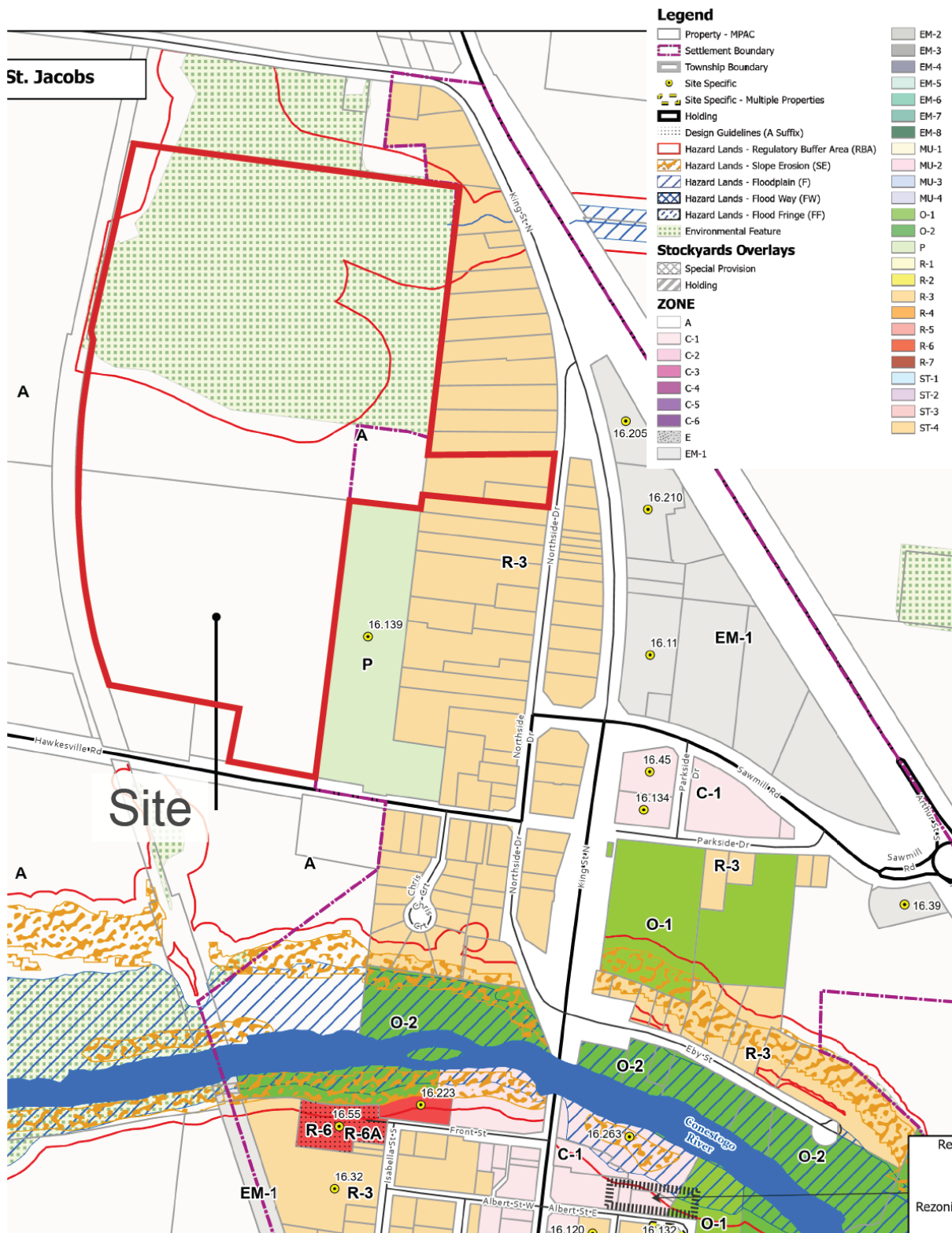
4.4.7 Chapter 19 – Implementation

Section 19.11 outlines policies relation to Holding provisions. A Holding provision is proposed as part of the Proposed Development such that the area subject to the holding provision be consolidated with lands to the north of it prior to the development of those lands. The proposed holding provision relates to implementation policy 19.11 c).

4.5 Zoning By-law

The Township of Woolwich Zoning By-law 26-2024 was adopted under Section 34 of the Ontario Planning Act R.S.O. 1990 to replace Zoning By-law 55-86, which was adopted and in-force since 1986. The new Zoning By-law 26-2024 provides site-specific land use permissions, prohibitions, and design requirements for land throughout the Township.

The Subject Property is currently zoned “A - Agriculture” on Schedule B, Map B3 of the Township of Woolwich Zoning By-law 26-2024 (See figure 9). The Submitted Zoning By-law Amendment seeks to change the zoning of the Subject Property from Agriculture “A” Zone to Residential Five Exemption (R-5 (16.aaa) Zone, Residential Five Exemption (R-5 (16.aaa) with a Holding (H) Zone, Residential Six Exemption (R-6 (16bbb)) Zone, and Open Space 1 (O-1) Zone. A draft Zoning By-law Amendment has been included as Appendix A of this report. Details on the site-specific regulations and planning rationale are discussed in Section 6.



5. Supporting Studies

5.1 Transportation Impact Study

A Transportation Impact Study was completed by Paradigm Transportation Solutions Limited (“Paradigm”), dated May 2025. This report included an analysis of existing traffic conditions, a description of the proposed development, traffic forecasts for a five-year horizon from the date the study was commissioned, and recommendations required to manage future traffic conditions. Based on Paradigm’s study, they 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 development is forecast to generate approximately 227 and 272 trips during the AM and PM peak hours respectively.
- The site access locations to both Hawkesville Road and Northside Drive are expected to meet all of the minimum sight distance requirements defined by the Transportation Association of Canada.
- The study area intersections are forecast to operate at acceptable levels of service similar to existing traffic conditions with no critical movements noted.
- Left-turn lanes are not warranted at the site access intersections.
- There is surplus capacity on Street A and at the intersections of Street A with Northside Drive and Hawkesville Road to accommodate additional uses should adjacent lands be redeveloped for additional residential uses and or intensified institutional uses.

Paradigm’s findings suggest that from a transportation impact perspective, approval of the Proposed Development should be considered.

5.2 Functional Servicing and Stormwater Management Report

Walter Fedy prepared a Functional Servicing and Stormwater Management Report, dated April 30, 2025. The purpose of this report was to provide a preliminary overview of how the Proposed Development will be serviced, including water, sanitary, and storm connections to existing municipal infrastructure. The report discusses boundary servicing conditions and the capacity of the municipal system to accommodate the Proposed Development. Storm sewer design, sanitary sewer design, and watermain sizing are presented in compliance with the Township of Woolwich, Region of Waterloo, and GRCA guidelines and criteria. Based on the analysis presented in the full report, Walter Fedy concludes that:

