

Planning Justification Report

1065 Listowel Road

Township of Woolwich, Region of Waterloo

Schlegel Urban Developments Corp.

Zoning By-law Amendment & Draft Plan of Subdivision

June 2025



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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 an application for a Zoning By-law Amendment and Draft Plan of Subdivision for the property municipally known by the Township of Woolwich as 1065 Listowel Road, Elmira (the “Subject Property”).

The proposal includes the development of a new residential subdivision containing a range and mix of housing typologies including single and semi-detached, on-street townhouses, and multiple residential. A total of 327-590 residential units are proposed. A park block, and a stormwater management block are also proposed to serve the development. Public roads are proposed to provide for adequate circulation within the subdivision and to connect to the existing road network surrounding the Subject Property. The proposal described above is detailed further throughout this report and is collectively described as the “Proposed Development” (See Figure 2).

The Subject Property is located within a Township Designated Greenfield Area and within a Township Urban Area Boundary of the Region of Waterloo Official Plan. The Subject Property is designated “Residential and Ancillary” Area on Schedule A – Township of Woolwich Urban Area Settlement Plan Elmira Land Use of the Township of Woolwich Official Plan. This designation permits a large range of residential land uses and uses ancillary to a residential area.

The Subject Property is currently zoned “A - Agriculture” on Schedule B, Map B9 of the Township of Woolwich Zoning By-law 26-2024. The Submitted Zoning By-law Amendment seeks to change the zoning of the Subject Property from Agriculture to Low Density Residential 5 Exemption (R.5-16aaa) Zone, Medium Density Residential 6 Exemption (R.6-16aaa) Zone, and Open Space 1 (O-1) Zones as outlined in Schedule A of the Draft Zoning By-law Amendment to facilitate the Proposed Development.

A pre-submission consultation was held by the Township of Woolwich on August 22, 2024, where the following documents were listed as required plans and studies for a Zoning By-law Amendment, and Draft Plan of Subdivision application:

- Zoning By-law Data Matrix
- Planning Justification Report
- Sustainable Design/Green Building Report
- Draft Zoning By-law
- Completed Application Forms (Subdivision and Zoning Amendment)

- Urban Design Report/Brief
- Conceptual Site Plan/Design for multi-use blocks
- Draft Plan
- Development Phasing Plan
- Landscape Plans
- Park/Landscape Design Plan
- Land Use Compatibility Study in accordance with D-6 Guidelines
- Noise Impact Assessment
- Environmental Site Assessment/Record of Site Condition
- Functional Servicing Study
- Lot Grading Plan
- Site Servicing Plan
- Confirmation from MECP that private well has been decommissioned;
- Stormwater Management Report;
- Hydrogeological Report;
- Dewatering Plan (if required);
- Chloride (Salt) Impact Assessment;
- Salt Management Plan;
- Geotechnical Investigation and Soil Report;
- Traffic Study including Active Transportation Plan, On Street Parking Plan;
- Archaeological Assessment & Ministry Acknowledgement Letter;
- Environmental Impact Study;
- Tree Management Plan

An overview of the findings of each report is discussed in Section 5 of this report. However, these reports should be read in full in conjunction with this report.

1.2 Purpose and Scope

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

- To provide a description of the Site's existing conditions and its context within Township of Woolwich and the immediate surroundings (Section 2),

- To outline the Proposed Development and development applications required to facilitate the development (Section 3),
- To provide an overview and analysis of the relevant Provincial, Regional, and Municipal 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 conducted in support of the proposed applications, including a description of their scope and summary of their conclusions (Section 5),
- To describe the proposed Zoning By-law Amendment and Draft Plan of Subdivision applications (Section 6),
- To outline the public consultation process for the Proposed Development (Section 7), and
- To provide an overview of the recommendations and conclusions in support of the Proposed Development (Section 8).

2. Site Information

2.1 Site Location and Existing Conditions

The Subject Property is located in the southern end of the Elmira Urban Settlement Area. It is an irregularly shaped parcel approximately 18.66 hectares (46.5 acres) in size. It has approximately 464 metres of frontage along Listowel Road. Listowel road represents the southern parcel boundary. The Subject Property is surrounded to the north, east, by existing residential development, and west by existing residential, commercial, and industrial uses. Road stubs to Weymouth Street and Woodberry Crescent are available to the west of the Subject Property. Road stubs to the north are available connecting the Proposed Development to Pintail Drive and Burlwood Drive. An existing temporary municipally-owned stormwater management facility is present in the north-west portion of the Subject Property which is intended to be decommissioned and replaced with the stormwater management facility provided as part of the Proposed Development.

The Subject Property is currently occupied by four buildings, two of which are located in the northeast corner of the property and the other two are situated in the southwestern portion of the property. The Subject Property contains actively farmed agricultural land in the center. Trees of various ages and types exist along north and west lot lines of the Subject Property. A row of street trees is located along the southern lot line of the Subject Property. Future development of the property has been anticipated with one access provided off Listowel, two accesses from South Parkwood Boulevard, and two from Timber Trail Road. Lions Ring Trail is located north of the Subject Property opposite South Parkwood Boulevard. The Subject Property does not contain any protected natural heritage features and is not located within the regulation limit of the Grand River Conservation Authority, though several boundary trees are present which are intended to be retained. The topography of the Subject Property generally slopes from north-west to south-east. However, a significant grade change in the north-west corner exists. This grade is fixed due to the location and grade of the adjacent road stubs which will connect to the Proposed Development. The design of the Proposed Development attempts to work with existing grades while maintaining a logical and functional subdivision.

2.2 Surrounding Context

The Subject Property is generally surrounded by residential, open space, commercial and agricultural uses (Figure 1). Directly north of the Subject Property are single detached dwellings and South Parkwood Boulevard. A segment of Lions Ring Trail is located further north with a trail head located off South Parkwood Boulevard.

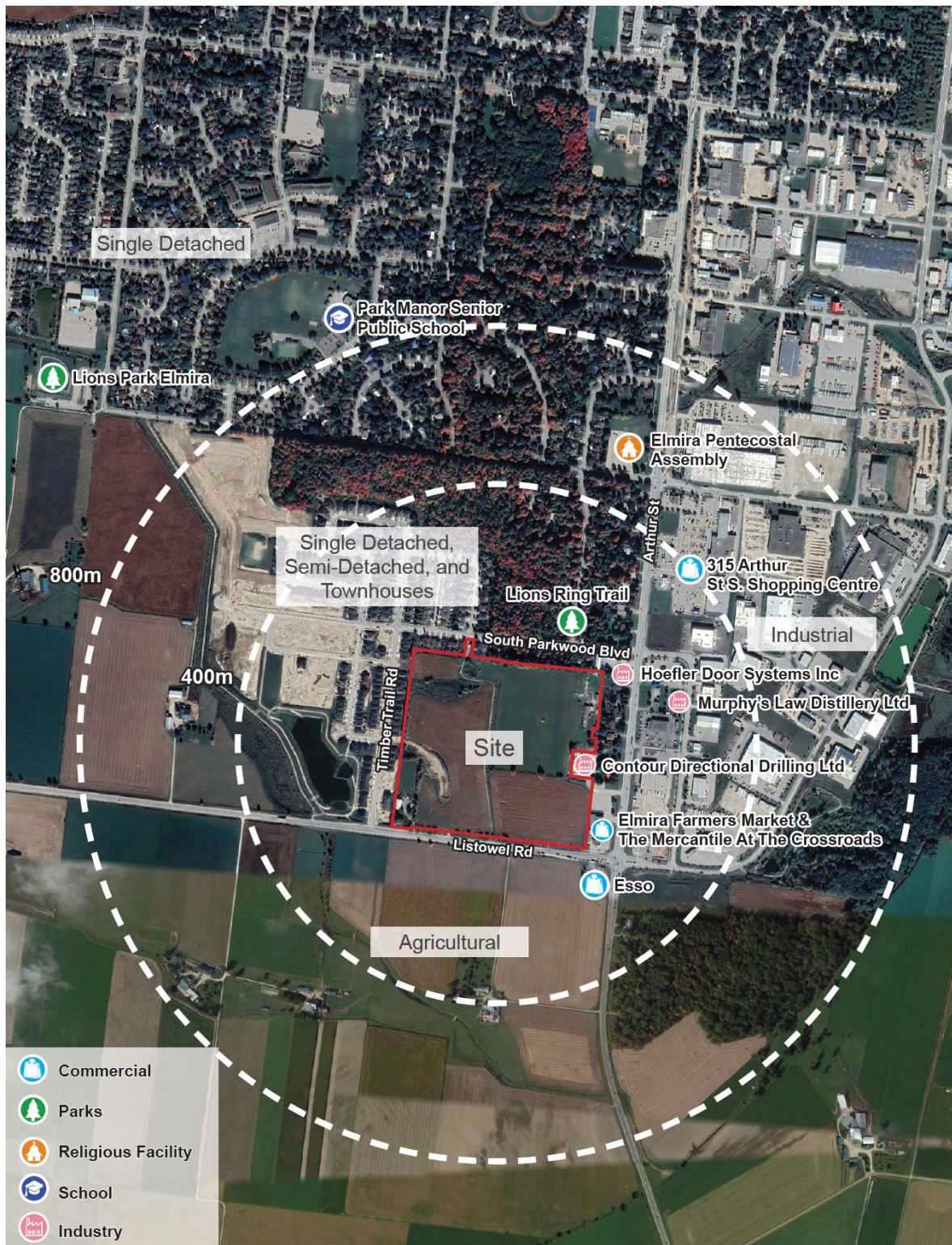
Several single detached residential dwellings, and commercial uses abut the property directly to the east. Among the commercial uses are Hoefler Door Systems Inc, Contour Directional Drilling, and Elmira Farmer's Market and the Mercantile at the Crossroads. Further east, on the east side of Arthur Street, is a predominately industrial area.

The Subject Property is adjacent to Listowel Road directly to the south. A gas station is located south of the Subject Property, near the Listowel Road and Arthur Street South intersection. Further south are agricultural lands.

Immediately west of the Subject Property is a new residential subdivision primarily consisting of single detached, semi-detached, townhouse and apartment dwelling units. The adjacent subdivision also contains a park and stormwater management pond.

Listowel Road has a Right-of-Way (ROW) width of approximately 34 metres, as seen in aerial imagery. The Region of Waterloo Official Plan establishes a required ROW of 30 metres from its intersection with Arthur Street South (85) and Line 86 (86), as per Schedule A. As such, road widening is required as part of the development of the Subject Property.

The Subject Property is within close proximity to two bus stops located on either side of Arthur Street South, and two bus stops at the intersection of Arthur Street South and Earl Martin Drive, both of which service Route 21. Route 21 provides connections to Conestoga Station and St Jacobs Market which provides expansive commercial and retail options for the community. There is also a large variety of commercial uses further north along Arthur Street. Public sidewalks are located along Timber Trail Road, South Parkwood Boulevard, and one side of Arthur Street South.



Property Location Map
Source: Google Earth (2022)

Figure
1

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 Elmira. The Proposed Development is intended to optimize a vacant parcel of land that was planned for development at the time of the development of the surrounding residential uses as evidenced by the available road stubs leading to the Subject Property. The Proposed Development makes efficient use of the planned development land while respecting the existing and planned 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 Listowel Road through Burlwood Drive, Woodberry Crescent, Weymouth Street, and Pintail Drive (see Figure 2). Burlwood Drive is planned to serve as a potential connecting corridor with a right-of-way of 23 metres. Burlwood Drive further acts as the main north-south spine through the subdivision that bisected the Subject Property. All other roads serve a local road purpose with a right-of-way width of 20 metres. Each street will feature asphalt roads, boulevard trees, street lighting, and sidewalks on both sides of the road as per the Township's standard right-of-way standard cross-section referenced in the Engineering Development Infrastructure Manual (EDIM). Burlwood Drive will feature a multi-use trail in place of sidewalk on one side of the road providing active transportation connections from Listowel Road to South Parkwood Boulevard.

A park block (Block 25) is provided centrally within the subdivision and is sized to meet the passive and active park needs of the future residents of the subdivision. Parkland makes up a total of 2.65% 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. 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 1-9 are proposed to contain single detached or semi-detached homes yielding approximately 77-111 residential units. Blocks 10-16 are proposed to contain an expanded range of residential unit types including single detached homes, semi-detached homes, and townhouses yielding approximately 63-164 units. Blocks 17-21 are proposed to contain on-street townhouses yielding between 51-65 units. Blocks 22-25 are proposed to contain multiple residential units which are proposed to contain townhouses or multi-residential units and will yield approximately 136-250 units.

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	1–9	Residential and Ancillary	R.5	77	111	4.45
Single/Semi/ Townhouse	10-16	Residential and Ancillary	R.5 (16.aaa)	63	164	4.17
Street Townhouse	17-21	Residential and Ancillary	R.6 (16. bbb)	51	65	1.38
Multiple Residential	22-24	Residential and Ancillary	R.6 (16.bbb)	136	250	2.10
Park	25	Open Space	Open Space (OS)	---	---	0.50
Stormwater Management	26	Open Space	Open Space (OS)	---	---	1.98
Roads	---	---	---	---	---	4.50
Total	---	---	---	327	590	18.66

3.2 Development Density Projections

Table 2 includes a break-down of projected population by dwelling type within 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 327-590 provided in the Proposed Development are expected to accommodate approximately 1100-1993 people and jobs. With a net developable area of 18.66 hectares, the Proposed Development provides for an overall density of approximately 59-107 persons and jobs per hectare.

Table 2 – Summary of Total Projected Persons and Jobs

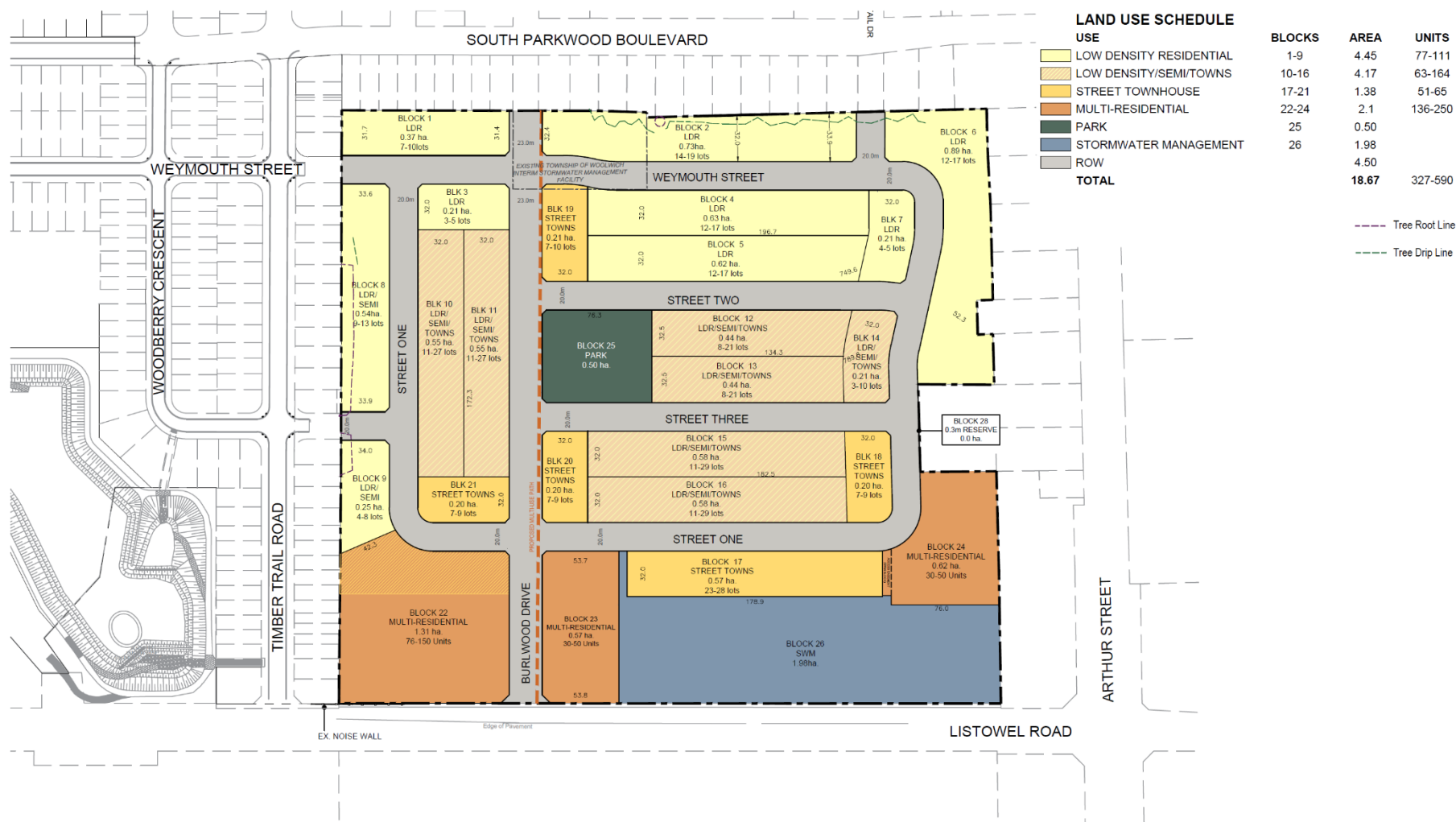
	Units		Persons per dwelling*	Population		Work-At-Home Jobs (28.8%)**		TOTAL RESIDENTS AND JOBS	
	Min.	Max.		Min.	Max.	Min	Max	Min	Max
Single Detached/ Semi	77	111	3.25	250.25	360.75	72.07	103.90	322.32	464.65
Single Detached/ Semi/ Street Townhomes	63	164	3.05	192.15	500.2	55.34	144.06	247.49	644.26
Street Townhomes	51	65	2.44	124.44	158.6	35.84	45.68	160.28	204.28
Multiple Residential	136	250	2.11	286.96	527.5	82.64	151.92	369.6	679.42
Totals	327	590		854	1547	246	446	1100	1993
Developable Area (ha)***								18.66	
TOTAL RESIDENTS AND JOBS PER HECTARE PROVIDED								Min	Max
								57	107
*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

A Zoning By-law Amendment and 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 Zoning By-law Amendment are presented in in Section 6 of this Report.