- The Proposed Development can be adequately serviced through both existing and planned municipal infrastructure (sanitary, storm, and watermain) and utilities.
- Municipal servicing and roadworks can be constructed in accordance with the Township of Woolwich and MECP standards.
- Stormwater management measures can be provided in accordance with various agency guidelines.
- Streets within the Block Plan will be constructed to the Township of Woolwich Design Standards.
- It is proposed that the development be serviced by the existing 200-mm-diameter sanitary service located on Northside Drive, at the northeastern corner of the site, which is sufficient to fully service the lands, and no additional connections are necessary.
- The proposed subdivision will have two watermain connections from the existing infrastructure surrounding the Site. A connection to the existing 150-mm-diameter watermain on Hawkesville Road will be installed at the southern entrance of the Site. This connection will require a short extension of the main to reach the development boundary. Additionally, a connection to the existing 150-mm-diameter watermain on Northside Drive will be installed at the north-eastern entrance of the Site. The final water distribution network will consist of 200-mm- to 300-mm-diameter pipes.
- Pipe sizes are such that velocities in all watermains are generally less than 5 m/s under fire flow conditions.
- The construction of two SWMFs (one wet pond, one dry pond) can effectively provide an Enhanced (80% TSS removal) level of water quality protection for the proposed development areas. Moreover, runoff from the 25 mm storm event can be detained and released over a 24-to-48-hour period to mitigate stream erosion.
- Sufficient storage volume is available in the proposed SWMFs to reduce overall post-development peak flows from the subject lands to less than pre-development levels. Post-development peak flows will be reduced to less than pre-development conditions and the Regional storm event can be safely conveyed through the SWMFs.
- A municipal storm sewer system can be sized to convey the 5-year minor system flows to the proposed SWMFs with major flows routed via the internal road network to overland flow inlets into the SWMFs.
- Efforts to maintain minimum separations from the underside of footings to seasonally-high groundwater levels ((0.6m for residential and non-residential buildings and 0.8m for walk-outs residential and nonresidential buildings) roads have grades ranging from 0.7% to a maximum of 5%, which will also help maintain

overland flow drainage routes to and from the two SWMFs, while matching the existing topography where possible.

- Erosion control measures will be required and will be reviewed and designed during the detailed design stage.
- The Engineer/Designer certifies that the proposed lot drainage and/or grading plan(s) have been designed in accordance with drainage common law in Ontario, sound engineering principles and the Ontario Building Code Articles, such as but not limited to 9.14.6.1 and 9.15.4.6. The Engineer/Designer ensures artificially collected and/or surface drainage will not adversely affect adjacent properties.

5.3 Hydrogeological Investigation

GHD Limited (“GHD”), prepared a Hydrogeological Investigation dated May 7, 2025 to support the Proposed Development. The purpose of the Hydrogeology Assessment is to characterize the geology and groundwater elevation/flow conditions within the uppermost groundwater zone encountered beneath the Subject Property. Shallow groundwater conditions will have the most significant bearing on the Proposed Development with respect to basement depths, subsurface servicing, earthworks, and grading.

The Assessment was completed through a review of background “desktop” information, and monitoring and analyzing 10 borehole monitoring wells installed across the Subject Property. Based on the findings of the analysis, the following summary is provided within the report:

- There are no surface water features on the Site, with the exception of a wetland in the northern portion of the Site that will remain intact as open space post-development. The wetland outlets to Municipal Drain No. 11 northeast of the Site. The feature-based water balance analysis for the wetland area presented in GHD (2025) shows only minor changes to the surface water flow contributions to the wetland area and show no changes to the hydrological function of Municipal Drain No. 11 due to the proposed Site development.
- MECP well records show that several private wells exist within a 500 m radius of the proposed Site development. The private wells range in depth from 47.7 to 63.1 mBGS and are screened in bedrock. Two exceptions to this are well 6502667 approximately 450 m southeast of the proposed Site development and well 6503087 approximately 300 m east of the proposed Site development that have shallow depths of 7.3 and 6.1 mBGS, respectively, and are screened in sand. The proposed Site development will not involve any significant dewatering, either during construction or post-development. Given this, and that the majority of the water wells are completed in bedrock, the proposed Site development is not expected to result

in any impacts to the water wells through any lowering of groundwater elevations in the shallow groundwater zone beneath the Site.

- Municipal water supply wells are located approximately 1.5 km to the north of the Site and approximately 2 km east of the Site. The Site is located beyond the WHPAs for these municipal wells developed under Ontario's SWP program. Additionally, the Site does not contain any vulnerable aquifers, as identified under the SWP program.
- The Site is underlain by a coarse-grained glaciofluvial deposit, a fine-grained glaciofluvial deposit, and a till unit. The groundwater table, referred to as the shallow groundwater zone, is located within the glaciofluvial units, and the till unit forms a base to the shallow groundwater zone. The till was encountered to the maximum depth investigated at the Site of approximately 6.5 mBGS.
- The groundwater elevation data collected to date show that, under seasonally wet conditions during winter and spring, the depth to groundwater is shallow across the Site ranging from approximately 0.2 to 1.8 mBGS.
- There is an apparent northwest to southeast oriented groundwater flow divide in the southern portion of the Site that coincides with the northwest to southeast oriented topographic ridge in this area. North of the divide, groundwater flow is directed to the north and northeast towards the wetland area. South of the divide, groundwater flow is directed to the southwest towards the unnamed tributary described in that connects to Conestogo River located approximately 0.5 km south of the Site.
- Continuous groundwater elevation monitoring shows the influence of groundwater pumping on the shallow groundwater zone during the summer and fall. Likely, this is due to pumping of one of two, or both, private water wells east of the Site, which are screened in bedrock at approximately 50 mBGS. These wells were installed in the 1960s and it is possible there is no seal between the well casing and overburden resulting in a hydraulic connection between the shallow groundwater zone and bedrock along the well casing exterior such that bedrock pumping draws some groundwater from the shallow groundwater zone.
- Groundwater samples were collected from the shallow groundwater zone for the laboratory analysis of general chemistry, nutrients, and metals (dissolved). The laboratory analytical results meet the MECP Table 2 Standards.
- The groundwater elevation monitoring completed to date show that groundwater discharge to the wetland from the shallow groundwater zone does not occur and that the wetland is sustained by surface water runoff. Thus, while the water balance analysis presented in GHD (2025) shows a reduction in infiltration due to the proposed Site development, any lowering of shallow groundwater elevations beneath the Site due to reduced infiltration will not have an impact on the wetland area.

- The groundwater elevation data collected to date show that, under seasonally wet conditions during winter and spring, the groundwater table depth is shallow across the Site ranging from approximately 0.2 to 1.8 mBGS. The shallow depth to groundwater will need to be accounted for in developing the grading design for the proposed Site redevelopment to meet the separation requirements between building footings and the seasonally high groundwater table. Woolwich Township requires a 0.6 m minimum separation for footings of foundations for residential and non-residential buildings, and a 0.8 m minimum separation for the underside of basement floors for walk-out residential and non-residential buildings.

5.4 Water Balance Assessment

GHD completed a preliminary feature-based water balance assessment of the sensitive wetland feature located within the open space block to the north of the residential portion of the Proposed Development. The Assessment is dated May 6, 2025. The Assessment evaluated the pre-development and post-development conditions. The evaluations resulted in the following conclusions:

- The results of the analysis predict a decrease in average monthly infiltration to the sensitive wetland feature from AP-1 to AP-3. This decrease can be attributed to a decrease in catchment size and change in land use.
- The results of the analysis predict an increase in average monthly runoff to the sensitive wetland feature from AP-2 to AP-3. This increase can be attributed to the diversion of controlled runoff from the wet pond to the wetland complex.
- The results of the analysis predict a minor decrease in average monthly runoff to the woodlot prior to AP-4. The minor decrease can be attributed to a decrease in catchment size facilitated by the diversion of Site runoff from the wet pond to AP-4 and changes in land use.
- The results of the analysis predict a decrease in average monthly runoff to Municipal Drain No. 11 at AP-5. The increase is contributed to an increase in catchment size facilitated by the diversion of Site runoff from the wet pond to AP-5 and changes in land use.
- The results of the analysis predict minor changes to the hydroperiod of sensitive wetland feature due to diversion of controlled runoff from the wet pond in the proposed development.
- The results of the analysis predict no changes to the hydrological function of the Northside Drive Municipal Drain or Municipal Drain No. 11 due to the proposed development.

5.5 Geotechnical Investigation

A Geotechnical Investigation was completed by MTE on January 30, 2025. The purpose of the geotechnical investigation was to determine the soil and groundwater conditions in the area proposed for residential development. The report provides geotechnical engineering recommendations for site grading, site servicing, foundations, basements, floor slabs, as well as pavement design and subdrainage requirements through the analysis of borehole data. The following findings are discussed in detail in the report:

- A combination of topsoil, sandy silt, sand, and clayey silt, and glacial till was found present on the Subject Property
- Based on the results of the geotechnical investigation, the Subject Property is suitable for the Proposed Development
- The native subgrade soils are susceptible to disturbance, and it is recommended that construction traffic on the subgrade be minimized. To minimize the effects of weather and groundwater, fill operations onsite should be carried out in the dry summer months.
- All excavations at the site should be carried out in conformance with the Ontario Occupational Health and Safety Act and Regulations for Construction Projects.
- In general, the undisturbed compact or stiff native soils or engineered structural fill are considered suitable to support the proposed buildings foundations.
- Basements must be provided as per the Ontario Building Code requirements.
- MTE recommends that geotechnical inspection and testing procedures be conducted throughout the various phases of the potential project.
- Engineer site visits should be conducted to confirm geotechnical bearing resistances for footings. Soil compaction testing should be carried out on structural fill beneath the proposed building addition, foundation wall backfill, sub slab granular fill, and trench backfill. Laboratory and field testing of the pavement structure components (granulars and asphaltic concrete) should be conducted, as well as concrete testing for foundations, curbs and sidewalks.

5.6 Noise and Vibration Impact Study

A Noise and Vibration Impact Study, also known as a Land Use Compatibility Study, was prepared by GHD Limited ("GHD"), dated April 30, 2025. The purpose of the study was to assess the potential impacts of noise at the Development due to future road traffic and rail traffic, stationary noise impacts from the off-site industrial/commercial facilities, and from on-site HVAC equipment. The study also assess ground-borne vibration impacts due to trail traffic.

The report finds that the predicted ambient noise levels at the Development due to future road traffic is sufficiently high that noise mitigation in the form of upgraded building façade components, the installation of central air conditioning, and warning clauses are recommended.

GHD conducted a site visit to observe and measure noise emissions from any nearby stationary sources. Cumulative stationary noise levels at the Site from nearby industrial and commercial facilities are within the applicable stationary noise limits of the MECP. Therefore, the Development is not expected reduce the ability of the facilities to comply with the MECP noise guidelines.

Overall, the findings of the assessment can be addressed through the implementation of the following recommendations:

- Consider building envelope construction assemblies be selected to achieve STC-33 for windows and STC-43 for exterior walls for the worst-case facades of the Development based on the assumptions detailed in Section 5.4.1 of the report. Other facades have lower STC rating requirements and are also outlined in the report.
- Provide central air conditioning or ability to install central air conditioning for all residential dwellings.
- Include warning clauses related to noise and proximity to CN Rail in purchase of agreement and sale for all residential dwellings.

Each recommendation is discussed further in the full report which should be read in conjunction with the Planning Justification Report.

5.7 Archaeological Assessment

Two archaeological Assessment Reports were provided for the Subject Property. The first, prepared by Irvin Heritage Inc, dated June 20, 2024 assessed the northern portion of the Subject Property. The second, prepared by Parslow Heritage Consultancy, dated February 22, 2024 assessed the southern portion of the Subject Property. These were both completed independently when the Subject Property consisted of two individual parcels owned by separate parties. The properties have since been consolidated.

The Stage 2 Archaeology Report, prepared by Irvin Heritage Inc, was initiated due to the recommendations of the Stage 1 Archaeology Report also completed by Irvin Heritage Inc. The Stage 2 Archaeological Assessment Survey consisted of a 5 m pedestrian survey and test pit survey of agricultural lands. A 15 m additional survey buffer was also conducted

within the wooded area, though this land will remain undeveloped. A detailed analysis is provided within the report. Based on the findings and conclusions of the report, the following recommendations are provided:

- Is it the professional opinion of the archaeological licensee, Thomas Irvin (P379) that the identified Euro-Canadian Northside West Site (AjHd-43) has been sufficiently assessed and retains no further Cultural Heritage Value or Interest per Section 2.2 Standard 1.c. of the Standard and Guidelines for Consultant Archaeologists. No further archaeological investigation is required.
- It is the professional opinion of the archaeological licensee, Thomas Irvin (P379) that the identified 685 Brewerton (AjHd-44) Isolated Findspot has been sufficiently assessed and retains no further Cultural Heritage Value or Interest per Section 2.2 Standard 1.c. of the Standard and Guidelines for Consultant Archaeologists. No further archaeological investigation is required.
- It is the professional opinion of the archaeological licensee, Thomas Irvin (P379) that the identified Isolated Findspots #1, #2, #3, #4, #5, #6, #7, #8, #9, #10, #11 and #12 have been sufficiently assessed and retain no further Cultural Heritage Value or Interest per Section 2.2 Standard 1.c. of the Standard and Guidelines for Consultant Archaeologists. No further archaeological investigation is required.
- It is the professional opinion of the archaeological licensee, Thomas Irvin (P379) that the Study Area subject to a Stage 2 Archaeological Assessment Survey and reported on herein has been sufficiently assessed and no further archaeological concerns exist.
- The retained lands within the Study Area, which have not been subject to a Stage 2 Archaeological Assessment Survey retain archaeological potential. A Stage 2 Archaeological Assessment Survey is recommended should development be contemplated.

Parslow Heritage Consultancy also completed a Phase 1 and Phase 2 Archaeological Assessment. Based on their findings, the Stage 2 survey did not result in the identification of archaeological materials and no further archaeological assessment is recommended for the study area.

Both assessments have been submitted to the Ministry of Heritage, Sport, Tourism and Cultural Industries for Ministerial clearance. It is understood that clearance from the Minister of Heritage, Sport, Tourism and Cultural Industries is required prior to approval of the Draft Plan of Subdivision.

5.8 Phase 1 and 2 Environmental Site Assessment

A Phase 1 Environmental Site Assessment (“ESA”) was prepared by GHD, dated March 13, 2025. The Phase 1 ESA identified through a non-intrusive investigation, the existence of any Potentially Contaminating Activities (PCAs) and Areas of Potential Environmental Concern (APECs) associated with the Subject Property as defined by Ontario Regulation 153/04. Based on the site inspection, and information provided by the site representatives, and regulatory agencies, and site history documents, the following APECs were identified to be associated with the Subject Property:

- Release of Fuel from Off-Site Aboveground Storage Tank (AST) i.e. a gasoline spill located on a property located 90 metres east of the Subject Property (80 Northside Drive)
- Agricultural Chemicals including herbicides, fungicides, and anti-fouling agents.

Based on the information obtained in completing the Phase 1 ESA, a Phase 2 ESA is required before a Record of Site Condition (RSC) can be filed with the MECP. A Phase 2 ESA will be completed and an RSC will be filed with the MECP prior to approval of the subdivision. An (H) Holding provision may be placed over the Subject Property until such time an RSC is filed within the MECP should draft plan approval be considered prior to the filing of the RSC.