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
(d)	the conservation of features of significant architectural, cultural, historical, archaeological or scientific interest;	An Archeological assessment was prepared by Parslow Heritage Consultancy Inc, dated November 1, 2023 and demonstrated that no archaeological resources were found and no further archaeological assessment is required.
(e)	the supply, efficient use and conservation of energy and water;	The Proposed Development makes efficient use of energy and water by connecting to existing and established municipal servicing infrastructure.
(f)	the adequate provision and efficient use of communication, transportation, sewage and water services and waste management systems;	The Proposed Development makes efficient use of existing infrastructure including municipal servicing infrastructure, the road network, telecommunications infrastructure and public service facilities.
(h)	the orderly development of safe and healthy communities;	The Subject Property is located within the Elmira Urban Area and are adjacent to an established residential neighbourhood. Road stubs are provided to the Subject Property indicating a logical extension of the built environment. As such, the Subject Lands are an

		appropriate location for the creation 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 within proximity to several commercial uses, schools and places of worship. The Subject Property is located close to a large trail network providing for passive outdoor recreation needs of the residents of the development.
(j)	the adequate provision of a full range of housing, including affordable housing;	The Proposed Development introduces 327-590 residential dwelling units with a range of unit types and sizes from single detached to multiple residential 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 Subject Property is located within the Elmira Urban Area and is surrounded by established residential, commercial and institutional uses, thereby ensuring the site is appropriate 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 density of 17.5-31.6 units per hectare in addition to pedestrian oriented infrastructure includes sidewalks and walkways to encourage active transportation and the use of public transportation.
(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 associated with reliance on personal automobiles through the provision of public and alternative forms of transportation including public transit, walking, and cycling.

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 Draft Plan of Subdivision has undergone several iterations and alternative concepts to best accommodate for the need for new housing stock in the Region while optimizing existing infrastructure. The Proposed Development is within an Urban Settlement Area which is where the Province directs growth. 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 represents an extension to the surrounding established residential subdivisions. 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.
(d.1)	if any affordable housing units are being proposed, the suitability of the proposed units for affordable housing;	The provision of affordable housing units will be considered at a later development stage.
(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;	Several internal streets are proposed to service the development and intend to connect to Timber Trail Road, Burwood Drive, and Listowel Road. Direct linkages to a highway 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 200m ² to 550m ² metres squared, and are consistent with the prevailing lotting pattern of the surrounding community.
(i)	the adequacy of utilities and municipal services;	The Proposed Development intends to connect to existing and available municipal servicing infrastructure and make efficient use of the existing road network.
(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 will convey a 0.5 hectare park block for parkland dedication purposes.
(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 will operate on full municipal services and implement energy conservation measures required by the Ontario Building Code thereby optimizing energy conservation.

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 0.94 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 0.5 hectares of parkland provided within Block 25 is proposed representing 2.65% of the land. It is GSP's opinion that the proposed 0.5 hectare park 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 Elmira Urban Area and is easily accessible to established commercial, institutional and residential uses and represents an ideal location for introducing 327-590 residential units of various types and sizes. 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 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 the planned build out of an existing settlement area that is well serviced by existing community and commercial amenities, and results in 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 and has been designed to include an active, accessible and well-connected pedestrian network including a multi-use trail that bisects the Subject Property providing a north-south connection for active transportation.

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 and where applicable should be focused in strategic growth areas and major transit station areas. 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 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 supported 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 Elmira Settlement Area. Elmira is not a strategic growth area and does not contain a major transit station area. The Proposed Development makes efficient use of the land and makes use of the existing and planned infrastructure for the Township. Sidewalks are proposed throughout the subdivision within the right-of-way and the multi-use path connection supports active transportation.

The Proposed Development reflects the existing built-form of the area and builds upon its suburban character while providing a range and mix of housing options appropriate for the area. The Proposed Development makes efficient use of the 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.”

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 sensitive land use. A noise feasibility study was conducted by HGC, dated June 11, 2025 and indicated that traffic and stationary noise can be mitigated through the implementation of the recommendations outlined in the report such as:

- increased setbacks in select locations;
- improved building envelope construction assemblies;
- central air conditioning;
- acoustic barriers in select locations; and
- warning clauses in agreements of Purchase and Sale.

This report and the recommendations are discussed in more in Section 5 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 25) is proposed within the development to serve the subdivision and community at-large. A multi-use trail is proposed along Burlwood Drive which is the north-south spine of the subdivision. The multi-use trail connects Listowel Road to the proposed park block, and further north to the existing neighbourhood on South Parkwood Boulevard. Cash-in-lieu of parkland will be provided for the balance of the parkland dedication requirements.

Chapter 4: Wise Use and Management of Resources

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.”*

Response: An Archaeological Assessment was completed for the Subject Property. The assessment determined that no archaeological resources were found on the Subject Property. The Ministry of Tourism and Culture has reviewed the assessment and provided their clearance letter and accepted the report into the Provincial Register of Archaeological Reports.

The Subject Property is located within the settlement boundary of Elmira 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 Elmira Settlement Area. The Proposed Development represents a logical extension of the residential neighbourhood to the north and east with connections to the street network and municipal services. Furthermore, the proposed range and mix of residential units are compatible with the existing community and the proposed new streets and multi-use trail head are well integrated into the existing network.

In our opinion, the Proposed Development is consistent with the PPS 2024.

4.3 Region of Waterloo Official Plan (“ROP”)

On August 18, 2022, Regional Council passed By-law No. 22-038 to adopt a new Official Plan for the Regional Municipality of Waterloo (Regional Official Plan). On April 11, 2023, the Ministry of Municipal Affairs and Housing approved Regional Official Plan Amendment No. 6 (ROPA 6) with modifications. The Regional Official Plan contains policies to guide growth and development within the Region to the year 2051.

4.3.1 Chapter 2 – Where and How to Grow

Chapter 2 of ROPA 6 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 Township Urban Area of Elmira as shown on Map 1 (see Figure 3). As such, the Subject Property 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 provides 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 walkways 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 up to 590 residential units, across 18.66 hectares of land at a density of 59-107 people 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 making 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.

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. A multi-use trail provides for active transportation options through the Subject Property and connecting to Listowel Road.

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 Property is within proximity to existing industrial uses east of the site. A Land Use Compatibility Study in accordance with D-6 Guidelines was completed by GHD in support

of the proposed development. As discussed above, the Study found that that traffic and stationary noise can be mitigated through the implementation of the recommendations outlined in the report and include:

- increased setbacks in select locations;
- improved building envelope construction assemblies;
- central air conditioning;
- acoustic barriers in select locations; and
- warning clauses in agreements of Purchase and Sale.

A detailed summary of the key findings and recommendations are outlined in Section 5 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. A minimum of 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.

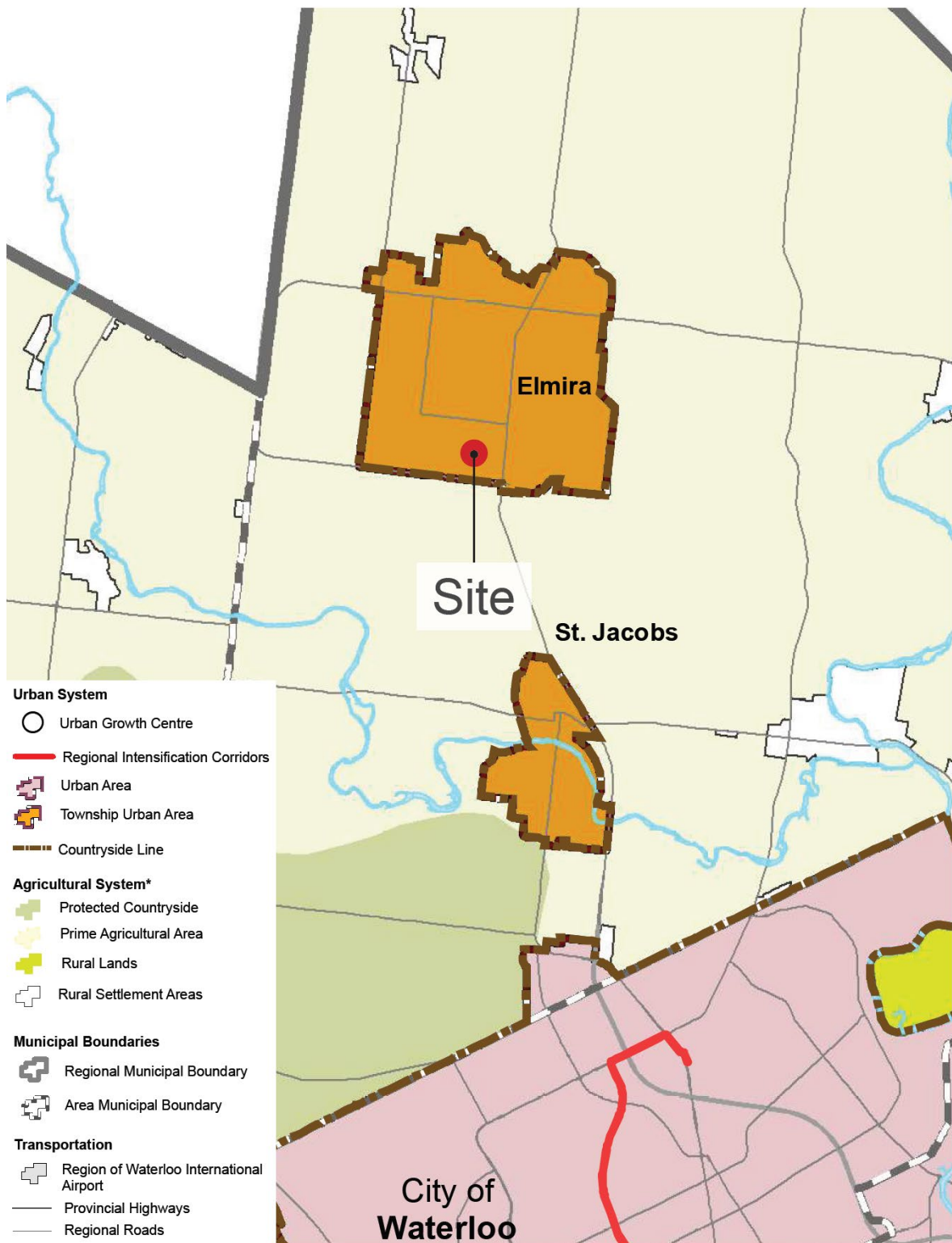
Policy 5.A.17 requires that wherever feasible, sidewalks will be provided on both sides of streets where transit service currently exists or is planned, and on a minimum of one side of all other through-streets or streets that interconnect with the walking network.

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. On Burlwood Drive, a 23-metre right of way is proposed with a sidewalk on one side of the road, and a multi-use trail on the other side.

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

Overall, the Proposed Development conforms to the policies of the Region of Waterloo Official Plan.

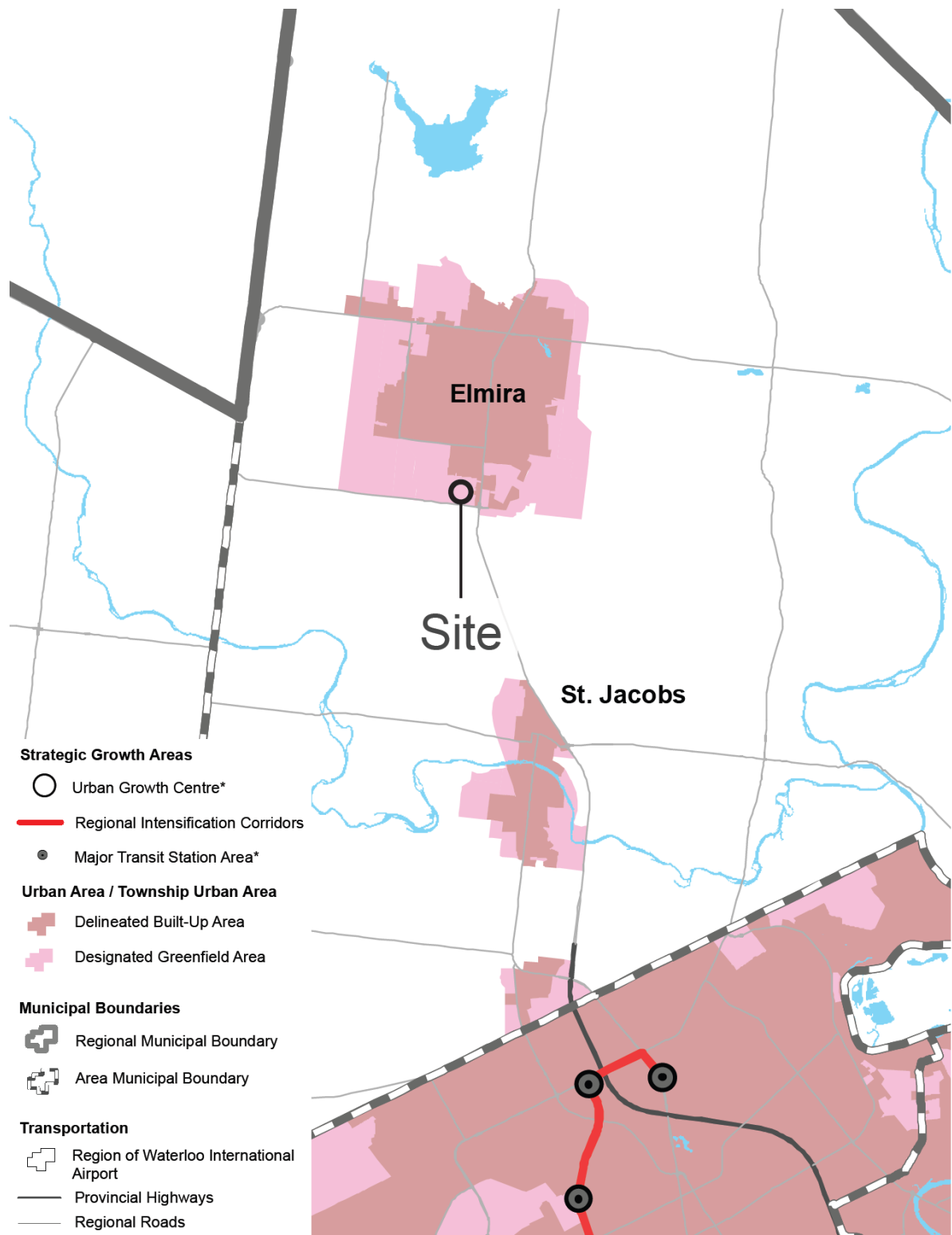


Regional Structure

Source: Waterloo Region Official Plan, Map 1 (2024)

Figure

3



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.

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 located within a Township Urban Area on Map 5.1 – *Township of Woolwich Planned Township Structure of the OP* (See figure 5).

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

Section 5.1.2 of the OP states “*The Elmira and St. Jacobs Township Urban Areas are illustrated on Map 5.1 of this Plan. 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. Future development in the Elmira and St Jacobs Township Urban Areas will be in accordance with the specific policies outlined in Section 7 of this Plan*”.

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 occurring within the Breslau and Stockyards Urban Areas [and Elmira and St. Jacobs per Policy 5.5.1] 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."*

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-wise 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 is located within the Township Urban Area of Elmira and will provide for a broad range and mix of residential uses. It will be serviced by full municipal services. The Proposed Development also provides an appropriate mix of housing options that respects the scale and character of the adjacent land uses and Elmira as a whole. The Proposed Development will not negatively impact the natural environment or surface and/or ground water

resources. The proposed road network connects to the road stubs adjacent to the property which anticipated the development of the Subject Property. The road network includes sidewalks on both sides of the road within the local roads standard rights-of-way. The collector road right-of way (Burlwood Drive) includes a sidewalk on one side and a multi-use trail on the other side within the right-of-way. The multi-use trail provides for a connection to Lions Ring Trail which is north of the subdivision along South Parkwood Boulevard providing good connection to active recreation needs to the trail for recreational pedestrian and cyclist use.

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)

In addition to anticipated population per dwelling unit, based on available 2021 census data, work-from-home jobs are added at a rate of 28.8% per resident.

The Proposed Development will house a population in the range of 854-1547 people. Therefore, a total of 246-446 jobs are expected within the Proposed Development. With a residential population range of 854-1547, and a range of 246-446 jobs, the Proposed Development is expected to host a total of 1100-1993 people and jobs with a density of 59-107 people and jobs per hectare. Overall, the Proposed Development will contribute to the Township achieving their density targets for greenfield areas of 45 residential and jobs per hectare.

The Proposed Development includes a future municipal park as well as a multi-use trail 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.

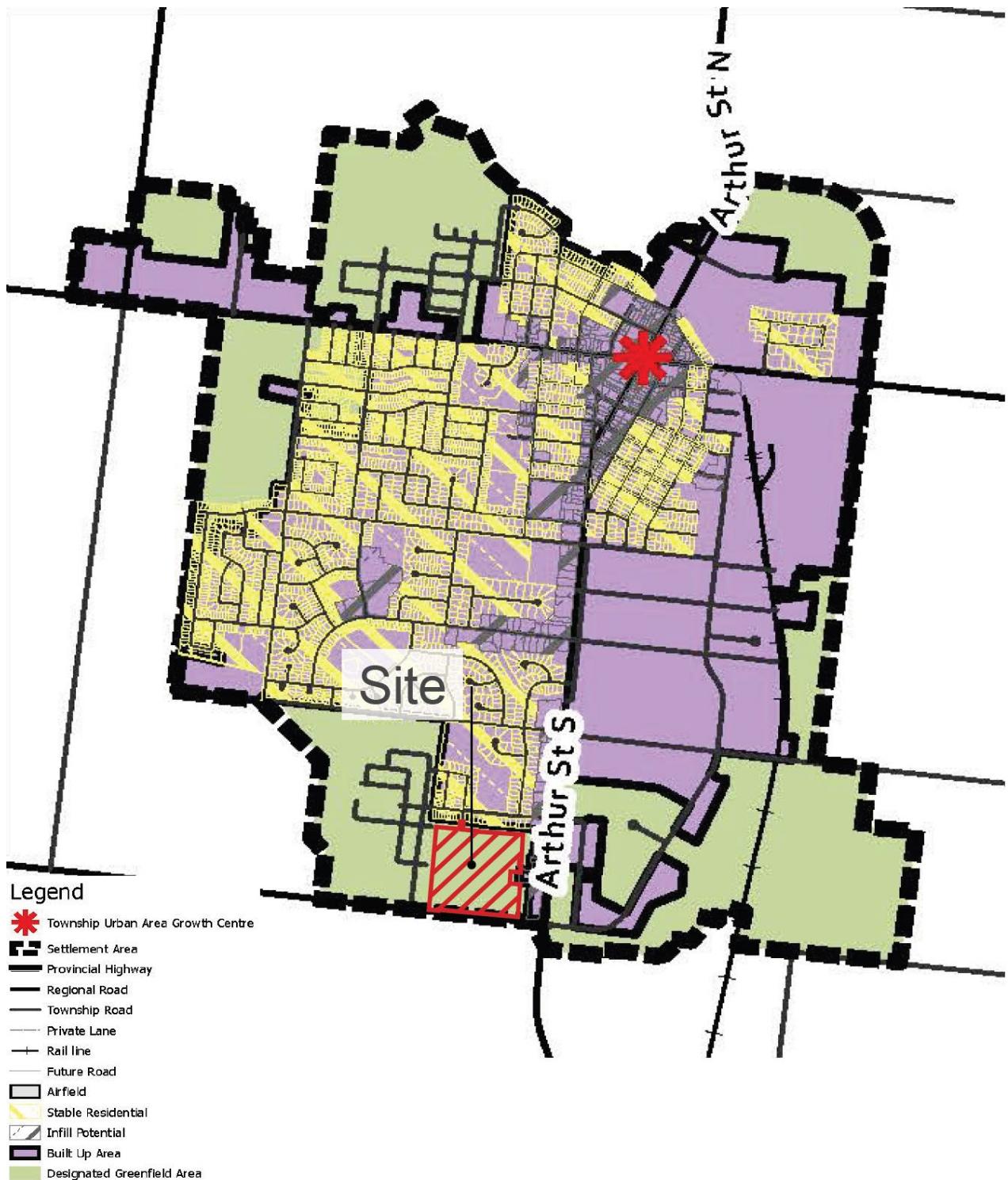
The Proposed Development will be serviced via municipal water and wastewater services. It also provides a coherent grid network of roads and sidewalks which will support the future integration of transit services.