5.9 Environmental Impact Assessment

An Environmental Impact Assessment was prepared by Natural Resource Solutions Inc (“NRSI”), dated April 2025. This report assessed the impact of the Proposed Development on the regulated nearby environmental features including a wetland and watercourse. The report summarizes background information on natural heritage features and species records, as well as results of field surveys completed within the study area. This information was used to delineate natural environmental development constraints based on the significance and sensitivity of the features and to inform the proposed development layout.

Recommendations are provided to avoid, or otherwise mitigate impacts to the existing natural features. The report finds that:

- The Core Environmental Feature is entirely outside of the development limit and have been adequately protected through buffers and detailed mitigation strategies.
- Indirect impacts to water quality and quantity are addressed in the Stormwater Management Report prepared by Walter Fedy (2025) and the Hydrogeological Report by GHD (2025). These report recommendations for erosion and sediment control adequately avoid indirect impacts to the natural features and will be finalized during the detailed design stage.

- Recommendations are detailed and include:
 - Stewardship management plan.
 - Pre-construction monitoring.
 - During construction monitoring.
 - Post construction monitoring.

6. Planning Applications

6.1 Official Plan Amendment

An Official Plan Amendment to the Township of Woolwich's Official Plan is required to facilitate the Proposed Development and to implement the Regional Official Plan policies.

The Official Plan Amendment proposed to amend several maps in the Official Plan to include the Subject Property within the Urban Settlement Area, and designate the Subject Property as Residential and Ancillary for the portion of the Subject Property that will be developed for residential use. Blocks 19-22 which include the park, parkette, protected natural feature and stormwater management facility respectively will be designated "Open Space".

Map 5.1 is the Township's Planned Township Structure and identifies the Subject Property as outside the Township Urban Area, but within the Countryside Line. The Official Plan Amendment shows the Subject Property fully within the Township Urban Area boundary.

Map 5.4 illustrates the Township's Urban Areas. This map identifies the Subject Property as outside of the Settlement Area. The Official Plan Amendment will amend this map to show the Subject Property as part of the Designated Greenfield Area.

Schedule "A" in the Township's Urban Area Settlement Plan map which outlines the various land use designations within the Urban Area. This map identifies the Subject Property as outside of the Settlement Area Boundary and within the Countryside Line. The Official Plan Amendment amends this map to redesignate the Subject Property as Residential and Ancillary which is the prevailing residential land use designation for the existing residential land uses directly east and south of the Site.

In all other aspects, the Proposed Development conforms to the Official Plan. The Proposed Development also conforms to all policies related to the Urban Settlement Area of St. Jacobs, and the Residential and Ancillary land use. The Official Plan Amendment is necessary to implement the Regional Official Plan policies which include the Subject Property within the settlement area of St. Jacobs which was approved by the Ministry of Municipal Affairs and Housing through ROPA 6. Therefore, the Official Plan Amendment is consistent with Provincial policy, and conforms to the Regional Official Plan.

A draft Official Plan Amendment is attached to this report as Appendix A – Draft Official Plan Amendment.

6.2 Zoning By-law Amendment

A Zoning By-law Amendment is also required to facilitate the Proposed Development. The Zoning By-law rezones a former Agricultural property and applies urban land use zones that permit a range of residential and open space uses appropriate for an Urban Settlement Area such as St. Jacobs.

Specialized regulations are proposed to provide additional flexibility for the residential blocks to provide a mix and range of housing, with context-appropriate density as the Proposed Development is built out over several years.

The following provides a summary of the Zoning By-law Amendment by land use:

6.2.1 Low Density Residential (R-5)

The Low-Density Residential uses within the Proposed Development are proposed to be zoned Residential Five (R-5) Zone with the following specialized regulations:

- A reduction of the required front yard setback to the front wall to 3.0m whereas 3.5 is required.
- A reduction of the required rear yard setback for lots less than 11 metres in width that contain a bungalow or backsplitted and/or lots with depths less than 30 metres to 6 metres whereas 7.5 metres is required.
- Increase in maximum building height to 14.5 metres or three storeys whereas the maximum building height is typically 10.5 metres for low density zones.
- Reduce the minimum lot area for a semi-detached dwelling to 210 square metres whereas 220 square metres is required in the R-5 zone.
- A setback of 15 metres from the Rail line is required.
- Blocks 6-13 are proposed to permit townhouses in accordance with the R-6 zone as well as single detached and semi-detached dwellings.

6.2.2 Medium Density Residential (R-6)

The Medium-Density Residential uses within the Proposed Development are proposed to be zoned Residential Six (R-6) Zone with the following specialized regulations:

- Reduced minimum corner lot width of 8.5 metres whereas 10 metres is required for townhouses.
- To permit more than (8) street townhouses to face the same direction within a block.

- A reduction in the amount of outdoor amenity space required for multiple residential units to permit a minimum of 10 square metres per unit, rather than 30 square metres.
- In the case of a through lot, a minimum rear yard of 3.5 metres is required.
- The maximum building height be increased to 14.5 metres rather than 12.5 metres.
- Parking for multiple dwellings (apartments) shall be provided at a minimum rate of 1.25 spaces per unit.
- Permit a density of less than 50 units per hectare whereas a range between 50-120 is required.

6.2.3 Future Development Block 24 (R-5)

The Future Development Block 24 will be zoned R-5 with added permissions for Institutional uses in accordance with the Institutional (P) Zone with the following specialized regulation:

- Institutional uses must be located on a lot of a minimum of 2,000 square metres.

6.2.4 Residential Reserve

Block 25 is proposed to be zoned Residential Five (R-5) Zone with a Holding Provision symbol such that the development of this portion of the Subject Property shall not be permitted until such time that it be consolidated with adjacent lands to provide a lot with a minimum lot depth of 20 metres, and that the Holding Provision (H) has been removed.

6.2.5 Open Space (O-1)

Blocks 19-22 are proposed to be zoned Open Space One (O-1) Zone. These blocks include the park and parkette, protected natural features and buffer, and the stormwater management facilities respectively. No exemptions are proposed for the zone.

The Zoning By-law Amendment is attached to this report as Appendix B – Draft Zoning By-law Amendment.

Each of the exemptions proposed for the Zoning By-law Amendment aim to provide flexibility for the Proposed Development to provide the widest range and mix of housing. Permissions to permit townhouse uses within the R-5 zone for example means that much of the Proposed Development can provide a range of single detached, semi-detached and townhouse built forms based on the evolving needs of the community. This flexibility also allows the Proposed Development to contribute to the Township's density targets for greenfield development.

The specialized regulations for setbacks allows for relief from the requirements under certain conditions such as for shallow lots, and also allows the Proposed Development to make more efficient use of land while still providing adequate setbacks. All of the specialized regulations are taken from nearby jurisdictions where the permissions have proven to maintain adequate space between buildings while providing for a desirable and livable community.

Generally, the proposed amendments provide the ability for the Proposed Development to meet the density needs of the Township and Region of Waterloo. The Zoning By-law Amendment allows for the efficient use of land and balances the needs of the future residents of the community.

6.3 Draft Plan of Subdivision

The Draft Plan of Subdivision application is required to subdivide the land and create the blocks identified in the concept plan. The Draft Plan provides for a range of unit sizes through lotless blocks and anticipates a total of 186-409 residential units across 18 residential blocks. Two parks are provided (Blocks 19 and 20) as well as stormwater management facilities (Block 22), Open Space (Block 21) and municipal roads.

7. Public Consultation

Upon acceptance and circulation of the application package in support of the Proposed Development, the Township requires the posting of Notice of Application sign(s) to inform surrounding property owners of the Proposed Development. GSP Group Inc. and Schlegel Urban Developments Corp. commit to post the required signage promptly with a clear, unobstructed view from the street, and agree to maintain the sign throughout the duration of processing of the applications by the Township.

The proposed Official Plan and Zoning By-law Amendments require a Statutory Public Meeting in accordance with the *Planning Act* R.S.O. 1990, c. P.13. GSP Group Inc. and Schlegel Urban Developments Corp. will attend the public meeting as scheduled by the Township and give a formal presentation regarding the Proposed Development and associated applications, as well as answer questions from residents, staff, and Councillors. During the public meeting, contact information for GSP Group will be provided to the public to address any follow-up questions or concerns.

Finally, GSP Group will provide direct written responses to comments raised throughout the public consultation.

8. Conclusions

GSP Group Inc. has been retained by Schlegel Urban Developments Corp. to assist with applications for Official Plan Amendment, Zoning By-law Amendment, and Draft Plan of Subdivision at 52 Hawkesville Road and 110 & 118 Northside Drive in the St. Jacobs community in the Township of Woolwich. The Subject Applications will facilitate a 186-409-unit subdivision on a parcel of approximately 28.98 hectares that has recently been added to the Township's Urban Area. The Subject Applications will incorporate the property within the Township's Urban Area and Designated Greenfield Area, assigning a residential and ancillary land use designation consistent with surrounding residential uses. The Subject Applications will urban development consistent with surrounding subdivisions.

The Zoning By-law Amendment applies appropriate zones for the residential and open space uses from Zoning By-law 26-2024, and includes Exceptions Zones to enable the Proposed Development.

The proposed dwelling units comprise a full range of unit types, from detached dwellings to multiple residential such as stacked townhouses to support the continuing growth and evolution of St. Jacobs as a complete community.

The proposed development represents efficient land use within a designated settlement area that provides a range and mix of housing options and densities. The variety of unit types provides flexibility in responding to evolving market-based needs. The Proposed Development has been designed to provide for the protection and enhancement of natural heritage features and to avoid areas that are subject to natural hazards. The development is therefore consistent with the Provincial Planning Statement, 2024.

The proposed development conforms with the general principles set out in the Region of Waterloo's Official Plan (as amended by ROPA 6) and will help the Township meet the minimum density target of 53 residents and jobs per hectare. The development will be consistent with the policies of the Township Official Plan and with the direction provided by the Urban Design Brief.

It is concluded that the proposed Official Plan Amendment, Zoning By-law Amendment, and Plan of Subdivision aligns with broader planning objectives of the Province and Region, and represents good land use planning.

Should you have any questions regarding these applications, please do not hesitate to contact us.

Yours truly,

GSP Group Inc.



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email: hprice@gspgroup.ca



Charlotte Lewington, MCIP, RPP
Planner
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Appendix A – Draft Official Plan Amendment

The Corporation of the Town of Woolwich

By-law No. XX-2024

A By-law to Adopt Official Plan Amendment Number X, to the Official Plan of the Woolwich Planning Area

**(52 Hawkesville Road, 110 and 118 Northside Drive North, St.
Jacobs)**

The Council of the Corporation of the Township of Woolwich, in accordance with the provisions of Section 21 of the Planning Act, 1990, as amended, hereby ENACTS AS FOLLOWS:

1. THAT Amendment Number X to the Official Plan of the Township of Woolwich consisting of the attached text and schedules, is hereby adopted.
2. THAT this By-law shall come into force and take effect on the final passing thereof.

Finally passed and enacted this ____th day of _____, 20__.

Mayor

Clerk

Township of Woolwich Official Plan Amendment

Part A – Preamble

The purpose of this Amendment is:

1. To add 52 Hawkesville Road, 110 and 118 Northside Drive North in St. Jacobs (“the property”) to the Urban Settlement Area of St. Jacobs.
2. To redesignate the portion of the property currently designated Agriculture to Residential and Ancillary Use.

Location

This amendment applies to 52 Hawkesville Road, 110 and 118 Northside Drive North in St. Jacobs, which is 28.98 hectares in size.

Basis of the Amendment

The proposed amendment to add the property to the St. Jacobs Settlement Area is necessary to bring the Official Plan into conformity with the Region of Waterloo Official Plan. The designation of a portion of the property as Residential and Ancillary Use is appropriate as it is located within the Urban Area and is adjacent to Hawkesville Road, a Regional road. The proposed development is located in proximity to existing and established commercial uses, thereby supporting the local economy. The proposed residential uses address the demand for housing while making efficient use of existing infrastructure and services.

Part B – The Amendment

The Amendment consists of the following components:

1. That Maps 5.1 and 5.4, Schedule ‘B’ Township of Woolwich Urban Area Settlement Plan St Jacobs Transportation Network and Schedule ‘A’ Township of Woolwich Urban Area Settlement Plan St. Jacobs Land Use be updated to refine the Township Urban Area, Designated Greenfield Area, Settlement Area and Land Use Designations respectively.