Overall, the Proposed Development conforms to the relevant policies of Chapter 5 of the OP.



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

Figure
5



Township of Woolwich Urban Areas

Source: Woolwich Official Plan, Map 5.4 (2022)

Figure
6

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 within a “*Residential and Ancillary*” Area on *Schedule A – Township of Woolwich Urban Area Settlement Plan Elmira Land Use* of the Township of Woolwich Official Plan (see Figure 7).

Section 7.4.1.2 of the Township Official Plan states that “*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.*”

Ancillary uses are intended to allow consideration in the implementing Zoning By-law for those types of related or ancillary uses which normally form part of a residential neighbourhood which may include uses such as home occupations, schools, churches, parks and neighbourhood commercial uses. The specific uses to be permitted, regulations and locations will be established in the Zoning Bylaw”.

Furthermore, section 7.4.1.2 of the Township Official Plan states that “*It is the stated intent of this Plan that the designation “Residential and Ancillary Uses” is not to be read as a commitment by Council to allow ‘living accommodation of all kinds’ nor any or all ancillary uses in any specific area at any specific time. This designation is only intended to indicate that residential and ancillary uses in the areas so designated may be considered.”*

It is the specific intent of this Plan that the Zoning By-law may specify and limit the type of living accommodation which will be permitted in any specific area and may limit or exclude entirely the ancillary uses to be permitted”.

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 Proposed Development is located within an Urban Settlement Area as defined in Section 7.1 of the OP. The Proposed Development conforms to the land use designations as set out in the Settlement Plan and will be further facilitated through a Zoning By-law Amendment. The proposed land uses respect the existing surrounding land uses and will be staged in accordance with the staging policies of the Settlement Plan.

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 7.29

Section 7.29 of the OP applies to the Elmira Township Urban Area. The Subject Property is located within the Elmira Township Urban Area. The Land Use designations for the Subject Property is which is illustrated in on Schedule 'A' 'Settlement Plan - "Elmira"' (see Figure 7)

Section 7.29.5.2 outlines the general residential policies:

- a) *“The Elmira Settlement Area shall have a planned future population of approximately 17,200 people within the planning period to 2031.*

- b) *The gross residential density for the Elmira 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. Higher density development may be considered by site-specific amendment to the Township Official Plan.*
- c) *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. Higher density development may be considered by site-specific amendment to the Township Official 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 Elmira 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.”*

Section 7.29.9.3 of the OP provides policies governing 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, parklands shall not include flood plain, valley lands or open space areas for stormwater retention purposes unless acceptable to the Township but may include wooded areas.*
- d) *Passive use parkland, in the form of lands designated Natural Hazards is located throughout the Settlement Plan Area and may be utilized for pedestrian and bicycle paths where appropriate.*
- e) *In order to ensure its retention, the woodlot south of Whippoorwill Drive and west of Arthur Street, designated Open Space Land Use on Schedule 'A' 'Settlement Plan "Elmira"', will be conveyed to the Township as part of the draft plan of subdivision for the lands contained in Area 1A-1. Such conveyance will be accepted by the Township as fulfilling all*

requirements for parkland dedication for the development of Area 1A-1. Notwithstanding the Open Space Land Use designation, the extension of Chapter 7 Page 210 Pintail Drive to provide access and services to the lands south and west of the woodlot will be permitted to the satisfaction of the Township. In addition, within the area identified as "Pintail Extension" on Schedule 'A' 'Settlement Plan "Elmira", limited residential development on the lands fronting the east, west and south side of the Pintail Drive extension will be permitted subject to an appropriate Tree Saving Plan to the satisfaction of the Township.

Section 7.29.11.1 governs general transportation policies, stating:

- 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.*
- d) The requirements for sidewalks, pedestrian and bicycle routes shall be determined by the Township at the time of draft plan of subdivision approval.*
- e) Signalized intersections shall be provided in accordance with Township of Woolwich and Regional Municipality of Waterloo requirements."*

Section 7.29.11.3 requires that right-of-way collector roads be up to 26 metres. Sub-collector roads shall be up to 23 metres.

Section 7.29.11.4 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 contemplate by the Settlement Plan.

Section 7.29.12.1 states that *"The Elmira Settlement Plan Area 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."*

Full municipal services are being proposed as part of the draft plan of subdivision.

Section 7.29.14.7 of the OP provides policies for the South-West Policy Area. The Subject Property is located within the South-west Policy Area as shown on Schedule 'A' 'Settlement Plan – Elmira" (see Figure 7)

It states:

- a) *“Residential development of the South-west Policy Area (Area 1A-2) is not anticipated until the end of the 2031 planning period or beyond and shall not be brought forward for development unless, by resolution of Township Council, it is considered that:*
 - i) *The implementation of Staging of Development Policies of the Elmira Settlement Area Plan requires an additional inventory of lands to satisfy the requirement for a three-year inventory of draft approved and registered plans or a ten-year supply of lands designated for residential land use; or,*
 - ii) *The inventory of lands is required to ensure sufficient flexibility in the provision of residential land use development opportunity.*
- b) *Consideration for residential development of the South-west Policy Area will be subject to Township Council approving the allocation of sewage treatment capacity to support the application for development of all or a portion of the lands.”*

Section 7.29.16.1 of the OP governs the staging of development, stating:

- a) *“Staging of residential development in the Elmira Settlement Area, other than infill, conversion and redevelopment, will generally occur within the 2031 planning horizon in the following sequence:*
 - Phase 1: Area 8, the remaining portions of Areas 1A-1 and 3B and portions of Area 1A-2 (i.e., Southwood 4 Policy Area) and Area 10 (i.e., Barnswallow Policy Area),*
 - Phase 2: Remaining portions of Areas 1A-2 and 10, and*
 - Phase 3: Area 11 (Eldale)*
- b) *Sequential ordering of development within or between each Phase shall be determined by resolution of Council in accordance with policies established in this Plan.*
- c) *Modification to the staging of development may only occur by resolution of Council following consideration of the Township Staging of Development Report addressing land use, servicing and growth management objectives set out in this Plan and the Growth Strategy and Master Servicing Study for the Settlements of Elmira and St.-Jacobs.*
- d) *The Township shall produce an annual Staging of Development Report detailing development and servicing priorities for residential growth.*
- e) *The Township shall maintain a minimum 15-year supply of land for residential development through residential intensification and redevelopment and, if necessary, lands that are designated and available for residential development.*
- f) *The Township shall maintain a minimum 3-year supply of residential units through lands suitably zoned to facilitate residential intensification and redevelopment, and lands in draft approved and registered plans of subdivision, condominium plans and/or site plans, subject*

to the availability of sewage and water capacity and other necessary services/infrastructure.”

Response: The Proposed Development provides up to 590 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 59-107 residents and jobs per hectare meeting the Township’s density policies for the Elmira and contributing to the planned population growth.