SCHEDULE 'A'
OFFICIAL PLAN AMENDMENT

TO THE
MAP 5.1

TOWNSHIP OF WOOLWICH PLANNED TOWNSHIP STRUCTURE



 Area to be added to the Township Urban Area

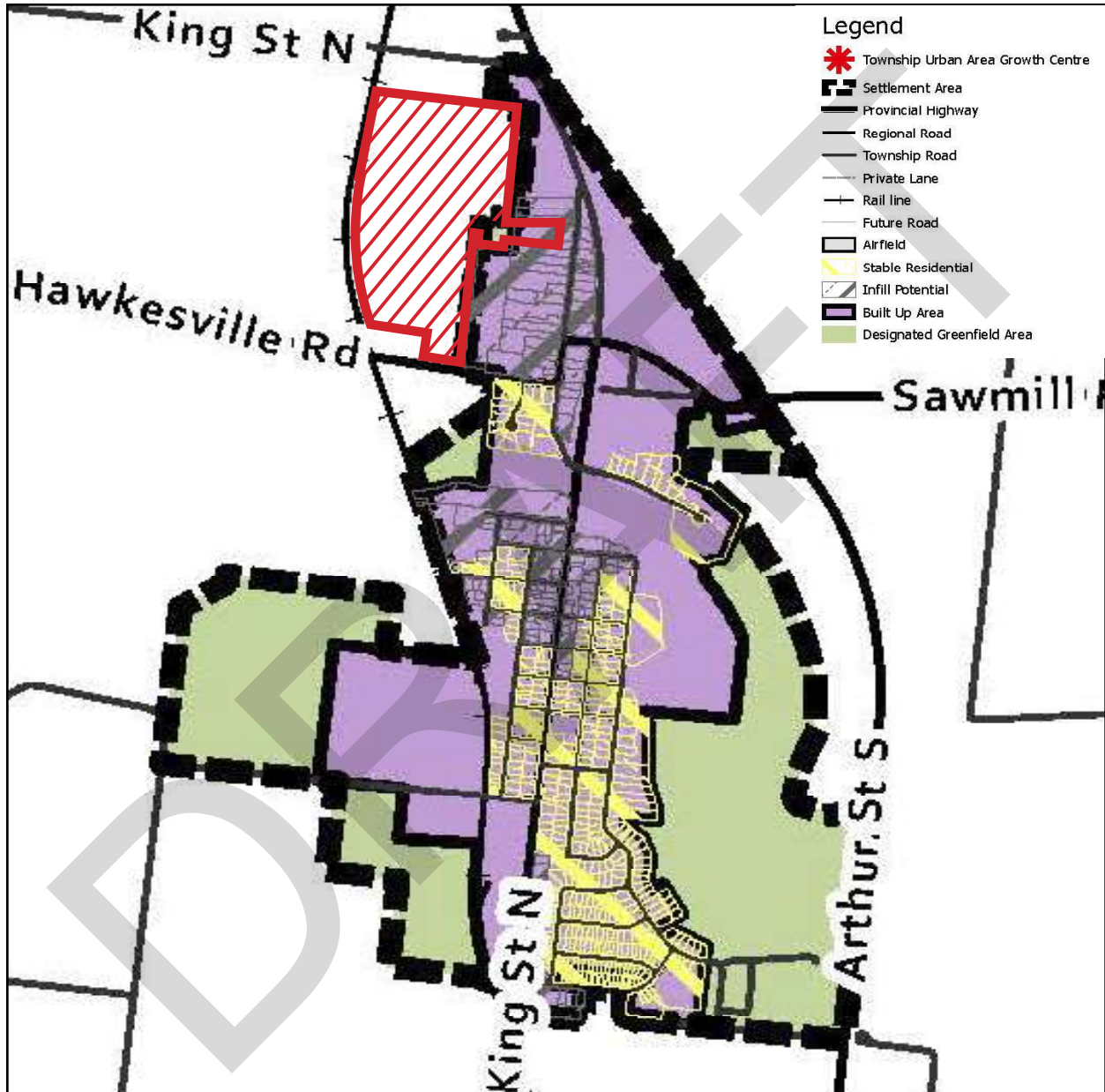
 Subject Property



FEBRUARY 2025

SCHEDULE 'B'
OFFICIAL PLAN AMENDMENT

TO THE
MAP 5.4
TOWNSHIP OF WOOLWICH URBAN AREAS



 Land to be designated Greenfield Area

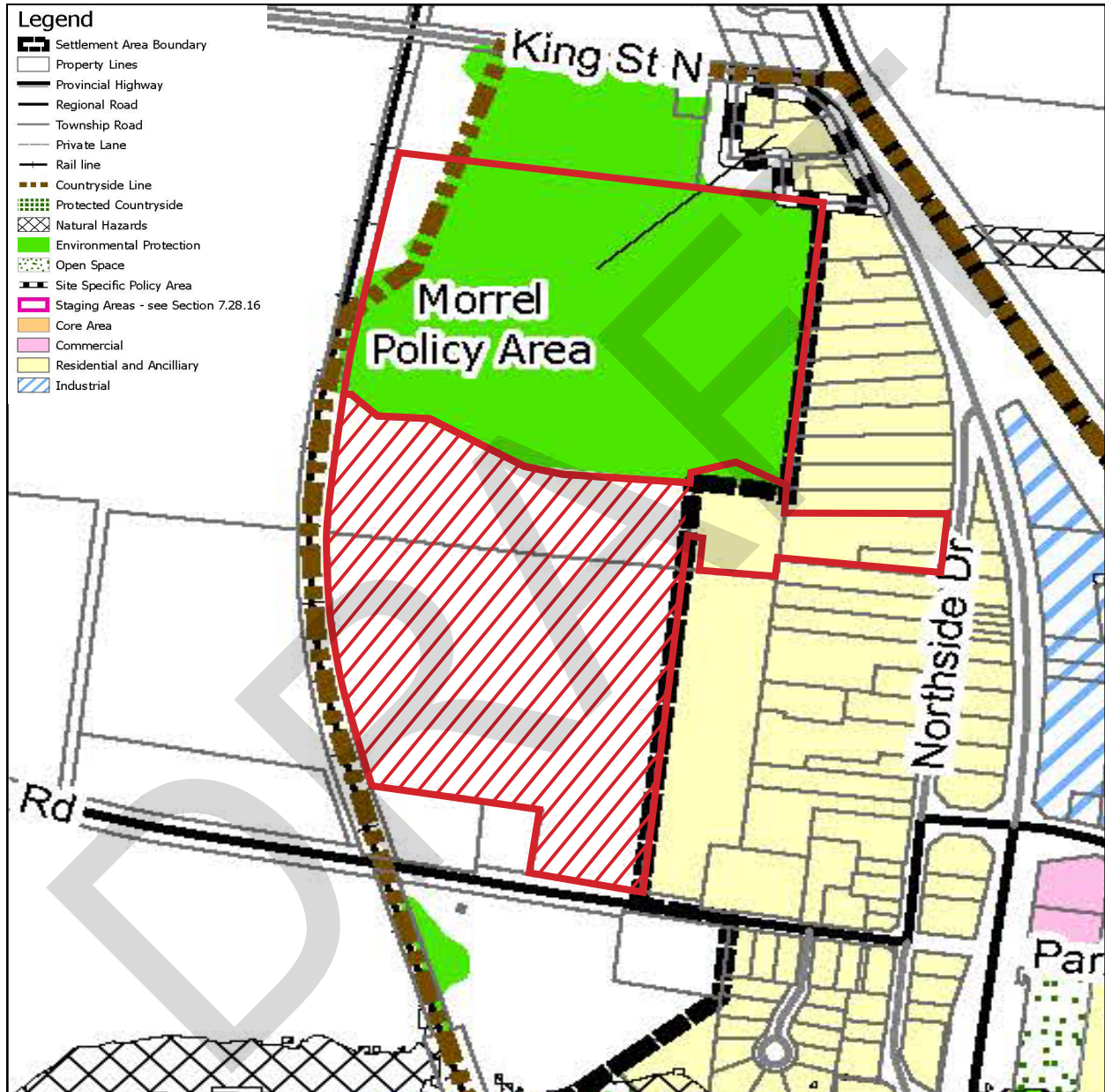
 Subject Property



FEBRUARY 2025

SCHEDULE 'C'
OFFICIAL PLAN AMENDMENT

TO THE
SCHEDULE 'A'
TOWNSHIP OF WOOLWICH URBAN AREA SETTLEMENT PLAN
ST JACOBS LAND USE

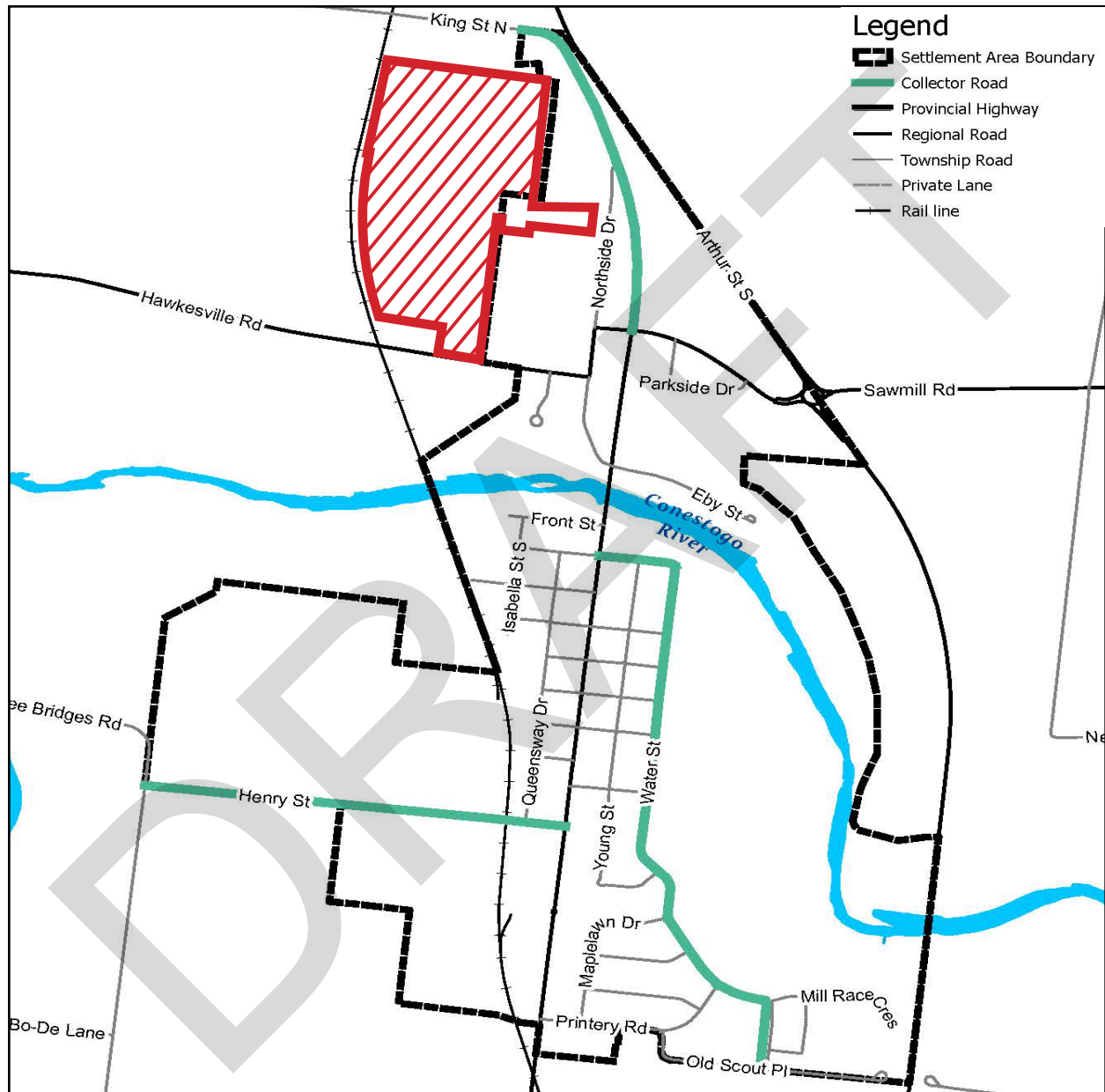


-  Land to be designated Residential and Ancillary
-  Subject Property



FEBRUARY 2025

SCHEDULE 'D'
OFFICIAL PLAN AMENDMENT
TO THE
SCHEDULE 'B'
TOWNSHIP OF WOOLWICH URBAN AREA SETTLEMENT PLAN
ST JACOBS TRANSPORTATION NETWORK



-  Area to be added to the Settlement Area Boundary
-  Subject Property



FEBRUARY 2025

Appendix B – Draft Zoning By-law Amendment

The Corporation of the Township of Woolwich

By-law No. 26-2024

A By-law to Further Amend Zoning By-law 26-2024, of the Township of Woolwich (52 Hawkesville Road, 110 and 118 Northside Drive North, St. Jacobs)

Whereas, on [Date], the Council of Woolwich deems it desirable to further amend By-law 26-2024, as amended;

Now therefore the Council of the Corporation of the Township of Woolwich hereby Enacts as follows:

1. That Zoning Map B.14 of Schedule 'B' of By-law 26-2024, as amended be deleted and replaced by the revised Zoning Map B.14 attached and new Sections 16.zzz and 16.bbb attached be added to Schedule "A" which rezones a 9.8 hectare property located at 52 Hawkesville Road, 110 and 118 Northside Drive North, St Jacobs described as TRACT GERMAN COMPANY PT LOT 37, Township of Woolwich, Regional Municipality of Waterloo from Agriculture (A) and Residential-3 (R-3) to Residential Five Exemption (R-5 (16.aaa)) Zone, Residential Five Exemption (R-5 (16.aaa) with a Holding (H) Zone, Residential Six Exemption (R-6 (16bbb)) Zone, and Open Space 1 (O-1) Zone as per Schedule 1, attached.
2. Notwithstanding any other provisions of this By-law, the lands illustrated on the plan forming Section 16.aaa of Schedule "A" of this By-law (the "Plan"), are subject to the following provisions:
 - a) the minimum front yard setback shall be 3.0 metres;
 - b) the minimum setback from a lot line shared with a railway right-of-way shall be 15 metres;