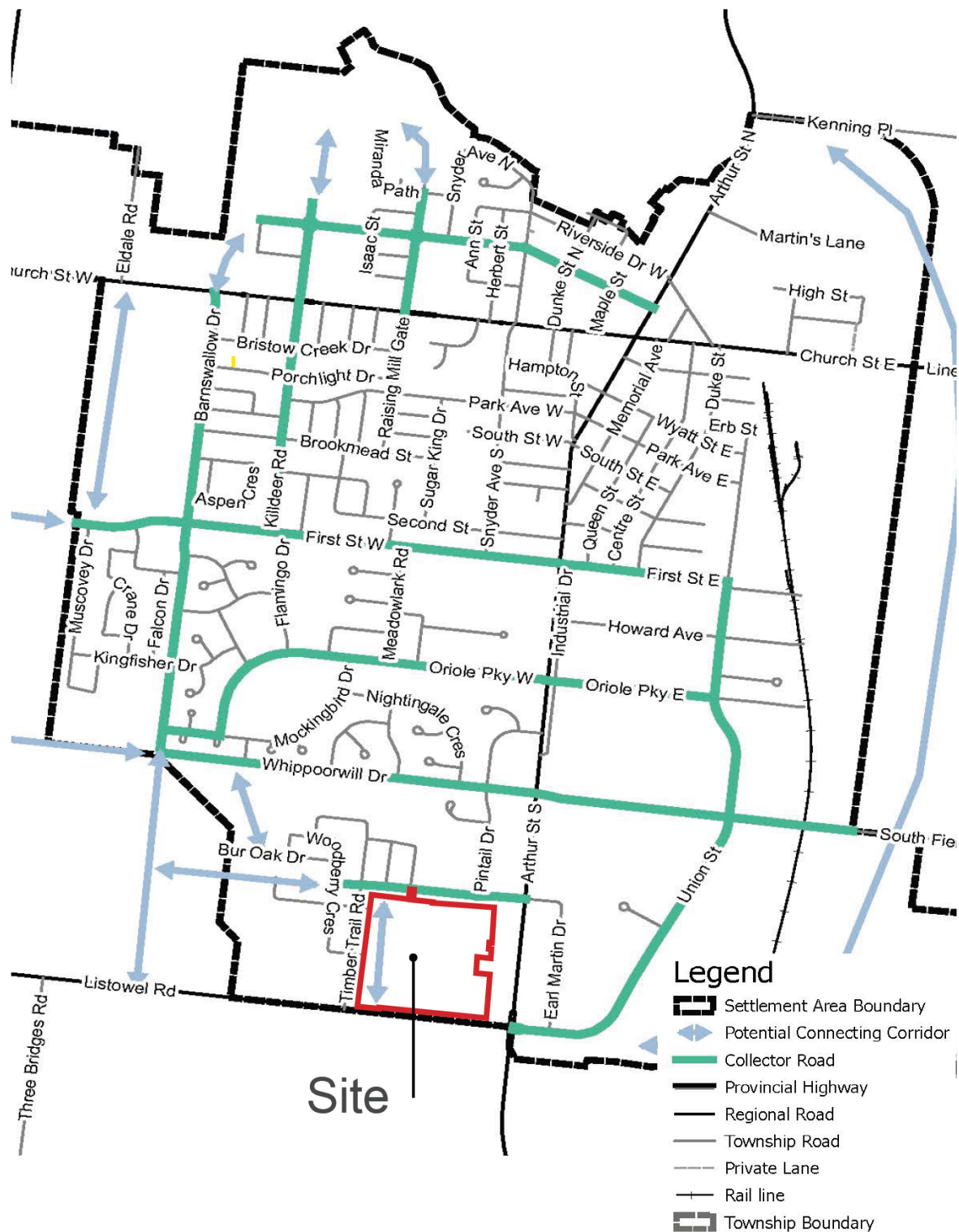
The provision of lotless blocks allows the subdivision to remain flexible to the housing needs of the community and react to changes in desired density, built form, and planned population and the Proposed Development is built out over time. The intention with the planning permissions sought through the Zoning By-law Amendment is to provide for a greater range and variety of dwelling unit types within a block, in alignment with Policy 7.29.5.2 d).

A 0.5ha park 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. Appropriate linkages are considered to a trail network to the north for use as passive parkland.

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 for the majority of streets which include sidewalks on both sides of the road, curbs and gutters. A 23-metre right-of-way is proposed on Burlwood Drive which allows for a multi-use trail rather than sidewalk on one side of the road.

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.

Policy 7.29.16.1 outlines staging policies to ensure that the development and build-out of the Greenfield Area of Elmira occur in a logical, phased manner. The Proposed Development is surrounded by existing development and will not create segmented development patterns within the Township. Further, development within the Proposed Development will be further phased to ensure the build out occurs in an orderly way which meets the intent of the staging policies of the OP.



Transportation Network
Source: Woolwich Official Plan, Schedule B (2015)

Figure
8

4.3.2 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 Elmira. 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 Elmira. This allows the Proposed Development to maintain the existing character of the broader Elmira context. A park block and a stormwater management block are also proposed to serve the development. The proposed unit mix provide a variety of low density and medium dense unit typologies serving a broad spectrum of affordability. The range of units proposed aims to broaden the selection of housing options for individuals of various of levels of income and age in Elmira.

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: The Proposed Development includes a 0.5 hectare large public park reflected as Block 25 on the Draft Plan of Subdivision. The Proposed Development includes the development of roads and sidewalks to connect newly-created streets to adjacent public streets such as South Parkwood Boulevard, Weymouth Street, and Listowel Road. A multi-use trail spanning the north to south length of the Proposed Development allows for the active transportation connection to the existing Lions Ring Trail to Listowell Road.

4.4.5 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 right-of-way widths throughout most of the subdivision, and 23-metre right-of-way width along Burlwood Drive, conforming to this policy.

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 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.



Zoning Map

Source: Woolwich Township, Zoning Schedule B (2015)

Figure

9

5. Supporting Studies

5.1 Land Use Compatibility & Noise Impact Study

A Land Use Compatibility and Noise Impact Study, was prepared by GHD Limited (“GHD”), dated June 11, 2025. The purpose of the study was to assess the potential impacts of noise, odour, dust, vibration, and air emissions from any nearby stationary, and road traffic sources.

The report finds that:

- No perceptible odour, air or dust emissions were observed during their site visit.
- Predicted noise levels from nearby industrial and commercial facilities are sufficiently high that noise mitigation is required in the form of acoustic barriers, but with mitigation are within the applicable stationary noise limits of the MECP, and thus will not reduce the ability of the facilities to comply with the MECP noise guidelines.
- Predicted ambient noise levels from road traffic are sufficiently high that noise mitigation is required in the form of upgraded building facades components, provisions for central air conditioning and noise barriers, as well as warning clauses.

Based on the findings of the analysis, the following recommendations are provided within the report:

- That the southernmost dwelling of Block 6 be setback minimum 5 metres from the property boundary shared with Contour Directional Drilling Ltd. (374 Arthur Street South).
- That the northernmost dwelling of Block 24 be setback minimum 5 metres from the property boundary shared with Contour Directional Drilling Ltd. (374 Arthur Street South).
- A 1.8-metre-tall acoustic fence/barrier should be constructed along the property boundary shared between Block 6 and Contour Directional Drilling Ltd. (374 Arthur Street South).
- Additional acoustic barriers for Blocks 17, 22, and 23 may be reviewed at a later stage such as site plan approval.
- That the building envelope construction assemblies be selected to achieve STC-31 for fixed glazing, STC-29 for operable windows, STC-28 for exterior doors, and STC-39 for exterior walls.
- Central air conditioning is required to be installed prior to occupancy for Blocks 22 and 23 residential buildings.

- Provisions be made to enable installation of central air conditioning at the occupant's discretion for Blocks 6, 9-11, 13-18, 20, and 21.
- Warning clauses be included in agreements of Offers of Purchase and Sale, lease/rental agreements, and condominium declarations for certain residential dwellings in affected blocks as detailed in the noise report.

The Study concludes that the proposed development is feasible and will not be restricted by the surrounding noise and vibration impact exposures, provided that the proposed development adheres to the noise mitigation recommended in the Study.

The Development is not anticipated to affect the ability of the nearby industrial/commercial facilities to comply with the sound level limits of the MECP.

5.2 Transportation Study

A Transportation Impact Study was completed by Paradigm Transportation Solutions Limited ("Paradigm"), dated June 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 to manage future traffic conditions. Based on Paradigm's study, they concluded that:

- The study area intersections are operating with acceptable levels of service, except for the westbound left-turn movement at the intersection of Arthur Street South and Listowel Road/Union Street which is operating with 95th percentile queues exceeding the available storage of 70 metres during the AM and PM peak hours.
- The development is forecast to generate 295 and 371 trips during the AM and PM peak hours, respectively.
- The study area intersections are forecast to operate with the same critical movements identified under existing traffic conditions, with the addition two further critical movements.
- An eastbound left-turn lane with 30 metres of storage is warranted on Listowel Road at Burlwood Drive under 2030 total traffic conditions.
- The separation distance on Listowel Road between the existing Timber Trail Road and proposed Burlwood Drive connections can accommodate the warranted eastbound left-turn lane storage and taper length.
- Traffic control signals are not warranted under the forecast total traffic conditions.
- The multi-use trail is most beneficial on the east side of Burlwood Drive.

Based on the conclusions, Paradigm recommends that:

- An eastbound left-turn lane with 30 metres of storage be provided on Listowel Road at Burlwood Drive; and
- TDM measures discussed in detail in the report be considered on-site.

5.3 Functional Servicing & Stormwater Management Report

Walter Fedy prepared a Functional Servicing and Stormwater Management Report, dated June 9, 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 Site can be adequately serviced through both existing and planned municipal infrastructure (sanitary, storm, and watermain) and utilities (gas/hydro/cable).
- 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 Subdivision will be constructed to the Township of Woolwich Design Standards.
- A 200-mm-diameter municipal sanitary sewer will be installed within the proposed rights-of-way to service the development. The Site will connect and outlet to the existing 375-mm-diameter sewer located on Listowel Road.
- The proposed water distribution network, consisting of 200-mm-diameter feeders, will connect to the 200-mm and 300-mm-diameter mains on Timber Trail Road and Listowel Road, respectively, to service the Site.
- Pipe sizes are such that velocities in all watermains are generally less than 5 m/s under fire flow conditions and meet fire flow requirements of 150 L/s for all proposed residential blocks.
- The construction of a SWM facility 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 SWM facility 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 SWM facility.

- A municipal storm sewer system can be sized to convey the 5-year minor system flows to the proposed SWM facility with major flows routed via the internal road network to overland flow inlets into the SWM facility.
- Erosion control measures will be required and will be reviewed and designed during the detailed design stage.
- The Engineer/Designer hereby 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.

5.4 Archaeological Report

A Stage 1 and 2 Archaeological Assessment was completed by Parslow Heritage Consultancy Inc, dated November 1, 2023. The objective of the Stage 1 archaeological assessment was to gather information about the study area's geography, history, current land conditions as well as any previous archaeological research and listed archaeological sites on or within the vicinity.

The Stage 1 background assessment concluded that the study area retained archaeological potential and should undergo Stage 2 assessment via test pit and pedestrian survey.

The objectives of the Stage 2 assessment are to determine if there are archaeological resources present on the property and to assess whether the identified resources have cultural heritage value or interest.

The Stage 2 survey did not result in the identification of archaeological materials and no further archaeological assessment is recommended for the Study Area.

The report was submitted to the Ministry of Tourism and Culture, as well as the Ministry of Citizenship and Multiculturalism and received ministry clearance from both. The clearance letters are provided as part of the complete application package.

5.5 Geotechnical Investigation

A geotechnical investigation was completed May 16, 2011 by LVM. The purpose of the investigation was to determine the soil and groundwater conditions at the site and, based

on that information, provide geotechnical recommendations pertaining to site preparation, site servicing, house construction, and stormwater management.

The investigation found that:

- Topsoil on the site is generally 125 to 800 mm thick.
- Underlying the topsoil, the site consists of sand, silt, and silt till.
- Groundwater at the site occurs perched within the upper silt and sand deposits overlying the relatively impermeable silt till at the site. Seasonal fluctuations and local variations in the ground water levels should be expected at the site.

Detailed recommendations related to site preparation, servicing, pavement design, house construction, and stormwater management are discussed in the report and should be read in conjunction with this report.

5.6 Hydrogeological Assessment

A Hydrogeological Assessment was prepared by Pinchin, dated May 23, 2025. The purpose of the Hydrogeological Assessment is to characterize the soil and groundwater conditions of the Site, assess the groundwater quality of potential discharge water, assess the pre-construction water balance, identify any potential impacts on the surrounding environment due to the proposed development, and provide recommendations concerning mitigative measures, if required. Eight boreholes were drilled and monitoring wells were installed which allowed for the sampling of soil, and to monitor groundwater levels soil characterization. The Report provides the following conclusions based on their findings:

- The Site is located in the Cox Creek – Grand River Subwatershed within the Upper Grand River Watershed under the jurisdiction of the Grand River Conservation Authority (GRCA);
- In general, the soil stratigraphy at the Site consists of topsoil material, overlying a silt or clay, which is underlain by glacial till, which comprises the upper SAT. At the Site the upper SAT is underlain by the UA, which is where the long term stabilized groundwater is located.
- Groundwater levels ranged from 0.39 mbgs to 3.08 mbgs and groundwater elevations ranged from 354.27 masl to 363.77 masl in the shallow monitoring wells. Groundwater levels ranged from 3.25 mbgs to 6.22 mbgs and groundwater elevations ranged from 352.69 masl to 358.22 masl in the deep monitoring wells. These measured groundwater levels are considered perched and within the SAT. The long term stabilized groundwater table below the Site occurs in the UA at approximately 15 to 21 mbgs;

- The estimated hydraulic conductivity of the Silt Till is approximately 4.3×10^{-6} cm/s;
- The required excavation depth for residential basements is 2.54 mbgs and the long term stabilized groundwater table must be a minimum of 0.6 m below the bottom of the excavation. Therefore, the basements should be constructed with the long term groundwater table at a minimum of 3.14 mbgs;
- As the long term stabilized groundwater table below the Site occurs in the UA at approximately 15 to 21 mbgs it will not impact basement construction at the Site. It is recommended that the basements be constructed with sump pumps to accommodate fluctuations in the perched water table, including the temporary high perched water table during the spring freshet (March to May, annually); Considering the low hydraulic conductivity of the SAT (i.e. 4.3×10^{-6} cm/s), where the seasonal perched water occurs, basement sump pumps will be adequate to drain perched groundwater within the SAT away from basements; and,
- Although a groundwater sample was not obtained during the hydrogeological assessment due to the water levels at the time of sampling, the GHD Phase Two ESA Report did complete analytical testing of the groundwater at the Site, and the results are summarized in the GHD report. The results were compared to the City of Waterloo Combined Sewer Use Bylaw, and the sample submitted from the SAT there were noted exceedances to Chlorides, Molybdenum and Zinc. It should be noted that an additional sample of the groundwater from the SAT should be submitted prior to commencement of discharge.

5.7 Phase I & Phase II Environmental Site Assessment

GHD Limited (“GHD”) prepared a Phase I ESA report, dated May 7, 2024. The purpose of the Phase One ESA was to identify, through a non-intrusive investigation, the existence of any Potentially Contaminating Activities (PCAs) and Areas of Potential Environmental Concern (APECs) associated with the Site.

Based on the results of the Phase I ESA, including the Site inspection, information provided by Site representatives and regulatory agencies, documents reviewed and the review of Site history, a number of APECs were identified in proximity to the Site. The findings of the Phase I Assessment triggered the requirement of a Phase II ESA.

GHD also prepared a Phase II ESA report, dated May 7, 2025. The purpose of the Phase II ESA was to investigate the above-noted APECs in accordance with O. Reg. 153/04.

GHD completed a soil and groundwater investigation at the Site as part of the Phase Two ESA. Soil and groundwater samples were collected and analyzed for specific parameters,

which included metals and inorganics, polycyclic aromatic hydrocarbons (PAHs), petroleum hydrocarbon fractions (PHC) F1 to F4, volatile organic compounds (VOCs), organochlorine pesticides (OCs) and N-nitrosodimethylamine (NDMA). Inorganics analyses for soil samples included electrical conductivity (EC), cyanide (weak acid dissociable) (CN-), pH, and sodium adsorption ratio (SAR). Inorganics analyses for groundwater samples included chloride (Cl-) and CN-. The analytical results were compared to the generic standards provided in the Ministry of the Environment, Conservation and Parks (MECP).

A total of 69 soil samples (including 9 field duplicate samples) were collected and submitted for chemical analysis. Based on the analysis, no COCs were identified in soil and there is no evidence of soil impacts related to any of the APECs identified at the Site.

A total of thirteen groundwater samples (including two field duplicate samples) were collected and submitted for chemical analysis during the Phase II ESA. No COCs were identified in groundwater and there is no evidence of groundwater impacts related to any of the APECs identified at the Site.

5.8 Tree Management Plan

Natural Resource Solutions (“NRSI”) prepared a Tree Management Plan, dated June 2025 in support of the complete application. The Subject Property is largely agricultural, with no natural heritage features present on Site. However, some trees and hedgerows existing on the Subject Property and along the property lines. The Tree Management Plan took inventory of the present trees, assessed their overall health. A tree retention analysis was conducted based on the proposed development. The report recommends protection measures for trees to be retained and provides mitigation and replacement considerations. In all, NRSI found that the Proposed Development will result in the removal of 124 trees. The Township of Woolwich Design Guidelines (2022) requires that tree compensation be at a rate of 1:1. Therefore, 124 trees shall be planted to compensate for the removed trees.

6. Planning Applications

6.1 Zoning By-law Amendment

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

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 Exemption (R-5 16.xxa) 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.
- Blocks 10-16 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 Exemption (R-6 16.xxa) 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.
- 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 Open Space (O-1)

Blocks 25 and 26 are proposed to be zoned Open Space One (O-1) Zone. These blocks include the park and the stormwater management facility respectively. No exemptions are proposed for the zone.

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

6.2 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 327-590 residential units across 24 residential blocks and one park (Block 25). A stormwater management facility (Block 26), and municipal roads are also provided which will later be dedicated to the Township.

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 Zoning By-law Amendment 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 Zoning By-law Amendment and Draft Plan of Subdivision at 1065 Listowel Road in the Elmira Urban Area in the Township of Woolwich. The Subject Applications will facilitate a 327-590-unit subdivision on a parcel of approximately 18.66 hectares that is within the Township's Urban Area.

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 Elmira 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 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 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,



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Appendix A – 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 (1065-1103 Listowel Road & 354 Arthur Street South, Elmira)

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.xxa and 16.xxb attached be added to Schedule "A" which rezones a 18.85 hectare property located at 1065-1103 Listowel Road & 354 Arthur Street South described as WOOLWICH GERMAN COMPANT TRACT PT LOT 86 RP 58R21746 PTS 1 TO 58, Township of Woolwich, Regional Municipality of Waterloo from Agriculture (A) to Residential Five Exemption (R-5 (16.aaa)) 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 to a garage shall be 6.0 metres;
 - c) The minimum rear yard shall be 6 metres for:
 - i) lots less than 11 metres in width that contain a bungalow or backsplitted; and
 - ii) lots with depths less than 30 metres.
 - d) The maximum building height shall be 14.5 metres or three storeys; and
 - e) The minimum lot area for a semi-detached dwelling shall be 210 square metres.