 - c) The minimum setback to a garage shall be 6.0 metres;
 - d) The minimum rear yard shall be 6 metres for:
 - i) lots less than 11 metres in width that contain a bungalow or backsplit; and
 - ii) lots with depths less than 30 metres.
 - e) The maximum building height shall be 14.5 metres or three storeys; and

- f) The minimum lot area for a semi-detached dwelling shall be 210 square metres.

On the lands illustrated as Part 1 on the Plan shall be subject to the following provisions;

- a) the front lot line shall be "Street A"; and
- b) a Holding (H) Symbol shall be applied until such time as a land assembly occurs and the Township is satisfied that a min lot depth of 20 metres is provided and Council has, by By-law, removed the Holding Provision (H) symbol from the Section 16.aaa Zoning Schedule A pursuant to Section 36 of the Planning Act.

On the lands illustrated as Part 2 on the Plan, street towns shall be permitted in accordance with the applicable townhouse regulations of the R6 Zone with the following exceptions:

- i) The minimum corner lot width shall be 8.5 metres;
- ii) More than eight (8) street towns may be permitted to face the same direction within a block;
- iii) A minimum density of 50 units per hectare shall not apply, and
- iv) Each unit shall provide a minimum outdoor amenity area of 10 square metres.

On the lands illustrated as Part 3 on the Plan, uses permitted within the Institutional (P) Zone shall also be permitted in accordance with the zone requirements for institutional uses in Section 12 of the Zoning By-law.

- i) Notwithstanding Section 12 of the Zoning By-law, institutional uses shall be subject to a minimum lot area of 2,000 square metres.

- 3. Notwithstanding any other provisions of this By-law, the lands illustrated on the plan forming Section 16.bbb of Schedule "A" of this By-law (the "Plan"), are subject to the following provisions:

- a) More than eight (8) townhouse units may be permitted to face the same direction within a block;
- b) The corner lot width for street towns shall be 8.5 m;
- c) In the case of a through lot the minimum rear yard shall be 3.5 metres;
- d) The maximum height shall be 14.5 metres;
- e) The minimum density of 50 units per hectare shall not apply;
- f) Outdoor amenity area shall be provided at a rate of 10 square metres per unit; and

g) Parking for multiple dwelling (apartments) shall be provided at a minimum rate of 1.25 spaces per unit.