- f) For lands abutting an industrial use, a minimum setback of 5 metres shall be required from the shared property line.

On the lands illustrated as Parts 1, 2, and 3 on Schedule A, street towns shall be permitted in accordance with the applicable townhouse regulations of the R-6 Zone with the following exceptions:

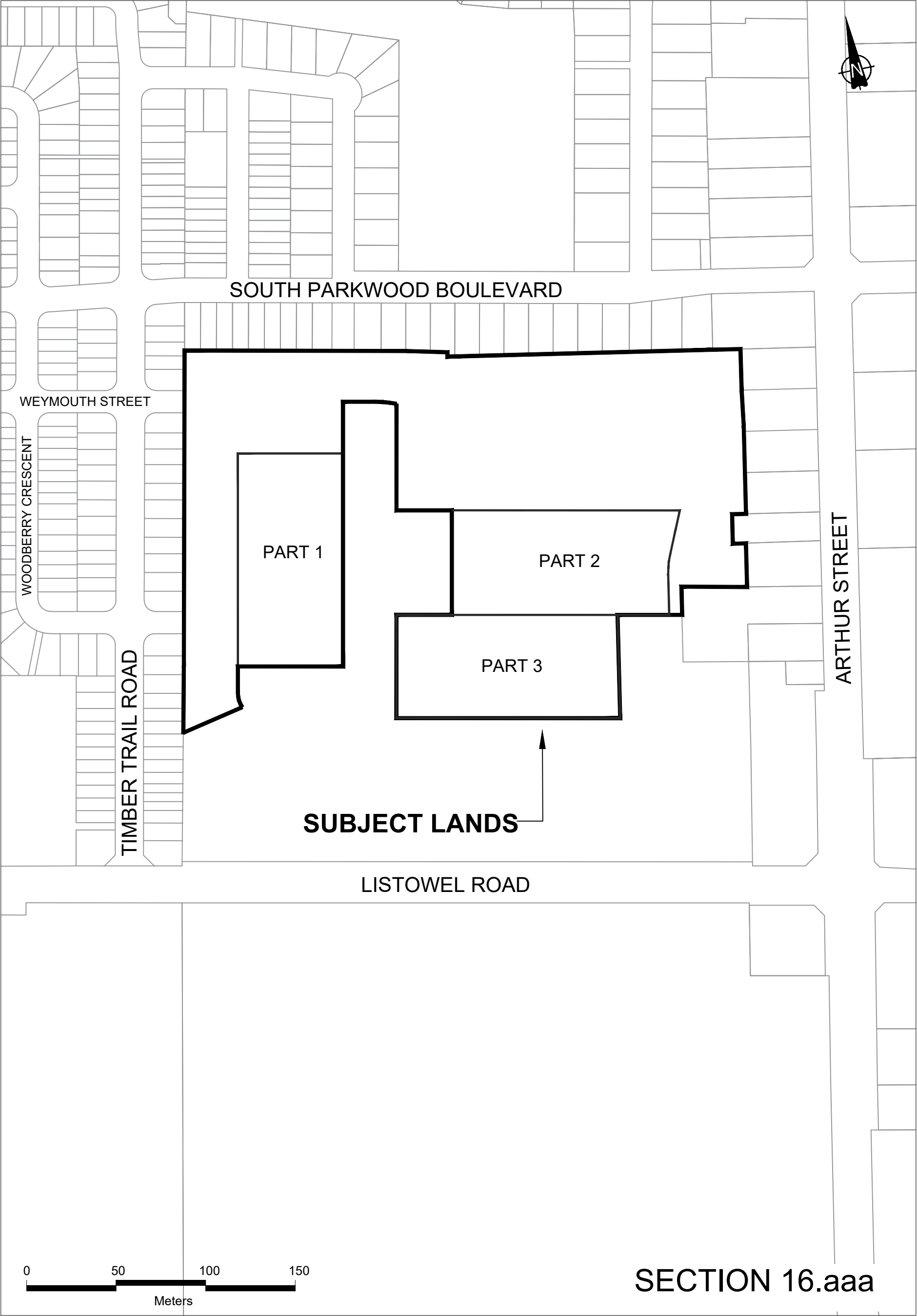
- i) The minimum corner lot width shall be 8.5 metres;
 - ii) More than eight (8) street towns may be permitted to face the same direction within a block;
 - iii) A minimum density of 50 units per hectare shall not apply, and
 - iv) Each unit shall provide a minimum outdoor amenity area of 10 square metres.
3. Notwithstanding any other provisions of this By-law, the lands illustrated on the plan forming Section 16.bbb of Schedule "B" 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) The maximum height shall be 14.5 metres;
 - d) The minimum density of 50 units per hectare shall not apply;
 - e) Outdoor amenity area shall be provided at a rate of 10 square metres per unit; and
 - f) 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.

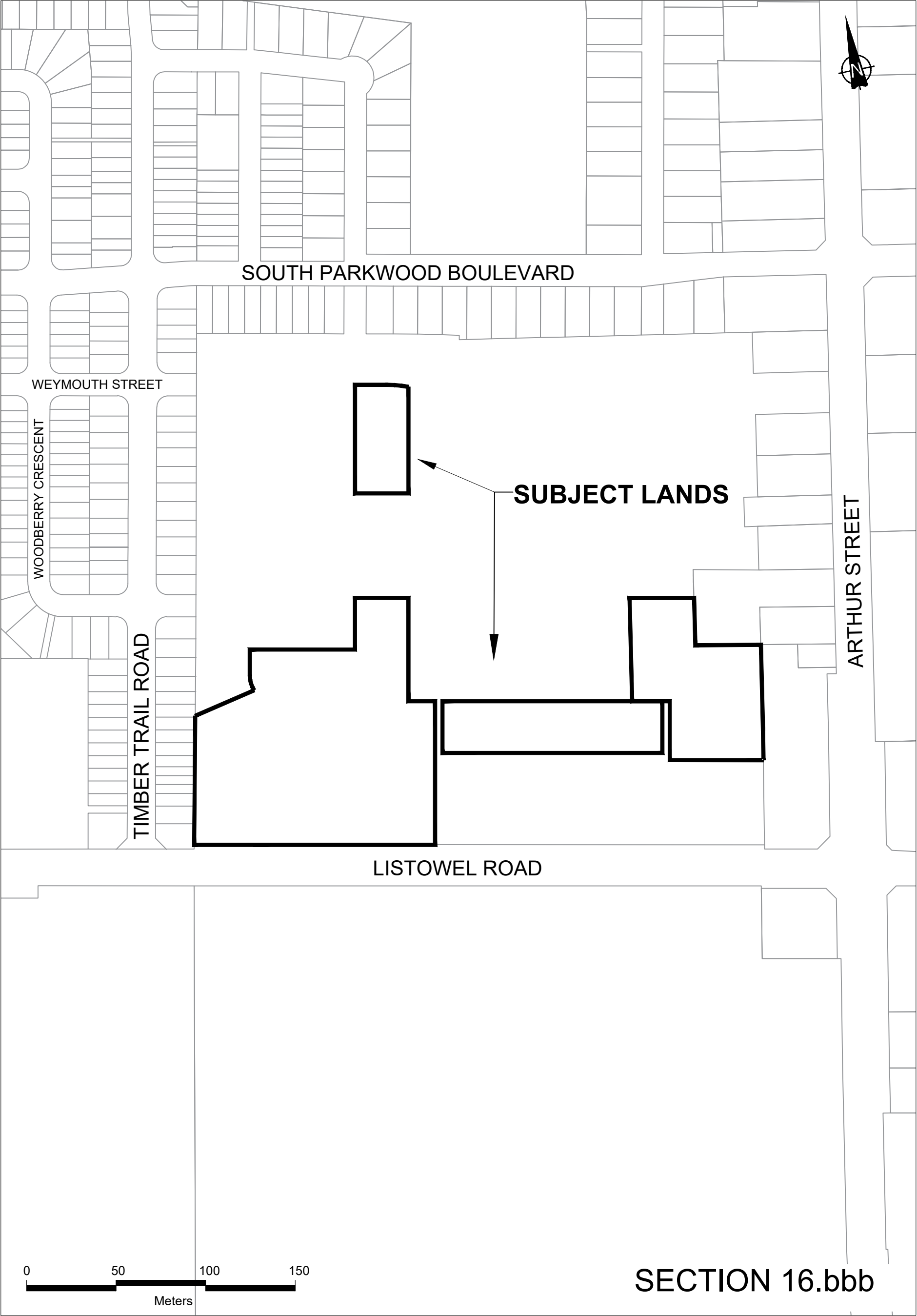
Mayor

Clerk

Schedule "A"
1065-1103 Listowel Road & 354 Arthur Street South
WOOLWICH GERMAN COMPANT TRACT PT LOT 86
RP 58R21746 PTS 1 TO 58



Schedule "B"
1065-1103 Listowel Road & 354 Arthur Street South
WOOLWICH GERMAN COMPANT TRACT PT LOT 86
RP 58R21746 PTS 1 TO 58



Schedule "C"
1065-1103 Listowel Road & 354 Arthur Street South
WOOLWICH GERMAN COMPANT TRACT PT LOT 86
RP 58R21746 PTS 1 TO 58