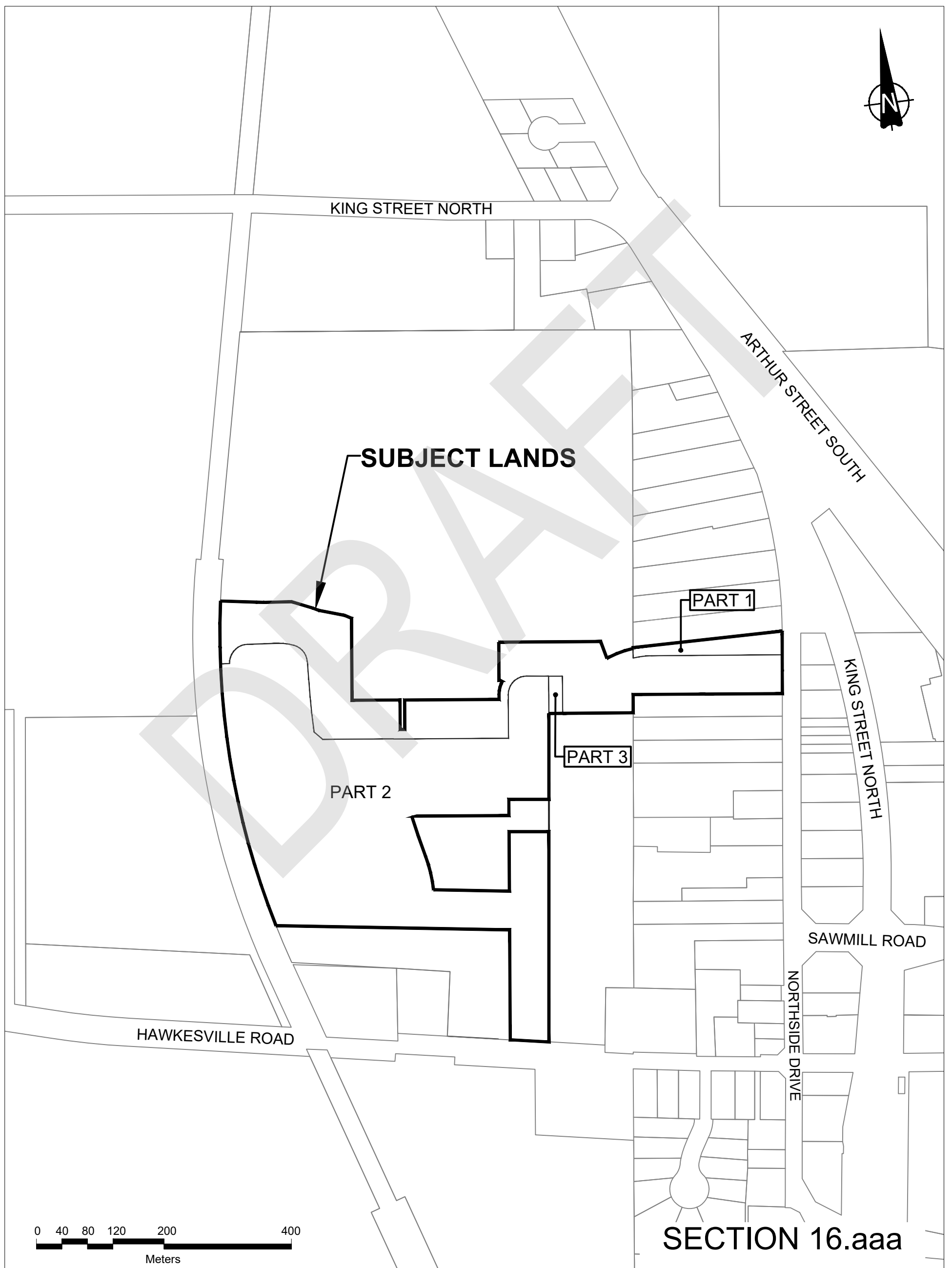
4. That this by-law shall come into full force and effect on the final passing thereof by the Council of the Corporation of the Township of Woolwich subject to the provisions of the Planning Act, 1990, and amendments thereto.

Finally passes and enacted this ___ day of _____, 2025.

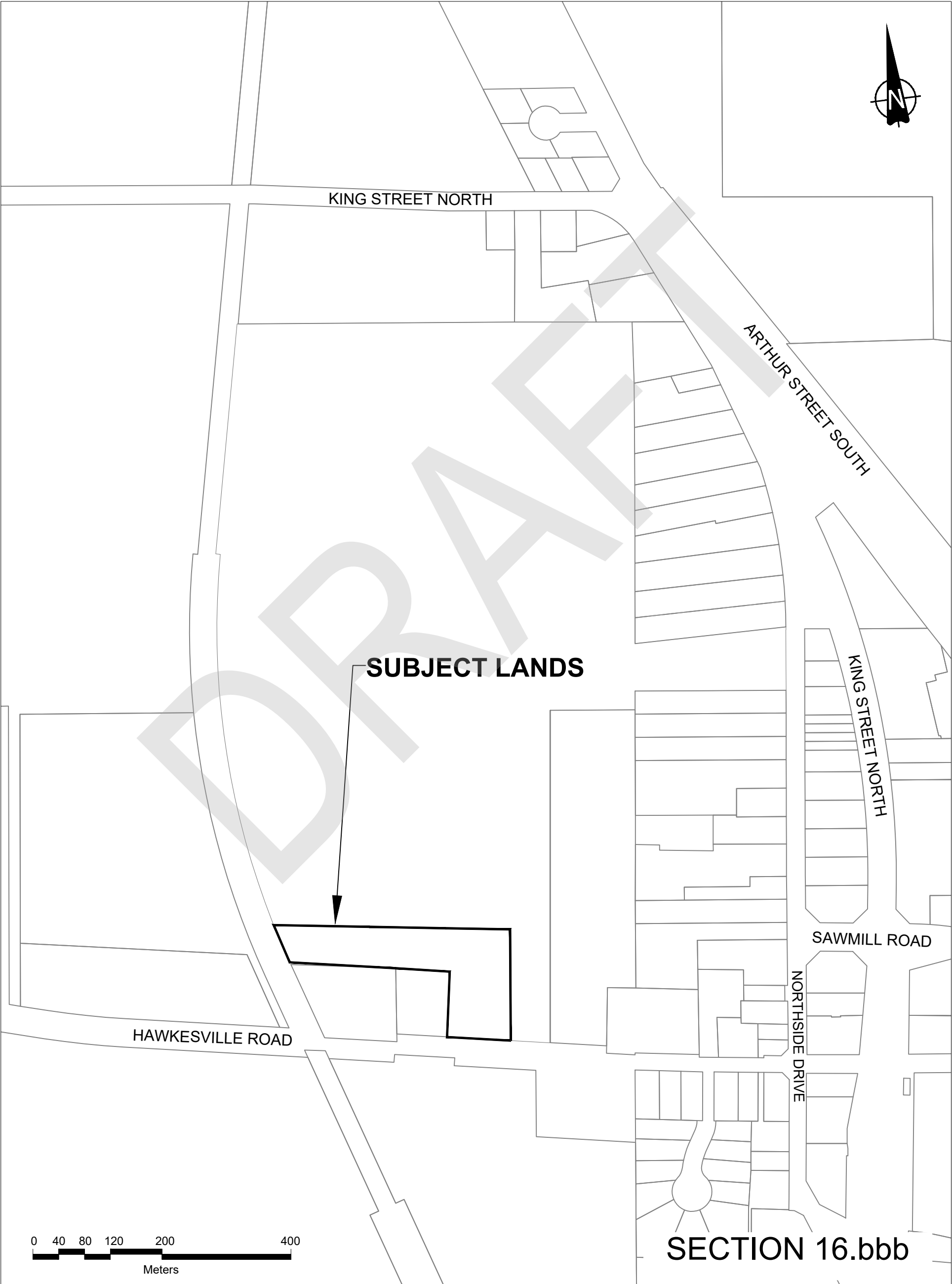
Mayor

Clerk

Schedule "A"
52 Hawkesville Road, 110 and 118 Northside Drive North
WOOLWICH TRACT GERMAN COMPANY PT LOT 37 RCP
1547 LOTS 38 AND 39



Schedule "B"
52 Hawkesville Road, 110 and 118 Northside Drive North
WOOLWICH TRACT GERMAN COMPANY PT LOT 37 RCP
1547 LOTS 38 AND 39



Schedule "C"

52 Hawkesville Road, 110 and 118 Northside Drive North
WOOLWICH TRACT GERMAN COMPANY PT LOT 37 RCP
1547 LOTS 38 AND 39

